City of St. Helena
Planning Commission
Regular Meeting
Tuesday, May 2, 2023 @ 6:00 PM
Vintage Hall Board Room - Second Floor

PLEASE NOTE: Any person who wishes to speak regarding an item on the agenda or make a comment under the "Oral Communication" portion of the agenda may do so, but please observe the time limit of four minutes.

The Planning Commission meeting will be live-streamed on Comcast Channel 28 and on the City's website. Public comment for Planning Commission meetings will be accepted via email to publiccomment@cityofsthelena.org. All public comments must be emailed at least three hours prior to the meeting. Emailed public comments will not be read out loud but will be publicly available and attached to the on-line agenda.

Simultaneous Spanish interpretation services during meetings can be scheduled upon request. To ensure interpreters are available, requests must be made at least 72 hours in advance by calling the Office of the City Clerk at (707) 968-2640 or emailing cityclerk@cityofsthelena.org.

The schedule of upcoming meetings and published meeting agendas can be found on the City of St. Helena website at https://sthelena.civicweb.net/portal/.

Servicios de interpretación en español durante la reunión pueden ser solicitados por el público. Para asegurar que los intérpretes estén disponibles, los servicios tienen que ser solicitados al menos 72 horas antes de la reunión llamando a la oficina de la Secretaria de la Ciudad al (707) 968-2640 o por correo electrónico a cityclerk@cityofsthelena.org .

El horario de las reuniones publicadas y próximas puede ser localizado en el sitio de web de la Ciudad en https://sthelena.civicweb.net/portal/ .

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1. PLEDGE OF ALLEGIANCE

2. CALL TO ORDER AND ROLL CALL
   Chair: John Ponte
   Commissioners: Autumn Anderson, Rosaura Segura, Marika Rothfeld and Chris Warner.

   City staff present at the meeting will be noted in the minutes.

3. PUBLIC FORUM:
   This is an opportunity for the public to address the Commission on items of interest to the public that are NOT listed on the agenda. Because of restrictions imposed by the Brown Act, the Commission may not engage in discussion nor take action on matters not described on the agenda. **Please observe the time limit of four minutes.**

4. CONSENT ITEMS
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Members of the Commission or the public may ask that any items be considered individually for purposes of considering alternative action, for extended discussion, or for public comment. Unless that is done, one motion may be used to adopt all recommended actions. (Roll Call Vote)

4.1. Approval of Minutes: April 18, 2023 7 - 9

Planning Commission Minutes_04.18.23

5. PUBLIC HEARINGS

ITEM 5.1 WILL BE CONTINUED TO A DATE CERTAIN OF MAY 16, 2023

5.1. Annual Capital Improvement Program. Determining that the City's proposed Fiscal Year 2023/24 Capital Improvement Program

5.2. Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment (GPA 2023-001) to update the Housing Element of the General Plan for the period of 2023-2031 and adopt an Addendum to the General Plan Environmental Impact Report. 11 - 1032

CEQA Determination: General Plan Environmental Impact Report Addendum pursuant to CEQA Guidelines Section 15164.
Prepared By: Aaron Hecock, Senior Planner
Recommendation:
Staff recommends that the Planning Commission adopt the attached resolution recommending that the St. Helena City Council:

1. Find that the EIR Addendum for the Housing Element Update to the City of St. Helena 2040 General Plan is adequate and complete in compliance with the California Environmental Quality Act; and

2. Adopt an Amendment to the General Plan (GPA 2023-001) updating the Housing Element of the General Plan for the period of 2023-2031 and incorporating it into the 2040 General Plan.

PC - Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment (GPA 2023-001) to update the Ho - Pdf
Presentation

5.3. Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment (GPA 2023-002) to update the Public Health, Safety, and Noise Element of the General Plan and adopt an Addendum to the General Plan Environmental Impact Report. 1033 - 1246

CEQA Determination: General Plan Environmental Impact Report Addendum pursuant to CEQA Guidelines Section 15164.
Prepared By: Aaron Hecock, Senior Planner
Recommendation:

Staff recommends that the Planning Commission adopt a resolution recommending that the St. Helena City Council:

1. Find that the EIR Addendum for the Public Health, Safety and Noise Element Update to the City of St. Helena 2040 General Plan is adequate and complete in compliance with the California Environmental Quality Act; and

2. Adopt an Amendment to the General Plan (GPA 2023-002) updating the Public Health, Safety and Noise Element and incorporating it into the 2040 General Plan.

PC - Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment (GPA 2023-002) to update the Pu - Pdf
Presentation

6. SCHEDULED MATTERS

None

7. DEPARTMENT REPORTS
This is an opportunity for staff to report on or update the Commission on any relevant matters.

8. AGENDA FORCAST
Below is a link to a list of pending and upcoming projects which may be of interest to the community.

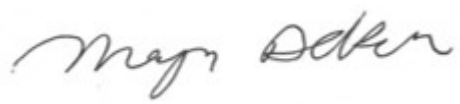
This is also an opportunity for the Commission as a whole to request items be placed on future agendas for discussion. These items should be consistent with, and work to implement adopted Council Goals.

A list of all current planning projects is available on our city website in the link below:
http://www.cityofsthelena.org/projects?term_node_tid_depth=21

Please contact the assigned project Planner for additional questions.

9. ADJOURNMENT
The next Regular Planning Commission meeting is scheduled for May 16, 2023 at 6:00 p.m. in the Vintage Hall Board Room located at 465 Main Street.

This agenda was posted at City Hall, 1088 College Ave., and at Vintage Hall, 465 Main Street, St. Helena, California on April 27, 2023.



Maya DeRosa, Planning & Building Director

Appeal. A person who is dissatisfied with a decision of the Planning Commission may appeal that decision to the City Council pursuant to Municipal Code Section 17.08.180, Appeal procedure. Actions of the Planning

Commission will be listed on the City Council agenda the following Tuesday to give the City Council opportunity to review the Planning Commission's decision. Absent of an appeal by the City Council or by a citizen, the appeal period will terminate two weeks after the Planning Commission hearing.

Special Assistance for the Disabled. In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please call the City Clerk's Office (707) 967-2792. Notification 48 hours prior to the meeting will enable City to make reasonable arrangements to ensure accessibility to this meeting (28 CFR35.102-35.104 ADA Title II). However, City staff will attempt to assist at any time with accessibility. The City Clerk has equipment to assist those with a hearing impairment.

PUBLIC TESTIMONY PROCEDURES

Pursuant to the Government Code Section 54954.3, the public may address the Commission on each agenda item during the Commission's consideration of that item. Each speaker has the option to state his or her name for the record before testifying. Depending on the number of speakers or the interest of the item, the Planning Commission Chairman may also restrict, at his/her discretion, the speaker's time to three minutes. The Chairman may also restrict public comments if they become irrelevant to the agenda item or repetitious of prior comments. All persons interested may appear and be heard or submit written statements prior to the Planning Commission meeting. Please note that if you challenge the City's decision on any of these matters in court, you may be limited to raising only those issues you or someone else raised at the meeting or in written correspondence delivered to the City at, or prior to, the meeting.

CHALLENGING DECISIONS OF CITY ENTITIES

The time limit within which to commence any lawsuit or legal challenge to any quasi-adjudicative decision made by the City of St. Helena is governed by Section 1094.6 of the Code of Civil Procedure, unless a shorter limitation period is specified by any other provision, including without limitation Government Code section 65009 applicable to many land use and zoning decisions, Government Code section 66499.37 applicable to the Subdivision Map Act, and Public Resources Code section 21167 applicable to the California Environmental Quality Act (CEQA). Under Section 1094.6, any lawsuit or legal challenge to any quasi-adjudicative decision made by the City must be filed no later than the 90th day following the date on which such decision becomes final. Any lawsuit or legal challenge, which is not filed within that 90-day period, will be barred. Government Code section 65009 and 66499.37, and Public Resources Code section 21167, impose shorter limitations periods and requirements, including timely service in addition to filing.

If a person wishes to challenge the above actions in court, they may be limited to raising only those issues they or someone else raised at the meeting described in this notice, or in written correspondence delivered to the City of St. Helena, at or prior to the meeting. In addition, judicial challenge may be limited or barred where the interested party has not sought and exhausted all available administrative remedies.

SUPPLEMENTAL MATERIAL RECEIVED AFTER THE POSTING OF THE AGENDA

Any supplemental writings or documents distributed to a majority of the Planning Commission regarding any item on this Agenda, after the posting of the Agenda, will be available for public review in the Planning Department's Office located at 1480 Main Street, St. Helena, California, during normal business hours. In addition, such writings or documents will be made available on the City's web site at http://cityofsthelena.org and will be available for public review at the respective meeting.

MINUTES
City of St. Helena
Planning Commission Meeting
Tuesday, April 18, 2023 @ 6:00 PM
Vintage Hall Board Room - Second Floor
465 Main Street, St. Helena

A complete video recording of this meeting, except for closed session, can be found at https://sthelena.civicweb.net/Portal/ or by calling the City Clerk at (707) 967-2792. The Planning Commission video is the official record of the Planning Commission meeting.

Present:	Chair John Ponte, Vice-Chair Christopher Warner *(arrived at 6:05 p.m.)* Commissioner Autumn Anderson, Commissioner Rosaura Segura, and Commissioner Marika Rothfeld *(arrived at 6:02 p.m.)*
Absent:	None
Staff Present:	Maya DeRosa, Community Development Director, Aaron Hecock, Senior Planner, and Xinia Gamero, Permit Technician III

1. PLEDGE OF ALLEGIANCE

2. CALL TO ORDER AND ROLL CALL

3. PUBLIC FORUM:
None.

4. CONSENT ITEMS

4.1 Approval of Minutes: March 7, 2023 and March 21, 2023

4.2 Request by Joe Pridmore on behalf of Jenna Mozzetti for approval of a Lot Line Adjustment moving a shared property line between 1521 and 1541 Elmhurst Ave. in the Medium Density Residential zoning district.
Prepared By: Aaron Hecock, Senior Planner

Commissioner Rosaura Segura moved to approve the Minutes of March 7, 2023 and March 21, 2023; and Item 4.2 on the Consent Calendar. The motion was seconded by Commissioner Autumn Anderson and on roll call carried by the following vote:

AYES: Autumn Anderson, Rosaura Segura, John Ponte, and Marika Rothfeld
NOES: None
ABSENT: Christopher Warner
ABSTAIN: None
RECUSE: None

5. PUBLIC HEARINGS

5.1 Request by Juancarlos Fernandez on behalf of Lance Kavanaugh for adoption of a resolution approving a demolition permit and design review in order to demolish an existing single-family residence to accommodate the construction of a new single-family home on the property located at 1663 Adams Street in the Medium Density Residential zoning district.
Prepared By: Aaron Hecock, Senior Planner

Chair Ponte opened the public hearing.

No ex-parte communication was disclosed by the Planning Commission.

Senior Planner Aaron Hecock showed a presentation and reported on the item.

Applicant, Lance Kavanaugh addressed the Planning Commission.

No public comment was received.

Chair Ponte closed the public hearing.

Commissioner Autumn Anderson moved to determine that the project is exempt from the requirements of CEQA pursuant to CEQA Guidelines Sections 15301, 15303 and 15332; and accept the required findings and approve the attached resolution granting demolition permit and design review approval for the proposed demolition and new construction on the property located at 1663 Adams Street. The motion was seconded by Commissioner Rosaura Segura and on roll call carried by the following vote:

AYES: Autumn Anderson, Rosaura Segura, John Ponte, Marika Rothfeld, and Christopher Warner
NOES: None
ABSENT: None
ABSTAIN: None
RECUSE: None

6. SCHEDULED MATTERS

None.

7. DEPARTMENT REPORTS

Community Development Director Maya DeRosa reported on the following:

- Regular Planning Commission meeting of May 2nd - Adoption of the Housing Element.
- Special Joint City Council and Planning Commission meeting/ workshop on the Zoning Code on May 10th at 5:00pm

Vice-Chair Warner addressed the following:

- Update on judicial ban of natural gas appliances affecting new construction.

8. AGENDA FORCAST

Vice-Chair Warner requested future review of Design Standards and Zoning Code regulations to minimize restrictions on housing, ADU's and affordable housing.

9. ADJOURNMENT

Chair Ponte adjourned the meeting at **6:27 p.m.**

The April 18, 2023 minutes were approved at the _____ Planning Commission meeting.

APPROVED:	**ATTEST:**
_____	_____
John Ponte, Planning Commission Chair	Maya DeRosa, AICP Community Development Director

PLANNING COMMISSION REPORT

Planning Commission Meeting of May 2, 2023

FILE NUMBER: GPA 2023-001

SUBJECT: Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment (GPA 2023-001) to update the Housing Element of the General Plan for the period of 2023-2031 and adopt an Addendum to the General Plan Environmental Impact Report.

PREPARED BY: Aaron Hecock, Senior Planner

REVIEWED BY: Maya DeRosa, Community Development Director

APPROVED BY: Maya DeRosa, Community Development Director

BACKGROUND

In February 2021, the City of St. Helena kicked off the update to the City's Housing Element for the 2023-2031 planning period. The purpose of the Housing Element is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community.

The Housing Element is one of seven required elements of the general plan. However, it has several unique requirements that set it apart from the other six elements. State law (Government Code Section 65580 (et seq.)) specifies in detail the topics that the Housing Element must address and sets a schedule for regular updates. State law requires each local government to update its housing element every eight years. The Housing Element is also the only element reviewed and certified by the State for compliance with State law. The Department of Housing and Community Development (HCD) is the State department responsible for this certification. Penalties for non-compliance include legal challenges, ineligibility for many State and regional grants, and, in extreme cases, loss of land use control.

Public Review

In response to the need for public participation, City planning staff worked with its consultants to develop a robust community engagement program tailored to ensure the community and other stakeholders were engaged in the process and are given ample

opportunities to provide input. The engagement program included branding, a project website, business cards, newsletters and eblasts, announcements on the City website and social medial, multiple workshops, a Housing Element Focus Group, and Planning Commission and City Council study sessions and hearings. The workshop and study sessions are summarized below:

The City held three public workshops on the Housing Element.

- Workshop #1, held September 16, 2021, provided an introduction to Housing Elements and the Reginal Housing Needs Allocation (RHNA).
- Workshop #2, held January 20, 2022, included a discussion of the sites inventory process and a walkthrough of potential housing sites.
- Workshop #3, held March 16, 2022, focused on Affirmatively Furthering Fair Housing (AFFH) in St. Helena. The workshop included a discussion of state requirements, initial findings from the draft AFFH analysis, and potential meaningful actions to overcome fair housing issues in the community.

The City held three joint Planning Commission and City Council public study sessions.

- Session #1, held on March 23, 2021, provided information on housing element requirements, legislative guidelines, project schedule and public outreach.
- Session #2, held on February 22, 2022, discussed the RHNA and the draft sites inventory.
- Session #3, held on July 21, 2022, was to receive public comment on the public review draft Housing Element Update and for the Planning Commission and City Council to provide direction on revisions and additions.

In addition to having a dedicated Housing Element Update website (www.sthelenahousing.com), there have been several newspaper articles written on the Housing Element Update process and the City has provided regular updates through social media posts and eblasts. More than 30 people signed up to receive the housing element update emails. Staff has attempted to make the process extremely transparent and open for public participation.

HCD Initial Review (90 days)

In July 2022, City Council reviewed the Public Review Draft Housing Element and public comments and directed staff to prepare the HCD Review Draft for initial 90-day review. Following the end of the public review period (June 29, 2022 – July 30, 2022), the City took at least ten business days to review comments and revise the Housing Element, as required by State law, and submitted the HCD Review Draft for State review on September 7, 2022. The City received HCD's response letter on December 6, 2022 reporting the results of their review (attached to this report). The letter specifies revisions to the Housing Element necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). HCD's comments and mandated revisions are described in four sections as summarized below:

A. Review and Revision [of the Previous Housing Element]. This content evaluates appropriateness, effectiveness, and progress in implementing the

previous housing element. HCD directive in this section calls for the City to provide an evaluation of the effectiveness of actions related to meeting the housing needs of special needs population.

B. Housing Needs, Resources and Constraints. This content, predominantly analysis based, pertains to Chapters 3-11. HCD comments called for additional data points and evaluation related to compliance with existing fair housing laws, concentrations of fair housing issues, housing costs, land inventory data and available sites, zoning for a variety of housing types, land use controls, permit processing timelines, design review, development standards, impact fees, building codes and enforcement, and constraints on housing for persons with disabilities.

C. Housing Programs. This content pertains entirely to policy language as conveyed in the Policy Document. HCD's directives require that the City provide: specific completion dates for programs listed as "ongoing"; detailed program language outlining State law requirements for rezone sites and sites identified in multiple planning periods; earlier implementation of critical program actions; and new programs related to nonvacant sites, publicly-owned sites, and SB 9 implementation.

D. Public Participation. This section pertains to the community outreach discussion included within the Introduction to the Needs Assessment, as well as Appendix B: Comments on the Public Review Draft 2023-2031 Housing Element Update. HCD direction related to public participation called for the City to include additional information related to how public input was considered and incorporated into the element.

Response to HCD Comments

The HCD comment letter, as summarized above, requested changes necessary to meet State Housing Law. Attached to this report is a table summarizing each HCD comment and the City's response. These changes can be summarized by section as follows:

A. The City added the required evaluation of effectiveness of 5th cycle goals, policies, and actions in meeting the housing needs of special needs populations.

B. In response to comments on housing needs, resources, and constraints, the City has:

- Expanded data and analyses related to compliance with existing fair housing laws; concentrations of fair housing issues; current housing costs; the sites inventory (nonvacant sites, realistic capacity, publicly-owned sites); infrastructure availability; and environmental constraints.
- Clarified data related to capacity of pending and approved projects and replacement housing requirements.
- Added analyses related to extremely low-income households and available resources; capacity for emergency shelters; and density and development standards in commercial, mixed use, and overlay zones.
- Reorganized and expanded the Governmental Constraints section to respond to comments on local processing and permit procedures, design review, local ordinances, on/off site improvements, fees, building codes and enforcement, reasonable accommodation procedures, and the zoning code definition of "family."

C. In response to HCD's comments in Section C: Housing Programs, the City has updated the Policy Document as follows:

- Updated all programs previously listed as "ongoing" with specific timing details.
- Updated *Program H-U: Place-based Density Increases* (formerly Program H-S) and Program H-I: ADU Workforce Housing Incentive Program to be implemented earlier in the planning period.
- Updated *Program H-A: Available Sites Inventory* to include language required by HCD related to rezone requirements.
- Updated *Program H-A: Available Sites Inventory* with language required by HCD related to density standards and by-right requirements for sites identified in multiple planning periods.
- Added new *Program H-K: Non-Vacant Sites* to incentivize redevelopment of non-vacant sites.
- Added new *Program H-L: City Owned Sites* to incentivize development of city owned sites.
- Revised *Program H-U: Place-based Density Increases* (formerly Program H-S) to include incentives and outreach related to SB 9 lot splits.
- Updated *Program H-C: Water and Sewer Access* to commit the Cityto deliver the adopted housing element to water and sewer providers with a cover memo describing the City's housing element, including the City's housing needs and regional housing need, as directed by HCD.
- Updated *Program H-B: Growth Management System* to commit the City to implementing changes immediately and updating the zoning code prior to the sunset of SB 330 (the GMS has been eliminated in the published public review draft of the Comprehensive Zoning Code Update planned for adoption in the summer of 2023).

D. The City added additional information to the Public Participation Summary and Appendix B identifying the City's response to comments and how the City incorporated input into the Draft. The Public Participation Summary is provided in the Introduction to the Needs Assessment.

HCD Second Review (60 days)

The revised draft as described above was sent to HCD on February 7, 2023 for a second review. HCD completed the second review of the Draft Housing Element on April 7, 2023 and issued the City a comment letter outlining additional revisions the City must undertake to achieve certification. The letter outlined the need for:

1. **Additional data and analysis** related to fair housing issues, lower-income sites, realistic capacity, non-vacant sites, lot consolidation, city owned sites, available infrastructure, use permit requirements, and impact fees;
2. **Further evaluation of constraints** to housing production related to land use controls and parking requirements;

3. **Specific program language** required for compliance with State law within programs addressing replacement housing requirements, City-owned sites, and permanent supportive housing; and
4. **Additional fair housing program actions** to work to overcome fair housing issues.

Response to HCD Comments

The HCD comment letter, as summarized above, requested changes necessary to meet State Housing Law. Attached to this report is a table summarizing each HCD comment and the City's response. These changes can be summarized below:

1. Additional Data and Analysis

- Fair Housing Issues: Added information on a previous settlement between the City and Esvin Calderon in 2021 [page A-13] and claim filed in the city in 2016 [page A-13] both based on fair housing concerns.
- Fair Housing Issues: Added information on City efforts to address fair housing concerns, including the 2018 St. Helena Housing Update Report [page A-100] and Diversity, Equity, and Inclusion Strategy [page A-101]., as well as additional information under headings 4.2.5 and 4.2.6 on pages A-103.
- Lower-income Sites: Included additional information on progress and timelines for the Hunter Subdivision Project [page 2-197]. We have also added an objective to Program H-A, which commits the City to supporting the timely completion of the Hunter Subdivision Project and alternative actions.
- Realistic Capacity: added the following information:
    - Site 2 [page 2-201]: Added details regarding the 2015 site feasibility and capacity analysis which found the site can accommodate the proposed number of housing units on the site.
    - Site 4 [page 2-206]: Revised to propose a total of four housing units on the site, equaling 80 percent of the maximum allowed density.
    - Site 5 [page 2-209]: Added details regarding non-profit ownership's plans to develop an affordable housing development on the site that is equal to greater than 100 percent of the maximum allowed density of the site, including referencing the allowed density bonus for a 100 percent affordable housing project and the feasibility analysis conducted by the non-profit.
- Nonvacant Sites: Added additional regional examples of redevelopment of nonvacant sites for current projects in the cities of Calistoga and Napa [page 2-205, and added additional statements of other underutilized factors for each of the non-vacant sites [pages 2-211 to 2-222].
- Lot Consolidation: We have added a statement clarifying that the parcels making up Site 8 and Site 9 are under single ownership and development would not be dependent upon lot consolidation [pages 2-215 and 2-217]. Added Program H-ZZ to encourage and incentivize lot consolidation.
- City-owned Sites: Added details of the 2015 site feasibility and capacity analysis which evaluated site capacity for all three of the proposed City-owned sites. We have also Incorporated information for each of the three sites on total housing unit

capacity, lot coverage, parking, environmental sensitives on site, and service connection obstacles from the 2015 analysis [pages 2-199 to 2-204].

- Infrastructure: Clarified that the RHNA allocation is within buildout of the Master Plan and that all improvements would not impede housing construction and would be constructed on the adopted CIP schedule [2-227 – 2-229].
- Use Permit Requirements. Revised the analysis to summarize allowed uses in the MR zone, and to clear up confusion related to implementation of the 5th cycle program discussed (see below); Included a new program action in Program H-N committing the City to allowing duplexes and triplexes, as well as density ranges from 5.1 to 16 du/ac in the MR zone without a CUP. Added information to inform HCD that the City is in the process of adopting a new Zoning Ordinance to be consistent with the 2040 General Plan, which would permit duplexes and triplexes within the MR District.
- Impact Fees: Revised the summary of fees and exactions to include the following analysis immediately following Table 36 on page 2-158.

2. Evaluation of Constraints

- Land Use Controls: Revised the analysis to include an analysis of height and lot coverage [page 2-137 just before the development standards table], and added new program actions in Program H-N.
- Parking: Revised the analysis to identify parking for multifamily developments with small unit sizes as a constraint. Also added a new program action related to parking standards in Program H-N.

3. Specific Program Language for Compliance with State Law

- Constraints on Housing for Person with Disabilities: Revised the relevant action in Program H-F with language from HCD.
- Replacement Housing Requirements: Added a new program, Program H-YY, based on HCD guidance.
- City-owned Sites: Added specific language to Program H-L based on example program from HCD related to the Surplus Land Act.
- Permanent Supportive Housing: Included a new program action in Program H-F with language provided by HCD.

4. Additional Fair Housing Program Actions

- Reviewed HCD's program evaluation and added actions, place-based strategies, metrics, and milestones, as appropriate, in the following programs:
    - H-A: Sites Inventory
    - H-E: Streamline Special Needs Housing
    - H-H: Workforce and Farmworker Housing
    - H-I: ADU Workforce Housing Incentive Program
    - H-K: Nonvacant Sites
    - H-Q: Direct Assistance for ADU Development
    - H-R: Place-based ADU Strategy
    - H-V: Multi-unit Development in High Resource Areas
    - H-W: Missing Middle Housing
    - H-X: Condominium Conversions
    - H-AA: Vacation Rentals
    - H-BB: Special Housing Needs Rehabilitation

- H-GG: Affordable Homeownership
- H-JJ: Housing Coordinator
- H-LL: Special Needs Housing Opportunities
- H-XX: Fair Housing Provider

PROJECT DESCRIPTION

California Environmental Quality Act (CEQA)

In considering the potential environmental impacts of the Housing Element update, the City determined that the Final Environmental Impact Report (EIR) certified for the 2040 General Plan update (2040 General Plan update Final EIR, State Clearinghouse Number 2010042001) is of continuing informational value. The City also determined that the potential environmental impacts (both direct and indirect impacts) of the Housing Element update are within the scope of the previously certified Final EIR and that none of the conditions requiring subsequent or supplemental environmental review under California Environmental Quality Act (CEQA) Guidelines Section 15162 exist. Based on the information and analysis provided in the attached EIR Addendum, the City determined that only minor or technical changes to the previously certified Final EIR are necessary and that that preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

Housing Element Purpose

The 2023-2031 Housing Element Update is an update to the City's current 2015-2023 Housing Element. The Housing Element Update is driven by the necessity to update the Regional Housing Needs Allocation (RHNA) sites inventory numbers and substantive changes to State housing law since the City's 2015-2023 Housing Element was adopted on May 26, 2015.

The Housing Element of the St. Helena General Plan is a comprehensive statement by the City of St. Helena about its current and future housing needs and proposed actions to facilitate the provision of housing to meet the needs of people of all income levels. The purpose of this Housing Element is to establish specific goals, policies, and objectives for providing housing, and to adopt an action plan toward this end. The element also identifies and analyzes housing needs, resources, and constraints on the City's ability to meet these needs.

The 2023-2031 Housing Element Policy Document includes six goals, supported by policies and implementation programs that aim to address identified housing needs during the planning period. The goals, policies, and programs of the Housing Element establish a policy framework to guide city decision-making to meet identified housing needs. The Policy Document is organized under the following goal topics:

1. A Diversity of Housing to Meet Local Needs
2. High-Quality Neighborhoods with a Balance of Housing
3. Conservation of Existing Housing
4. Assistance to Support Affordable Housing
5. Resource Conservation
6. Affirmatively Further Fair Housing

State law requires that a housing element be consistent with other general plan elements. It must provide clear policy direction for making decisions pertaining to zoning, subdivision approval, housing allocations, and capital improvements. State law (California Government Code Sections 65580-65589) mandates the contents of the housing element. By law, housing elements must contain:

- an assessment of housing needs and an inventory of resources and constraints relevant to meeting those needs;
- an assessment of fair housing needs;
- an inventory of land suitable for housing;
- an assessment of special housing needs, including the identification of zones where emergency shelters are allowed by-right;
- an assessment of "at-risk" assisted housing developments;
- an evaluation of opportunities for residential energy conservation;
- the identification of quantified objectives; and
- a set of goals, policies and programs that set forth an eight-year schedule of actions that further the goals and objectives of the housing element.

The Housing Element must also identify adequate residential sites available for a variety of housing types for all income levels; provide assistance in developing adequate housing to meet the needs of low- and moderate-income households; address governmental constraints on the maintenance, improvement, and development of housing; conserve and improve the condition of the existing stock of affordable housing; and promote housing opportunities for all persons.

RHNA Overview

Each jurisdiction in California is required to plan for its fair share of the region's housing need. This fair share is determined through a process called the Regional Housing Need Allocation (RHNA). HCD identifies the total housing need for each region of the State. Regional Councils of Government, in this case the Association of Bay Area Governments (ABAG), are responsible for distributing this need to local governments in the region. Once a local government has received its RHNA, it must revise its housing element to show how it plans zone residential land to accommodate its portion of the region's housing need. The RHNA is one of the primary threshold criteria necessary to achieve HCD support of the Housing Element.

Table 1 shows St. Helena's RHNA for the 2023-2031 Housing Element (6th Cycle) and illustrates the increase from the 5th Cycle requirements.

Table 1: RHNA Comparison Between 5th and 6th Cycle Requirements

	Lower		Moderate	Above Moderate	Total RHNA
	Very Low	Low			
5th Cycle	8	5	5	13	31

6th Cycle	104	59	26	67	256
Change	**+96**	**+54**	**+21**	**+54**	**+225**
%Change	**+1,288%**	**+1,180%**	**+520%**	**+508%**	**+819%**

Due to the State's No-Net-Loss Zoning law (SB 166, 2017), each jurisdiction must provide an additional 20 percent buffer across all income categories. This buffer allows some units to be developed outside the projected income area (i.e., moderate income housing on a lower-income site) without the City falling into a deficit in any individual category.

Table 2: Regional Housing Need Allocation and HCD-Required 20 Percent Buffer, St. Helena

	Lower		**Moderate**	**Above Moderate**	**Total RHNA**
	Very Low	**Low**			
St. Helena RHNA	**104**	**59**	**26**	**67**	**256**
St. Helena RHNA + 20% Buffer	**121**	**71**	**31**	**79**	**302**

The City of St. Helena is able to accommodate more than the 302 housing units required through existing approved projects, projected accessory dwelling unit development, city-owned sites, and vacant and underutilized parcels.

Housing Element Update Components

The 2023-2031 Housing Element Update consists of two parts; the Housing Needs Assessment and this Housing Element Policy Document.

1. The **Needs Assessment** identifies and analyzes the existing and projected housing needs, provides a list of sites for housing development that are adequate to accommodate the City's regional housing needs allocation, documents constraints to housing production, and analyzes fair housing. In short, the Needs Assessment provides the context for the City's housing action plan.
2. The **Policy Document** states goals, policies, implementing program, and quantified objectives for the development, rehabilitation, and preservation of housing. The Policy Document is the action plan that reacts directly to the findings of the Housing Needs Assessment and input from the community. The City will implement the actions specified in the Policy Document throughout the planning period.

General Plan Consistency

California Government Code Section 65300.5 requires that a general plan be internally consistent, meaning that no conflicts exist among the elements of the plan. Government Code section 65583(c) requires that a housing element describe how consistency has been achieved among the general plan elements. The most important aspect of consistency among general plan elements is that policies and implementation measures do not conflict but support one another to achieve the overall goals and vision of a general plan.

In preparing the 2023-2031 Housing Element, the City reviewed goals and policies in the various elements of the 2040 St. Helena General Plan. With the passage of SB 1035 in 2018, the City must update its Safety Element to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies. Program H-G commits the City to updating the Safety Element. Additionally, the City has committed to remove the Growth Management System through Program H-B, and will need to update the Zoning Code and General Plan for consistency. Consistency with the remaining components of the 2040 General Plan has been achieved through the adoption of complementary policies in each of the elements that support the goals and policies of the other elements.

Changes to State Law

The following items represent substantive changes to State housing law since the City's last Housing Element was adopted and certified. While this is not an exhaustive list, these items are state mandates that must be addressed within the Housing Element.

Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017)

SB 35 requires a streamlined, ministerial review process, or objective design standards, for qualifying multifamily, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their State-mandated RHNA. Among other requirements, to qualify for streamlining under SB 35, a project must incorporate one of two threshold levels of affordable housing: (1) 10 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for above moderate-income housing or have failed to submit an annual progress report as required under state law; or (2) 50 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for below moderate-income housing. Additionally, the Housing Element must describe the City's processing procedures related to SB 35.

The City has adopted a streamlined approval process for multi-family units within the community, in compliance with SB 35/SB 330. The process incorporates an objective checklist and does not impose discretionary processes.

Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017)

These bills require additional analysis and justification of the sites included in the sites inventory of the City Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Additionally, the bills require additional analysis of non-vacant sites and additional analysis of infrastructure capacity, and by place size restrictions on all sites. The Housing Element sites inventory has been prepared in compliance with AB 879 and AB 1397.

Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)

AB 686 requires the City to administer its housing programs and activities in a manner to affirmatively further fair housing and not take any action that is inconsistent with this obligation. The City must take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities. The Housing Element must include an assessment of fair housing practices, an examination of the relationship of available sites to areas of high opportunity, and actions to affirmatively further fair housing. This Housing Element includes Program H-VV addressing fair housing and AFFH directly, and objectives to affirmatively further fair housing in programs throughout the Element. Appendix A: Affirmatively Furthering Fair Housing includes an analysis of fair housing in St. Helena.

No-Net-Loss Zoning: Senate Bill 166 (2017)

SB 166 amended the No-Net-Loss rule to require that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate the unmet RHNA. When a site identified in the Housing Element as available to accommodate the lower-income portion of the RHNA is actually developed for a higher income group, the City must either (1) identify, and rezone, if necessary, an adequate substitute site or (2) demonstrate that the land inventory already contains an adequate substitute site. This Housing Element has been prepared in accordance with the No-Net-Loss rule and identifies sites that can accommodate 172 units in addition to the City's RHNA requirement of 256. Chapter 11 of the Needs Assessment includes a detailed discussion of the sites inventory process.

Safety Element to Address Adaptation and Resiliency: Senate Bill 1035 (2018)

SB 1035 requires the General Plan Safety Element to be reviewed and revised to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies with each revision of the housing element. Program H-H of this Housing Element commits the City to updating the Safety Element within three years of certifying this Housing Element.

By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019)

AB 2162 requires the City to change its zoning to provide a “by right” process and expedited review for supportive housing. The bill prohibits the City from applying a conditional use permit or other discretionary review to the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25

percent or 12 units, whichever is greater. The change in the law applies to sites in zones where multifamily and mixed uses are permitted, including in nonresidential zones permitting multifamily use. The City currently permits transitional and supportive housing within all residential zones.

Additionally, AB 101 requires that a Low Barrier Navigation Center development be a use allowed by right in mixed-use zones and nonresidential zones permitting multifamily uses if it meets specified requirements. The City does not currently comply with this requirement. Program H-G commits the City to update the zoning code to allow low barrier navigation centers by right in areas zoned for mixed use as well as nonresidential zones permitting multifamily uses.

Accessory Dwelling Units: Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly Bill 587 (2019), Senate Bill 13 (2019), and Assembly Bill 671 (2019)

In recent years, multiple bills have added requirements for local governments related to Accessory Dwelling Unit (ADU) regulation. The 2016 and 2017 updates to State law included changes pertaining to the allowed size of ADUs, permitting ADUs by right in at least some areas of a jurisdiction, and parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days and remove lot size and replacement parking space requirements. AB 68 allows an ADU and a junior ADU to be built on a single-family lot, if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, and prohibits fees on units of less than 750 square feet. In addition, AB 671 requires the Housing Element to include plans to incentivize and encourage affordable ADU rentals. In 2020 and 2023, the City adopted updated ADU regulations which streamlined the review process for ADU construction and conversion, in compliance with the requirements of State law.

Density Bonus: Assembly Bill 1763 (2019) and AB 2345 (2020)

AB 1763 amended California's density bonus law to authorize significant development incentives to encourage 100 percent affordable housing projects, allowing developments with 100 percent affordable housing units to receive an 80 percent density bonus from the otherwise maximum allowable density on the site. If the project is within half a mile of a major transit stop, a jurisdiction may not apply any density limit to the project. AB 2345 further amended California's density bonus law to allow residential projects with some on-site affordable housing to receive a density bonus of up to 50 percent. Specifically, a residential development is eligible for a 50 percent density bonus if 11 percent of the units are very low-income, 20 percent are low-income units, or 40 percent are moderate-income units. The affordable units must remain affordable for a minimum of 55 years. In addition to the density bonus, qualifying projects will receive four regulatory incentives or concessions, depending on how much of the development includes affordable units. Specifically:

- One incentive or concession for projects that include at least 10 percent of the total units for lower-income households, at least five percent for very low-income

households, or at least 10 percent for persons and families of moderate-income in a common interest development.

- Two incentives or concessions for projects that include at least 17 percent of the total units for lower-income households, at least 10 percent for very low-income households, or at least 20 percent for persons and families of moderate-income in a common interest development.
- Three incentives or concessions for projects that include at least 24 percent of the total units for lower-income households, at least 15 percent for very low-income households, or at least 30 percent for persons and families of moderate-income in a common interest development.
- Four incentives or concessions for projects where one hundred percent of all units in the development, including total units and density bonus units, but exclusive of a manager's unit or units, are for lower income households, as defined by Section 50079.5 of the Health and Safety Code, except that up to 20 percent of the units in the development, including total units and density bonus units, may be for moderate-income households, as defined in Section 50053 of the Health and Safety Code. For these projects, if it is located within one-half mile of a major transit stop, the applicant also receives a height increase of up to three additional stories (33 feet).

The City of St. Helena currently establishes density bonus provisions for affordable housing in Chapter 17.144 (Affordable Housing). The provisions in that Chapter do not reflect the new maximum density bonus tier framework that was adopted by the State in 2020. Program H-F to commits the City to amend the Zoning Code for compliance with California Government Code Sections 65915 through 65918; the updated density bonus ordinance in the published public review draft of the Comprehensive Zoning Code Update is in compliance with state law with an anticipated adoption in the summer of 2023.

Housing Crisis Act of 2019: Senate Bill 330

SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease would preclude the jurisdiction from meeting its RHNA housing targets; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels. The Housing Element must describe the City's processing procedures related to SB 330. Please see the Needs Assessment, Chapter 8: Nongovernmental and Governmental Constraints for more information.

The City has adopted an SB 330 process and checklist to streamline the design and approval of by-right multi-family units within the community, in compliance with SB 330.

Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019)
AB 1486 refines the Surplus Land Act to provide clarity and further enforcement to increase the supply of affordable housing. The bill requires the City to include specific information relating to surplus lands in the Housing Element and Housing Element Annual Progress Reports, and to provide a list of sites owned by the City that have been sold, leased, or otherwise disposed of in the prior year. AB 1255 requires the City to create a central inventory of surplus and excess public land each year. The City is required to transmit the inventory to the Department of Housing and Community Development and to provide it to the public upon request. The City has committed to transmitting the required information to HCD each year with their annual report in Program H-CC.

Housing Information Transparency: Assembly Bill 1483 (2019)
AB 1483 requires the City to publicly share information about zoning ordinances, development standards, fees, exactions, surplus public lands, fair housing resources, and affordability requirements. The City is also required to update such information within 30 days of changes. The Housing Element will report on the City's compliance with these requirements. Program H-MM specifically commits the City to providing updated information on a range of housing issues through their website and at City offices.

Emergency and Transitional Housing Act of 2019: Assembly Bill 139 (2019)
AB 139 established new criteria for evaluating the needs of the homeless population. The analysis must assess the capacity to accommodate the most recent homeless point-in-time count by comparing that to the number of shelter beds available on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing (see Chapter 7: subsection Persons Experiencing Homelessness). The bill also established new parking standards for emergency shelters. Lastly, the bill requires the Housing Element to include a review of the effectiveness of the housing element goals, policies, and related actions to meeting the jurisdiction’s special housing needs (see Chapter 2: Review of Previous Element).

The City is in compliance with State laws related to emergency shelters, supportive housing, and transitional housing. Currently, the Zoning Code allows both supportive and transitional housing by-right in all residential zoning districts. Additionally, emergency shelters are identified as a by-right use in the I and SC zoning districts.

Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)
SB 6 requires the City to electronically submit the sites inventory to HCD. The City will submit the final sites inventory to HCD with the adopted Housing Element. Program H-A commits the City to submitting an electronic copy of the inventory to HCD.

Evacuation Routes: Senate Bill 99 and AB 747 (2019)
Two recent bills, AB 747 and SB 99, require the General Plan Safety Element to be updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes.

The bill requires these updates to occur with the 2023-2031 Housing Element Update. Program H-H commits the City to updating to the Safety Element as necessary for compliance with SB 99 and AB 747 during the 6th Housing Element cycle.

ISSUES

The 6th cycle housing element updates for the Association of Bay Area Governments (ABAG) region were mandated to be adopted by each local jurisdiction by January 31, 2023. In recognition of the challenges in meeting this deadline, HCD offers a 120-day grace period for adoption. If the housing element is adopted during this time (by May 31, 2023), the housing element is considered compliant. The next step after this Planning Commission public hearing is for the City Council to consider adoption on May 9, 2023. Any final changes in the adoption hearings would be integrated into the the final Housing Element Update and sent to HCD shortly after the Council hearing. Certification by HCD occurs following the deadline (assuming HCD find the revised adopted document addresses their outstanding comments) and does not need to occur within the grace period. If the element is adopted before the end of the grace period, the City has three years to complete required rezoning. If adopted after the grace period, that time drops to one year.

STAFF RECOMMENDATION

Staff recommends that the Planning Commission adopt the attached resolution recommending that the St. Helena City Council:

1. Find that the EIR Addendum for the Housing Element Update to the City of St. Helena 2040 General Plan is adequate and complete in compliance with the California Environmental Quality Act; and

2. Adopt an Amendment to the General Plan (GPA 2023-001) updating the Housing Element of the General Plan for the period of 2023-2031 and incorporating it into the 2040 General Plan.

ATTACHMENTS

HE Resolution
2023 - 2031 Housing Element Update - Final April 2023
Housing and Safety Elements EIR Addendum - Final April 2023
HCD Letter #1_120622
HCD Response Matrix #1_022223
HCD Letter #2_040723
HCD Response Matrix #2_042523
2023 - 2031 Housing Element Update - Redline Version

CITY OF ST. HELENA PLANNING COMMISSION

RESOLUTION NO.

A RESOLUTION OF THE CITY OF ST. HELENA PLANNING COMMISSION RECOMMENDING THAT THE CITY COUNCIL ADOPT A GENERAL PLAN AMENDMENT (GPA 2023-001) TO UPDATE THE HOUSING ELEMENT OF THE GENERAL PLAN FOR THE PERIOD OF 2023-2031 AND ADOPT AN ADDENDUM TO THE GENERAL PLAN ENVIRONMENTAL IMPACT REPORT

Recitals

1. The California legislature has found that "California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state's environmental and climate objectives." (Gov. Code Section 65589.5.); and
2. The legislature has further found that "Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration." (Gov. Code Section 65589.5.); and
3. The legislature recently adopted the Housing Crisis Act of 2019 (SB 330) which states that "In 2018, California ranked 49th out of the 50 states in housing units per capita… California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over 7 years"; and
4. State Housing Element Law (Government Code Sections 65580 et seq.) requires that the City Council adopt a Housing Element for the eight-year period 2023-2031 to accommodate the City of St. Helena's (City) regional housing need allocation (RHNA) of 256 housing units, comprised of 104 very-low income units, 59 low-income units, 26 moderate-income units, and 67 above moderate-income units; and
5. To comply with State Housing Element Law, the City of St. Helena has prepared Housing Element Update 2023-2031 (the Housing Element); and
6. As provided in Government Code Section 65350 et. seq., the Housing Element constitutes a General Plan Amendment; and
7. As provided in Government Code Sections 65352 – 65352.5 the City of St. Helena referred the Housing Element to all California Native American tribes on the contact list provided by the Native American Heritage Commission and to other entities listed. No California Native American tribe requested consultation; and

8. The Housing Element has been prepared to comply with State law, accommodate the RHNA, affirmatively further fair housing, and facilitate and encourage a variety of housing types for all income levels, including multifamily housing (Gov. Code Sections 65583.2 and 65583(c)); and
9. The City conducted extensive community outreach over a two-year period including six public meetings/workshops and joint Planning Commission/City Council meetings; and
10. In accordance with Government Code Section 65585 (b), on September 7, 2022, the City submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its review; and
11. On December 6, 2022, the City received a letter from HCD providing its comments and findings regarding the draft Housing Element; and
12. On January 31, 2023, the City published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft; and
13. On February 7, 2023, the City submitted a second draft Housing Element to HCD for review; and
14. On April 7, 2023, the City received a second letter from HCD providing additional comments and findings regarding the draft Housing Element; and
15. The City revised the draft Housing Element to address HCD's additional comments; and
16. On May 2, 2023, the Planning Commission conducted a duly and properly noticed public hearing, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's findings, the City's response to HCD's findings, the staff report and all attachments, and oral and written public comments; and determined the Housing Element to be consistent with State law and the General Plan of the City of St. Helena.

Resolution

A. Now, therefore, the City of St. Helena Planning Commission resolves as follows, based on substantial evidence in the record:

   1. The foregoing recitals are true and correct and are incorporated by reference into this action.
   2. The St. Helena Planning Commission recommends that the City Council adopt a General Plan Amendment (GPA 2023-001) to update the Housing Element of the General Plan for the period of 2023 – 2031 and adopt an Addendum to the General Plan Environmental Impact Report.

I HEREBY CERTIFY that the foregoing was duly and regularly approved by the Planning Commission of the City of St. Helena at a regular meeting of said Planning Commission held on May 2, 2023 by the following roll call vote:

AYES:

NOES:
ABSENT:
ABSTAIN:

APPROVED:

John Ponte
Chair, Planning Commission

ATTEST:

Maya DeRosa, AICP
Community Development Director













City of St. Helena

2023-2031 Housing Element Update

Public Hearing Draft

April 2023

ST. HELENA
CALIFORNIA
HOUSING ELEMENT
2023 - 2031



Table of Contents

Introduction iii

1. Policy Document

Policy Document Contents 1-1

Organization of the Policy Document 1-3

Key Findings and Recommendations 1-5

Goals, Policies, and Implementation Programs 1-9

Quantified Objectives 1-48

2. Needs Assessment

Needs Assessment Contents 2-1

1. Introduction 2-7
2. Review of the Existing Housing Element 2-34
3. Demographic and Economic Trends 2-58
4. Population and Employment Projections 2-80
5. Housing Conditions 2-84
6. Housing Market Conditions 2-97
7. Special Housing Needs 2-108
8. Non-governmental and Governmental Constraints 2-130
9. Opportunities for Energy Conservation 2-171
10. Zoning for a Variety of Housing Types 2-173
11. Housing Resources 2-179

Appendix A: Affirmatively Further Fair Housing (AFFH)

AFFH Contents A-1

1. Introduction A-5
2. Summary of Fair Housing Issues A-9
3. Segregation and Integration Patterns and Trends A-14
4. Local Area of Knowledge A-99
5. Sites Inventory Analysis A-102
6. Contributing Factors A-107

Appendix B: Comments on the Public Review Draft Housing Element B-1


Private Property
STONEBRIDGE
900-1078 COLLEGE AVENUE

Introduction

Purpose of the Element

Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting housing plans as part of their "general plan" (also required by the state). General plans serve as the local government's "blueprint" for how the city and/or county will grow and develop and include seven required elements: land use, transportation, conservation, noise, open space, safety, and housing. The law mandating that housing be included as an element of each jurisdiction's general plan is known as "housing-element law."

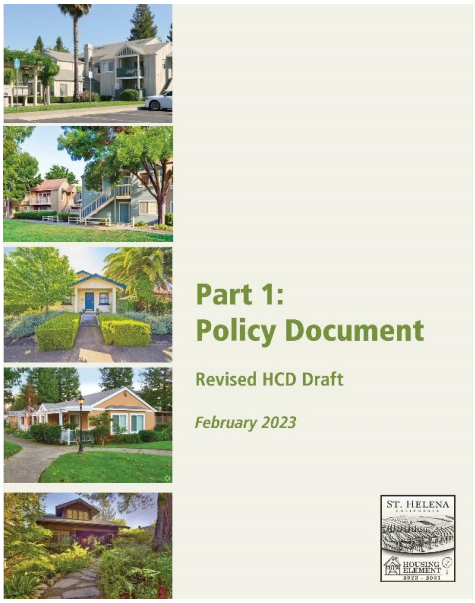
California's housing-element law acknowledges that, in order for the private market to adequately address the housing needs and demand of Californians, local governments must adopt plans and regulatory systems that provide opportunities for (and do not unduly constrain), housing development. As a result, housing policy in California rests largely upon the effective implementation of local general plans and, in particular, local housing elements.

Although the Housing Element is one of seven required elements of the general plan, it has several unique requirements that set it apart from the other six. State law (Government Code Section 65580 (et seq.)) specifies in detail the topics that the housing element must address and sets a schedule for required updates every eight years. The housing element is also the only element reviewed and certified by the State for compliance with State law. Every jurisdiction in the State of California is required to submit a Housing Element to the Department of Housing and Community Development (HCD) for review and certification.

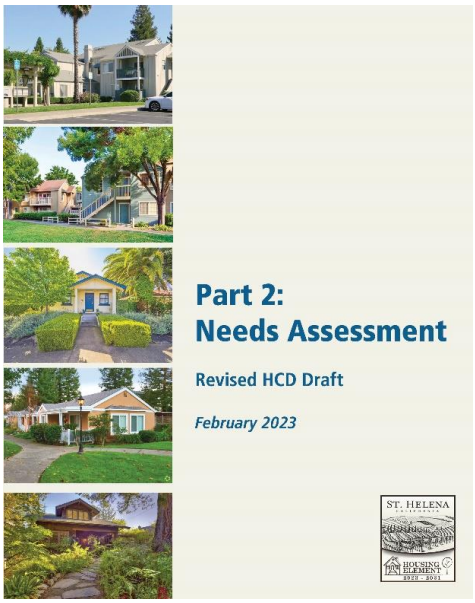
The 2023-2031 Housing Element establishes a comprehensive plan to address housing needs in St. Helena over the eight-year planning period between January 31, 2023 and January 31, 2031. The Housing Element sets the community goals and policies surrounding the development, rehabilitation, and preservation of housing units to meet the needs of St. Helena residents (present and future. St. Helena is a member of the Association of Bay Area Association of Governments and, therefore, is required submit an updated Housing Element to HCD by January 31, 2023.

Housing Element Update Components

The 2023-2031 Housing Element Update consists of two parts; the Housing Needs Assessment, and this Housing Element Policy Document.



1. The **Policy Document** states goals, policies, implementing program, and quantified objectives for the development, rehabilitation, and preservation of housing. The Policy Document is the action plan that reacts directly to the findings of the Housing Needs Assessment and input from the community. The City will implement the actions specified in the Policy Document throughout the planning period.



2. The **Needs Assessment** identifies and analyzes the existing and projected housing needs, provides a list of sites for housing development that are adequate to accommodate the City's regional housing needs allocation, documents constraints to housing production, and analyzes fair housing. In short, the Needs Assessment provides the context for the City's housing action plan.











Part 1: Policy Document

Public Hearing Draft

April 2023

ST. HELENA
CALIFORNIA
HOUSING ELEMENT
2023 - 2031


1426

Policy Document Contents

Organization of the Policy Document 1-3

Key Findings and Recommendations 1-5

Review of Existing Housing Element 1-5

Demographic and Economic Trends 1-5

Housing Conditions 1-5

Special Housing Needs 1-6

Non-governmental and Governmental Constraints 1-7

Sites Inventory and Zoning for a Variety of Housing Types 1-7

Affirmatively Furthering Fair Housing 1-8

Goals, Policies, and Implementation Programs 1-9

Goal 1 A Diversity of Housing to Meet Local Needs 1-9

Goal 2 High-Quality Neighborhoods with a Balance of Housing Types 1-20

Goal 3 Conservation of Existing Housing 1-29

Goal 4 Assistance to Support Affordable Housing 1-33

Goal 5 Resource Conservation 1-40

Goal 6 Affirmatively Furthering Fair Housing 1-43

Quantified Objectives 1-48

Quantified Objectives by Type 1-48

Quantified Objectives Summary Table 1-49







Organization of the Policy Document

The 2023-2031 Housing Element Policy Document includes six goals, supported by policies and implementation programs that aim to address identified housing needs during the planning period. The goals, policies, and programs of the Housing Element establish a policy framework to guide city decision-making to meet identified housing needs. The Policy Document is organized under the following goal titles:

1. A Diversity of Housing to Meet Local Needs
2. High-Quality Neighborhoods with a Balance of Housing
3. Conservation of Existing Housing
4. Assistance to Support Affordable Housing
5. Resource Conservation
6. Affirmatively Further Fair Housing

Goals

The housing goals are articulated as general "end condition statements," which describe a desired outcome or end state. The goals do not contain an action verb as they reflect a final statement of what the city hopes to achieve. Goals describe ideal future conditions for a topic and tend to be general and broad in nature. How the goal will be achieved is established via the applicable policies and programs.

Policies

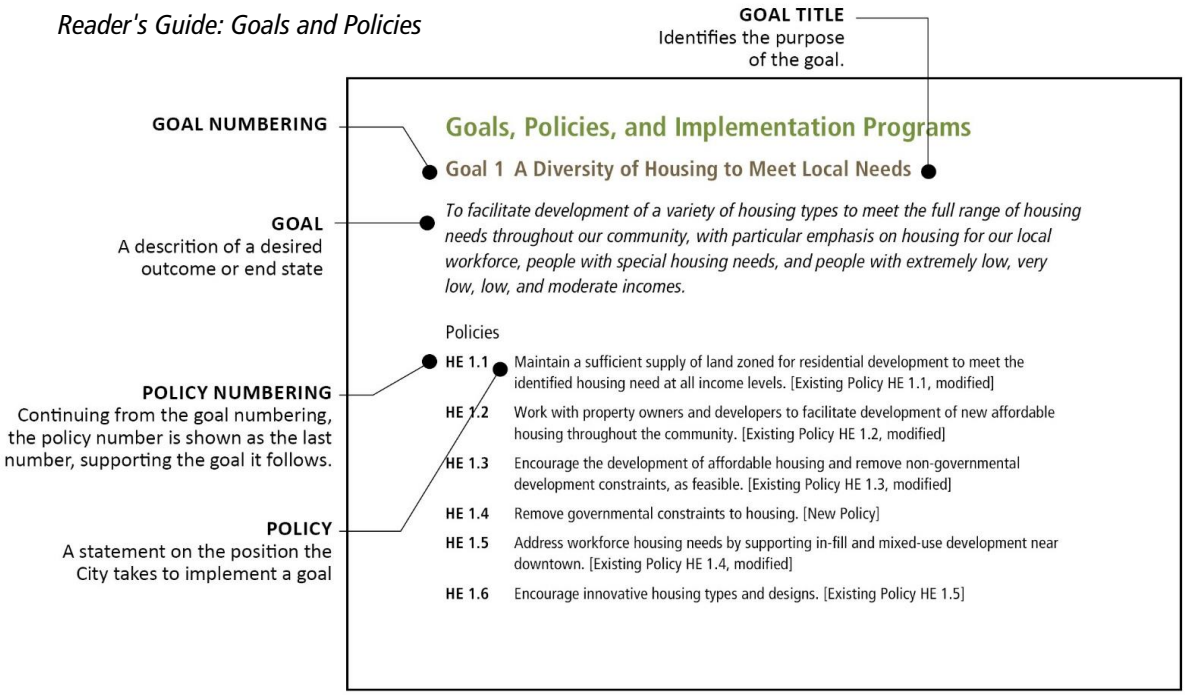
Policies are statements on the position the City takes to implement a goal. Policies contained in the Housing Element are important statements as they provide a clear and unambiguous statement that guides a specific course of action for decision-makers to achieve a desired goal. Future actions and development must be consistent with these policies.

Programs

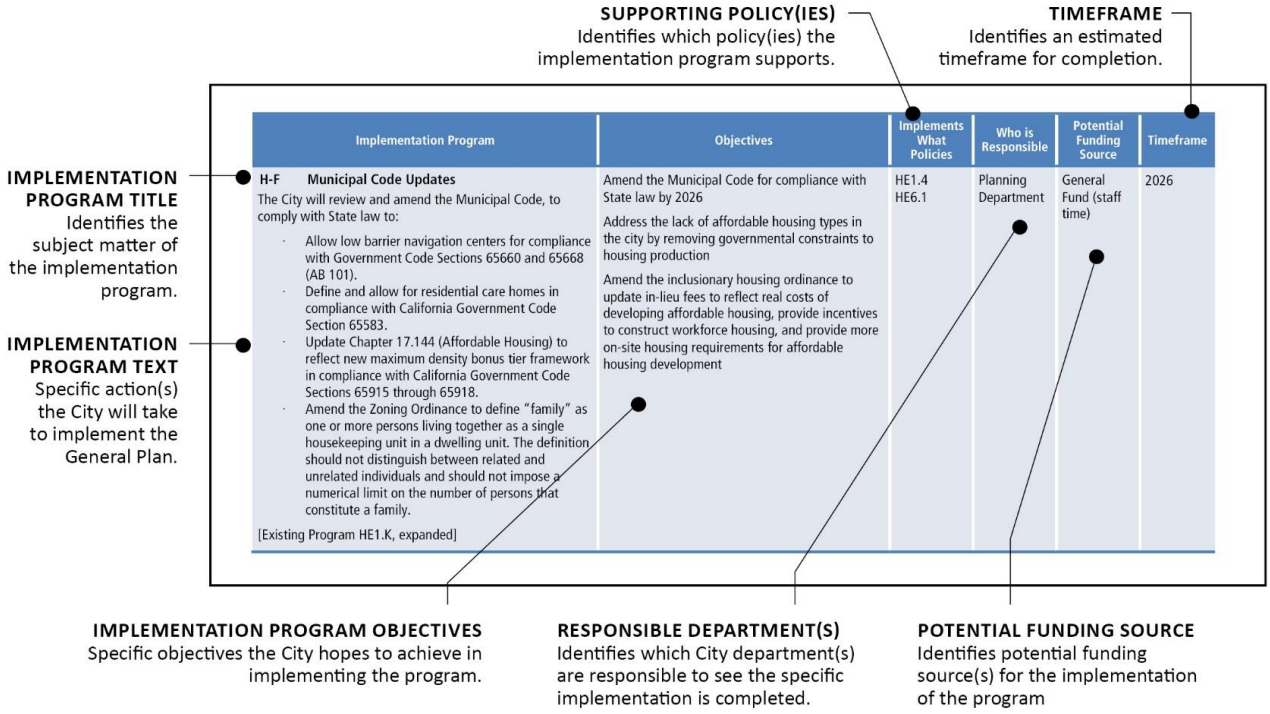
While many policies can be implemented as part of standard City operations, some policies require specific programs to assure their implementation. Housing programs define the specific actions the City will undertake to achieve the stated goals and policies.

For more information, please see the Policy Document Reader's Guide diagrams on the following page.

Reader's Guide: Goals and Policies



Reader's Guide: Implementation Programs



Key Findings and Recommendations

The following section summarizes the key findings in the Housing Needs Assessment and references the resulting programs.

Review of Existing Housing Element

Since the City of St. Helena adopted the Housing Element Update in 2014, the City successfully implemented a majority of the Housing Element implementation programs. Between 2014 and 2021, the City was successful in obtaining additional funding for affordable housing production, preserving existing affordable housing units, and promoting the expansion of multifamily and mixed use housing through the recent 2040 General Plan Update. The City also successfully implemented programs incentivizing and streamlining affordable housing development and revised development standards related to second units for state compliance. While the 2040 General Plan Update process required significant staff time and delayed implementation of some Municipal Code amendments, the City is currently (2022) undertaking a zoning code update that will address the remaining code amendments implementation measures during the 6th cycle. As the code update draws to its conclusion, the City will have more resources available to implement the remaining implementation actions, which have been continued and expanded in the 2023-2031 Housing Element.

Demographic and Economic Trends

Generally, the population of the Bay Area continues to increase because of natural growth and the strong economy drawing new residents to the region. The population of St. Helena increased by 2.1 percent from 2000 to 2020, which is lower than the growth rate of the Bay Area. In 2019, St. Helena's youth population under the age of 18 was 1,050 and senior population 65 and older was 1,636. These age groups represent 17.2 percent and 26.8 percent, respectively, of St. Helena's population. Program H-A commits the City to providing sufficient housing sites to meet the needs of the population and Programs H-H and H-I address workforce housing.

Housing Conditions

Number of Homes. The number of new homes built in the Bay Area has not kept pace with the demand, resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness. The number of homes in St. Helena increased, 4.4 percent from 2010 to 2020, which is above the growth rate for Napa County and below the growth rate of the region's housing stock during this time period. Program H-N, H-O work to facilitate higher density development, and H-P works to provide residential development opportunities in commercial areas through the implementation of mixed-use zoning.

Home Prices. A diversity of homes at all income levels creates opportunities for all St. Helena residents to live and thrive in the community.

- **Ownership.** The largest proportion of homes had a value in the range of $1 million-$1.5 million in 2019. Home prices increased by 118.2 percent from 2010 to 2020. Program H-GG works to increase affordable homeownership opportunities in St. Helena through the pursuit of mortgage credit certificates.

- **Rental Prices.** The typical contract rent for an apartment in St. Helena was $1,470 in 2019. Rental prices increased by 15.7 percent from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to make $59,160 per year. Programs H-DD, H-EE, H-FF, and H-HH work to assist the development of affordable housing. Program H-II includes a commitment to support the Housing Choice Voucher program and to support efforts to expending funding for the program.

Housing Type. It is important to have a variety of housing types to meet the needs of a community today and in the future. In 2020, 63.9 percent of homes in St. Helena were single family detached, 6.1 percent were single family attached, 6.2 percent were small multifamily (2-4 units), and 18.4 percent were medium or large multifamily (5+ units). Between 2010 and 2020, the number of single-family units increased more than multi-family units. Generally, in St. Helena, the share of the housing stock that is detached single family homes is above that of other jurisdictions in the region. Programs aimed at addressing the lack of affordable housing types include H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-P, and H-W.

Cost Burden. A household is considered "cost-burdened" if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered "severely cost-burdened." In St. Helena, 21.1 percent of households spend 30-50 percent of their income on housing, while 16.6 percent of households are severely cost burden and use the majority of their income for housing. Lower-income, Latinx, and large households are disproportionally impacted by housing cost burdens. Programs including H-E, H-H, H-M, H-DD, H-EE, and H-FF work to reduce the costs of production or create more affordable housing opportunities by streamlining development approvals, incentivizing affordable housing types, generating funds, and reducing fees.

Special Housing Needs

People with Disabilities. In St. Helena, people with disabilities make up around 12 percent of the total population. Children (under 18) make up around 38 percent of the developmentally disabled population, while adults make up around 62 percent. Most of the developmentally disabled population reside with their parent, family, or guardian.

Senior Households. Senior households represent a higher percentage of the total households in St. Helena, at about 39 percent of households in the city. There is a large income disparity between seniors who rent housing and seniors who own their home. Most seniors who rent make 0 to 30 percent of AMI, and sixty-eight percent of senior households in this income category have housing cost burdens. By contrast, most seniors who own make greater than 100 percent of AMI; thirteen percent of senior households in this category experience housing cost burdens.

Farmworkers. The number of permanent farm workers in Napa County has increase from 2,916 in 2002 to 4,290 in 2017, while the number of seasonal farm workers decreased from 7,855 to 5,734. In St. Helena, the migrant worker student population totaled 20 during the 2019-20 school year, an increase of two students since the 2016-17 school year.

Persons Experiencing Homelessness. According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. Countywide, many of the persons experiencing homelessness report chronic substance abuse or mental illness.

Programs H-E, H-H, H-I, H-BB, H-FF, H-KK, H-LL, H-NN, H-OO respond to the city's special housing need by streamlining development review, incentivizing development, or providing directly funding for construction or rehabilitation of housing for those with special needs.

Non-governmental and Governmental Constraints

The non-governmental constraints that restrict building in St. Helena include the price of land, cost of construction, flooding, conservation easements and long-term vineyard leases, and a lack of rental accessory dwelling units. The governmental controls analyzed in this section were land use controls, codes and enforcements, on-and off-site improvements, fees and exactions, processing and permit procedures, and regulations affecting housing for persons with disabilities. The land use controls including zoning and current General Plan land use designations do not constrain residential development; however, some changes are necessary to streamline the design review process. Additionally, water and sewer access are constrained, and the City must prioritize service for proposed development that includes housing for lower-income households (Program H-C). Additionally, St. Helena must also amend the Zoning Code to allow for low barrier navigation centers, consistent with State law. See Program H-F for more information.

Sites Inventory and Zoning for a Variety of Housing Types

Sites Inventory. In combination with the City's pending projects and ADU development trends, the sites inventory provides adequate sites to meet the City's RHNA allocation and buffer requirements. St. Helena received a RHNA of 256 total units distributed across very low-income (104 units), low-income (59 units), moderate-income (26 units), and above moderate-income (67 units) categories. A total of 83 lower income housing units can be accommodated on City-owned properties and 332 total housing units can be accommodated on vacant and non-vacant sites. Multiple property owners of vacant and non-vacant sites are supportive of and interested in housing development on their properties. See Program H-A for more information.

Zoning for a Variety of Housing Types. St. Helena's Zoning Code allows for a variety of housing types in the City including multiple-family units, transitional and supportive housing, single-room occupancy units, manufactured and mobile homes, and accessory dwelling units. However, to comply with Section 65915 through 65918 of the California Government Code, St. Helena should amend the Zoning Code to reflect the new

maximum density bonus provisions that were adopted by the State in 2020. Program H-F commits the City to updating the Zoning Code for compliance with State law.

Affirmatively Furthering Fair Housing

Concentrations of Lower- and Moderate-Income Earning Populations. In St. Helena, residents with low and moderate household incomes are concentrated in the eastern portion of the city. The Housing Element ensures available land to accommodate all income levels on sites located across the city. Efforts to combat this impediment are outlined in Programs H-A, H-B, H-N, H-O, H-R, H-S, H-U, H-V, H-W, and H-AA.

Insufficient Housing Stock for Farmworkers. Farmworker housing is a critical need in Napa County and St. Helena due to the presence of year-round agricultural production. The migratory and sometimes seasonal nature of farm work poses housing challenges for the community and are seen as an impediment for St. Helena. Efforts to combat this impediment are outlined in Programs H-E, H-H, H-I, and H-KK.

Lack of Affordable Housing Types. There is a lack of diversity in housing types that restricts development of affordable housing in St. Helena. Local land use and zoning regulations perpetuate this deficiency by limiting the form of housing that can be developed on a particular site. Much of the residentially zoned parcels within the city are zoned low and medium density residential and are not compatible with the construction of duplexes, triplexes, quadplexes and multifamily housing developments. The City is upzoning a number of parcels as a part of the Housing Element Update to allow higher density residential development. Efforts to further combat this impediment are outlined in Programs H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-N, H-P, H-R, H-S, H-V, H-W, H-AA, H-DD, H-EE, H-FF, H-GG, H-LL, and H-NN.

Goals, Policies, and Implementation Programs

Goal 1 A Diversity of Housing to Meet Local Needs

To facilitate development of a variety of housing types to meet the full range of housing needs throughout our community, with particular emphasis on housing for our local workforce, people with special housing needs, and people with extremely low, very low, low, and moderate incomes.

Policies

HE 1.1 Maintain a sufficient supply of land zoned for residential development to meet the identified housing need at all income levels. [Existing Policy HE 1.1, modified]

HE 1.2 Work with property owners and developers to facilitate development of new affordable housing throughout the community. [Existing Policy HE 1.2, modified]

HE 1.3 Encourage the development of affordable housing and remove non-governmental development constraints, as feasible. [Existing Policy HE 1.3, modified]

HE 1.4 Remove governmental constraints to housing. [New Policy]

HE 1.5 Address workforce housing needs by supporting in-fill and mixed-use development near downtown. [Existing Policy HE 1.4, modified]

HE 1.6 Encourage innovative housing types and designs. [Existing Policy HE 1.5]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-A Available Sites Inventory The City will prepare a sites inventory and suitability analysis that identifies suitable sites for housing development that allows targeted income housing developers to have a clear idea of what sites are suitable for meeting the Regional Housing Needs of the City. To accommodate the remaining lower-income RHNA of 156 units, the City of St. Helena will identify and rezone a minimum of 14 acres to the HDR zoning district, allowing exclusively residential uses and a minimum of 20 units per acre to a maximum of 28 units per acre by January 31, 2026. Rezoned sites will permit owner-occupied and rental multifamily uses by right pursuant to Government Code section 65583.2(h) and (i) for developments in which 20 percent or more of the units are affordable to lower income households and will be selected from sites 2, 3, 5, 8, and 10 in the parcel listing (Table 58). As reflected in *11: Housing Resources*, each site has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided. The City will maintain an inventory of parcels meeting the requirements of Government Code Section 65583.2(c); that is, vacant sites identified in two or more consecutive housing elements or nonvacant sites identified in a prior housing element, that are identified to accommodate housing for lower income households. This inventory shall be made available online. All previously used lower-income sites currently meet the lower-income density threshold (20 du/ac), however the City shall update the zoning code to allow by-right approval for housing developments that	Identify housing sites suitable to accommodate: · Very low income: 104 units · Low income: 59 units · Moderate income 26 units · Above Moderate income: 67 units · Total: 256 units Provide sites that proactively work to overcome concentrations of lower- and moderate-income earning populations; with the goal of facilitating the development of 82 lower income units in the western portion of the city Provide sites appropriate for affordable housing types Commit to streamlining review of Hunter Subdivision project to completion with the goal of Building Permit applications in 2025. Evaluate timeline at the end of 2025 and if determined necessary, identify additional housing sites to meet the City's 6th Cycle RHNA requirements.	HE1.1	Planning Department	General Fund (staff time)	Within three years of the adoption deadline Publicly-available inventory: by 2024 **Hunter Subdivision** Building permits: 2025 Evaluate timeline by end of 2025

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
include 20 percent or more of its units affordable to lower income households (Gov. Code, § 65583.2, subd. (c).) on these sites. The City will consider AFFH in the identification of sites within the inventory and will work to provide sites that proactively work to overcome concentrations of lower- and moderate-income earning populations on the eastern portion of the city. [New Program]					
H-B Growth Management System The City will remove the Growth Management System (GMS) from the Zoning Code. Due to Senate Bill 330, the GMS cannot currently be enforced. The City shall remove the GMS from the zoning code through the current Comprehensive Zoning Code Update currently underway. The GMS has been removed from the Draft Zoning Code, which is scheduled for adoption in summer/fall 2023. [Existing Program HE1.A, modified]	During the planning period, encourage the development of: · 4 very low-income units · 4 low-income units · 10 moderate-income units · 10 above moderate-income units Address the city's lack of affordable housing by removing governmental constraints	HE1.1 HE1.4	Planning Department	General Fund (staff time)	Implementation: immediate Revised Zoning Code: by 2025 (prior to sunset of SB 330)

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-C Water and Sewer Access The City will continue to give priority access to water and sewer infrastructure to projects that include affordable housing units. As required by State law, the City shall deliver the adopted housing element to water and sewer providers, including a cover memo describing the City's housing element, as well as the City's housing needs and regional housing need. [Existing Program HE1.C, modified]	· Establish specific procedures providing priority access to water and sewer infrastructure to developments with units affordable to lower-income households, as required by State law. Provide water and sewer providers with the adopted housing element, including cover memo, as required by State law.	HE1.3 HE1.4	Planning and Public Works Departments	General Fund (staff time) Water and Sewer Enterprise Funds	Establish procedure: by 2025 Provide providers with housing element: immediately upon adoption
H-D Road and Utility Improvement Coordination The City will continue to work with private property owners/developers to plan for road and utility improvements necessary to support housing on sites identified for lower-income housing, in the event these sites are developed. Funding for off-site improvements will be provided through development impact fees. The City shall annually evaluate funding levels and potential opportunities for use of the funds in line with this program. [Existing Program HE1.E]	During the planning period, encourage the development of: · 4 very low-income units · 4 low-income units · 4 units identified for seniors, farmworkers, or persons with disabilities	HE1.2 HE1.3	Planning Department	General Fund (staff time)	Throughout the planning period, as needed Evaluate funding levels and opportunities: annually

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-E Streamline Special Needs Housing The City will apply streamlined ministerial review to housing developments that meet the needs of lower income households and special needs groups, such as seniors, people with disabilities, farmworkers, and homeless families and individuals. The City shall evaluate the streamlined review policy every two years to identify constraints on special needs housing production. The City shall provide priority processing to development applications that work to provide housing for residents with special housing needs. The City shall also support these applicants by providing technical support through the entitlement process and shall provide additional density bonuses and modifications to development standards (beyond State law) to special needs housing projects proposed on the western half of the city, where fair housing issues are less concentrated. [Existing Program HE1.F, modified]	During the planning period, encourage the development of: · 15 very low-income units · 8 low-income units · 6 units identified for seniors, farmworkers, or persons with disabilities Address the lack of affordable housing types in the city Address the lack of farmworker housing in the city Provide incentives that work to overcome concentrations of affordable housing on the eastern portion of the city.	HE1.4	Planning Department	General Fund (staff time)	Evaluate constraints: every two years Apply streamlined review: throughout planning period

H-F Municipal Code Updates The City will review and amend the Municipal Code, to comply with State law to: · Allow low barrier navigation centers for compliance with Government Code Sections 65660 and 65668 (AB 101). · Allow for residential care facilities of six or fewer in zones allowing single-family uses, subject only to the requirements of single-family uses, in compliance with State law (HSC § 1568.0831); and permit facilities with seven or more beds in all residential zones with objectivity and certainty similar to other residential uses of the same form · Update Chapter 17.144 (Affordable Housing) to reflect new maximum density bonus tier framework in compliance with California Government Code Sections 65915 through 65918. · Amend the Zoning Ordinance to define "family" as one or more persons living together as a single housekeeping unit in a dwelling unit. The definition should not distinguish between related and unrelated individuals and should not impose a numerical limit on the number of persons that constitute a family. · Update parking requirements related to emergency shelters for compliance with Government Code section 65583, subdivision (a)(4)(A) to require only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones. · Allow accessory dwelling units in all zones allowing residential uses, including the AP Zone, mixed-use and commercial zones.	Amend the Municipal Code for compliance with State law by 2025 Address the lack of affordable housing types in the city by removing governmental constraints to housing production Amend the inclusionary housing ordinance to update in-lieu fees to reflect real costs of developing affordable housing, provide incentives to construct workforce housing, and provide more on-site housing requirements for affordable housing development	HE1.4 HE6.1	Planning Department	General Fund (staff time)	By 2025

Agenda Item #5.2.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
· Update Chapter 17.116.030 (Accessory Dwelling Units) for compliance with Government Code section 65852.2. · Update Chapter 173.200 (Reasonable Accommodation) to remove discretionary finding requirements that constrain development, including finding #5, which considers impacts to surrounding properties or uses. · Incorporate objective design standards for single-family, small lot, and multifamily developments that provide a ministerial design review process · Provide a by-right streamlined review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330. · Allow permanent and supportive housing pursuant to Government Code section 65661 without discretionary action. [Existing Program HE1.K, expanded]					
H-G Safety Element Update The City will, in accordance with SB 1035, update the General Plan Safety Element to include any new information on fire and flood hazards, as well as climate adaptation and resiliency strategies. In accordance with SB 99 and AB 747, the updated Safety Element will also include evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. [New Program]	Update the Safety Element by 2024	HE1.4	Planning Department	General Fund (staff time)	2024

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-H Workforce and Farmworker Housing The City will identify and adopt, as appropriate, incentives for development to address the housing needs of "workforce" and farmworker households, with priority given to projects in lower-density higher income on the western half of the city.. As part of this effort, the City will explore the feasibility of adding an above moderate-income workforce housing component to the Inclusionary Housing Ordinance requirements and amend the Ordinance as appropriate. [Existing Program HE1.H, modified]	Identify and adopt, as appropriate, development incentives such as higher density and height allowances, a streamlined design review process, and financial incentives, including fee reductions and waivers and contributions from the City's Housing Trust Fund, to encourage the development of workforce and farmworker housing, including additional incentives for those projects in low-density high-income areas Encourage the development of: · 10 units identified for workforce or farmworker housing during the planning period · 2 workforce housing developments in low-density high-income areas Address the lack of affordable housing types in the city Address the lack of farmworker housing in the city	HE1.4	Planning Department	General Fund (staff time)	By 2025

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-I ADU Workforce Housing Incentive Program The City will implement a program to provide financial assistance for the development of accessory dwelling units in exchange for affordability restrictions that will provide workforce housing. Potential funding sources include, but are not limited to, Housing Trust Funds and Transient Occupancy Tax revenues. To encourage housing mobility and housing choice, the City shall provide marketing of the ADU Workforce Housing Program (and financial incentives) targeted at low-density areas of the city, with particular emphasis on the western half of the city where fair housing issues and existing affordable units are less concentrated. As part of this effort, the City shall hold up to two multi-lingual engagement events. [Existing Program HE1.I]	Establish an ADU Workforce Housing incentive program Market financial incentives to residents in LR and MR zones, particularly on the western portion of the City in combination with Programs H-Q and H-R, encourage the development of: · 80 accessory dwelling units, targeting 60 on the western portion of the city · 20 ADUs with affordability restrictions during the planning period, including 15 within the western portion of the city. · 15 ADUs near downtown Address the lack of affordable housing types in the city Address the lack of farmworker housing in the city	HE1.4	Planning Department	Housing Trust Funds Transient Occupancy Tax State and Federal workforce housing programs State and Federal grant funding	Establish program: by 2025 Provide marketing and engagement events: 2025

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-J Non-traditional Housing Types The City will encourage development of co-housing, ecohousing, a 'green' manufactured home, and other forms of housing, and will ensure these housing types are considered in the city's streamlined approval process. The City will evaluate and update, as appropriate, current zoning practices to remove constraints to non-traditional housing types. The City will also amend the zoning code to provide objective standards for residential development that work for a variety of housing types, including non-traditional housing types. [Existing Program HE1.J, modified]	Evaluate current zoning practices to identify constraints to non-traditional housing types by 2025. Amend the zoning code to remove constraints and provide objective design standards by 2026. Encourage the development of: · 10 missing middle units on infill parcels or in areas within the western portion of the city, consistent with AFFH. · 4 non-traditional housing units during the planning period. Address the lack of affordable housing types in the city	HE1.5	Planning Department	General Fund (staff time)	Encourage non-traditional housing types: throughout the planning period Evaluate zoning: by 2025 Amend zoning: by 2026
H-K Non-Vacant Sites The City shall adopt a policy(ies) to incentivize new or more intense development on sites included in the sites inventory as lower-income capacity, including sites 7, 9, and 11 (for sites 1 and 2, see Program H-L. Incentives may include, but are not limited to, reducing development standards, providing flexible parking standards, priority processing, or deferred fees. The City shall engage property owners within six months of adoption to discuss constraints and potential incentives.	Adopt policies that Incentivize the development of new or more intense uses on non-vacant sites identified as lower-income capacity to meet the RHNA. Encourage the construction of 42 new lower-income units on sites 7, 9, and 11, including 32 on the western portion of the city	HE 1.1 HE 1.2 HE 1.3	Planning Department	General Fund (staff time)	Engage property owners: within six months of adoption Adopt incentives: 2024

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-L City-owned Sites The City will maintain compliance with the Surplus Land Act throughout the 2023-2031 Housing Element planning period. The City will assess the appropriateness of and consider implementing the following: outreach opportunities with housing developers, requests for proposals, development incentives, fee waivers, priority processing, and financial assistance (when available) to facilitate and incentivize developers to develop housing units on City-owned sites. The City plans to make 3 properties available through the Surplus Land Act process over the next two years for a potential development of 57 lower-income units. The City shall conduct studies of City owned sites included in the sites inventor to determine the most efficient use for housing. These include sites 1, 2, and 3. Through this process, the City shall engage local affordable housing developers to determine site constraints and potential policies to meaningfully incentivize affordable housing development on these sites. The City shall proceed with the findings for housing development by 2026. The City anticipates two-and-a-half years to enter into an Exclusive Negotiation Agreement (Fall 2026), and one-and-a-half additional years for land use entitlements and development agreements (Spring 2028). City owned sites included in the inventory (sites 1-3) shall be rezoned incompliance with Govt. Code Section 65583.2(h) and (i) within three years of the adoption deadline (by January 31, 2026.	Engage local affordable housing developers immediately Study city owned sites to determine the most efficient use for affordable housing development within the first year following adoption By 2026, implement an action plan to sell, or release an RFP to develop, City owned land for affordable housing development based on the findings of the conducted studies. Through the action plan, establish and implement a variety of incentives to facilitation housing development. Maintain compliance with the Surplus Land Act throughout the 2023-2031 Housing Element Planning Period Make properties available through the Surplus Land Act process Target Exclusive Negotiating Agreement by Fall 2026 Target land use entitlements issuance by Spring 2028 Encourage the development of 57 lower-income units in the northeast quadrant of the city near transit opportunities, and where fair housing issues are less concentrated, and walkability and environmental scores are more positive	HE 1.1 HE 1.2 HE 1.3	Planning Department	General Fund (staff time)	Engage developers: immediately upon adoption Conduct studies: by July 2025 Implement action plan and incentives for City owned sites: by 2026 Rezone sites: by Jan. 31, 2026

Goal 2 High-Quality Neighborhoods with a Balance of Housing Types

To plan for a balance of housing types throughout the community. [Existing Goal, modified]

Policies

HE 2.1 Encourage higher density development. [Existing Policy HE 2.1, modified]

HE 2.2 Promote higher density development opportunities in low density, high resource areas. [New Policy]

HE 2.3 Promote mixed-use developments. [Existing Policy HE 2.3]

HE 2.4 Promote accessory dwelling unit (ADU) production. [Existing Policy HE 2.4, modified]

HE 2.5 Allow duplexes to the extent required by State law in all single-family residential zones consistent with SB 9. [New Policy]

HE 2.6 Promote the development of missing middle housing with an area median income target of 120 percent (moderate income). [New Policy]

HE 2.7 Promote a balance of housing types and unit sizes throughout the community. [Existing Policy HE 2.6, modified]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
H-M Incentives for Lower-Cost Housing Types The City will continue to provide incentives for higher density housing and will explore possible incentives for building attached market rate housing units for rent and for sale. Incentives may include, but are not restricted to, fast tracking development applications, deferred development fees, reduced parking and/or other city standards, and density bonuses. [Existing Program HE2.A]	Encourage the development of 20 lower income units during the planning period Study potential incentives for attached market rate units by 2027 Address the lack of affordable housing types in the city	HE2.1	Planning Department	General Fund (staff time)	Throughout the planning period Attached market-rate housing study by 2027

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
H-N Zoning to Facilitate Higher Density Housing The City will modify the Zoning Code to facilitate higher density housing, consistent with the 2040 General Plan Update and Housing Sites Analysis, and discourage the construction of oversize homes, particularly within the western portion of the city, consistent with AFFH. The City shall revise maximum lot coverage to 55 percent and maximum height to 42 feet in the HR zone and on key housing sites in the MR zone (see Section 17.40.020(N)). The City shall revise the zoning code to allow minor modifications of up to 10 percent increase in lot coverage standards and 5 percent (or two feet, whichever is greater) in maximum height. Minor modifications shall be approved by the Community Development Director without a public hearing. The City shall reduce parking requirements for multifamily uses with three or more units to require one parking space for studio or one-bedroom units. The City shall revise Section 17.40.020 to allow duplexes and triplexes and densities of 5.1 to 16 dwelling units per acres in the MR zone without a conditional use permit. [Existing Program HE2.B, modified]	Modify the development standards within the Zoning Ordinance to encourage higher density developments by 2026 Develop land use patterns that work to overcome geographic concentrations of lower-and moderate-income earning populations Address the lack of affordable housing types in the city	HE2.1 HE2.2	Planning Department	General Fund (staff time)	By 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
H-O Exemptions from Minimum Density The City will amend zoning regulations to prohibit exemptions from minimum density requirements. [Existing Program HE2.C]	Prohibit exemptions from minimum density requirements Encourage development patterns that work to overcome geographic concentrations of lower-and moderate-income earning populations	HE2.1 HE2.2	Planning Department	General Fund (staff time)	By 2026
H-P Mixed-use Development Types The City will amend the Zoning Code to create and implement the development criteria set for mixed use development within St Helena. [Existing Program HE2.G, modified]	Amend the Zoning Ordinance to create and implement the development criteria set for mixed use development by 2026 Encourage the development of 20 housing units in mixed-use projects during the planning period Explore and adopt, as appropriate, development incentives such as higher density and height allowances, a streamlined design review process, and financial incentives, including fee reductions and waivers and contributions from the City's Housing Trust Fund, to encourage employers to provide on-site employee housing Address the lack of affordable housing types in the city	HE2.3	Planning Department	General Fund (staff time)	By 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
H-Q Direct Assistance for ADU Development The City will continue to provide financial incentives, such as fee waivers and pre-approved plans, for ADU development. The City will also explore additional options such as covering the cost of a feasibility consult or the license fee for pre-approved plans, or capping total fees. The City will work with Napa Sonoma ADU to provide public information regarding ADUs on the City website, including a guide for homeowners explaining the benefits and procedures for adding an ADU and links to resources, including the ADU Feasibility Calculator, Home Match Program, and Standard ADU Plans Program. [Existing Program HE2.J, modified]	Provide direct financial incentives to 10 ADU projects in the planning period Explore additional financial incentives by 2025 Provide informational materials and technical assistance regarding the development of ADUs to 30 households in low-density western portions of the city within the planning period Address the lack of affordable housing types in the city	HE2.4	Planning Department	Housing Trust Fund General Fund (staff time)	Explore additional incentives: by 2025 Provide information al materials: by 2025 Engage Napa Sonoma ADU: annually

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
H-R Place-based ADU Strategy The City will target specific areas for ADU incentives and will create incentives to construct ADUs in the low- and medium-density areas near downtown as well as in low-density higher-income areas of the city, particularly on the western portion of the city. Potential incentives include, but are not restricted to, fast tracking development applications, deferred development fees, and reduced parking and/or other city standards. [Existing Program HE2.K, modified]	Establish place-based ADU strategies and incentives by 2026 In combination with Program H-I and H-Q, the development of: · 80 accessory dwelling units, targeting 60 on the western portion of the city · 20 ADUs with affordability restrictions during the planning period, including 15 within the western portion of the city. · 15 ADUs near downtown Proactively work to overcome concentrations of lower- and moderate-income earning households Proactively work to relieve displacement pressures on multifamily zones	HE2.2 HE2.4	Planning Department	General Fund (staff time)	Establish program: by 2026
H-S Affordability Requirements for ADU Incentives The City will link financial incentives and development standard variances to affordability requirements for ADUs. Whenever the City assists in the development of an ADU through financial incentives or by granting a variance, the City will require that either the main house or the ADU is used as a rental unit affordable to lower- and moderate-income households for a minimum of five years through an affordable housing regulatory agreement with the City. [Existing Program HE2.M, modified]	Update the zoning ordinance to include affordability requirements for ADU projects receiving financial or regulatory incentives by 2026 Incentivize the development of: · 12 very low-income units · 14 low-income units · 6 moderate income units	HE2.4	Planning Department	Housing Trust Fund General Fund (staff time)	By 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
H-T Illegal Housing Units The City will continue to respond to complaints regarding illegal units. Additionally, the City will work with the property owners to help bring illegal units up to code and to abate the use of non-habitable buildings as living units. [Existing Program HE2.N]	Respond to complaints regarding illegal units Provide technical and financial support to assist five lower income units to be brought up to code within the planning period	HE2.4	Planning and Building Department	General Fund (staff time) Housing Trust Fund	Throughout the planning period
H-U Place-based Density Increases The City will revise the Zoning Code to allow urban lot splits, duplexes, and other two-unit projects in single-family residential zones in accordance with Senate Bill 9. The City will also adopt incentives, which may include fee reductions, deferrals, or waivers; flexible development standards; priority processing, or allowing triplexes on single-family lots if one unit ensures affordability to lower- or moderate-income renters by deed restriction. The City shall publicize informational materials outlining policies and incentives on the City website and through mailing lists and social media outlets. [New Program]	Adopt incentives for small multi-unit SB 9 projects in single-family zones by 2024 Publicize informational materials by 2024; update within 30-days of changes Revise the Zoning Code by 2026 Proactively work to overcome concentrations of lower- and moderate-income populations Proactively work to relieve displacement pressures in multifamily zones	HE2.2 HE2.5	Planning Department	General Fund (staff time)	Allow duplexes: by 2024 Adopt incentives: by 2024
H-V Multi-unit Development in Low-density Higher-income Areas The City will encourage the development of affordable housing on in-fill parcels and in low-density areas in the western portion of the city, in line with the City's commitment to affirmatively further fair housing. As part of this effort, the City will explore and adopt, revisions to development	Post an inventory of potential housing sites on the City's web site immediately following adoption of the Housing Element Explore revisions to development standards to encourage multi-unit infill development (as part of comprehensive zoning code update) by 2026	HE2.2, HE2.6	Planning Department City Council	General Fund (staff time)	Housing sites posted to website in 2023 Standards update: 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
standard to encourage multi-unit developments within existing neighborhoods throughout the city. The City will also explore additional incentives to encourage affordable multi-unit projects in high resource areas, including, but not limited to priority permit processing, reduced or waived development fees, reduced parking and/or other city standards, and an additional density bonus. [Existing Program HE2.P, modified]	Facilitate the development of three multi-unit lower-income housing projects on City-owned properties in the planning period Facilitate the development of five lower- or moderate-income infill projects in the planning period Address disproportionate housing needs in infill areas, including overpayment, overcrowding, and displacement risk by increasing housing opportunities; facilitate seven SB9 lot splits to increase housing opportunities in single family neighborhoods in the planning period, with a goal of facilitating development of five lower-income units on these properties Explore additional incentives for affordable multi-unit projects in low-density areas on the western portion of the city by 2026 Encourage the development of eight lower- and eight moderate income multi-family units in high resource areas or on infill parcels within the planning period Proactively work to overcome concentrations of lower- and moderate-income households on the eastern portion of the city Address the lack of affordable housing types in the city				Explore potential addition incentives: by 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
H-W Missing Middle Housing The City will review and amend the zoning code and applicable development standards to encourage and promote a mix of dwelling types and sizes, specifically missing middle-density housing types (e.g., triplexes, courtyard buildings, townhomes, live/work) to create a diversity of housing types and densities and increase the availability of affordable housing to reduce displacement risk for residents overpaying for housing. Specifically, the City will add a new mixed use zone, consistent with the 2040 General Plan Update, and will evaluate and revise minimum lot sizes and parking ratios, particularly in high resource, low-density areas. [New Program]	Revise zoning standards to encourage missing middle housing by 2026 To enhance housing mobility and housing choice, encourage the development of a variety of missing middle housing types in infill projects; support the development of three missing middle housing developments between three and 20 units To enhance housing mobility, encourage the development of 15 lower- and 15 moderate-income units in low-density high-income areas	HE2.2 HE2.6 HE2.7	Planning Department	General Fund (staff time)	Revise Zoning Code: by 2026

Goal 3 Conservation of Existing Housing

Improve and conserve existing housing, with particular attention to the rehabilitation and retention of existing affordable units. [Existing Goal]

Policies

HE 3.1 Protect the existing stock of affordable and market rate housing. [Existing Policy HE 3.1]

HE 3.2 Support the conservation of existing housing units for those with special housing needs, including seniors and others with special housing needs. [New Policy]

HE 3.3 Monitor housing conditions. [Existing Policy HE 3.2]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-X Condominium Conversion The City will continue to restrict the conversion of rental units to condominiums. Current policy allows conversion to condominiums under certain circumstances when the vacancy rate is high. Because the presence of second homes within the community results in an inflated vacancy rate, the City will update the current policy to eliminate the linkage to vacancy rates. To work to reduce displacement pressures in lower-resourced areas, the revised policy will completely restrict all conversions in the eastern portion of the city. [Existing Program HE3.A]	Preserve existing affordable housing stock Update current policy to remove linkage to vacancy rates Completely restrict condominium conversion in the eastern portion of the City Address the lack of affordable housing types in the city	HE3.1	Planning Department	General Fund (staff time)	Update policy by 2026
H-Y Affordable Housing Impact Fee The City will continue to charge an affordable housing impact fee whenever housing units are converted to other uses. The City will exempt conversion projects that create affordable for-sale housing from this impact fee. Collected affordable housing impact fees will be used for the preservation and development of housing opportunities affordable to lower- and moderate-income households, and will give priority to projects in the eastern portion of the city where fair housing issues, and displacement risks exist in greater concentrations. [Existing Program HE3.B]	Evaluate the impact fee against the real cost of affordable housing development every two years Discourage the conversion of residential uses to nonresidential uses Address the lack of affordable housing types in the city by working to retain existing units or generating funding for future affordable units	HE3.1	Planning Department	General Fund (staff time)	Throughout the planning period Evaluate impact fee: every two years

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-Z At-Risk Assisted Affordable Housing Units Although there are no assisted affordable units currently at-risk of conversion to market rate in St. Helena, the City with the assistance of the Napa Housing Authority, shall continue to monitor assisted properties. If units are identified as at-risk of conversion, the City will work with the property owners and/or other parties to ensure that they are conserved as affordable housing. The City will also engage with owners of deed-restricted moderate-income for-sale units (Marietta Townhomes and Voorhees Circle) at-risk of conversion to market rate within the planning period. The City will work with owners to find solutions to extend affordability requirements. [Existing Program HE3.C, modified]	Unless consistent with the terms of an affordable housing agreement with the City of St. Helena, prohibit the conversion of assisted affordable units to market rate Retain all assisted affordable units during the planning period Immediately (by 2024) engage homeowners with expiring deed-restrictions	HE3.1	Planning Department	General Fund (staff time)	Engage at-risk property owners: immediately, and twice annually thereafter
H-AA Vacation Rentals The City will continue to limit the conversion of market rate housing to vacation rentals and will abate the use of illegal vacation rentals, including time shares and fractional interests. To preserve existing affordable housing and reduce displacement pressures, the City shall adopt a policy restricting conversion of units occupied by lower- and moderate- income households in the southeast quadrant of the city to vacation rentals. [Existing Program HE3.D]	Maintain the current stock of market rate housing Restrict the conversion of housing units to vacation rentals occupied by lower- and moderate-income households in the southeast quadrant of the city where fair housing issues exist in greater concentrations Discourage the conversion of market rate housing units to vacation rentals, particularly in low-density higher-resourced areas Address the lack of affordable housing types in the city	HE3.1	Planning Department	General Fund (staff time)	Throughout the planning period

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-BB Special Housing Needs Rehabilitation Program The City shall actively pursue federal and State funding sources, including CDBG, Affordable Housing and Sustainable Communities (AHSC), Permanent Local Housing Allocation (PLHA), CalHome funds, HOME, and other grant sources to establish a program to support the rehabilitation needs of seniors and others with special housing needs, particularly on the eastern portion of the city where affordable units are generally concentrated and displacement risks are increased[Source: New Program]	Pursue funding to assist with rehabilitation costs for lower income households and seniors During the Planning Period, encourage the rehabilitation/conservation of: · 20 units accessible to seniors · 10 units accessible to persons with a disability	HE3.2	Planning and Finance Departments	CDBG, AHSC, PLHA, CalHome, HOME	Annually and as notices of funding availability are released.
H-CC Annual Progress Report The City will continue to review housing needs, conditions, achievements and challenges as part of the City's regular General Plan review and Annual Housing Element Progress Report, as required by State law. [Existing Program HE3.E]	Submit the Annual Progress Report to the State Department of Housing and Community Development and the Governor's Office of Planning and Research by April 1st of each year Provide transparency on housing-related actions and programs	HE3.3 HE4.6	Planning Department	General Fund (staff time)	Annually

Goal 4 Assistance to Support Affordable Housing

To provide technical and financial resources to support development of affordable housing in our community, especially housing that meets the needs of our local workforce, people with special housing needs, and people with moderate, low, and very low incomes.

Policies

HE 4.1 Develop permanent local sources of funding to support affordable housing. [Existing Policy HE 4.1]

HE 4.2 Aggressively pursue and 'leverage' State and Federal housing funds. [Existing Policy HE 4.2]

HE 4.3 Address farmworker housing needs. [Existing Policy HE 4.3]

HE 4.4 Support housing that meets special needs, including senior citizens and persons with disabilities. [Existing Policy HE 4.4]

HE 4.5 Explore methods to increase Housing Trust Fund money. [Existing Policy HE 4.5]

HE 4.6 Provide transparency regarding information on housing-related actions, fees, and programs. [New Policy]

HE 4.7 Provide local preference in the procurement process when municipal funds may be used for housing. [New Policy]

HE 4.8 Give preference to projects providing workforce housing affordable to up to 140 percent of the AMI. [New Policy].

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-DD Revenue Generation for Affordable Housing The City will continue to generate revenues for affordable housing through the Affordable Housing Trust Fund and Transient Occupancy Tax and will continue to use the revenue to support the development or rehabilitation of affordable housing. [Existing Program HE4.B, modified]	Support the development or preservation of five extremely low or very low-income units Address the lack of affordable housing types in the city	HE4.1 HE4.5	Planning Department	General Fund (staff time) Housing Trust Fund Transient Occupancy Tax	Throughout the planning period
H-EE Reduced Fees for Affordable Housing The City will continue to reduce, defer, or waive fees for affordable housing developments and will explore and adopt as appropriate higher incentives for affordable housing developments with units affordable to extremely low- and very low-income households. [Existing Program HE4.C, modified]	Reduce fees for 30 extremely-low or very low-income units Address the lack of affordable housing types in the city	HE4.1	Planning Department	General Fund Housing Trust Fund	Evaluate and adopt, as appropriate, potential additional incentives: by 2026
H-FF Extremely Low-Income Units The City will continue to prioritize the use of the Affordable Housing Trust Fund in support of the development and preservation of regulated affordable units for extremely low-income households. The City will immediately engage with developers interested in creating or preserving housing for extremely low-income households to discuss available incentives and any financial or technical assistance the City can provide. [Existing Program HE4.D]	Support the development or preservation of six units for extremely low-income households Address the lack of affordable housing types in the city	HE4.1	Planning Department	Housing Trust Fund	Engage prospective developers: immediately upon identification

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-GG Affordable Homeownership The City will continue to pursue mortgage revenue bonds and/or mortgage credit certificates to promote affordable homeownership opportunities for moderate- and lower-income households. The City shall evaluate these opportunities and engage with potential partnering jurisdictions or institutions annually. The City shall also engage with local mortgage brokers and real estate agents to identify existing programs providing downpayment loans or direct assistance to first-time homebuyers and shall make this information available on the city's website, as well as through up to two multi-lingual engagement events targeting the eastern portion of the city. [Existing Program HE4.E]	Research and identify potential funding sources in 2024 and annually thereafter with the goal of establishing a homeownership assistance program in 2026 Collect and publicize information on existing programs available to first-time and lower-income prospective homeowners through State, Federal, or non-profit agencies within 18 months of adoption of the Housing Element; hold up to two multi-lingual events on the eastern portion of the City by 2026 Assist three lower- or moderate-income households transition from rental housing to homeownership Address the lack of affordable housing types in the city	HE4.2	Planning and Finance Departments	General Fund (staff time)	Annually Identify funding for City led program: in 2024 and annually thereafter Collect and publicize information on existing programs: within 18 months of adoption Targeted engagement events: by 2026
H-HH Additional Funding The City will continue to pursue additional funding for affordable housing and will explore new options for affordable housing funding. [Existing Program HE4.F, modified]	Explore new funding sources every two years to support housing for lower- and moderate-income households, seniors, and residents with special housing needs Address the lack of affordable housing types in the city	HE4.1	Planning and Finance Departments	General Fund (staff time)	Explore new opportunities: Every two years

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-II Section 8 Subsidies The City will continue to partner with the City of Napa Housing Authority to provide rental assistance to low-, very low-, and extremely low-income households through Housing Choice Voucher (Section 8) rent subsidy certificates. [Existing Program HE4.G]	Support the City of Napa Housing Authority rental assistance efforts; engage the Housing Authority annually to explore opportunities Provide informational materials regarding Housing Choice Voucher subsidies on the City website by 2024 Address the lack of affordable housing types in the city	HE4.2	Planning Department	General Fund (staff time)	Engage the Housing Authority: annually Informational materials: by 2024
H-JJ Housing Coordinator While the City currently contracts with the City of Napa for Housing Authority services, the City will explore the possibility of establishing a full-time, shared Housing Coordinator for the up-valley communities to: promote development of new affordable housing in low-density higher-resourced areas, assist lower-income households obtain housing in higher resourced areas, and preserve existing affordable units. The City shall enter into a cost-sharing agreement, if feasible. The position would serve all of the up-valley communities, including Napa County. [Existing Program HE4.H]	Meet with potential partner jurisdictions a minimum of two times during the planning period to explore options Identify and procure funds to establish a shared Housing Coordinator for the up-valley communities to promote affordable development in low-density higher resourced areas, assist lower-income households obtain housing in higher-resourced areas, and preserve existing lower- and moderate-income units	HE4.2	City Manager Planning Department	General Fund (staff time) CDBG, AHSC, PLHA), CalHome, HOME, and other grant sources	Engage potential partners: by 2026 Identify potential funding: by 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-KK Farmworker Housing Needs The City will contribute staff time and City resources, as appropriate, to countywide farmworker housing efforts that may occur during the Housing Element planning period. The City will reach out to affordable housing developers to support regional and City efforts to develop farmworker housing, including assisting with financing or applications, incentives and concessions, expedited review or other strategies to encourage the development of housing for farmworkers. [Existing Program HE4.I]	Support local and regional efforts to develop farmworker housing Assist in the development of one farmworker housing project during the planning period Address the lack of farmworker housing in the city	HE4.3	Planning Department	General Fund (staff time) Housing Trust Fund	Outreach to affordable housing developers by 2024 and every two years thereafter
H-LL Special Needs Housing Opportunities The City will encourage new developments to provide a portion of units to meet the special housing needs of seniors and persons with disabilities, including developmental disabilities, throughout the city. The City will provide information on available incentives on the City website and shall immediately engage individuals or agencies interested in special needs production to discuss opportunities and constraints specific to the parcel(s) being considered. [Existing Program HE4.J]	During the Planning Period, encourage the development of: · 10 units accessible to seniors · 5 units accessible to persons with disabilities Address the lack of affordable housing types throughout the city	HE4.4	Planning Department	General Fund (staff time)	Information to website: by 2025 Engage potential developers: immediately upon identification

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-MM Housing Information Transparency The City will, in accordance with AB 1483 (2019), obtain, maintain, update, and make publicly available information related to zoning ordinances, development standards, fees, exactions, affordability requirements, and fair housing laws from the Department of Housing and Community Development, State Fair Employment, and Housing Commission's enforcement program, as well as programs and funding sources for homeowners at risk of foreclosure, the State Historic Building Code, and information on energy conservation opportunities. The City will, as appropriate, share this information on the City website and/or in hard copy form at City offices. Any changes to such information shall be made public within 30 days of changes. The City will provide these items in Spanish, as funding and staff time allows. [New Program]	Create and share a digital information database in compliance with AB 1483 by 2024 Updated information is made publicly available within 30 days of changes Provide information in Spanish, as funding allows	HE4.6	Planning Department	General Fund (staff time)	Database: By 2024 and annually thereafter Update information: within 30-days of any changes
H-NN Funding for New Special Housing Needs The City shall actively pursue federal and State funding sources, including CDBG, Affordable Housing and Sustainable Communities (AHSC), Permanent Local Housing Allocation (PLHA), CalHome funds, HOME, and other grant sources to support the construction of housing for seniors and those with special housing needs. The City shall periodically review available housing programs to identify additional funding sources. [Source: New Program]	Pursue funding to assist with construction and rehabilitation needs of lower income households and seniors During the Planning Period, encourage the development of: · 20 units accessible to seniors · 10 units accessible to persons with disabilities	HE3.1 HE 4.1 HE4.2 HE4.4	Planning and Finance Departments	CDBG, AHSC, PLHA, CalHome, HOME	Annually and as notices of funding availability are release.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-OO Unit Conversion for Extremely Low-Income Households The City will continue to explore the potential of using Affordable Housing Trust Fund money to purchase existing housing for conversion to restricted affordable housing and will commit funding as appropriate. Priority for use of Affordable Housing Trust Fund monies will be given to the creation of housing affordable to extremely-low-income households, particularly within the western portion of the city, consistent with the commitment to overcome geographic income disparities. [Existing Program HE4.L]	Identify potential funding Engage with owners of local market rate multifamily units to discuss opportunities, if funding allows Assist in the conversion of two units from market rate to extremely low-income during the planning period Proactively work to overcome concentrations of lower- and moderate-income populations Address the lack of affordable housing types in the city	HE4.1	Planning Department	Housing Trust Fund General Fund (staff time)	Identify potential funding: annually Engage owners: immediately as funding and potential properties are identified
H-PP Surplus and Excess Public Land The City will, in accordance with AB 1486 (2019) and AB 1255 (2019), annually identify and inventory a list of sites owned by the City that have been sold, leased, or otherwise disposed of in the prior year. This inventory shall be publicly available and be included in the Housing Element annual report presented to the City Council and submitted to HCD. [New Program]	Regularly maintain an inventory of publicly-owned surplus or excess land on the City website Annually release information regarding publicly-owned sites that have been sold, leased, or disposed of	HE4.6	Planning Department	General Fund (staff time)	2023, with annual updates

Goal 5 Resource Conservation

To promote resource conservation by encouraging housing types and designs that use fewer resources (water, electricity, etc.) and therefore cost less to operate over time, supporting long-term housing affordability.

Policies

HE 5.1 Encourage alternative energy sources. [Existing Policy HE 5.1]

HE 5.2 Encourage energy and resource conservation. [Existing Policy HE 5.2]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-QQ Green Building Ordinance The City shall update the Green Building Ordinance, as necessary, to meet or exceed periodic updates to the State's Green Building Standards Code (CalGreen). [Existing Program HE5.A, modified]	Ensure compliance with CalGreen throughout the planning period	HE5.1	Planning and Building Department	General Fund (staff time)	Throughout the planning period, as necessary
H-RR Alternative Energy Technologies The City will continue to encourage the use of alternative energy technologies and will explore incentives for the use of solar energy in new and rehabilitated housing. Incentives to adopt as appropriate include, but are not restricted to, ensuring a streamlined review process for applications, allowing applications to be submitted via email and paid by phone, deferred fees, and reduced applicable city standards. [Existing Program HE5.B, modified]	Encourage alternative energy technologies in new and existing developments Explore additional incentives for solar installation	HE5.1	Planning and Building Department	General Fund (staff time)	Explore and adopt incentives, as appropriate: by 2026
H-SS Alternative Energy Technology Information The City will continue to provide public information on energy conservation and alternative energy technologies to residential developers, contractors, and property owners. [Existing Program HE5.C]	Provide information on the City website and at City Hall regarding energy conservation, alternative energy technology options, possible sources of financing, and any applicable information regarding necessary local permits	HE5.1	Planning and Building Department	General Fund (staff time)	2023; updated annually thereafter

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-TT Cost-Effective Energy Conservation The City will continue to require cost-effective energy conservation measures in all new and rehabilitated housing to promote long-term affordability for occupants. The City will adopt the State's new Energy Efficiency Standards as part of any update to the California Building Standards Code and ensure that all new housing units constructed in the City meet or exceed these standards. [Existing Program HE5.D]	Promote long-term affordability Adopt updated State energy efficiency and building code standards, as necessary, throughout the planning period	HE5.2	Planning and Building Department	General Fund (staff time)	Every three years beginning in 2023
H-UU Energy Conservation Measures The City will continue to participate in AB-811 programs and will explore additional state and federal sources of funding to finance local energy conservation measures. Sources of state and federal funds include, but are not limited to, the California Energy Commission State Energy Program and Energy Efficiency and Conservation Block Grant Program, and the Low-Income Home Energy Assistance Program. [Existing Program HE5.E]	Identify and procure additional funding to support energy conservation measures Provide information on available assistance programs on the City website by 2024 Assist three households, through financial or technical assistance, with the implementation of energy conservation measures	HE5.2	Planning and Finance Departments	General Fund (staff time) State and Federal Grant Funds	Throughout the planning period Explore funding: annually Provide information on assistance programs: by 2024
H-VV Water Conservation The City will continue to apply Municipal Code provisions pertaining to water resources, including requirements for water-efficient landscaping for new residential and commercial construction, as well as implementing the "Water Neutrality" policy for all new development. [Existing Program HE5.H]	Reduce water consumption Require water-efficient landscaping Implement the "Water Neutral" policy Implement the Water Efficient Landscape Ordinance (WELO)	HE5.2	Planning and Public Works Departments	General Fund (staff time)	Throughout the planning period

Goal 6 Affirmatively Furthering Fair Housing

To assure that housing programs maximize opportunity and housing choice throughout the city and proactively work to overcome patterns of economic segregation and discrimination based upon age, sex, race, sexual orientation, religion, familial status, ethnic background, or disability. [Existing Goal, modified]

Policies

HE 6.1 Support equal housing opportunities for all residents of St. Helena. [Existing Policy HE 6.1]

HE 6.2 Support the fair housing services provider. [New Policy]

HE 6.3 Support regional efforts to affirmatively further fair housing. [New Policy]

HE 6.4 Ensure public investments are equitably distributed throughout the community. [New Policy]

HE 6.5 Consider affirmatively furthering fair housing goals in all housing related decisions. [New Policy]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-WW Affirmatively Furthering Fair Housing The City shall address disparities in housing needs and access to opportunity for all persons regardless race, color, religion, sex, national origin, familial status, disability gender, gender identify, gender expression, sexual orientation, marital status, ancestry, veteran or military status, source of income, and genetic information as protected categories by the California Fair Employment and Housing Act (Part 2.8 [commencing with Section 12900] of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. The City identified barriers to fair housing through the Affirmatively Furthering Fair Housing Assessment. Actions the City will take to address the identified barriers and foster an inclusive community, include: · Concentrations of Lower- and Moderate-income Earning Populations: H-A, H-B, H-N, H-O, H-R, H-U, H-V, H-W and H-OO. · Insufficient Housing Stock for Farmworkers: H-E, H-H, H-I, and H-KK. · Lack of Affordable Housing Types: H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-N, H-P, H-Q, H-V, H-X, H-AA, H-DD, H-EE, H-FF, H-GG, H-LL, H-NN, and H-OO. · Fair Housing Enforcement and Outreach: H-T, H-II, H-JJ, H-WW, and H-XX. · Limited Resources for Persons with Disabilities: H-BB, H-LL, and H-NN; as well as objectives D, F and G in this program.	A) Work to coordinate annual meetings with jurisdictions and fair housing providers in the county to assist with and participate in promoting fair housing opportunities through pursing potential funding opportunities and joint efforts aimed at educating the community about fair housing issues and resources B) Promote the availability of bi-lingual resources by ensuring that City-provided services and materials are available in Spanish and that information is included regarding the availability of interpretation or translation services C) Facilitate development of multifamily housing on the western portion of the city by providing developers with information on incentives for affordable multifamily development and maintaining a list of available sites (for metrics, see Program H-V) D) Use local permitting and approval processes to ensure all new multifamily construction, as well as ADUs, meet the accessibility requirements of the federal and state fair housing acts; with the goal of facilitating the development of 30 units accessible to seniors and other residents with special housing needs E) Affirmatively recruit a diverse and multi-lingual staff, as positions become available F) Work with Napa Valley Transportation Authority to explore lowering ridership costs for the VineGo paratransit system	HE6.1 HE6.2 HE6.3 HE6.4 HE6.5	City Council City Manager Planning Department	General Fund (staff time)	A and H: annually C: engage with developers twice within the planning period D: by 2027 F and G: Every two years

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
· Place-based Strategies for Community Preservation and Revitalization and Displacement Protection: H-A, H-I, H-J, H-N, H-Q, H-R, H-U, H-V, H-W, and H-WW. The City has included additional objectives with this program. The City shall monitor progress toward these objectives annually in the Annual Progress Report and shall implement additional measures as necessary. [New Program]	G) Work with the County of Napa to carry out an ADA self-evaluation and transition plan to remove barriers for persons with disabilities to facilities and programs in Napa County H) Prioritize capital improvement projects for public infrastructure improvements that facilitate affordable housing development in the eastern portion of the city				
H-XX Fair Housing Provider The City will continue to utilize and support Fair Housing Napa Valley as the City's fair housing service provider, responsible for implementing fair housing programs, receiving complaints, and providing referrals to available resources when necessary. The City will work with the Fair Housing Napa Valley to provide educational materials to educate real estate professionals, property owners and tenants on their rights and responsibilities and the resources available to address fair housing issues. [Existing Program HE6.A, modified]	Provide direct funding to Fair Housing Napa Valley with of goal of providing up to $80,000 over the planning period Support fair housing investigations with a goal of assisting with five investigations of existing affordable developments for rent in the southeast quadrant of the city and fair housing issues are more concentrated and displacement risk is higher Provide multi-lingual informational materials to the public regarding tenant rights, fair housing issues, and resources on the City's website and hold one multi-lingual engagement event to present the information targeting residents in the eastern portion of the city Provide a link to Fair Housing Napa Valley on the City's website	HE6.2	City Manager Planning Department	General Fund	Engage Fair Housing Napa Valley: annually Informational materials to City website: by 2024 Engagement event: 2025

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-YY Replacement Unit Program The City will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions: • currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and • was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or • subject to any other form of rent or price control through a public entity's valid exercise of its police power, or • occupied by low or very low-income households	In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development.	HE3.1 HE6.1	Planning Department	General Fund	Implement: immediately Adopt policy: by January 31, 2024

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-ZZ Lot Consolidation To expand opportunities for additional affordable housing, the City will encourage the consolidation of small parcels to accommodate larger-scale and higher density developments that are compatible with existing neighborhoods. The sites inventory includes five parcels equating to 39 lower- and 39 moderate-income RHNA units. These sites were identified based on common ownership and contiguous lots. While all five parcels are within moderate resource areas, two of these parcels (site 9) are located on the western portion of the city, an area with fewer fair housing issues, and adjacent to Spring Street in proximity to high-quality transit opportunities. While these parcels will be processed by-right pursuant to Gov. Code section 65583(c)), the City will also implement other efforts to facilitate and encourage lot consolidation.	Post the sites on the City's website by October 2023 and provide list to interested developers when requested, and review annually for accuracy Develop and implement incentives for lot consolidation by January 2024 such as fee waivers, reduced development fees, expedited permit processing, greater density bonus incentives, and modifications to parking, height, or setback standards Facilitate lot consolidation for high density residential developments by providing appropriate assistance to developers to encourage negotiations between property owners Encourage the development of 39 lower- and 39 moderate income units during the planning period. To increase housing mobility and opportunities in areas where fair housing issues are less concentrated, encourage the development of 15 lower- and 15 moderate-income units on the western portion of the City	HE 1.3 HE 4.6 HE6.1	Planning Department	General Fund Housing Trust Fund	Post sites to website: by Oct. 2023 Implement incentives: by 2024
H-AAA Permit Streamlining Act The City shall amend the Municipal Code to specify who is responsible for making CEQA determinations and within the timeframes of PRC 21080.1 and PRC 21080.2; and determination of when the PSA is triggered per Government Code 65950(a)(5) the Permit Streamlining Act (PSA).	Amend the municipal code for compliance with State law within 18 months of adoption of the Housing Element	HE 1.3 HE 4.6	Planning Department	General Fund (staff time)	Within 18 months of adoption of the 2023-2031 Housing Element

Quantified Objectives

Quantified Objectives by Type

One of the requirements of State law (California Government Code, Section 65583[b]) is that the Housing Element contains quantified objectives for the maintenance, preservation, improvement, and development of housing. State law recognizes that the total housing needs identified by a community may exceed available resources and the community's ability to satisfy this need. Under these circumstances, the quantified objectives need not be identical to the total housing needs, however, the quantified objectives shall establish the number of housing units by income category that can be realistically constructed, rehabilitated, and conserved. The City has established quantifiable objectives in implementation programs throughout the policy document. This section summarizes new construction, conservation, and special needs housing objectives for the 2023-2031 planning period.

New Construction Objectives

Extremely low-income	33 units	166 lower-income units	302 total units
Very low-income	73 units		
Low-income	60 units		
Moderate-income	44 units	136 moderate and above-moderate units	
Above moderate-income	92 units		

Rehabilitation and Conservation Objectives

- Conservation of all existing affordable housing units.
- Conserve 200 manufactured homes at manufactured home parks.
- Rehabilitation of 20 units for seniors and 10 units for persons with a disability

Assistance for Special Needs Households

- 35 units of senior housing
- 18 units for persons with a disability
- 12 units for farmworkers
- Assist in the conversion of two units from market rate to extremely low-income during the planning period.
- Assist three lower- or moderate-income households transition from rental housing to homeownership

Quantified Objectives Summary Table

The City will strive to exceed the following targets for affordable housing development in St. Helena.

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction	33	73	60	44	92	302
Rehabilitation	10	10	5	5	0	30
Conservation/Preservation	0	120	100	231	0	451

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Part 2: Needs Assessment

Public Hearing Draft

April 2023

ST. HELENA
CALIFORNIA
HOUSING ELEMENT
2023 - 2031



Needs Assessment Contents

1. Introduction 2-7

Housing Element Purpose 2-7

Authority 2-7

Status 2-7

Consistency with the General Plan 2-8

Changes to State Law 2-8

Public Participation 2-13

2. Review of the Existing Housing Element 2-34

Housing Production During the 2015-2023 Planning Period 2-34

Progress in Implementation 2-35

3. Demographic and Economic Trends 2-58

Key Findings 2-59

Population Trends 2-59

Household Trends 2-60

Demographic Trends 2-67

Extremely Low-Income Households 2-73

Employment Trends 2-73

4. Population and Employment Projections 2-80

Key Findings 2-80

Population 2-80

Households 2-81

5. Housing Conditions 2-84

Key Findings 2-84

Existing Housing Conditions 2-85

6. Housing Market Conditions 2-97

Key Findings 2-97

For-Sale Housing 2-97

Rental Housing 2-101

7. Special Housing Needs 2-108

Key Findings 2-108

People with Disabilities 2-109

People Living with Developmental Disabilities 2-110

Seniors 2-112

Large Households 2-115

Female-Headed Households 2-118

Farmworkers 2-121

Extremely Low-Income Households 2-123

Persons Experiencing Homelessness 2-124

Non-English Speakers 2-128

8. Non-governmental and Governmental Constraints 2-130

Key Findings 2-130

Non-governmental Constraints 2-131

Governmental Constraints 2-134

9. Opportunities for Energy Conservation 2-171

10. Zoning for a Variety of Housing Types 2-173

Key Findings 2-173

Multiple-Family Rental Housing 2-173

Density Bonuses for Affordable Housing 2-173

Housing for Permanent and Seasonal Agricultural Employees 2-174

Zoning for Emergency Shelters, Transitional Housing, and Supportive Housing 2-174

Residential Care Facilities 2-175

Low Barrier Navigation Centers 2-176

Single Room Occupancy (SRO) 2-176

Factory Built Housing and Mobile Homes 2-177

Accessory Dwelling Units 2-177

11. Housing Resources 2-179

Future Housing Need 2-179

Residential Site Inventory 2-181

Availability of Infrastructure and Services 2-209

Environmental Constraints 2-211

References 2-212

Figures

Figure 1 Population Growth Trends, Indexed to 1990 2-60

Figure 2 Housing Tenure 2-62

Figure 3 Housing Tenure by Race of Householder 2-63

Figure 4 Housing Tenure by Age 2-64

Figure 5 Housing Tenure by Housing Type 2-65

Figure 6 Households by Displacement Risk and Tenure 2-66

Figure 7 Population Growth Trends 2-67

Figure 8 Senior and Youth Population by Race 2-68

Figure 9 Population by Race, St. Helena, 2000-2019 2-69

Figure 10 Households by Household Income Level 2-70

Figure 11 Household Income Level by Tenure 2-71

Figure 12 Poverty Status by Race 2-72

Figure 13 Jobs in St. Helena 2-74

Figure 14 Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence 2-75

Figure 15 Jobs-Worker Ratios, By Wage Group 2-76

Figure 16 Jobs-Household Ratio 2-77

Figure 17 Resident Employment by Industry 2-78

Figure 18 Unemployment Rate 2-79

Figure 19 Bay Area, Population Totals and Projections, 1990-2050, Plan Bay Area 2050. 2-81

Figure 20 Housing Type Trends 2-86

Figure 21 Housing Units by Year Structure Built 2-87

Figure 22 Occupancy Status 2-88

Figure 23 Vacant Units by Type 2-89

Figure 24 Overcrowding by Tenure and Severity 2-90

Figure 25 Overcrowding by Income Level and Severity 2-91

Figure 26 Overcrowding by Race 2-92

Figure 27 Cost Burden by Tenure 2-93

Figure 28 Cost Burden by Income Level 2-94
Figure 29 Cost Burden by Race 2-95
Figure 30 Substandard Housing Issues, St. Helena, 2019 2-96
Figure 31 Home Values of Owner-occupied Units 2-98
Figure 32 Zillow Home Value Index (ZHVI) 2-98
Figure 33 Contract Monthly Rents for Renter-occupied Units 2-102
Figure 34 Median Contract Monthly Rent 2-103
Figure 35 Map of Affordable Housing Units, St. Helena 2-105
Figure 36 Disability by Type 2-109
Figure 37 Senior Households by Income and Tenure 2-113
Figure 38 Cost-Burdened Senior Households by Income Level 2-114
Figure 39 Household Size by Tenure 2-116
Figure 40 Housing Units by Number of Bedrooms 2-117
Figure 41 Cost Burden by Household Size 2-118
Figure 42 Household Type 2-119
Figure 43 Female-Headed Households by Poverty Status 2-120
Figure 44 Farm Labor by County, Napa County 2-122
Figure 45 Racial Group Share of General and Homeless Populations, Napa County 2-125
Figure 46 Hispanic or Latinx Share of General and Homeless Populations, Napa County 2-126
Figure 47 Population with Limited English Proficiency 2-129
Figure 48 Discretionary Permit Process Flowchart 2-154
Figure 49 Residential Site Inventory Map 2-207

Tables

Table 1 Progress Toward the 5th Cycle RHNA 2-34
Table 2 Program Implementation Status pursuant to GC Section 65583 2-39
Table 3 Population Growth Trends 2-59
Table 4 Household Trends 2-61
Table 5 Average Household Size, St. Helena and Napa County 2-61
Table 6 St. Helena Regional Housing Needs Allocation 2-73
Table 7 St. Helena, Population Totals and Projections, 2010-2040, Plan Bay Area 2040 2-80
Table 8 Department of Finance Population Projections, Napa County, 2010-2050 2-80

Table 9 Plan Bay Area 2050 Population Projections, Bay Area, 2015-2050 2-81
Table 10 Table 2: St. Helena, Household Totals and Projections, 2010-2040, Plan Bay Area 2040 2-82
Table 11 Household Projections by Region, 2015-2050 2-82
Table 12 Job Totals and Projections, St. Helena and Napa County, 2010-2040 2-82
Table 13 Job Totals and Projections, North Napa County and the Bay Area, 2015-2050 2-83
Table 14 Housing Permitting from 2015-2019 St. Helena 2-86
Table 15 Affordable Home Purchase Prices by Income Level, Napa County 2-100
Table 16 Residential Properties for Sale, January 2023 2-101
Table 17 Affordable Rental Housing Units, St. Helena 2-105
Table 18 Affordable For-Sale Housing Units, St. Helena 2-106
Table 19 Residential Properties for Rent, January 2023 2-106
Table 20 Assisted Affordable Housing Developments by Conversion Risk Status, St. Helena 2-107
Table 21 People with Developmental Disabilities by Age, St. Helena 2-110
Table 22 People with Developmental Disabilities by Residence 2-111
Table 23 Households by Age 2-112
Table 24 Senior Housing Units, St. Helena. 2-115
Table 25 Migrant Worker Student Population 2-121
Table 26 Farm Labor, Napa County 2-121
Table 27 Homelessness by Household Type and Shelter Status, Napa County 2-124
Table 28 Characteristics for the Population Experiencing Homelessness, Napa County 2-127
Table 29 Students in Local Public Schools Experiencing Homelessness 2-127
Table 30 Price of Vacant Land, March 2022 2-131
Table 31 Zoning Districts that Permit Residential Uses 2-135
Table 32 Density/Intensity Standards by Zoning District 2-137
Table 33 Development Standards by Zone 2-137
Table 34 Residential Street Width Requirements 2-143
Table 35 Parking Requirements, St. Helena, Napa, Yountville 2-148
Table 36 Planning and Development Fees 2-150
Table 37 Construction Cost Summary, Cost Per Unit and Cost Per Square-Foot 2-151
Table 38 Planning Application Fees – Surrounding Jurisdictions, Single-Family and Multiple-Family 2-152
Table 39 Typical Processing Procedures by Project Type 2-155

Table 40 Timelines for Permit Procedures 2-155
Table 41 Timelines for Permit Procedures 2-156
Table 42 Housing Types Permitted by Base Zoning District 2-160
Table 43 Pending and Entitled Projects 2-180
Table 44 Progress Towards RHNA 2-181
Table 45 Site 1 Summary 2-182
Table 46 Site 2 Summary 2-184
Table 47 Site 3 Summary 2-186
Table 48 Site 4 Summary 2-190
Table 49 Site 5 Summary 2-192
Table 50 Site 6 Summary 2-194
Table 51 Site 7 Summary 2-196
Table 52 Site 8 Summary 2-198
Table 53 Site 9 Summary 2-199
Table 54 Site 10 Summary 2-201
Table 55 Site 11 Summary 2-203
Table 56 Site 12 Summary 2-205
Table 57 Summary of Housing Units 2-206
Table 58 Vacant and Nonvacant Sites 2-208

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1. Introduction

Since 1969, California Housing Element Law has required that local governments develop plans to accommodate and facilitate housing for current and future residents, at all income levels.

Housing Element Purpose

The purpose of the Housing Element is to establish a comprehensive plan to address housing needs in St. Helena over the eight-year planning period between January 31, 2023, through January 31, 2031. The Housing Element sets the policies surrounding the development, rehabilitation, and preservation of housing units that meet the needs of St. Helena residents.

The Housing Element consists of two parts, the Housing Needs Assessment and a Housing Element Policy Document. The Housing Needs Assessment identifies and analyzes the existing and projected housing needs for St. Helena and also identifies sites for housing development that are adequate to accommodate the City's regional housing needs allocation. The Housing Policy document will state goals, policies, quantified objectives, and implementation programs for the development, rehabilitation, and preservation of housing, based upon the findings of the Housing Needs Assessment and input received through public outreach. Then, throughout the eight-year planning period, St. Helena will implement a set of programs to meet the goals included in the Housing Element Policy Document.

Authority

Housing Elements are required by section 65302(c) of the California Government Code. Housing Elements are one of seven mandatory General Plan Elements. Specific requirements for Housing Elements are set forth beginning at section 65580 of the Government Code, with additional guidance provided by the State Department of Housing and Community Development (HCD). The combination of the Housing Needs Assessment and the Housing Element Policy Document will address all applicable requirements of state law.

Status

The St. Helena City Council adopted the prior Housing Element in 2015 for the planning period ranging from January 31, 2015 through January 31, 2023. Upon review of the adopted Housing Element, HCD sent the City of St. Helena a letter of compliance on May 29, 2015.[1] The 2023-2031 Housing Element Update will plan for St. Helena's housing needs through the 8-year planning period of January 31, 2023, through January 31, 2031. While the City's policies and programs guide housing development during the planning period, the City receives credit for housing units that are built during the Regional Housing Need Assessment (RHNA) projection period, which is June 20, 2022, through December 31, 2030, a period of 8.5 years.[2]

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[1] *California Department of Housing and Community Development. Housing Element Review Letters. http://www.hcd.ca.gov/hpd/hrc/plan/he/he_review_letters/. Accessed on March 11, 2014.*

[2] *California Department of Housing and Community Development. Housing Element Update Schedule. https://www.hcd.ca.gov/community-development/housing-element/docs/6th-web-he-duedate.pdf. Accessed November 2021.*

Consistency with the General Plan

California Government Code Section 65300.5 requires that a general plan be internally consistent, meaning that no conflicts exist among the elements of the plan. Government Code section 65583(c) requires that a housing element describe how consistency has been achieved among the general plan elements. The most important aspect of consistency among general plan elements is that policies and implementation measures do not conflict but support one another to achieve the overall goals and vision of a general plan.

In preparing the 2023-2031 Housing Element, the City reviewed goals and policies in the various elements of the 2040 St. Helena General Plan. With the passage of SB 1035 in 2018, the City will need to update its Safety Element to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies. Program H-G commits the city to updating the Safety Element. Additionally, the City has committed to remove the Growth Management System through Program H-B, and will need to update the Zoning Code for consistency. Consistency with the remaining components of the 2040 General Plan has been achieved through the adoption of complementary policies in each of the elements that support the goals and policies of the other elements.

Changes to State Law

The following items represent substantive changes to State housing law since the City's last Housing Element was adopted and certified. While this is not an exhaustive list, these items are state mandates that must be addressed in the Housing Element.

Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017)

SB 35 requires a streamlined, ministerial review process, or objective design standards, for qualifying multifamily, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their State-mandated RHNA. Among other requirements, to qualify for streamlining under SB 35, a project must incorporate one of two threshold levels of affordable housing: (1) 10 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for above moderate-income housing or have failed to submit an annual progress report as required under state law; or (2) 50 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for below moderate-income housing. Additionally, the Housing Element must describe the City's processing procedures related to SB 35.

The City is not subject to the requirements of SB 35 as it has successfully met its fair share of local housing needs for the fifth cycle, an accomplishment only shared with a small handful of jurisdictions statewide. The City has not adopted a streamlined approval process for multi-family units related to SB 35 or SB 330, however, it has drafted a process to comply with the law which is being codified as a part of the ongoing Zoning Code Update. The process incorporates objective design standards and ministerial review free of discretionary processes. Program H-F commits the City to amending the Zoning Code to provide a by-right streamlined review

process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330..

Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017)

These bills require additional analysis and justification of the sites included in the sites inventory of the City Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Additionally, the bills require additional analysis of non-vacant sites and additional analysis of infrastructure capacity, and by place size restrictions on all sites. The Housing Element sites inventory has been prepared in compliance with AB 879 and AB 1397.

Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)

AB 686 requires the City to administer its housing programs and activities in a manner to affirmatively further fair housing and not take any action that is inconsistent with this obligation. The City must take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities. The Housing Element must include an assessment of fair housing practices, an examination of the relationship of available sites to areas of high opportunity, and actions to affirmatively further fair housing. This Housing Element includes Program H-WW addressing fair housing and AFFH directly, and objectives to affirmatively further fair housing in programs throughout the Element. Appendix A: Affirmatively Furthering Fair Housing includes an analysis of fair housing in St, Helena.

No-Net-Loss Zoning: Senate Bill 166 (2017)

SB 166 amended the No-Net-Loss rule to require that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate the unmet RHNA. When a site identified in the Housing Element as available to accommodate the lower-income portion of the RHNA is actually developed for a higher income group, the City must either (1) identify, and rezone if necessary, an adequate substitute site or (2) demonstrate that the land inventory already contains an adequate substitute site. This Housing Element has been prepared in accordance with the No-Net-Loss rule and identifies sites that can accommodate 241 units in addition to the City's RHNA requirement of 256. Chapter 11 includes a detailed discussion of the sites inventory process.

Safety Element to Address Adaptation and Resiliency: Senate Bill 1035 (2018)

SB 1035 requires the General Plan Safety Element to be reviewed and revised to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies with each revision of the housing element. Program H-G of this Housing Element commits the City to updating the Safety Element within three years of certifying this Housing Element.

By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019)

AB 2162 requires the City to change its zoning to provide a "by right" process and expedited review for supportive housing. The bill prohibits the City from applying a conditional use permit or other discretionary review to the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater. The change in the law applies to sites in zones where multifamily and mixed uses are permitted, including in nonresidential zones permitting multifamily use. The City currently permits transitional and supportive housing within all residential, commercial, and mixed-use zones, subject only to the same conditions as residential uses, in compliance with State law..

Additionally, AB 101 requires that a Low Barrier Navigation Center development be a use allowed by right in mixed-use zones and nonresidential zones permitting multifamily uses if it meets specified requirements. The City does not currently comply with this requirement. Program H-F commits the City to update the zoning code to allow low barrier navigation centers by right in areas zoned for mixed use as well as nonresidential zones permitting multifamily uses.

Accessory Dwelling Units: Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly Bill 587 (2019), Senate Bill 13 (2019), and Assembly Bill 671 (2019)

In recent years, multiple bills have added requirements for local governments related to Accessory Dwelling Unit (ADU) regulation. The 2016 and 2017 updates to State law included changes pertaining to the allowed size of ADUs, permitting ADUs by right in at least some areas of a jurisdiction, and parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days and remove lot size and replacement parking space requirements. AB 68 allows an ADU and a junior ADU to be built on a single-family lot, if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, and prohibits fees on units of less than 750 square feet. In addition, AB 671 requires the Housing Element to include plans to incentivize and encourage affordable ADU rentals. In 2020, the City adopted updated ADU regulations which streamlined the review process for ADU construction and conversion The St. Helena Zoning Code allows ADUs in all residential zoning districts, however, to achieve compliance with California Government Code Sections 65852.2 and 65852.22, the City must allow ADUs in all zones that allow for residential uses, including the AP Zone, and any mixed-use, and commercial zones. Additionally, several areas of Chapter 17.116.030 need to be revised for compliance with State law. This includes, but is not limited to, the definition of a cooking facility, definition of an efficiency kitchen, allowing both an ADU and JADU for conversions on a lot with an existing or proposed single-family dwelling, separate conveyance of an ADU or JADU, and restricting bedroom count.

The City is currently undertaking a comprehensive zoning code update that will address these compliance issues. Program H-F in this Housing Element commits the City to revising the code for compliance with State law by 2026.

Density Bonus: Assembly Bill 1763 (2019) and AB 2345 (2020)

AB 1763 amended California's density bonus law to authorize significant development incentives to encourage 100 percent affordable housing projects, allowing developments with 100 percent affordable housing units to receive an 80 percent density bonus from the otherwise maximum allowable density on the site. If the project is within half a mile of a major transit stop, a jurisdiction may not apply any density limit to the project. AB 2345 further amended California's density bonus law to allow residential projects with some on-site affordable housing to receive a density bonus of up to 50 percent. Specifically, a residential development is eligible for a 50 percent density bonus if 11 percent of the units are very low-income, 20 percent are low-income units, or 40 percent are moderate-income units. The affordable units must remain affordable for a minimum of 55 years. In addition to the density bonus, qualifying projects will receive four regulatory incentives or concessions, depending on how much of the development includes affordable units. Specifically:

- One incentive or concession for projects that include at least 10 percent of the total units for lower-income households, at least five percent for very low-income households, or at least 10 percent for persons and families of moderate-income in a common interest development.
- Two incentives or concessions for projects that include at least 17 percent of the total units for lower-income households, at least 10 percent for very low-income households, or at least 20 percent for persons and families of moderate-income in a common interest development.
- Three incentives or concessions for projects that include at least 24 percent of the total units for lower-income households, at least 15 percent for very low-income households, or at least 30 percent for persons and families of moderate-income in a common interest development.
- Four incentives or concessions for projects where one hundred percent of all units in the development, including total units and density bonus units, but exclusive of a manager's unit or units, are for lower income households, as defined by Section 50079.5 of the Health and Safety Code, except that up to 20 percent of the units in the development, including total units and density bonus units, may be for moderate-income households, as defined in Section 50053 of the Health and Safety Code. For these projects, if it is located within one-half mile of a major transit stop, the applicant also receives a height increase of up to three additional stories (33 feet).

The City of St. Helena currently establishes density bonus provisions for affordable housing in Chapter 17.144 (Affordable Housing). The provisions in that Chapter do not reflect the new maximum density bonus tier framework that was adopted by the State in 2020. Because of this, the City is not currently in compliance and has included Program H-F to commit the City to amend the Zoning Code for compliance with California Government Code Sections 65915 through 65918. The City is currently undertaking a Zoning Code Update. The Draft Zoning Code includes density bonus provisions that comply with State law. The Zoning Code Update is currently scheduled for adoption in summer/fall 2023.

Housing Crisis Act of 2019: Senate Bill 330

SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease would preclude the jurisdiction from meeting its RHNA housing targets; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels. The Housing Element must describe the City's processing procedures related to SB 330. Please see Chapter 8: Nongovernmental and Governmental Constraints for more information.

The City has adopted an SB 330 process and checklist to streamline the design and approval of by-right multi-family units within the community, in compliance with SB 330.

Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019)

AB 1486 refines the Surplus Land Act to provide clarity and further enforcement to increase the supply of affordable housing. The bill requires the City to include specific information relating to surplus lands in the Housing Element and Housing Element Annual Progress Reports, and to provide a list of sites owned by the county that have been sold, leased, or otherwise disposed of in the prior year. AB 1255 requires the City to create a central inventory of surplus and excess public land each year. The City is required to transmit the inventory to the Department of Housing and Community Development and to provide it to the public upon request. The City has committed to transmitting the required information to HCD each year with their annual report in Program H-CC.

Housing Information Transparency: Assembly Bill 1483 (2019)

AB 1483 requires the City to publicly share information about zoning ordinances, development standards, fees, exactions, surplus public lands, fair housing resources, and affordability requirements. The City is also required to update such information within 30 days of changes. The Housing Element will report on the City's compliance with these requirements. Program H-NN specifically commits the City to providing updated information on a range of housing issues through their website and at City offices.

Emergency and Transitional Housing Act of 2019: Assembly Bill 139 (2019)

AB 139 established new criteria for evaluating the needs of the homeless population. The analysis must assess the capacity to accommodate the most recent homeless point-in-time count by comparing that to the number of shelter beds available on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing (see Chapter 7: subsection Persons Experiencing Homelessness). The bill also established new parking standards for emergency shelters. Lastly, the bill requires the Housing Element to include a review of the effectiveness of the

housing element goals, policies, and related actions to meeting the jurisdiction's special housing needs (see Chapter 2: Review of Previous Element).

The City is in compliance with State laws related to emergency shelters, supportive housing, and transitional housing. The City currently permits transitional and supportive housing within all residential, commercial, and mixed-use zones, subject only to the same conditions as residential uses, in compliance with State law. Additionally, emergency shelters are identified as a by-right use in the I and SC zoning districts.

Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)

SB 6 requires the City to electronically submit the sites inventory to HCD. The City will submit the final sites inventory to HCD with the adopted Housing Element. Program H-A commits the City to submitting an electronic copy of the inventory to HCD.

Evacuation Routes: Senate Bill 99 and AB 747 (2019)

Two recent bills, AB 747 and SB 99, require the General Plan Safety Element to be updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The bill requires these updates to occur with the 2023-2031 Housing Element Update. Program H-G commits the City to updating to the Safety Element as necessary for compliance with SB 99 and AB 747 during the 6th Housing Element cycle.

Public Participation

Section 65583(c)(5) of the Government Code states that "The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort." Public participation played a critical role in the formulation and refinement of the County's housing goals and policies.

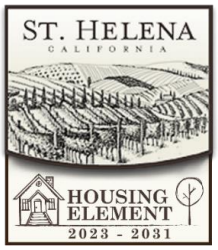
Housing issues affect the entire community – residents, employers, and the public and private sectors. The public participation requirement of housing element law presents an opportunity to engage constituents in a dialogue – defining problems and creating solutions. The inclusion of community stakeholders in the housing element public participation process helps ensure appropriate housing strategies are more efficiently and effectively evaluated, developed, and implemented. An inadequate public participation process may lead to community conflict or in worse case scenarios, anti- development initiatives, and NIMBYism. Successful public participation is important because a diverse cross section of the population can be engaged in defining the housing problem and in crafting community sensitive solutions. Another benefit of broad participation and true engagement of the public is that when it is time to adopt housing strategies and approve housing developments, a greater portion of the community has been involved and participated in the plan and more frequently will support its implementation. Meaningful participation creates stakeholders in the ultimate outcome of the process.

In response to the need for public participation, City planning staff worked with consultants to develop a robust community engagement program tailored to ensure the community and other stakeholders are engaged in the process and are given ample opportunities to provide input. The key objective of the community engagement program is to maximize opportunities for everyone interested in the Housing Element to participate. The engagement program includes branding, a project website, business cards, newsletters and eblasts, announcements on the City website and social medial, multiple workshops, a Housing Element Focus Group, and Planning Commission and City Council study sessions and hearings. This section summarizes our engagement program.

In an effort to Affirmatively Further Fair Housing (AFFH), the City reached out to a broad range of stakeholders, including not just housing developers and residents, but also to Spanish speakers and those working to address fair housing issues and the lack of affordable housing citywide. Throughout the Update, the Project team asked focus group members, workshop participants, the Planning Commission, and the City Council about fair housing issues in the community. The City has incorporated this feedback into Program H-WW: Affirmatively Further Fair Housing, as well as into a variety of programs throughout the Policy Document.

Branding

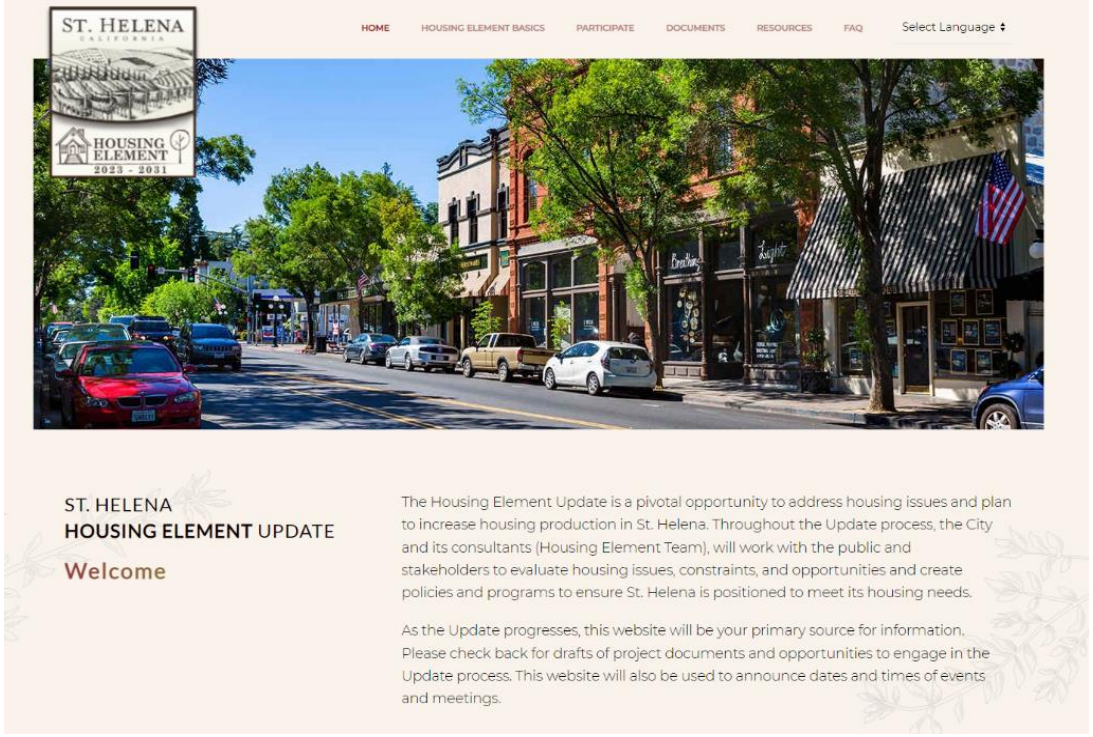
A branding package was prepared for the project. This included a project logo and style templates for all work products, maps, presentations, and publicity materials. The common branding helps to build recognition for the project and ensure that this effort is distinct in the minds of the community. The logo to the right will be used on all materials developed as part of the Housing Element Update.



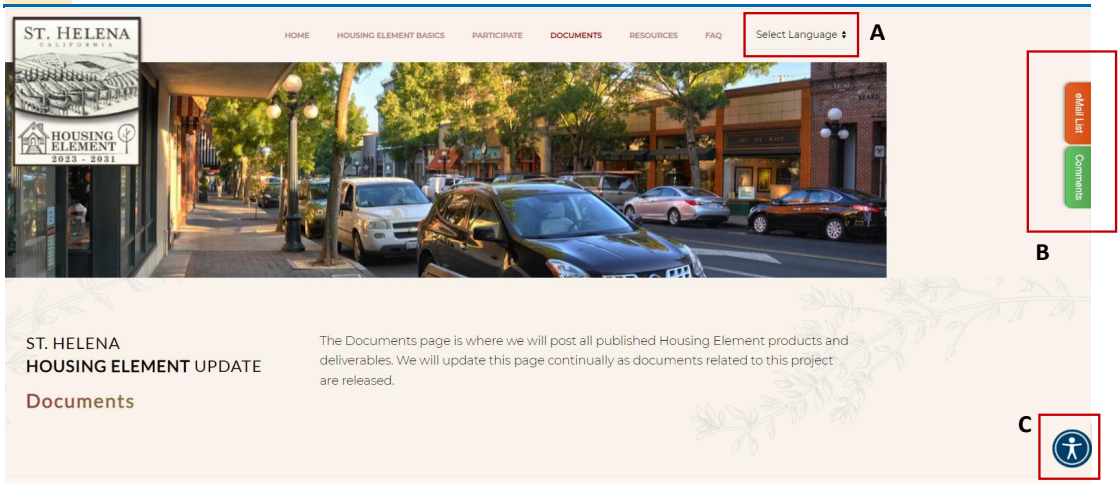
Housing Element Website

During the development and review of the Housing Element, the City created and maintained a website dedicated to the 2023-2031 Housing Element Update. This website provided easy access to information on the project, including the Housing Element information/Frequently Asked Questions, the project newsletters, and Zoom meeting info. Project documents were posted to the website and comments were encouraged through the provided "Comments" button on each page. A link on the website allowed residents to sign up for the email list. The website also featured a Google Translate menu allowed readers to translate the website into Spanish. Lastly, an accessibility widget was incorporated into the website allowing readers to adjust text size and spacing, contrast, and a number of other aspects of the website to suit the reader's needs.

https://sthelenahousing.com



https://sthelenahousing.com/documents



A: Google Translate Tool: This tool allows users to translate the entire website into Spanish.

B: Email and Contact Buttons: These buttons allow users to join the project email list or provide a comment to the project Team.

C: Accessibility Widget: This widget allows users to choose visibility options for greater accessibility

https://sthelenahousing.com/basics

The project website features a Housing Element 101 video, presented in English and Spanish.

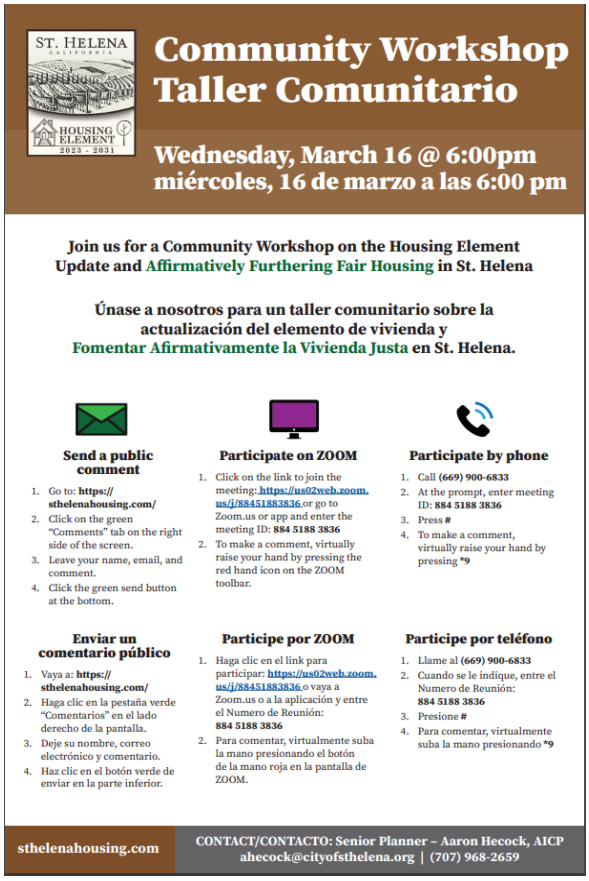
VIDEO: ST. HELENA HOUSING ELEMENT 101



English



Spanish



ST. HELENA CALIFORNIA
HOUSING ELEMENT 2023 - 2031

Community Workshop
Taller Comunitario

Wednesday, March 16 @ 6:00pm
miércoles, 16 de marzo a las 6:00 pm

Join us for a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing in St. Helena

Únase a nosotros para un taller comunitario sobre la actualización del elemento de vivienda y Fomentar Afirmativamente la Vivienda Justa en St. Helena.

Send a public comment

1. Go to: **https://sthelenahousing.com/**
2. Click on the green "Comments" tab on the right side of the screen.
3. Leave your name, email, and comment.
4. Click the green send button at the bottom.

Participate on ZOOM

1. Click on the link to join the meeting: **https://us02web.zoom.us/j/88451883836** or go to Zoom.us or app and enter the meeting ID: **884 5188 3836**
2. To make a comment, virtually raise your hand by pressing the red hand icon on the ZOOM toolbar.

Participate by phone

1. Call **(669) 900-6833**
2. At the prompt, enter meeting ID: **884 5188 3836**
3. Press **#**
4. To make a comment, virtually raise your hand by pressing ***9**

Enviar un comentario público

1. Vaya a: **https://sthelenahousing.com/**
2. Haga clic en la pestaña verde "Comentarios" en el lado derecho de la pantalla.
3. Deje su nombre, correo electrónico y comentario.
4. Haz clic en el botón verde de enviar en la parte inferior.

Participe por ZOOM

1. Haga clic en el link para participar: **https://us02web.zoom.us/j/88451883836** o vaya a Zoom.us o a la aplicación y entre el Numero de Reunión: **884 5188 3836**
2. Para comentar, virtualmente suba la mano presionando el botón de la mano roja en la pantalla de ZOOM.

Participe por teléfono

1. Llame al **(669) 900-6833**
2. Cuando se le indique, entre el Numero de Reunión: **884 5188 3836**
3. Presione **#**
4. Para comentar, virtualmente suba la mano presionando ***9**

sthelenahousing.com

CONTACT/CONTACTO: Senior Planner – Aaron Hecock, AICP
ahecock@cityofsthelena.org | (707) 968-2659

In addition to eblasts and Facebook posts, meetings were announced via the website. Flyers were posted for each event in English and Spanish.



MEETINGS

COMMUNITY WORKSHOPS −

Title	Date	Flyer	Presentation	Agenda	Other Materials	Video
Workshop #3	March 16, 2022 6 pm, via Zoom					
Workshop #2	Janaury 20, 2022 6 pm, via Zoom					
Workshop #1	September 16, 2021 6 pm, via Zoom					

FOCUS GROUPS +

PLANNING COMMISSION +

CITY COUNCIL +

For those unable to attend, event materials, presentations, and videos are posted to the Participate page.

Project Business Cards

To encourage the use of the project website, business cards were made up for the Project. The cards were provided to the City and can be handed out to those looking for additional information on the Housing Element Update. Each card lists the project website address and a QR Code that can direct users to that website.





Newsletters and Email Notifications (eBlasts)

During the Housing Element development, two newsletters will be developed and distributed. The newsletters will be designed to give the community a better understanding of the Update process and the draft Housing Element. Both newsletters will be published in both English and Spanish and made available from the project website.

Newsletter #1: Housing Element Update Overview

Newsletter #1 describes what a housing element is, how and why it is being updated, the project schedule, and how to get involved in the Update process. The newsletter also describes the other components of the project, including General Plan amendments, Safety Element update, and the environmental analysis. The newsletter will publicize upcoming community engagement opportunities and the project website.

Newsletter #2: HCD Review Draft Housing Element

Newsletter #2 will provide a summary of the key findings and changes in the HCD Review Draft Housing Element, particularly key changes to policies and programs, any proposed changes to land use designations (locations or density ranges), and what these changes mean for their community.

Email notifications (eblasts) are sent out to announce upcoming events and the release of project-related documents. Email addresses were compiled from those requesting notification from the City and from those signing up on the project website and at project events. As of May 2022, the Housing Element email list has 32 subscribers.

Images of Newsletter #1 and an eBlast are included on the following page.



NEWSLETTER #1: HOUSING ELEMENT OVERVIEW

St. Helena Housing Element Update!

We are excited to announce that in February 2021, the City of St. Helena kicked off the update to the City's Housing Element. The update is scheduled to take approximately two years, and throughout the process, we invite the public to be part of the planning process and provide input on how St. Helena should provide housing over the planning period (2023-2031).

What is a Housing Element?

Since 1969, every jurisdiction in California has been required to have a Housing Element as part of their General Plan. Unlike other mandatory General Plan elements, the Housing Element must be updated every eight years and is subject to review and approval by the California Department of Housing and Community Development (HCD). Major components of the Housing Element include a housing needs assessment, the identification of sites for housing at all income levels, a review of constraints to housing, and updated policies and programs to carry out the goals of the updated element.

The City's current 2014-2022 Housing Element was adopted in 2015 and was part of the 5th Cycle of housing element updates in the State. This update for the 2023-2031 Housing Element is part of the 6th Cycle of housing element updates. Between the 5th and 6th Cycles, the State has passed over a dozen of new housing laws, many of which aim to lower barriers to building affordable housing. These will all be addressed with this update.

Another major addition to the 6th Cycle Housing Element Update is the inclusion of an Affirmatively Furthering Fair Housing analysis. This analysis will examine housing practices in the city to identify any areas that may perpetuate housing inequities in the community. Once identified, the Housing Element will create policies and programs to help work towards more equitable housing practices.

Visit the Project Website to:

- Stay informed
- Find out about upcoming meetings and events
- Sign-up for email updates
- Share your ideas

sthelenahousing.com

Have questions?

City of St. Helena
Aaron Hecock, Senior Planner
ahecock@cityofsthelena.org

1



BOLETÍN #1: RESUMEN DEL PLAN DE VIVIENDA ELEMENTAL

¡Actualización del Plan de Vivienda Elemental en St. Helena!

Nos complace anunciar que, en febrero de 2021, la Ciudad de St. Helena inició la actualización del Plan de Vivienda Elemental de la Ciudad. La actualización está programada para tomar aproximadamente dos años, y a lo largo del proceso, invitamos al público a ser parte del proceso de planificación y proporcionar información sobre cómo St. Helena debe proporcionar vivienda durante el período de planificación (2023-2031).

¿Qué es el Plan de Vivienda Elemental?

Desde 1969, todas las jurisdicciones de California están obligadas a tener un Elemento de Vivienda como parte de su Plan General. A diferencia de otros elementos obligatorios del Plan General, el Elemento de Vivienda debe actualizarse cada ocho años y está sujeto a revisión y aprobación por el Departamento de Vivienda y Desarrollo Comunitario de California (HCD). Los principales componentes del Elemento de Vivienda incluyen una evaluación de las necesidades de vivienda, la identificación de sitios para vivienda en todos los niveles de ingresos, una revisión de las limitaciones a la vivienda, y políticas y programas actualizados para llevar a cabo los objetivos del elemento actualizado.

El actual Elemento habitacional 2014-2022 de la ciudad fue adoptado en 2015 y formó parte del 5º Ciclo de Actualizaciones de Elementos habitacionales en el Estado. Esta actualización para el Elemento habitacional 2023-2031 forma parte del 6º Ciclo de actualizaciones del Plan de Vivienda Elemental. Entre los ciclos 5 y 6, el Estado ha aprobado más de una docena de nuevas leyes de vivienda, muchas de las cuales tienen como objetivo reducir las barreras a la construcción de viviendas asequibles. Todos ellos se abordarán con esta actualización.

Otras de las principales novedades del Plan de Vivienda Elemental del 6º Ciclo es la inclusión de un análisis afirmativo de vivienda justa. Este análisis examinará las prácticas de vivienda en la ciudad para identificar cualquier área que contribuya a perpetuar las desigualdades de vivienda en la comunidad. Una vez identificado, el Plan de Vivienda Elemental, creará políticas y programas para ayudar a conseguir que el desarrollo de viviendas sea más equitativo.

Visite el sitio web del proyecto para:

- Manténgase informado
- Más información sobre las próximas reuniones y eventos
- Registrarse para actualizaciones por correo electrónico
- Comparte tus ideas



sthelenahousing.com

¿Tiene preguntas?

Ciudad de St. Helena
Aaron Hecock, Planificador Principal
ahecock@cityofsthelena.org

1



CITY OF ST. HELENA

2023-2031 Housing Element

Reminder: Community Workshop #3 Today, Wednesday, March 16th!

Join us for a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing in St. Helena!

WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)?

Affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

- California Department of Housing and Community Development

The duty to affirmatively further fair housing extends to all of the City's activities and programs relating to housing and community development. Join us at the workshop to learn more.

Wednesday, March 16, 2022 6:00 pm

Participate on ZOOM

1. To join the meeting: **CLICK HERE** or go to Zoom.us or app and enter the meeting ID: **884 5188 3836**

2. To make a comment, virtually raise your hand by pressing the red hand icon on the ZOOM toolbar.

Participate by phone

1. Call **(669) 900-6833**
2. At the prompt, enter meeting ID: **884 5188 3836**
3. Press #
4. Press *9 to speak.

Email a Public Comment

1. Email your comment to: **publiccomment@cityofsthelena.org**
2. In the subject line include: 'Comment on Housing Sites'

Click Here to download the event flyer.

St. Helena 2023-2031 Housing Element

CONTACT:
Senior Planner – Aaron Hecock, AICP
ahecock@cityofsthelena.org | (707) 968-2659

Public Workshops

Throughout the Housing Element Update, City staff worked with the consultant team to hold community workshops at critical points in the process.

Workshop #1: Housing Element Basics

On September 16, 2021 the City held a community workshop to introduce the housing element and discuss housing needs, opportunities, and constraints in St. Helena.





The workshop presentation highlighted engagement efforts and let participants know how they can connect with the Project Team.

During the Workshop, participants were prompted to comment on housing needs, issues, and constraints in the community. Several public comments were received and are documented below. These comments and information provided during this discussion were used to inform and confirm data in the Needs Assessment. Additionally, input related to sites and constraints were considered in the development of the initial sites inventory. Finally, comments related to housing needs helped to inform implementation actions and priorities. The City has included a number of programs to address constraints, incentivize affordable and special needs housing development, and encourage workforce and missing middle housing opportunities.

Comment
Jenny
▪ Shortage of affordable housing compounded by 2020 fires ▪ Rents have increased but wages haven't kept up ▪ Many residents are struggling to pay rent. ▪ There is a long waiting list for affordable housing (5 year waiting list) ▪ Smoke Free housing is needed, as 2nd hand smoke is an issue in multifamily housing
Nancy
▪ Demand is such that large-scale developments are needed ▪ Overcrowding is an issue in the city ▪ Many St. Helena workers commute into the city because they can't afford to live here.
Joe
▪ Multifamily is challenging as affordability is difficult to make cost effective. Subsidies are required to create housing that is affordable. Financing for these projects is difficult. ▪ Affordable projects move slowly and this increases costs. ▪ Market partners may be able to help solve the housing problem. ▪ What in the zoning code can be changed to help reduce costs? ▪ Development standards such as Density, Parking, Height, and Water Neutrality, as well as fees, can be obstacles to development. ▪ NIMBY opposition and land costs can be constraints ▪ Sites: feasibility is a problem and owners need to be engaged. ▪ Larger sites are located near the urban limit, but density is needed near city center. Height limits should be reconsidered. ▪ Main Street has commercial/retail vacancies. Potential for housing as mixed use. ▪ 900 Crane is for sale and may be a potential site. ▪ Can we expedite rezones for housing? ▪ Multifamily areas that only allow up to a triplex are a constraint. We need to allow more building forms. ▪ Please clear as many hurdles to development as possible.
Ester
▪ Many properties are small and can't hold larger projects. Lot consolidation may be needed. Adams St. property could be a potential low-income housing site.
Paul

- Please consider public safety issues and make sure that sites are feasible and safe.

Workshop #2: Housing Opportunity Sites

On January 20, 2022, the City held a Community Workshop to discuss the Housing Element Update and available housing sites in St. Helena. Following the workshop, a map of potential sites was posted to the Housing Element website and the City encouraged residents and stakeholders to submit through the "Comments" button.

The table below shows public input received at the event and how each participant's input was incorporated into the Draft Housing Element.



Comment	Response
Jeff Farmer: Consider closed catholic school. Some talk with church officials there. Also, the city corp yard. It may be available. ADUs, concern about lack of ADU rentals	The City investigated potential sites and considered ADU affordability trends in the sites inventory.

Comment	Response
Norma: Potential sites: corner of Fulton and east of the railroad tracks, both the north and south side of Fulton. What happened with the big property by vineyard valley (Hunter project). Regarding Pope, there is another site east toward college there may be a big vacant site to consider.	The City investigated potential sites based on public comments and revised the inventory, as necessary.
Joe McGrath: 1998 Spring Street just changed hands and may have a vineyard lease. The 3-acre site. McCorkle sites have a pending contract and may have other plans One other McCorkle site was just renovated Fulton site had interest for housing development in the past. Other sites to consider: across from corps yard on Charter Oak. Consider this please.	The City considered the constraints and sites mentioned here.
Jordan Bentley: 1998 Spring Street changed hands and has a vineyard lease. Please provide a list of properties that can be developed.	The City investigated the constraint mentioned here. The City also provided a list of properties with online map via the project website.
Pat Friday: Crane is a good place for housing. Keep it. Across from Episcopal church, there is a vacant parcel that used to be a church. This may be a possibility. Walking distance to everything. Spring Street across from the cemetery there is a big area of vacant land.	The City investigated potential sites based on public comments and revised the inventory, as necessary.

Comment	Response
Rick Crebs: Consider workforce housing for the missing middle types and incomes.	The City considered workforce and missing middle housing in crafting the Policy Document. Several programs are included to respond to these topics specifically.
Mary Stephenson: Concern that ADUs are not being rented. Over 40 percent of land in city limits is in vineyards. How much of this is zoned for housing? Can we look at these and create a long-term plan? What will remain in vineyard and what will remain in housing? The process to rezone is expensive and time-consuming Lots of expensive houses with ADUs that won't be rented. It's an extension of the main house.	The City considered ADU affordability trends in the sites inventory and are working to promote ADU development through implementation programs. Additionally, the City included a program to explore the removal of the Urban Limit Line.
John Sales: Site on Crane Avenue by the creek has a major power line running across the property. This has to be dealt with before housing can be built on the site.	The City considered the constraint mentioned here and revised the sites inventory accordingly.
Jennifer La Liberte: North Crane: there's another parcel close to the one considered. Consider this. Suggests we include this site if Crane Avenue site is included.	The City investigated potential sites based on public comments and revised the inventory, as necessary.

Comment	Response
Tracy McBride: The City needs low income housing that is ownership based. On the map on your website. The lower income sites are east of main street and site 9 is west of main street. Keep this site to disperse lower income sites around the city. How can we incentivize housing development? With by-right this can make things easier if nothing is developed and the site is reused in the next round. Adams St and church sites: why can't we use these sites? Are churches really harder to redevelop?	The City investigated potential sites based on public comments and revised the inventory, as necessary. The City also worked to provide sites consistent with the goals of AFFH. The City also crafted a number of implementation programs that work to incentivize development of lower and moderate income housing.
Joe McGrath: PG&E property on Mitchell: Consider the site. Adams: would subdivision help the political situation?	The City investigated potential sites based on public comments and revised the inventory, as necessary. The City Council is considering a number of options for the Adams Street property.
Jennifer La Liberte: Please let the public know which sites have been ruled out and why.	The City included information about sites investigated but not selected in the materials posted to the project website following the event.
Nancy Dervin Encourages the City to include feasible sites. Some sites could be higher density and available to lower income families. The site map shows moderate on west site and lower on the east side of town. Is there a disparity between east and west? Please don't force the lowest income earners into the most-dense areas of the city. Mix up housing opportunities.	The City considered feasibility in the selection of each site. Additionally, the City investigated opportunities for density increases at each site. The City also worked to provide sites consistent with the goals of AFFH.

Comment	Response
Steve Goldfarb: Adams Street. Why not include it? Advantages to this property: publicly owned (it can be sold). Please include this. It's feasible. Subdivision may be necessary, and it can house a lot of people across a lot of income categories.	The City Council is considering a number of options for the Adams Street property.
Pat Friday: We need to develop Adams Street; agrees that the property may need to be subdivided.	The City Council is considering a number of options for the Adams Street property.
Norma Ferriz: Consider vineyards that are further out than the city center. The edges of town may have potential for housing.	The City included a program in the DraftHousing Element to explore the removal of the Urban Limit Line.
Tracy McBride: Consider new laws regarding subdivision of sf homes (SB 9).	The City encourages lot splits and ADU development consistent with SB9. The Housing Element includes a program committing the City to allowing and incentivizing SB 9 projects.

Workshop #3: Affirmatively Furthering Fair Housing

On March 16, 2022, the City held a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing (AFFH) in St. Helena. The workshop included an introduction to AFFH, a presentation of initial findings and potential actions, and opportunities for the public to join the discussion and provide comments.

COMMUNITY WORKSHOP #3

On March 16, 2022, the City held a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing in St. Helena. A video of the event can be viewed below.

WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)?

Affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.
- California Department of Housing and Community Development

The duty to affirmatively further fair housing extends to all of the City's activities and programs relating to housing and community development. Join us at the workshop to learn more.

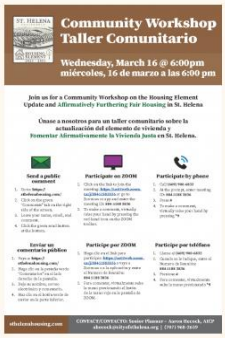


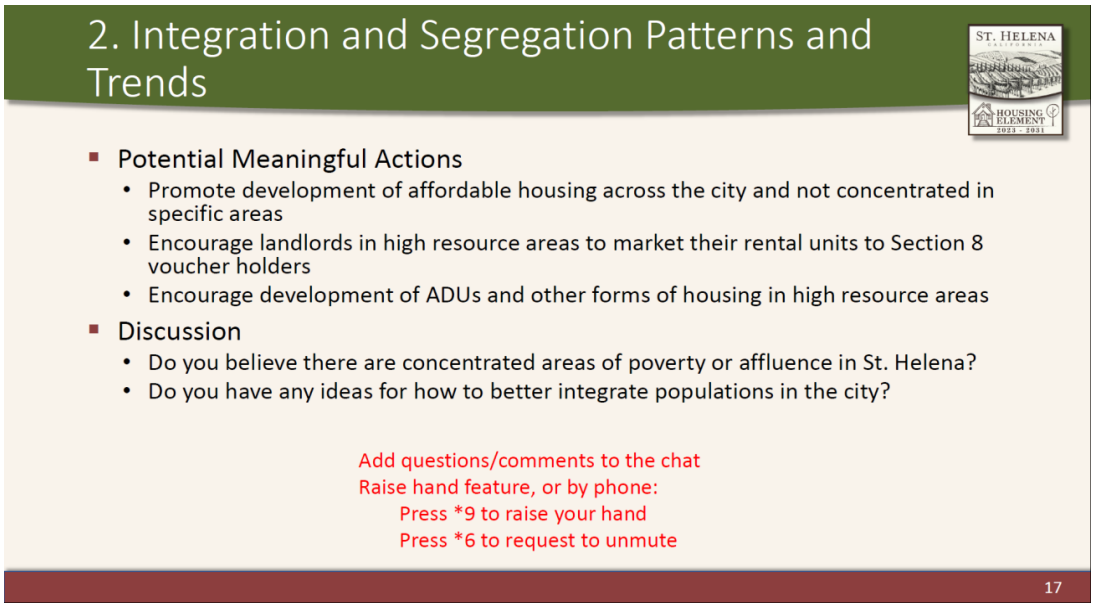
VIRTUAL WORKSHOP HELD MARCH 16, 2022

Public Comments Received:
Click Here to Download

Event Presentation:
Click Here to Download

EVENT FLYER:
Click Here to Download





An example slide from the workshop presentation. Presentation available at sthelenahousing.com

The following is a summary of comments that emerged through the public discussion and comment period of the workshop, as well as how the comments informed the Draft Housing Element

Comment	Response
The city needs more housing units and people.	The City has provided sites with capacity to meet the RHNA and to incentivize development citywide.
There is no evidence that ADUs accommodate affordable units.	The City considered ADU affordability trends in the development of the sites inventory and worked to incentivize accessory dwelling units and affordable rental ADUs through implementation programs.
The City of Napa has technical assistance and funding for people that agree to deed restrict ADUs and the City of St. Helena should look at this program.	The City has investigated these and other incentives to the construction of affordable rental ADUs, and has included an implementation program committing the City to providing incentives and technical assistance to support the construction of these units.
The City should have policies that promote both low- and moderate-income housing units.	The City has included implementation programs with objectives aimed at promoting housing for households of all incomes, including moderate-income households.
The cost of construction makes it difficult for the private market to accommodate affordable housing and public financing can help produce deed restricted units.	This comment supports the findings of the constraints analysis. The City provides funding and loans to assist in the development of affordable housing.
Requiring a CUP for multi-family project in the Medium Density district limits opportunities for more units.	The City is currently (2022) exploring changes to development standard through the comprehensive zoning code update.

Focus Group Meetings

As part of the Housing Element Update project, the City formed a Focus Group to assist in the development and review of the Housing Element and Safety Element. The Focus Group served as a technical working group that assisted in generating ideas and commenting on direction. Recommendations from the Focus Group were used to revise drafts of the Housing and Safety Elements and provide recommendations to the Planning Commission and City Council.

The members of the Focus Group were as follows:

- City Councilmember Paul Dohring
- Planning Commissioner Autumn Anderson
- Planning Commissioner Rosaura Segura
- Jennifer La Liberte (Our Town St. Helena)
- Mary Koberstein (Former Councilmember)

The Focus Group was active throughout the Update project. The following provides an overview of meetings.

Past Meetings

Focus Group Meeting #1: Housing Element Overview

Provided an overview of the Housing Element process and project schedule. Collected expectations for the project and insights on housing issues, priorities, and concerns that informed the Needs Assessment. The Focus Group provided critical input related to the most pressing housing needs in the community and encouraged the City to pursue sites that are feasible and can provide capacity for a larger number of units.

Focus Group Meeting #2: Preparing for the Housing Element

Discussed results of Community Workshop #1 and the integration of community input into the Housing Element Update. Reviewed the next steps in the Update with a focus on site assessment. The Focus Group reviewed the engagement strategy and provided ideas for additional outreach efforts.

Focus Group Meeting #3: Sites Assessment Review

Discussed the results of the vacant and underutilized sites inventory and reviewed sites inventory methodology and assumptions. Focus Group input provided guidance on individual sites, capacity assumptions, and feasibility of affordable unit production.

Focus Group Meeting #4: Public Input on the Sites Assessment

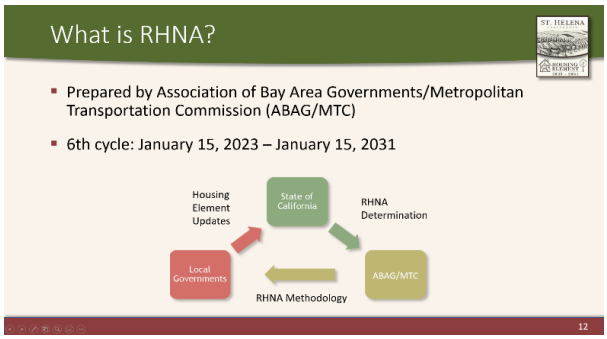
Discussed the results of Community Workshop #2 and how to address community concerns in the Housing Element. The Focus Group considered public comment and provided additional direction on each site. Following this final Focus Group Input, the sites inventory was revised and presented to the City Council for final direction.

Public Meetings with City Leadership

Past Meetings

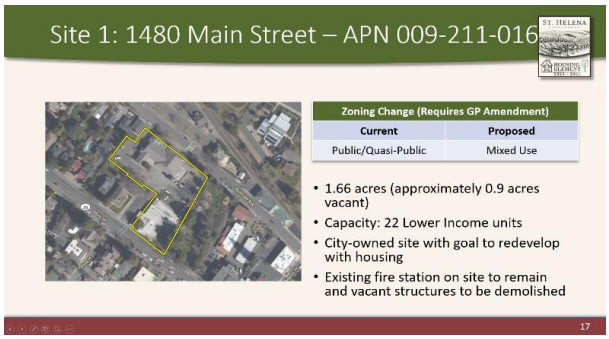
Planning Commission/City Council
Joint Study Session 1: Housing Element Overview
Held March 23, 2021

Provided an overview of the Housing Element process, project schedule, and project expectations. Discuss housing issues, priorities, and concerns.



Planning Commission/City Council
Joint Study Session 2: Sites Assessment
Held February 22, 2022

Discussed the RHNA and the sites inventory process and presented a walkthrough of potential housing opportunity sites. Discussed the results of Community Workshop #2 and public input on housing sites. Commissions and Councilmembers provided input on sites included in the draft sites inventory and reviewed each for potential constraints. The draft sites inventory was revised according to direction taken during this meeting in the preparation of the public review draft.



Planning Commission/City Council Joint Study Session: Public Review Draft Housing Element
Held July 21, 2022

Solicited input on the Public Review Draft Housing Element. Discussed next steps, HCD review, revisions, and remaining project schedule. Input from this event informed the City's response to comments on the Public Review Draft, discussed in Appendix B.

Future Meetings

- **Planning Commission Public Hearing: Recommendation for Adoption**
  To present the Draft Housing and Safety Elements, associated General Plan and Zoning Code Amendments, and responses to comments from previous Planning Commission and City Council Public Hearings and seek recommendation for adoption to City Council.

- **City Council Adoption Hearing: Adopt Housing and Safety Elements**
  To present the Final Housing and Safety Elements, associated General Plan and Zoning Code Amendments,

and responses to comments from previous Planning Commission and City Council Public hearings and seek adoption of the Housing and Safety Elements from City Council.

Other Outreach Activities

St. Helena set out to collect as much feedback as possible from the community, from their general concerns and ideas to where new housing could go. It was also important to us to consider community outreach best practices and consult and partner with organizations working in the community, to ensure we were reaching as many people as possible and doing so thoughtfully.

Sites Inventory Mapping Exercise

As discussed in the summary of Workshop #2 above, the City produced an interactive online map that allowed residents and stakeholders to view and comment on potential housing opportunity sites. The online map was posted for more than a month following the workshop and the City encouraged all those interested in the Housing Element to submit their comments. The City incorporated comments on potential housing sites into the Sites Inventory by removing or revising constrained sites and considering additional sites with potential for residential uses.

Equity Advisory Group

In alignment with community outreach best practices, it was important to include the guidance of and foster partnerships with community organizations to help ensure everyone's voices were heard during the Housing Element update. In response, an Equity Advisory Group (EAG) was formed consisting of 15 organizations or leaders across the region that are advancing equity and affordable housing. A stipend of $1,500 was originally provided for meeting four to five times over 12 months to advise on Housing Element outreach and helping get the word out to the communities they work with.

After meeting twice in 2021, it was decided the best use of the EAG moving forward would be to provide more focused support in 2022 based on jurisdiction need and organization expertise. To date, EAG members have facilitated and hosted community meetings in partnership with 21 Elements, collected community housing stories to put a face to housing needs, advised on messaging, and amplified events and activities to their communities. The EAG continue to work collaboratively with jurisdictions and deepen partnerships, as well as connect community members to the Housing Element Update process. All participating organizations are featured on the Let's Talk Housing website and include the following:

- Ayudando Lations A Soñar (ALAS) www.alashmb.org
- Community Legal Services www.clsepa.org
- El Comite de Vecinos del Lado Oeste (El Comite) www.tenantstogether.org/resources/el-comité-de-vecinos-del-lado-oeste-east-palo-alto
- EPACANDO www.epacando.org
- Faith in Action www.faithinaction.org/federation/faith-in-action-bay-area/
- Housing Choices www.housingchoices.org

- Housing Leadership Council www.hlcsmc.org
- Menlo Together www.menlotogether.org
- Nuestra Casa www.nuestracasa.org
- One San Mateo www.onesanmateo.org
- Peninsula for Everyone www.peninsulaforeveryone.org
- Puente de la Costa Sur www.mypuente.org
- San Mateo County Health www.gethealthysmc.org
- Youth Leadership Institute www.yli.org/region/san-mateo
- Youth United for Community Action www.youthunited.net

Over six sessions, the EAG discussed explicit and implicit barriers to obtaining and maintaining affordable housing and this document outlines key findings, repeated themes, and recommendations from the EAG to the Napa Sonoma Collaborative. Key findings include:

- The current approach to housing policies throughout the region is ad hoc and piecemeal and what is really needed is a holistic approach to housing and homelessness issues
    - Affordable homeownership is missing from the conversation
    - Transitional and supportive housing as a more integrated part of the whole conversation is missing
    - The traditional paradigm of designing affordable housing should be changed at the educational level; design professionals should be educated to think holistically about designing communities and integrating affordable housing patterns into community design
- A lack of community trust leads to a lack of honest and transparent communication and engagement between local governments, partner agencies and the community members
- Additional housing costs are not factored into the affordable housing definition
    - The official definition of affordable housing does not include all related housing costs
        i. Those who live in deed-restricted affordable housing face food shortages, high insurance rates, and rising utility costs to name a few, which are not factored into the official definition of affordable housing. Yet these are costs that must be included in an already strained budget
    - Supercommuting leads to higher gas costs and more wear and tear on cars but is necessary to find and maintain affordable housing
    - The housing situation within the region leads to students working to support their families, creating an unintended consequence of students dropping out of their educational careers and/or leaving the community after they matriculate from High School since they cannot afford housing
    - Onerous regulation leads to displacement
- Affordable homeownership is missing from the conversation as renting is not a sustainable approach for all and it prevents people from accessing the "American Dream"

- The lack of affordable and safe housing due to high development costs, loss of units due to disasters, and/or gentrification are some of the contributing factors to the housing crisis within the region.
- Discrimination is both subtle and overt
    - Tenants are susceptible to landlords taking advantage of them due to a very specific cocktail of issues including but not limited to:
        i. Language barriers
        ii. Cultural Barriers
        iii. Stereotypes
        iv. Disabilities
        v. Income
    - Discrimination is a multilayered situation:
        i. Tenants in substandard/unhealthy housing live in precarious situations and are afraid to complain due to the fear of being evicted (which means that they live in substandard living conditions)
        ii. There is a very real fear that rents will increase if tenants complain about substandard situations
    - Stereotypes associated with low-income tenants and voucher holders are a real barrier to obtaining housing
        i. Criminal backgrounds and subsidies contribute to stereotypes which make landlords leery of renting.
        ii. SB 329 makes it illegal to reject housing vouchers, however, it still occurs
    - Discrimination is hard to determine since there aren't enough vacancies to even apply for housing
- The lack of available land coupled with regulations and high impact fees are contributing factors to astronomical development costs

The City considered these key findings in the development of the Needs Assessment and Policy Document. The Policy Document includes programs focused on regional coordination on housing issues, increasing affordable homeownership opportunities, providing transparency on housing-related decisions and actions, removing governmental constraints, incentivizing affordable housing construction, and working with Fair Housing Napa Valley to provide fair housing services.

2. Review of the Existing Housing Element

This section examines the effectiveness of the 2015 Housing Element, the progress made in achieving the goals, objectives and policies outlined in the Housing Element, along with a discussion of the Element's appropriateness given current conditions within the City of St. Helena. This evaluation will inform the policies and programs developed as part of the 2023-2031 Housing Element Update.

Housing Production During the 2015-2023 Planning Period

The City's RHNA for the 2015-2023 planning period was for eight units affordable to very low-income households, five units affordable to low-income households, five units affordable to moderate income households, and 13 units affordable to above moderate-income households, for a total of 31 housing units. Table 1 compares units permitted and constructed to the 5th cycle RHNA. Between 2015 and 2021, the City permitted a total of 110 units, including seven very low-, nine low-, and four moderate-income units. All permitted projects have been constructed.

Table 1 Progress Toward the 5th Cycle RHNA

	Very Low	Low	Moderate	Above Moderate	Total
RHNA	8	5	5	13	31
Permitted Units	7	9	4	90	110

Source: City of St. Helena, 2021 Housing Element Annual Progress Report, 2022.

Progress toward the Lower Income Housing Goals

The City has issued building permits for the Turley Flats affordable housing project, an 8-unit multifamily project with loan funding from the Affordable Housing Trust Fund (all low income), and occupancy of all units occurred in 2019. Further, the City has issued building permits for the Brenkle Court 8-unit affordable housing project (two very-low and six low income). In 2020, the City approved a deed restricted affordable housing project (four low to very-low income and one moderate income) at 963 Pope Street. The combined affordability of these units is expected to help the City make significant progress toward meeting these unit counts.

Most of the housing permitted during this planning period was above moderate-income housing. Between 2015 and 2021, 90 of the 110 units constructed were above moderate-income units.

Progress in Implementation

The 2015 Housing Element established the six goals with coordinated policies and implementing programs, organized around the following goal areas:

1. A Diversity of Housing to Meet Local Needs
2. Efficient Land Use and High-Quality Neighborhoods
3. Conservation of Existing Housing
4. Assistance to Support Affordable Housing
5. Resource Conservation
6. Equal Housing Opportunities

Table 2 provides a detailed evaluation of the implementing programs that support each of these goals, and the subsequent sections discuss the extent to which the 2015 Housing Element policies and implementing programs helped the City of St. Helena meet the goals.

Diversity of Housing to Meet Local Needs

Facilitate development of a variety of housing types to meet the full range of housing needs in our community, with particular emphasis on housing for our local workforce, people with special housing needs, and people with extremely low, very low, low and moderate incomes.

In order to supply a diversity of housing types to meet local needs, the 2015 Housing Element developed Policies 1.1 through 1.6 and implementing Actions 1.A through 1.K. Policies 1.1 through 1.6 focus on ensuring that the City provides a sufficient supply of residential land to meet the housing needs of the community, encouraging and facilitating the development of affordable housing, removing constraints to housing production, and providing workforce and mixed-use development near downtown. In line with these policies, the City proceeded with successfully implementing Actions 1.A through 1.K, which range from large efforts, such as streamlining approvals for affordable multifamily projects and providing priority access to water and sewer infrastructure to development with affordable units, to smaller efforts, such as encouraging non-traditional housing types. While many of these programs were completed, the City did not revise the definition of "family" within the Municipal Code for consistency with State law and must include a program in the 2023-2031 Housing Element to address this compliance issue.

Efficient Land Use and High-Quality Neighborhoods

Make efficient use of land within the Urban Limit Line to protect agricultural lands, promoting compact, well-designed developments that 'fit in' with existing neighborhoods and contribute to the overall livability of our community. Encourage a balance of housing types throughout the entire community.

Policies 2.1 through 2.6 encourage higher density development where appropriate, mixed-use development, second units, and a variety of housing type throughout the community. These policies are supported by Implementing Actions 2.A through 2.P. Most notable among these actions is the progress towards incentivizing

higher density housing (Action 2.A), which has been supported by the removal of the Use Permit requirement for multi-family housing in the High Density Residential land use designation and Housing Opportunity Sites located on parcels designated Medium Density Residential. Additionally, the City has implemented state-mandated ADU regulations (Action 2.I) and integrated a mixed-use land use designation into the 2040 General Plan (Action 2.H). While some of these programs were completed with the recent General Plan Update, programs related to zoning changes are being undertaking in the current (2022) comprehensive Zoning Code update. These programs should be continued in the 2023-2031 Housing Element.

Conservation of Existing Housing

Improve and conserve existing housing, with particular attention to the rehabilitation and retention of existing affordable units.

Policies 3.1 and 3.2 are designed to conserve the existing housing stock through restricting conversion of rental units to condominiums and to monitor housing conditions citywide. Actions 3.A through 3.E implement these policies. Actions 3.A, 3.C, and 3.D help protect current housing stock by working to limit conversion to more limited uses, such as vacation rentals, or to nonresidential uses. Action 3.B implements an affordable housing impact fee to help monetarily incentivize the conversion of existing housing units. Action 3.E describes reporting requirements and commits the City to producing an annual Housing Element progress report, as required by HCD. Since the last Housing Element, the City has implemented a Housing Impact Fee, actively limits short-term rentals to twenty five units, and continuously looks for methods to promote the conservation of existing housing.

Assistance to Support Affordable Housing

Provide technical and financial resources to support development of affordable housing in our community, especially housing that meets the needs of our local workforce, people with special housing needs, and people with moderate, low, and very low incomes.

Policies 4.1 through 4.5, as well as Implementing Actions 4.A through 4.L, are designed to support this goal of actively assisting affordable housing growth, especially for special needs groups, such as farmworkers, seniors, and persons with disabilities. The City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. During the 5th cycle, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects (Turley Flats, Brenkle Court, and 963 Pope), anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. The City has also passed Measure E, which increased the Transit Occupancy Tax rate by one percent, which generates further funds towards affordable housing. Estimated annual revenue from this measure is approximately $280,000. Since 2015, the City has fully funded all funding requests made by affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.

Resource Conservation

Promote resource conservation by encouraging housing types and designs that use fewer resources (water, electricity, etc.) and therefore cost less to operate over time, supporting long-term housing affordability.

The City of St. Helena took an active role in promoting the use of alternative energy sources and encouraging energy conservation, as targeted by Policies 5.1 and 5.2 and Programs 5.A through 5.H. During the 5th cycle, the City implemented these actions by adopting the 2019 State Building Codes, including the CALGreen Building Code, creating a "Rapid Permit" procedure for solar installations, and adopting a "water neutral" policy for new development. Additionally, the City is engaged with the Napa Valley Transportation Authority to adopt a countywide bicycle and pedestrian plan, which works to increase accessibility and promote tourism across the county while reducing vehicles on the road.

Equal Housing Opportunities

Assure that housing programs maximize choice, avoid economic segregation and avoid discrimination based upon age, sex, race, sexual orientation, religion and ethnic background

The sixth and final goal has one policy and two implementing programs, which commit the City to supporting Fair Housing Napa Valley as the City Fair Housing Provider. The City works with Fair Housing Napa Valley to provide information to the public regarding the rights and responsibilities and resources available to address fair housing issues. The City provides funding to Fair Housing Napa Valley and responds to all referrals from the agency. This governmental cooperation between local and county level agencies allows for enhanced coordination to combat housing insecurity across the region.

In the upcoming cycle, the City should be strengthened to promote a proactive approach to fair housing consistent with the State's requirements related affirmatively further fair housing (AFFH). Additional policies and programs will be needed to address fair housing issues. Additionally, the City should analyze all goals, policies, and programs through the lens of AFFH, and should apply fair housing objectives as appropriate.

Effectiveness of 2015 Housing Element

As discussed in the preceding section and in Table 2, the City implemented many policies and programs to facilitate housing production. Most importantly, the City has made great strides in securing additional funding for affordable housing and working with local stakeholders and county organizations to improve housing accessibility. From preserving existing housing and promoting the expansion of multifamily housing through relaxed regulation, the City recognizes the severity of the housing crisis and has worked progressively to do its part in adding housing towards meeting and exceeding RHNA goals. However, in some cases, the City did not have the necessary staff resources or funding to implement programs. While the 2040 General Plan Update process required significant staff time and delayed implementation of some Municipal Code amendments, the City is currently (2022) undertaking a comprehensive Zoning Code update that will address the remaining code amendment implementation measures during the 6th cycle. As the code update draws to its conclusion, the City

will have more resources available to implement remaining implementation actions, which have been continued in the 2022 Housing Element Update.

Effectiveness in Meeting the Needs of Special Needs Populations

The previous Housing Element had one program targeting special needs populations, Program 1.F. Program 1.F calls for the fast-tracking of housing developments that meet lower income and special needs populations. During the fifth cycle, 13 units of deed restricted affordable housing units were approved. No housing developments specifically tailored to the needs of special needs communities, such as seniors and farmworkers, were approved or built during the planning period. The previous housing element also contained the following quantified objectives tailored towards Special Needs Households:

- Assist in the acquisition of low-interest loans to 10 first-time homebuyers.
- 20 percent of new units to meet senior needs.
- 10 percent of new units accessible to persons with disabilities.
- Purchase of 3 existing housing units and conversion to regulated affordable housing for lower-income households.

The City of St. Helena did not meet any of the previously listed quantified objectives during the fifth cycle. However, the City made significant progress with the construction of 8 units of market-rate housing that was fully compliant with Americans with Disabilities Act (ADA) requirements. This equates to 7.3 percent of new units being accessible to persons with disabilities during the fifth cycle.

The 2023 Housing Element Update provides new and updated programs to commit the City new actions that work to meet the needs of special needs populations. Program H-E, a revised version of Program 1.F, commits the City to providing a streamlined ministerial review process for special needs housing, with a goal of encouraging the development of 6 units for seniors, farmworkers, or persons with disabilities. Program H-BB, a new program, commits the City to pursuing funding to assist with rehabilitation costs for lower income households and seniors. Program H-KK specifically commits the City to supporting efforts to improve access to farmworker housing in the City and region. Program H-LL commits the City to encouraging developers to include units dedicated to those with special housing needs in new developments. Finally, Program H-NN commits the City to pursue funding to assist with funding new housing projects for populations with special needs.

Table 2 Program Implementation Status pursuant to GC Section 65583

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE1.A	Continue to exempt permits for regulated affordable units as well as second units from Growth Management System	Ongoing	The City currently exempts all units, including affordable housing units and Accessory Dwelling Units from the Growth Management system in compliance with current state law. This provision will be removed in a future zoning code update.	Modify to reflect removal of the GMS
HE1.B	Review and possibly amend the Growth Management System to encourage the production of regulated affordable and workforce housing units.	2017	The City Council reviewed the Growth Management system in 2016 (as required) and provided direction to update and potentially amend the GMS Ordinance, after the 2040 General Plan update is completed. Given that the only multi-family housing applications reviewed by the City in recent years have been approved, it does not appear that the current GMS Ordinance is affecting the development of workforce housing. As explained above, the Growth Management System will be removed from the Municipal Code as part of the comprehensive zoning code update.	Modify to reflect removal of the GMS, merge with HE1.A
HE1.C	Give projects that include affordable housing units priority access to water and sewer resources over other new projects should the capacity of the local water or sewer systems become inadequate to meet the full demand for new connections.	Ongoing	The City provides priority access to water and sewer resources to projects to affordable housing projects.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE1.D	Revise the permitting process to streamline the review of affordable housing and market rate multifamily projects.	2016	In an effort to implement this Goal, the City has removed the Use Permit requirement for multi-family housing in the High Density Residential (HR) zone and all of the Housing Opportunity Sites (Key Housing Sites, see Section 17.40.020(N)) located within the Medium Density Residential (MR) zone and has established a streamlined approval process consistent with SB35 and SB330. Further, as mentioned above, affordable housing units are not subject to the GMS Ordinance limitations.	Delete
HE1.E	Work with private property owners/developers to plan for road and utility improvements necessary to support housing on key opportunity sites, in the event these sites are developed.	Ongoing	The City is continually looking for grant and other funding opportunities to off-set the costs of infrastructure Further, the 2040 General Plan update and current Capital Improvement Program provide direction and discussion regarding needed infrastructure improvements.	Keep
HE1.F	When possible, fast-track housing developments that meet lower income and special housing needs.	Ongoing	The City is committed to expediting any affordable housing applications that are submitted for review and action. Eight owner-occupied affordable housing units were approved by the City in Dec. 2016 (Self-Help Affordable Housing Project called the Brenkle Ct. Project from Our Town St. Helena (OTSH)). Building permits for each unit were issued in 2019. An additional five deed restricted affordable units were approved in 2020 however building permits have not yet been issued.	Modify
HE1.G	Maintain the local preference policy to possibly include people needed for work during city emergencies.	2017	No revisions to the current local preference policy for affordable housing units has been made as of yet.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE1.H	Explore, and adopt as appropriate, a program to address the housing needs of "workforce" households, which have incomes above 120 percent of AMI, but are still unable to afford market rate housing.	2017	The City Council has expressed an interest in reviewing housing needs Citywide. Pending development applications anticipated to increase the demand for employee housing are being asked to make efforts to address the housing impacts associated with their individual developments.	Modify and Expand
HE1.I	Implement a program to provide financial assistance for the development of second units in exchange for affordability restrictions that will provide workforce housing.	Ongoing	The City Council has expressed an interest in finding ways to deed restrict and/or incentivize the use of ADUs as rental units.	Keep
HE1.J	Encourage development of co-housing, ecohousing, 'green' manufactured homes and other 'nontraditional' forms of housing. Ensure these housing types are addressed in the development of design guidelines to streamline to approval process.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide now that the 2040 St Helena General Plan has been adopted. In addition, the Comprehensive Zoning Code update includes standards for small lot development and standards to encourage a variety of housing types.	Keep
HE1.K	Amend the Zoning Ordinance to define "family" as one or more persons living together as a single housekeeping unit in a dwelling unit. The definition should not distinguish between related and unrelated individuals and should not impose a numerical limit on the # of persons that constitute a family.	Ongoing	No revisions to the current zoning code definition of family have been made as of yet as the comprehensive zoning code update is still underway. However, all City actions are made in keeping with California State law, as it has precedence over any in-consistent locally adopted land use definitions.	Required Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.A	Provide incentives for higher density housing. Explore possible incentives for building attached market rate housing units for rent and for sale.	Ongoing	In an effort to implement this Goal, the City has removed the Use Permit requirement for multi-family housing in the High Density Residential land use designation and all of the Housing Opportunity Sites located within other land use designations (Medium Density Residential). In addition, the City has created an SB 330 Checklist to further streamline the design and approval of by-right multi-family units within the community.	Keep
HE2.B	Study potential modifications to the Zoning Ordinance to facilitate higher density housing [and discourage construction of oversize homes]. Modify the Zoning Ordinance to encourage higher density developments [and restrict construction of large single-family units], including current floor area ratios and yard and setback requirements.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide. The comprehensive zoning code update is in progress and these items will be addressed as part of that effort.	Keep
HE2.C	Amend regulations to discourage exemptions from the minimum density requirements. The City shall discourage exemptions for minimum density requirements and establish mitigation measures for exemptions in the Zoning Ordinance.	Ongoing	The comprehensive zoning code update is in progress and these items will be addressed as part of that effort. However, all City actions are made in keeping with California State law, as it has precedence over any in-consistent locally adopted land use definitions.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.D	Modify section 17.100 of the Zoning Ordinance to rename the Mobilehome Park Overlay District to "Manufactured Housing Overlay District". Develop policies to streamline the review process for this overlay district on residential land for projects that create land-ownership opportunities for residents. Support giving residents the right of first refusal if an existing park is to be sold.	Ongoing	No revisions to the current zoning code have been made yet as the comprehensive zoning code update is currently underway. However, all City actions are made in keeping with California State law and any request to implement a Manufactured Housing Overlay District would be reviewed as such.	Delete
HE2.E	Amend the "Subdivisions" section of the Municipal Code. The City will amend Title 16 of the Municipal Code to prevent subdivision activity from effectively resulting in lower densities and a loss of potential housing units on the site.	Ongoing	No revisions to the current "Subdivisions" section of the Municipal Code have been made as of yet. The City Council has expressed an interest in reviewing housing needs Citywide.	Delete
HE2.F	Update the General Plan Land Use Element in consideration of the established Housing Element land use goals and policies. Amend General Plan Elements concurrent with adoption of the General Plan Update as needed to ensure internal consistency.	2015	The St Helena 2040 General Plan update incorporates the adopted 2015 Housing Element. The Housing Element and General Plan are consistent.	Modify for required Safety Element Update

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.G	Promote both 'vertical' and 'horizontal' mixed-use. Encourage mixed-use developments that combine compatible uses on the same site, either in the same structure or adjacent structures. Amend the Zoning Ordinance accordingly. Amendments to the Zoning Ordinance include permitting the FAR for the residential component of a mixed-use development to be 'additive' rather than within the established FAR for that zone, and allowing commercial and residential users to 'share' their parking, resulting in a lower overall parking requirement. Requirements for covered parking should also be reconsidered.	2017	The St Helena 2040 General Plan update incorporates the adopted 2015 Housing Element. This update includes the creation of a mixed-use land use designation and will be followed by a comprehensive zoning code update, intended to create and implement the development criteria set for mixed use development within St Helena.	Revise for zoning code consistency

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.H	Explore the possibility of allowing mixed use and live/work units in non-residential zoning districts. Explore and adopt as appropriate modifications to non-residential Zones that would permit, either as of right or as a conditional use, residential uses including mixed use and integrated live/work units. Analyze requirements that commercial projects provide housing for a portion of the employment that will be generated on site. The City will study and determine what portion of employment generated will require housing, whether housing will be required on-site or allowed off-site, if pricing for the non-inclusionary units will be tied to anticipated salaries for employees in the commercial portion of the project, and if in-lieu fees will be permitted for smaller sized projects. Explore and adopt as appropriate development incentives such as higher density and height allowances, a streamlined design review process, and financial incentives, including fee reductions and waivers and contributions from the City's Housing Trust Fund, to encourage employers to provide on-site employee housing.	2017	The St Helena 2040 General Plan update includes the creation of a mixed-use land use designation. The comprehensive zoning code update will create and implement the development criteria for mixed-use development within St Helena.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.I	Review and revise development standards pertaining to second units. Ensure that the development of second units is physically and financially feasible in targeted areas. Give particular attention to parking standards, setbacks, and impact fees.	Ongoing	In 2020, the City adopted updated ADU regulations which streamlined the review process for ADU construction and conversion, in keeping with the requirements of State law. The St Helena 2040 General Plan update was adopted in May 2019. A comprehensive zoning code has begun and will include additional direction regarding the development of Accessory Dwelling Units.	Delete
HE2.J	Provide financial assistance for second unit development. Incentives might include low interest loans or fee waivers.	2020	The City of St. Helena has amended its zoning ordinance to be compliant with state law with regards to ADUs, their permitting, and reduced impact fees.	Modify and Expand
HE2.K	Target specific areas for second unit incentives. Create incentives to construct second units in the medium density areas near downtown. Incentives to adopt as appropriate include, but are not restricted to, fast tracking development applications, deferred development fees, and reduced parking and/or other city standards.	Ongoing	The City of St. Helena has amended its zoning ordinance to be compliant with state law with regards to ADUs, their permitting, and reduced impact fees.	Keep
HE2.M	Link financial incentives and development standard variances to affordability requirements for second units. Require that either the main house or the second unit is used as a rental unit that is affordable to moderate or below moderate households whenever the City assists in development through financial incentives or by granting a variance.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide which is expected to occur along with the comprehensive zoning code update. The City has also begun its 6th Cycle Housing Element Update which will identify Key Housing Opportunity Sites and potential rezoning opportunities withing the City.	Modify

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.N	Respond to complaints regarding illegal units. The City will work with the property owners to help bring illegal units up to code and to abate the use of non-habitable buildings as living units	Ongoing	While the City does not have a dedicated Code Enforcement Department, Planning and Community Improvement Department staff is responsible for responding to Code Enforcement complaints and prioritize life and safety issues, such as substandard housing, in these efforts. Additional Code Enforcement improvements have been identified as an element of the adopted City Council goals.	Keep
HE2.O	Identify appropriate 'target' areas for conversion of single-family homes to multi-unit dwellings, Identify areas, zoning districts, or specific sites where conversion would be appropriate or desirable.	Ongoing	A majority of the City's residential land is designated as Medium Density Residential, allowing conversion of existing SFD to MFD at a density of 5.1-16 units per acre. The City has also begun its 6th Cycle Housing Element Update which will identify Key Housing Opportunity Sites and potential rezoning opportunities withing the City. The 6th Cycle Housing Element identifies sites for rezoning to increase density and encourage affordable housing production.	Delete
HE2.P	Develop a program to encourage affordable housing in clusters of 4-6 units on Infill parcels on west side of town. The City will post an inventory of available sites on the City's website. City will explore and adopt as appropriate incentives to encourage affordable housing clusters, including, but not limited to priority permitting processing, reduced or waived development fees, reduced parking and/or other city standards, and an additional density bonus.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide and have prioritized creation of a Citywide Housing Strategy as one of the Council Goals. This is expected to occur along with the comprehensive zoning code update. Incentives for the development of these units including parking ratio reductions, will be included as a part of this review. Further, a majority of the City's residential land is designated as Medium Density Residential, allowing conversion of existing SFD to MFD at a density of 5.1-16 units per acre. The City has also begun its 6th Cycle Housing Element Update which will identify Key Housing Opportunity Sites and potential rezoning opportunities withing the City.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE3.A	Restrict conversion of rental units to condominiums. Current policy allows conversion to condominiums under certain circumstances when the vacancy rate is high. The presence of second homes results in an inflated vacancy rate. The policy should be further studied to reflect a general guiding principle of preserving the affordable housing stock while eliminating the current linkage to vacancy rates.	Ongoing	The City will endeavor to work the Napa Housing Authority to create regulations to restrict the conversion of rental units to condominiums.	Keep
HE3.B	Charge an affordable housing impact fee whenever housing units are converted to other uses. Exempt conversion projects that create affordable for-sale housing from this impact fee.	Ongoing	The City currently charges an Housing Impact Fee. Further, the City Council has expressed an interest in reviewing housing needs Citywide and have prioritized creation of a Citywide Housing Strategy as one of the Council Goals. This is expected to occur concurrently with the comprehensive zoning code update.	Keep
HE3.C	Address the potential loss of assisted units. Identify assisted properties at risk of conversion to market rates and work with the property owners and/or other parties to ensure that they are conserved as affordable housing.	Ongoing	The City Council has expressed an interest in reviewing housing needs; the maintenance of assisted units will be a part of this discussion.	Modify based on current at-risk units
HE3.D	Continue to limit the conversion of market rate housing to vacation rentals. Abate the use of illegal vacation rentals, including time shares and fractional interests.	Ongoing	The City strictly limits the use of residential units for short-term rental (STR) use to a maximum of 25 STR units within the City. Funds collected from these units are utilized to assist with active and aggressive enforcement of these limitations. This enforcement continued to be a priority throughout the planning period.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE3.E	Review housing needs, achievements and challenges as part of the City's regular General Plan review. As required by State law, submit a progress report to the State Department of Housing and Community Development and Governor's Office of Planning and Research by April 1st of each year.	Annually	This report is being done as a part of this Goal and as of 2021 reporting year (submitted April 2022), the City of St. Helena is up to date on its reporting requirements regarding Housing Element implementation with the Office and HCD.	Keep
HE4.A	Review and possibly amend the inclusionary housing ordinance to: Adjust the inclusionary housing ordinance to require further distribution of affordable units within the various income categories… Balance collecting housing impact fees with the requirement to construct affordable housing, either on or off site depending on the size of the site and other site conditions, for larger commercial developments… Increase as appropriate residential construction in-lieu fees and/or create a sliding scale for larger houses. Add an above moderate-income workforce housing component to the Inclusionary Housing Ordinance requirements.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide. Potential revisions to the inclusionary housing requirements will be included as a part of this review.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.B	Generate Revenues for Affordable Housing through the Transient Occupancy Tax. Either increase the Transient Occupancy Tax or increase the number of transient occupancy rooms and apply the increased revenue to support affordable housing.	Ongoing	The City passed Measure E which increased the Transit Occupancy Tax rate by 1% and those funds raised go towards affordable housing.	Keep
HE4.C	Reduce, defer, or waive fees for affordable housing developments. The City will establish a set of criteria for project eligibility to have fees reduced, deferred or waived. The City will explore and adopt as appropriate higher incentives for affordable housing developments with units affordable to extremely low and very low income households.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. Since 2016, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects, anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. Since 2015, the City has fully funded all funding requests made by an affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.	Keep
HE4.D	Prioritize the use of Housing Trust Funds in support of the development and preservation of regulated affordable units for extremely low-income households.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. Since 2016, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects, anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. Since 2015, the City has fully funded all funding requests made by an affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.E	Pursue mortgage revenue bonds and/or mortgage credit certificates. Promote affordable homeownership opportunities for moderate- and lower-income households.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part of continued Citywide housing review.	Keep
HE4.F	Pursue additional funding for affordable housing. Explore other options for affordable housing funding, including a real property transfer tax and Housing Trust Fund contributions from the wine and hospitality industry in Napa Valley.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. In 2018, the City joined with all municipalities in Napa County, put Measure E on the ballot, requesting voter approval of a special tax to increase Transit Occupancy Taxes on hotels by one percent, with these additional funds being for the sole purpose of housing. This measure was approved and went into effect January 1, 2019. Estimated annual revenue from this measure is approximately $280,000.	Keep
HE4.G	Continue Section 8 rent subsidy certificates. Work with the City of Napa Housing Authority to provide continued rental assistance to low, very low and extremely low-income households.	Ongoing	The City continues to contract with the City of Napa for Housing Authority services, including Section 8.	Keep
HE4.H	Explore the possibility of establishing a full-time, shared Housing Coordinator for the up-valley communities to promote development of new affordable housing and enter into a cost-sharing agreement if feasible. The position would serve all of the up-valley communities, including Napa County.	Ongoing	The City continues to contract with the City of Napa for Housing Authority services, including Section 8.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.I	Address farmworker housing needs. The City will contribute staff time and City resources, as appropriate, to countywide farmworker housing efforts that may occur during the Housing Element planning period. The City will reach out to affordable housing developers to support regional and City efforts to develop farmworker housing, including assisting with financing or applications, incentives and concessions, expedited review or other strategies to encourage the development of housing for farmworkers.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part continued Citywide housing review.	Keep
HE4.J	Establish regulations requiring that a portion of units in all new developments meet the special housing needs of seniors and persons with disabilities, including developmental disabilities. Target 20 percent of new housing units to meet senior household needs and 10 percent accessible to persons with disabilities.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part continued Citywide housing review. A recent eight-unit market rate project (632 McCorkle) approved within the City will provide two fully compliant ADA units.	Delete
HE4.K	The City shall participate with mediation between property owners if needed to facilitate affordable housing. The City will provide staff resources and/or work with affected parties along with an outside mediator if necessary to address issues raised by community members in response to affordable housing development applications.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part continued Citywide housing review.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.L	Explore the potential of using Housing Trust Fund money to purchase existing housing for conversion to restricted affordable housing and commit funding as appropriate. Priority use of Housing Trust Fund monies will be given to the creation of housing affordable to extremely low-income households.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. Since 2016, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects, anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. Since 2015, the City has fully funded all funding requests made by an affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.	Keep
HE5.A	Adopt a Green Building Ordinance. The City shall adopt building code standards that meet or exceed the State's Green Building Standards Code. The Planning and Building Department shall coordinate this effort with the Climate Protection Task Force.	Ongoing	The City adopted the most recent standard building code updates in 2017 and again in 2019 and will continue to do so as updates are required.	Keep
HE5.B	Encourage use of alternative energy technologies. Create incentives for the use of solar energy in new and rehabilitated housing. Incentives to adopt as appropriate include, but are not restricted to, ensuring a streamlined review process for applications, deferred fees, and reduced applicable city standards.	Ongoing	The City currently issues building permits for solar panel installation, backup battery installation, and electric vehicle charging infrastructure under the "Rapid Permit" category and will continue to do so into the foreseeable future. The City has extended services for Solar Permits to be submitted via email and paid over the phone to expedite further the process and reduce the number of trips into City Hall to get the permit.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE5.C	Provide public information on alternative energy technologies for residential developers, contractors, and property owners. The City will provide information on its web site and/or at City Hall regarding alternative energy technology options, possible sources of financing, and any applicable information regarding necessary local permits.	Ongoing	The City currently provides Green Building Code information upon request and has updated the City website, allowing additional information to be provided on an on-going basis.	Keep
HE5.D	Require cost-effective energy conservation measures in all new and rehabilitated housing to promote long-term affordability for occupants. The City will adopt the State's new Energy Efficiency Standards as part of any update to the California Building Standards Code and ensure that all new housing units constructed in the City meet or exceed these standards.	Tri-Annually	The City continues to work toward concurrent building code adoption along with standard building code updates. The last update being January 1, 2020, with adoption of the 2019 Code Standards.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE5.E	Provide low-interest loans for implementation of energy conservation measures. The City will identify a source of loan funds to provide energy conservation assistance to homeowners and homebuilders. The City will continue to participate in AB-811 programs and will explore additional state and federal sources of funding to finance local energy conservation measures. Sources of state and federal funds include, but are not limited to, the California Energy Commission State Energy Program and Energy Efficiency and Conservation Block Grant Program, and the Low Income Home Energy Assistance Program.	Ongoing	No additional ability to provide loans from City funds have been identified as of yet, however the City continues to seek opportunities to assist home owners with low-cost options for energy conservation.	Keep
HE5.F	Provide public information on alternative energy technologies for residential developers, contractors, and property owners. The City will provide information on its website and/or City Hall regarding alternative energy technology options, possible sources of financing, and any applicable information regarding necessary local permits.	Ongoing	The City currently provides Green Building Code information upon request and has recently updated the City website, allowing additional information to be provided on an on-going basis. In 2018, the City added information regarding solar panel installation, backup battery installation, and electric vehicle charging infrastructure to the City's website to ease access to the requirements and incentives available.	Delete or merge with 5.C

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE5.G	Require bicycle and pedestrian amenities and connectivity to surrounding areas, in all new housing developments. Support programs to develop more local and regional walking and biking trails. In addition to requiring bicycle and pedestrian connectivity in all new residential developments, the City will provide staff time in support of regional trail programs.	Ongoing	The City engaged with the Napa Valley Transportation Authority on the adoption of a county wide bicycle and pedestrian plan. Further, the City has engaged with the Vine Trail organization in an effort to assist with implementation of the best route for the trail through St Helena. The City has established a Trails Committee and a Trails and Open Space Plan to promote pedestrian connectivity has been drafted and is expected to be adopted by the City Council in 2023. Finally, it is anticipated the comprehensive zoning code update, will include additional requirements for bicycle parking.	Delete
HE5.H	Continue to apply Municipal Code provisions pertaining to water resources. City will continue to require water-efficient landscaping for new residential and commercial construction, as well as implementing the Water Use Efficiency and Use Guidelines.	Ongoing	The City has adopted a "Water Neutral" policy for all new development (Municipal Code Chapter 13.12) and continues to implement a Water Efficient Landscape Ordinance (MWELO) in keeping with anticipated State requirements.	Keep
HE6.A	Provide educational materials at City Hall, through the press and directly to interested parties to educate real estate professionals, property owners and tenants on their rights and responsibilities and the resources available to address fair housing issues.	Ongoing	The City works with Fair Housing Napa Valley to put on an annual housing workshop to highlight the rights and responsibilities of tenants and landlords, in addition to discussing affordable housing challenges generally.	Keep
HE6.B	Continue to utilize and support Fair Housing Napa Valley for implementing fair housing programs, receiving complaints, and providing referrals to available resources when necessary.	Ongoing	The City contracts with Fair Housing Napa Valley to support fair housing and allocates direct funding as part of the budget process for their assistance.	Merge with 6.A

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
Goal 3 Quantified Objective:	Assist in the acquisition of low-interest loans for rehabilitation, including energy conservation, of 10 lower-income housing units by January 31, 2023, of the end of the Housing Element planning period (two extremely low income, two very low income, three low income, and three moderate income households).	12/31/2022	City was awarded $500,000 HOME funds grant in 2017 and initiated implementation of a program to make 0-interest, 0-payment 30-year loans for rehabilitation work to owners of deed restricted homes. To date, the City has expended or committed approximately $448,000 of these funds to assist 18 low-income homeowners and continues to roll out funds as loans are repaid. The City was awarded another $500,000 in HOME funds in 2020 however the City is waiting for approval from HCD to begin processing loan requests as they review the updated guidelines and environmental documentation.	Establish new Quantified Objectives in the Housing Element Update
Goal 1- Quantified Objective:	Construct four units of affordable housing to Extremely-Low income households; four units of housing affordable housing to Very Low Income households; five units for Low Income households; five units for Moderate Income households; and 13 units for above Moderate Income households by October 31, 2022 (31 total RHNA).	12/31/2022	The City has issued building permits for the Turley Flats affordable housing project, an 8-unit multifamily project with loan funding from the Affordable Housing Trust Fund (all low income). Occupancy of all units occurred in 2019. Further, the City has issued building permits for the Brenkle Court 8-unit affordable housing project (two very-low and six low income). In 2020, the City approved a deed restricted affordable housing project (four low to very-low income and one moderate income) at 963 Pope Street. The combined affordability of these units is expected to help the City make significant progress toward meeting these unit counts.	Establish new Quantified Objectives in the Housing Element Update
Goal 4 Quantified Objective:	Reduce, defer or waive fees for 18 housing units affordable to extremely low, low, very low- and moderate-income households.	12/31/2022	The City has both reduced and deferred fees (through a loan from the Affordable Housing Trust Fund) for the Turley Flats Affordable Housing Project, an 8-unit multi-family development at 1105 Pope St, the Brenkle Court 8-unit affordable housing project access off of McCorkle, and the 5-unit affordable housing project at 963 Pope Street. Combined, the City has reduced, deferred or waived fees for 21 affordable housing units as of Jan. 1, 2022.	Establish new Quantified Objectives in the Housing Element Update

3. Demographic and Economic Trends

In order to understand the current housing needs of St. Helena residents, this section examines historic, current, and projected population, household, and employment trends. The figures for St. Helena are compared with the equivalent figures for Napa County and the Bay Area, to frame the St. Helena figures within the trends of the greater region.[3]

The data for the analysis of population, household characteristics, and employment come from the last four decennial Censuses, the 2015-2019 American Community Survey, the U.S. Department of Housing and Urban Development's (HUD) 2013-2017 Comprehensive Housing Affordability Strategy, the California Department of Housing and Community Development's (HCD) 2020 5th Cycle Annual Progress Report Permit Summary, the California Department of Finance's (DoF) 2020 E-5 series, and the 2010-2021 California Employment Development Department (EDD) Local Area Unemployment Statistics.

The Association of Bay Area Governments (ABAG) supplied an HCD Preapproved Data Package that included the vast majority of the data included in this analysis. Additionally, ABAG, in coordination with Baird + Driskell Community Planning provided a Housing Needs Data Report that directly informed this section of the Needs Analysis.[4]

The Bay Area continues to see growth in both population and jobs, which means more housing of various types and sizes is needed to ensure that residents across all income levels, ages, and abilities have a place to call home. While the number of people drawn to the region over the past 30 years has steadily increased, housing production has stalled, contributing to the housing shortage that communities are experiencing today. In many cities, this has resulted in residents being priced out, increased traffic congestion caused by longer commutes, and fewer people across incomes being able to purchase homes or meet surging rents.

The 2023-2031 Housing Element Update provides a roadmap for how to meet our growth and housing challenges. Required by the state, the Housing Element identifies the existing housing conditions and community needs, reiterates goals, and creates a plan for more housing. The Housing Element is an integral part of the General Plan, which guides the policies of St. Helena.

This section presents information regarding population, household, and income trends between 2010 and 2019, with some additional analysis for the period between 2000 and 2010.

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[3] For the purposes of this Housing Needs Assessment, the Bay Area is defined to include the following counties in the Association of Bay Area Governments (ABAG): Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Sonoma, and Solano.

[4] ABAG/MTC Staff and Baird + Driskell Community Planning, Housing Needs Data Report: St. Helena, May 2021.

Key Findings

- **Population**. Generally, the population of the Bay Area continues to increase because of natural growth and the strong economy drawing new residents to the region. The population of St. Helena increased by 2.1 percent from 2000 to 2020, which is lower than the growth rate of the Bay Area.
- **Age.** In 2019, St. Helena's youth population under the age of 18 was 1,050 and senior population 65 and older was 1,636. These age groups represent 17.2 percent and 26.8 percent, respectively, of St. Helena's population.
- **Race/Ethnicity.** In 2020, 65.1 percent of St. Helena's population was White while 1.6 percent was African American, 1.3 percent was Asian, and 30.9 percent was Hispanic or Latinx. People of color in St. Helena comprise a proportion below the overall proportion in the Bay Area as a whole.
- **Employment.** St. Helena residents most commonly work in the Health & Educational Services industry. From January 2010 to January 2021, the unemployment rate in St. Helena increased by 1.3 percentage points. Since 2010, the number of jobs located in the jurisdiction decreased by 2,620 (32.4 percent). Additionally, the jobs-household ratio in St. Helena has decreased from 3.47 jobs per household in 2002 to 2.23 in 2018.

Population Trends

The Bay Area is the fifth-largest metropolitan area in the nation and has seen a steady increase in population since 1990, except for a dip during the Great Recession. Many cities in the region have experienced significant growth in jobs and population. While these trends have led to a corresponding increase in demand for housing across the region, the regional production of housing has largely not kept pace with job and population growth. Table 3 shows population growth trends. In 2020, the population of St. Helena was estimated to be 6,073. From 1990 to 2000, the population increased by 19.2 percent, while it decreased by 2.3 percent during the first decade of the 2000s. In the most recent decade, the population increased by 4.5 percent to 6,073. The population of St. Helena makes up 4.4 percent of Napa County.[5]

Table 3 Population Growth Trends

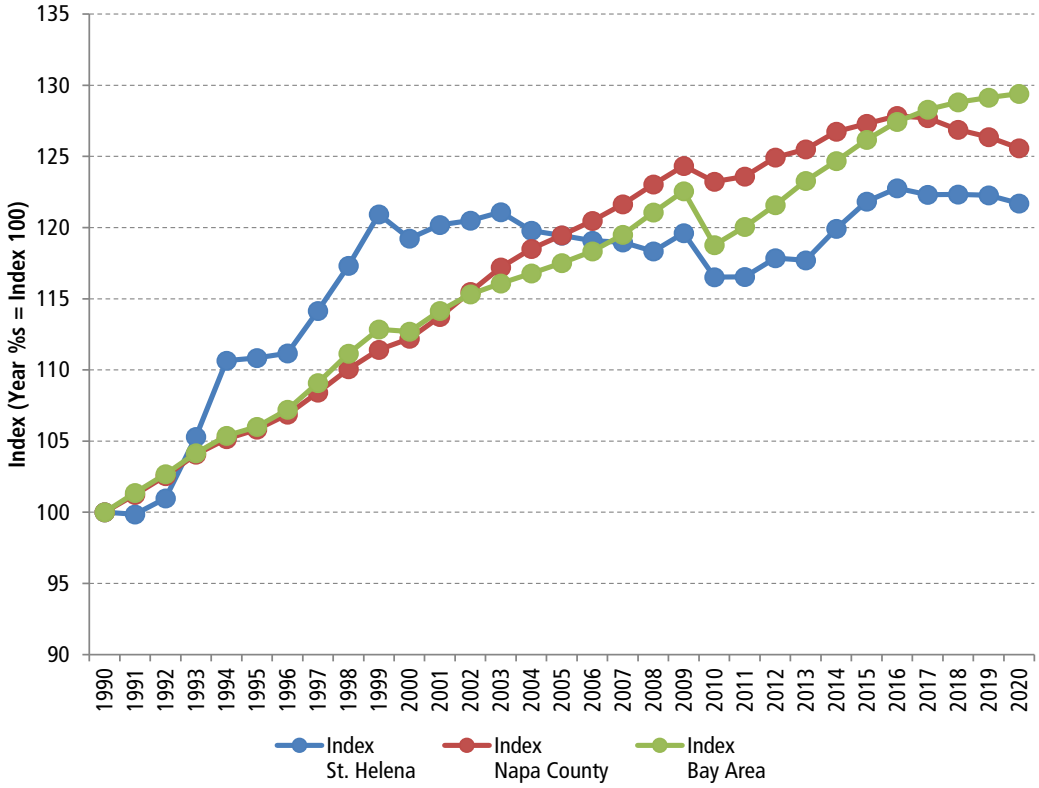
	1990	1995	2000	2005	2010	2015	2020
St. Helena	4,990	5,531	5,950	5,960	5,814	6,079	6,073
Napa County	110,765	117,216	124,279	132,314	136,484	141,010	139,088
Bay Area	6,020,147	6381961	6,784,348	7,073,912	7,150,739	7,595,694	7,790,537

Source: California Department of Finance, E-5 series, 2020.

[5] To compare the rate of growth across various geographic scales, Figure 1 shows population for the jurisdiction, county, and region indexed to the population in the year 1990. This means that the data points represent the population growth (i.e. percent change) in each of these geographies relative to their populations in 1990.

Figure 1 displays population growth trends indexed to the population in the year 1990. Since 2000, St. Helena's population has increased by 2.1 percent; this rate is below that of the region as a whole, at 14.8 percent. In St. Helena, roughly 8.7 percent of its population moved during the past year, a number 4.8 percentage points smaller than the regional rate of 13.4 percent.

Figure 1 Population Growth Trends, Indexed to 1990



Source: California Department of Finance, E-5 series Note: The data shown on the graph represents population for the jurisdiction, county, and region indexed to the population in the first year shown. The data points represent the relative population growth in each of these geographies relative to their populations in that year.
For some jurisdictions, a break may appear at the end of each decade (1999, 2009) as estimates are compared to census counts. DOF uses the decennial census to benchmark subsequent population estimates.
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-01.

Household Trends

As shown in Table 4, between 1990 and 2020, the number of households in St. Helena increased moderately, by an average 0.73 percent annually, however much of this growth occurred prior to the year 2000. From 1990 and 2000, the number of households increased at a rate of 2.1 percent annually. Between 2000 and 2010, this rate decreased to an increase of only 0.1 percent annually, or about 21 households per year. The rate increased slightly to an average of 0.5 percent per year between 2010 and 2020, or about 105 households per year. In

contrast, the number of Napa County households grew by one percent annually between 2010 and 2020, representing an increase of about 5,000 households per year.

Table 4 Household Trends

Household Trends	1990	2000	2010	2020	Average Annual Growth 1990-2000	Average Annual Growth 2000-2010	Average Annual Growth 2010-2020
St. Helena	2,138	2,380	2,401	2,866	1.2%	0.1%	2.0%
Napa County	41,312	45,402	48,876	48,484	1.1%	0.8%	-0.1%

Source: Census 1990, 2000, 2010, 2020.

Average Household Size

Average household size (Table 5) is a function of the number of people living in households divided by the number of occupied housing units in a given area. In general, a decline or increase in average household size signals that the population and the number of households are growing at different rates. Overall, the average household size in St. Helena was slightly smaller than in Napa County in 1990, 2000, and 2010 and considerably smaller in 2020. With the number of households growing, and a slight drop in population in St. Helena between 2000 and 2020, average household sizes fell from 2.48 to 2.38 persons per household between 2000 and 2010 and then to 2.08 persons per household by 2020. In contrast, the population in Napa County increased more rapidly than the number of households, leading to increases in the average household size from 2.62 to 2.69 persons per household between 2000 and 2010 and up to 2.78 by 2020.

Table 5 Average Household Size, St. Helena and Napa County

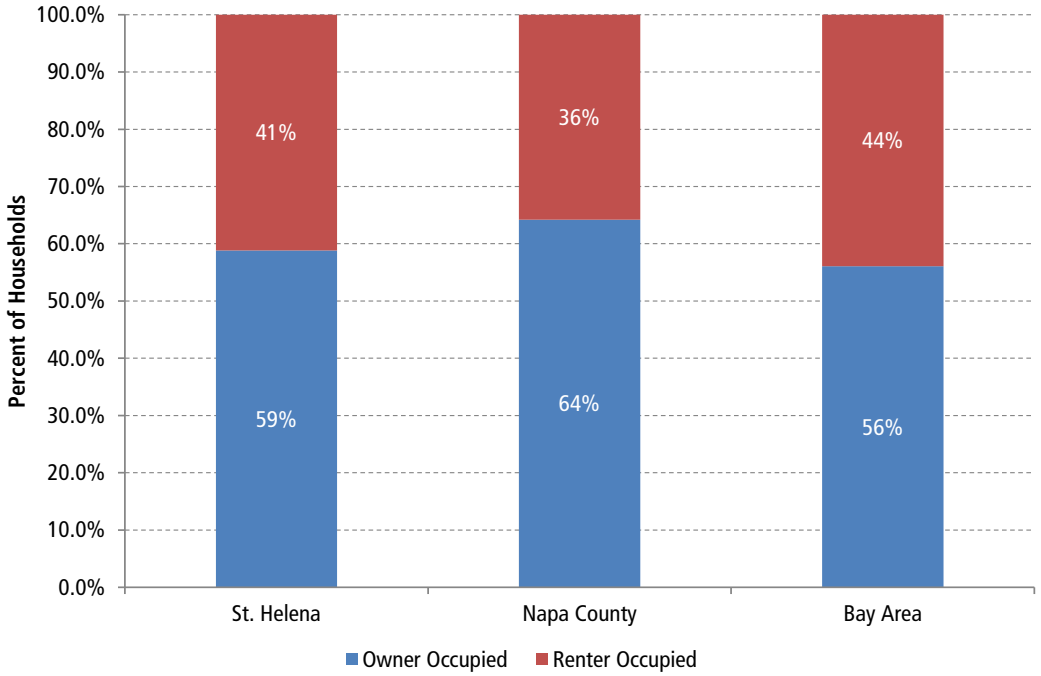
	1990	2000	2010	2020
St. Helena	2.31	2.48	2.38	2.08
Napa County	2.54	2.62	2.69	2.78

Source: Census 1990, 2000, 2010, 2020.

Household Tenure

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity – ability for individuals to stay in their homes – in a city and region. Generally, renters may be displaced more quickly if prices increase. In St. Helena there are a total of 2,702 housing units, and fewer residents rent than own their homes: 41.2 percent versus 58.8 percent (Figure 2). By comparison, 35.8 percent of households in Napa County are renters, while 44 percent of Bay Area households rent their homes.

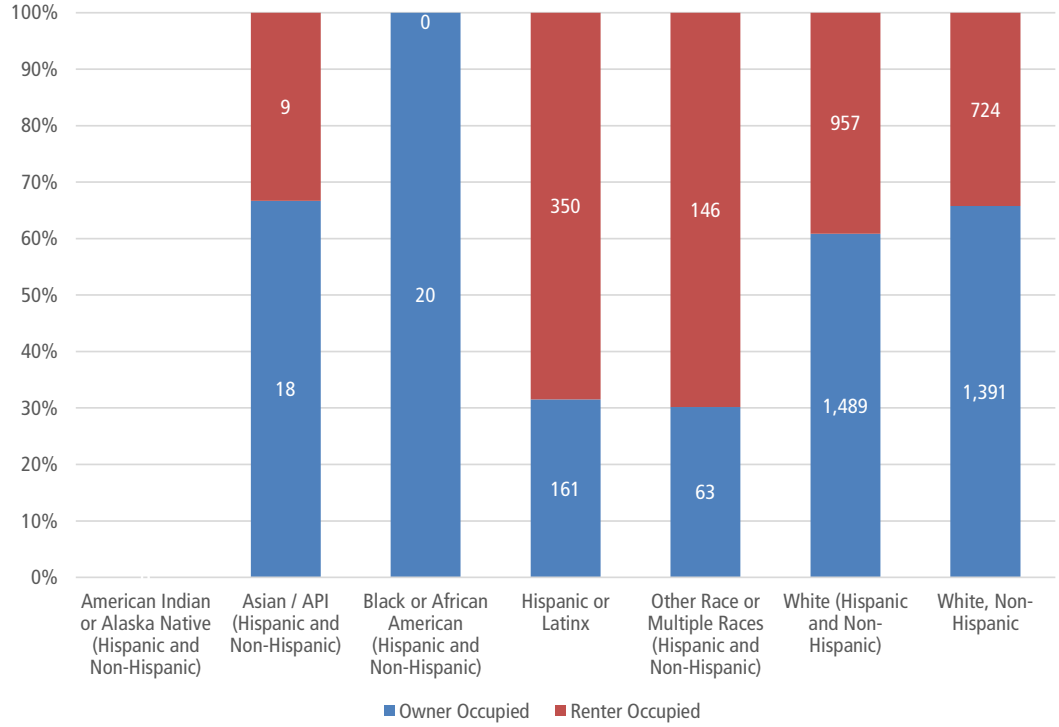
Figure 2 Housing Tenure



Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-16.

Homeownership rates often vary considerably across race/ethnicity in the Bay Area and throughout the country. These disparities not only reflect differences in income and wealth but also stem from Federal, State, and local policies that limited access to homeownership for communities of color while facilitating homebuying for white residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policy are still evident across Bay Area communities. Figure 3 shows housing tenure by race. In St. Helena, 100.0 percent of Black households owned their homes, while homeownership rates were 66.7 percent for Asian households, 31.5 percent for Hispanic or Latinx households, and 60.9 percent for White households. Notably, recent changes to state law require local jurisdictions to examine these dynamics and other fair housing issues when updating their Housing Elements.

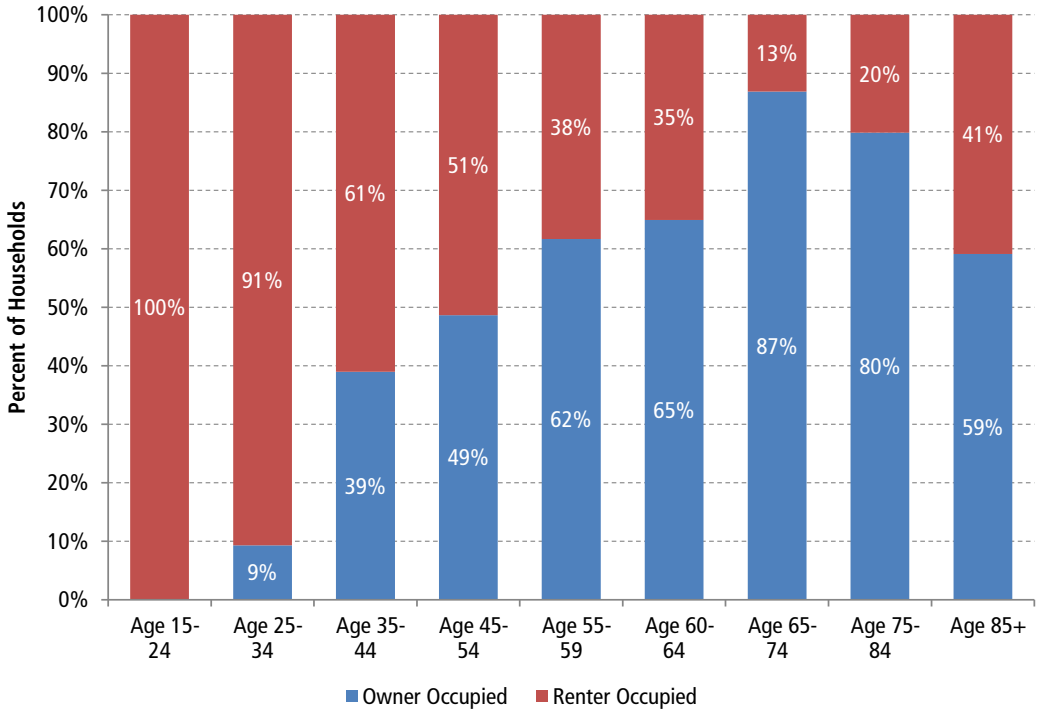
Figure 3 Housing Tenure by Race of Householder



Universe: Occupied housing units
Notes: For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003(A-I)For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-20.

The age of residents who rent or own their home can also signal the housing challenges a community is experiencing. Younger households tend to rent and may struggle to buy a first home in the Bay Area due to high housing costs. At the same time, senior homeowners seeking to downsize may have limited options in an expensive housing market. In St. Helena, 75.1 percent of householders between the ages of 25 and 44 are renters, while 19.7 percent of householders over 65 are (Figure 4).

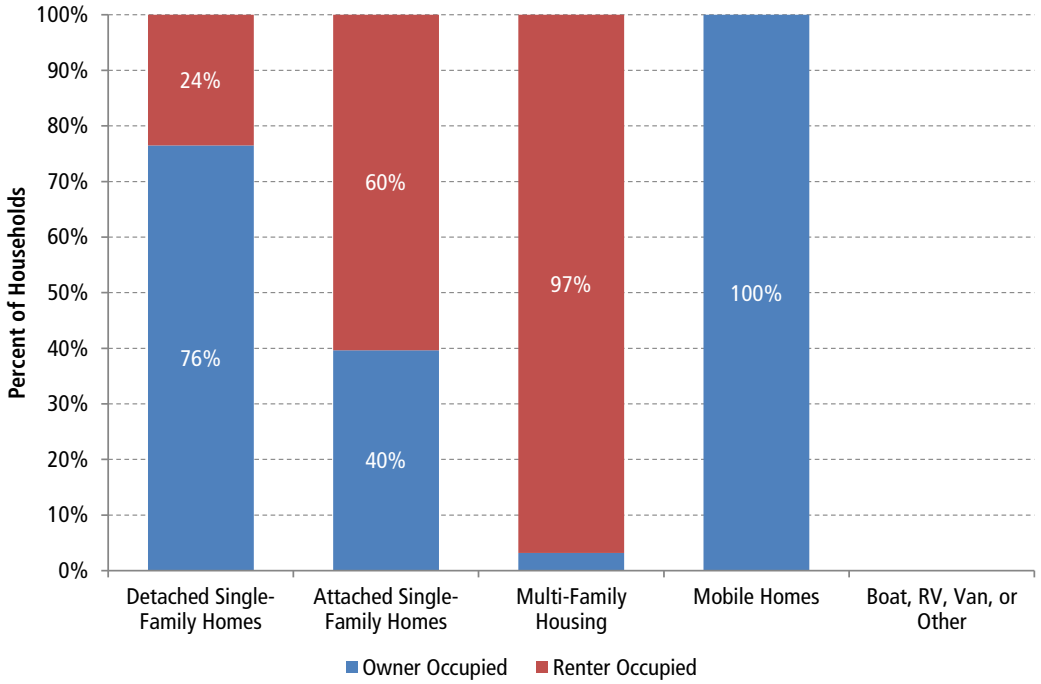
Figure 4 Housing Tenure by Age



Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25007 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-18.

In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multi-family housing. In St. Helena, 76.5 percent of households in detached single-family homes are homeowners, while 3.2 percent of households in multi-family housing are homeowners (Figure 5).

Figure 5 Housing Tenure by Housing Type



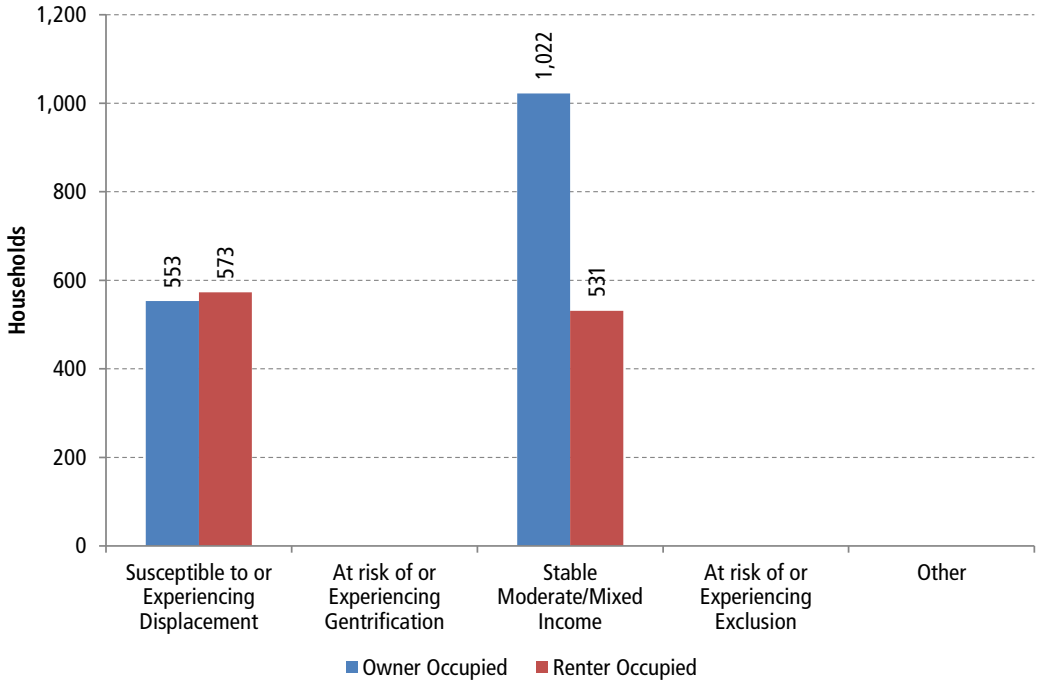
Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25032 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-22.

Households by Displacement Risk

Because of increasing housing prices, displacement is a major concern in the Bay Area. Displacement has the most severe impacts on low- and moderate-income residents. When individuals or families are forced to leave their homes and communities, they also lose their support network.

The University of California, Berkeley has mapped all neighborhoods in the Bay area, identifying their risk for gentrification. They find that in St. Helena, 42.0 percent of households live in neighborhoods that are susceptible to or experiencing displacement and 0.0 percent live in neighborhoods at risk of or undergoing gentrification. Figure 6 shows households by displacement risk and tenure.

Figure 6 Households by Displacement Risk and Tenure



Universe: Households
Notes: Displacement data is available at the census tract level. Staff aggregated tracts up to jurisdiction level using census 2010 population weights, assigning a tract to jurisdiction in proportion to block level population weights. Total household count may differ slightly from counts in other tables sourced from jurisdiction level sources. Categories are combined as follows for simplicity: At risk of or Experiencing Exclusion: At Risk of Becoming Exclusive; Becoming Exclusive; Stable/Advanced Exclusive At risk of or Experiencing Gentrification: At Risk of Gentrification; Early/Ongoing Gentrification; Advanced Gentrification Stable Moderate/Mixed Income: Stable Moderate/Mixed Income Susceptible to or Experiencing Displacement: Low-Income/Susceptible to Displacement; Ongoing Displacement Other: High Student Population; Unavailable or Unreliable Data
Source: Urban Displacement Project for classification, American Community Survey 5-Year Data (2015-2019), Table B25003 for tenure.
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-25.

Equally important, some neighborhoods in the Bay Area do not have housing appropriate for a broad section of the workforce. UC Berkeley estimates no households in St. Helena are in neighborhoods where low-income households are likely to be excluded due to prohibitive housing costs.[6]

[6] *More information about this gentrification and displacement data is available at the Urban Displacement Project's webpage: https://www.urbandisplacement.org/. Specifically, one can learn more about the different gentrification/displacement typologies shown in Figure 18 at this link: https://www.urbandisplacement.org/sites/default/files/typology_sheet_2018_0.png. Additionally, one can view maps that show which typologies correspond to which parts of a jurisdiction here: https://www.urbandisplacement.org/san-francisco/sf-bay-area-gentrification-and-displacement*

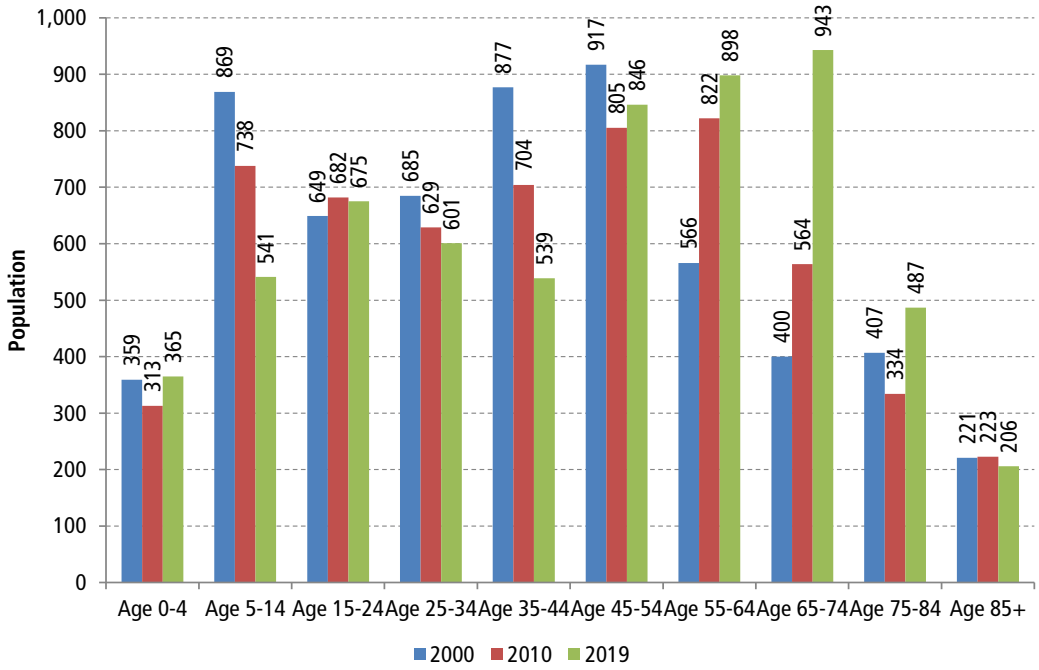
Demographic Trends

Age Distribution

The distribution of age groups in a city shapes what types of housing the community may need in the near future. An increase in the older population may mean there is a developing need for more senior housing options, while higher numbers of children and young families can point to the need for more family housing options and related services. There has also been a move by many to age-in-place or downsize to stay within their communities, which can mean more multifamily and accessible units are also needed.

Figure 7 shows population growth trends. In St. Helena, the median age in 2000 was 39.2; by 2019, this figure had increased, landing at around 49 years. More specifically, the population of those under 14 has decreased since 2010, while the 65- and-over population has increased.

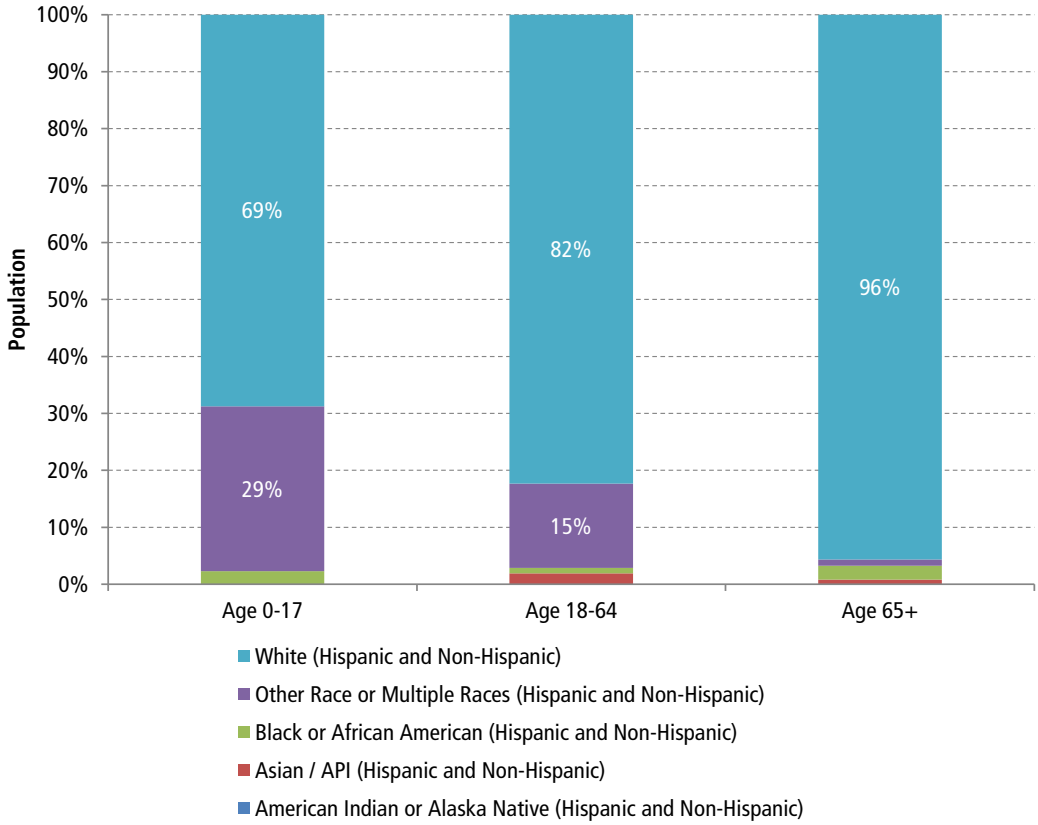
Figure 7 Population Growth Trends



Universe: Total population
Source: U.S. Census Bureau, Census 2000 SF1, Table P12; U.S. Census Bureau, Census 2010 SF1, Table P12; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-04.

Looking at the senior and youth population by race can add an additional layer of understanding, as families and seniors of color are even more likely to experience challenges finding affordable housing. People of color make up 4.3 percent of seniors and 31.2 percent of youth under 18 (Figure 8).

Figure 8 Senior and Youth Population by Race

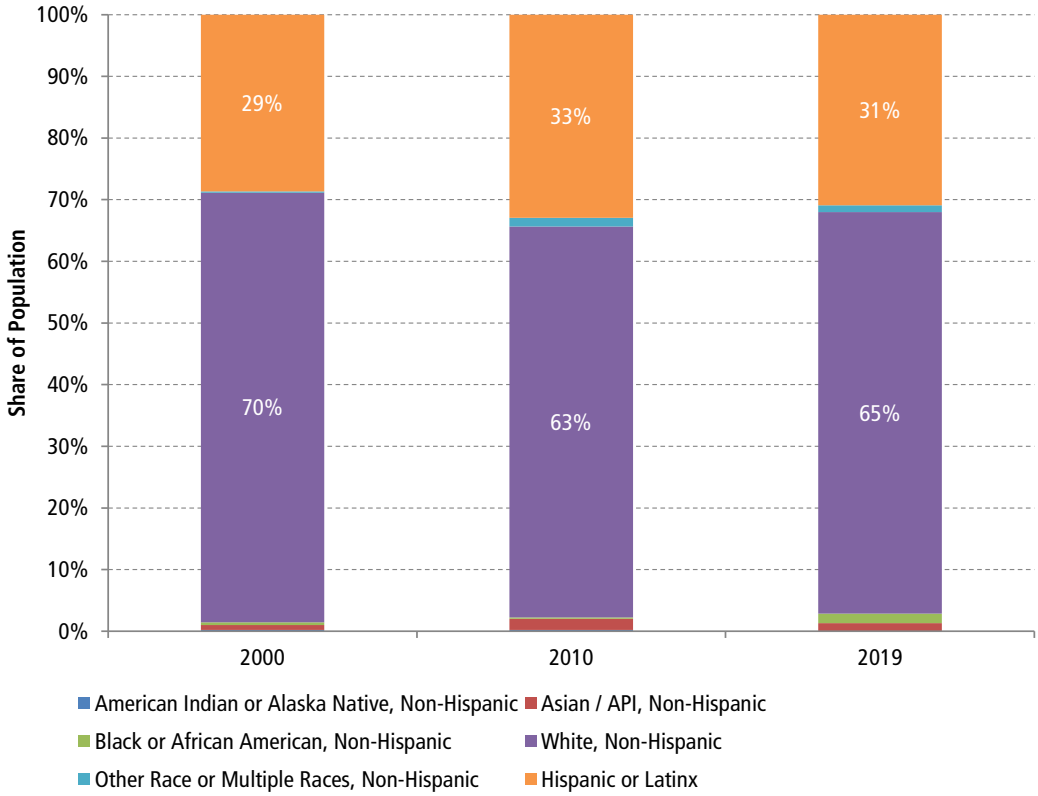


Universe: Total population
Notes: In the sources for this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity, and an overlapping category of Hispanic / non-Hispanic groups has not been shown to avoid double counting in the stacked bar chart.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-G)
For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-02.

Race and Ethnicity

Understanding the racial makeup of a city and region is important for designing and implementing effective housing policies and programs. These patterns are shaped by both market factors and government actions, such as exclusionary zoning, discriminatory lending practices and displacement that has occurred over time and continues to impact communities of color today. Since 2000, the percentage of residents in St. Helena identifying as White has decreased – and by the same token the percentage of residents of all other races and ethnicities has increased – by 4.6 percent, with the 2019 population standing at 3,973. In absolute terms, the Hispanic or Latinx population increased the most while the White, Non-Hispanic population decreased the most. Figure 9 shows population trends by race.

Figure 9 Population by Race, St. Helena, 2000-2019



Universe: Total population
Notes: Data for 2019 represents 2015-2019 ACS estimates. The Census Bureau defines Hispanic/Latinx ethnicity separate from racial categories. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.
Source: U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-02.

Income

Household Income Distribution

Despite the economic and job growth experienced throughout the region since 1990, the income gap has continued to widen. California is one of the most economically unequal states in the nation, and the Bay Area has the highest income inequality between high- and low-income households in the state.[7]

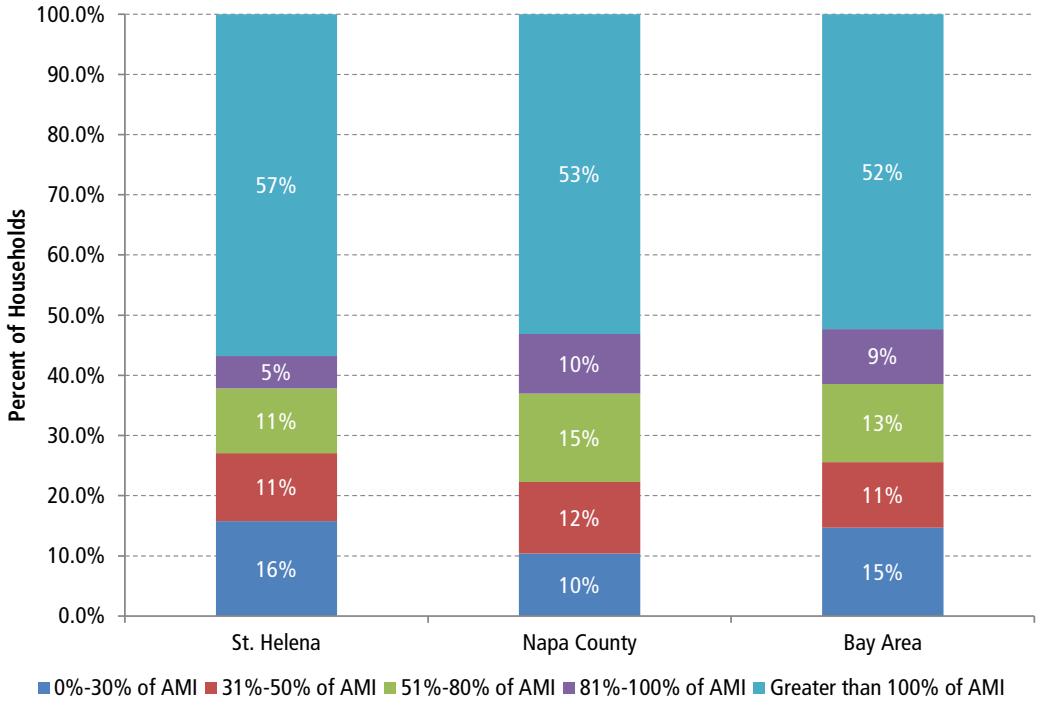
[7] *Bohn, S.et al. 2020. Income Inequality and Economic Opportunity in California. Public Policy Institute ofCalifornia.*

Household Income Categories

The Department of Housing and Urban Development defines income categories as a percentage of the Area Median Income (AMI). Households whose income equals 30 percent or less of the AMI are considered extremely low-income; households with incomes between 30 and 50 percent of the AMI are classified as very low-income; and those between 50 and 80 percent of the AFI are low-income. The CHAS data set also provides information on households earning between 80 and 100 percent of the AMI and households with incomes above 100 percent of the AMI.

In St. Helena, 56.8 percent of households make more than 100 percent of the Area Median Income (AMI)[8], compared to 15.8 percent making less than 30 percent of AMI, which is considered extremely low-income (Figure 10).

Figure 10 Households by Household Income Level



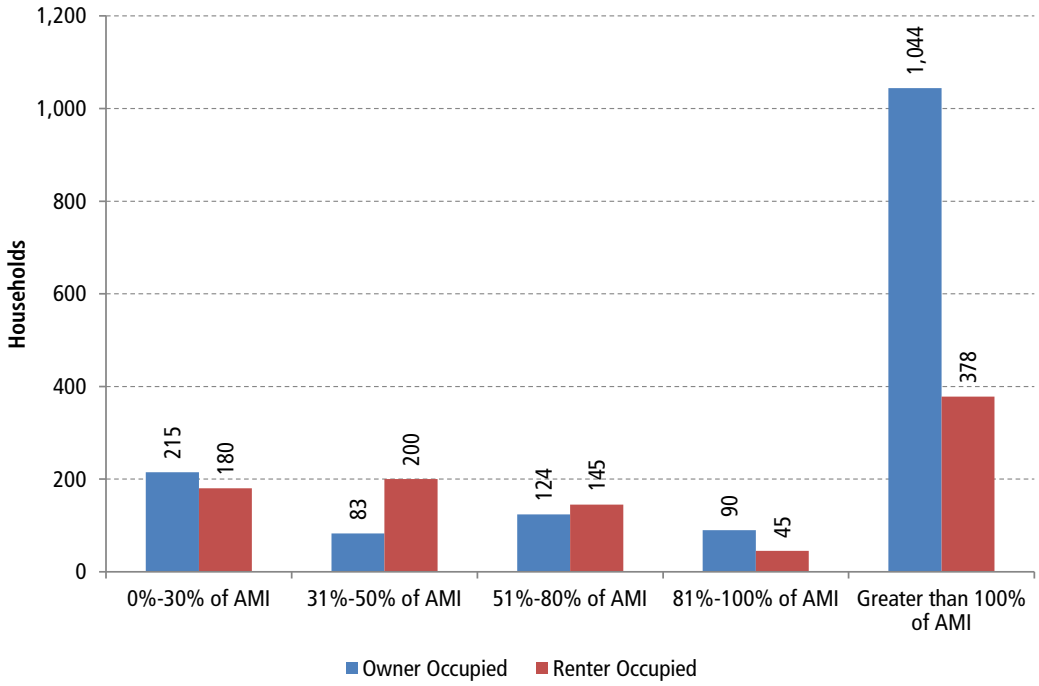
Universe: Occupied housing units
Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County),

[8] *Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). This is then adjusted for household size.*

and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. The data that is reported for the Bay Area is not based on a regional AMI but instead refers to the regional total of households in an income group relative to the AMI for the county where that household is located. Local jurisdictions are required to provide an estimate for their projected extremely low-income households (0-30 percent AMI) in their Housing Elements. HCD's official Housing Element guidance notes that jurisdictions can use their RHNA for very low-income households (those making 0-50 percent AMI) to calculate their projected extremely low-income households. As Bay Area jurisdictions have not yet received their final RHNA numbers, this document does not contain the required data point of projected extremely low-income households. The report portion of the housing data needs packet contains more specific guidance for how local staff can calculate an estimate for projected extremely low-income households once jurisdictions receive their 6th cycle RHNA numbers.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-01.

Throughout the region, there are disparities between the incomes of homeowners and renters. Typically, the number of low-income renters greatly outpaces the amount of housing available that is affordable for these households. In St. Helena, the largest proportion of renters falls in the Greater than 100 percent of AMI income group, while the largest proportion of homeowners are found in the Greater than 100 percent of AMI group (Figure 11).

Figure 11 Household Income Level by Tenure

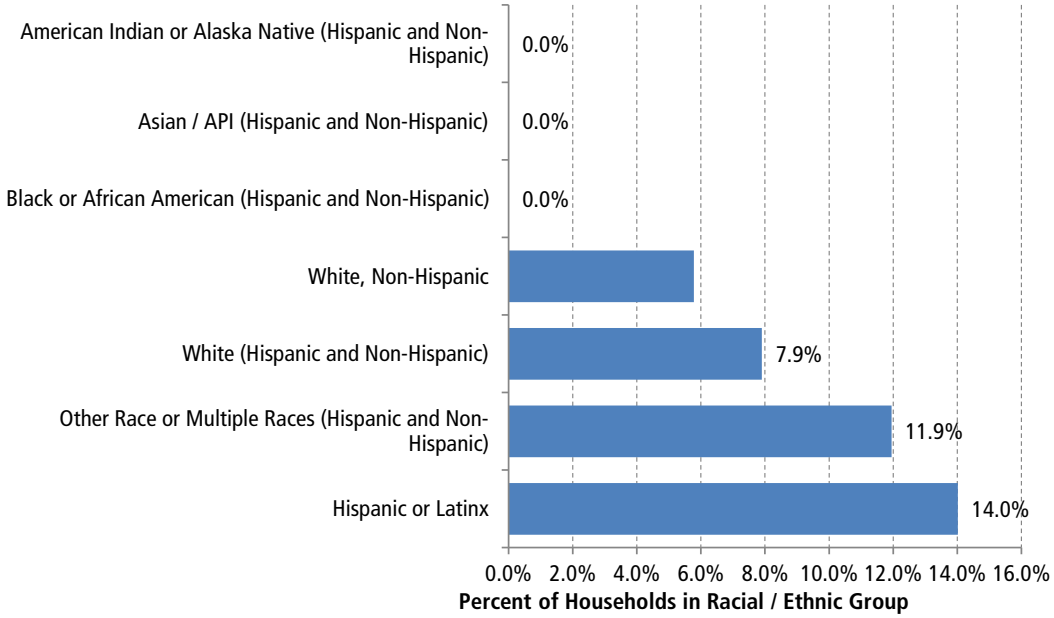


Universe: Occupied housing units
Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County),

and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-21.

Currently, people of color are more likely to experience poverty and financial instability as a result offederal and local housing policies that have historically excluded them from the same opportunities extended to white residents.[9] These economic disparities also leave communities of color at higher risk for housing insecurity, displacement or homelessness. In St. Helena, Other Race or Multiple Races (Hispanic and Non-Hispanic) residents experience the highest rates of poverty, followed by White (Hispanic and Non-Hispanic) residents (Figure 12).

Figure 12 Poverty Status by Race



Universe: Population for whom poverty status is determined
Notes: The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the population for whom poverty status is determined for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the population for whom poverty status is determined.

[9] *Moore, E., Montojo, N. and Mauri, N., 2019. Roots, Race & Place: A History of Racially Exclusionary Housing the San Francisco Bay Area. Hass Institute.*

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I) For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-03.

Extremely Low-Income Households

In St. Helena, 56.8 percent of households make more than 100 percent of the Area Median Income (AMI), compared to 15.8 percent making less than 30 percent of AMI, which is considered extremely low-income (see Figure 10). Regionally, more than half of all households make more than 100 percent AMI, while 15 percent make less than 30 percent AMI. In Napa County, 30 percent AMI is the equivalent to the annual income of $27,950 for a family of four. Many households with multiple wage earners – including food service workers, full-time students, teachers, farmworkers, and healthcare professionals – can fall into lower AMI categories due to relatively stagnant wages in many industries.

Within the Housing Element, cities must estimate the extremely low-income housing need in the community. Based on HCD guidance, the City of St. Helena estimates that approximately 52 extremely low-income housing units are needed in the planning period. This estimate was calculated based on HCD guidance, as 50 percent of the very low-income housing need, as identified by the RHNA (Table 6).

Table 6 St. Helena Regional Housing Needs Allocation

Geography	Very Low Income (<50 percent of AMI)	Low Income (50%-80 percent of AMI)	Moderate Income (80%-120 percent of AMI)	Above Moderate Income (>120 percent of AMI)
St. Helena	104	59	26	67

[1] Per HCD guidance, the extremely low-income need in St. Helena is estimated at 50 percent of the very low income RHNA requirement, or approximately 52 units.

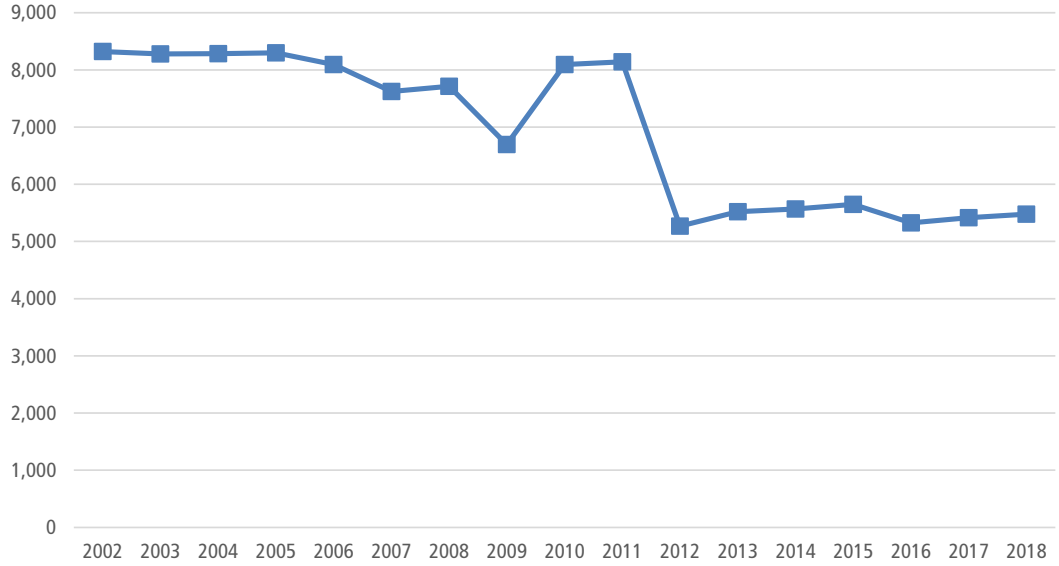
Employment Trends

Balance of Jobs and Workers

A city houses employed residents who either work in the community where they live or work elsewherein the region. Conversely, a city may have job sites that employ residents from the same city, but more often employ workers commuting from outside of it. Smaller cities typically will have more employed residents than jobs and export workers, while larger cities tend to have a surplus of jobs and import workers. To some extent the regional transportation system is set up for this flow of workers to the region's core job centers. At the same time, as the housing affordability crisis has illustrated, local imbalances may be severe, where local jobs and worker populations are out of sync at a sub-regional scale.

One measure of this is the relationship between workers and jobs. A city with a surplus of workers "exports" workers to other parts of the region, while a city with a surplus of jobs must conversely "import" them. Between 2002 and 2018, the number of jobs in St. Helena decreased by 34.2 percent (Figure 13).

Figure 13 Jobs in St. Helena



Universe: Jobs from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment
Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-11.

There are 3,005 employed residents, and 5,476 jobs[10] in St. Helena - the ratio of jobs to resident workers is 1.82; St. Helena is a net importer of workers. Figure 14 shows the balance when comparing jobs to workers, broken down by different wage groups, offering additional insight into local dynamics. A community may offer employment for relatively low-income workers but have relatively few housing options for those workers - or conversely, it may house residents who are low wage workers but offer few employment opportunities for them. Such relationships may cast extra light on potentially pent-up demand for housing in particular price categories. A surplus of jobs relative to residents in a given wage category suggests the need to import those workers, while conversely, surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. Such flows are not inherently bad, though over time, sub-regional imbalances may appear.

St. Helena has more low-wage jobs than low-wage residents (where low-wage refers to jobs paying less than $25,000). This disparity implies that, every day, low wage workers commute to St. Helena from their residences outside of the city. At the other end of the wage spectrum, the city has more high-wage jobs than high-wage residents (where high-wage refers to jobs paying more than $75,000). This figure suggests that high-wage

[10] *Employed residents in a jurisdiction is counted by place of residence (they may work elsewhere) while jobs in a jurisdiction are counted by place of work (they may live elsewhere). The jobs may differ from those reported in Figure 5 as the source for the time series is from administrative data, while the cross-sectional data is from a survey.*

workers are also commuting into St. Helena. Since both high wage workers and low wage workers are faced with commuting into St. Helena for work, it suggests a lack of housing, both market-rate and affordable, within the city. (Figure 14).[11]

Figure 14 Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence

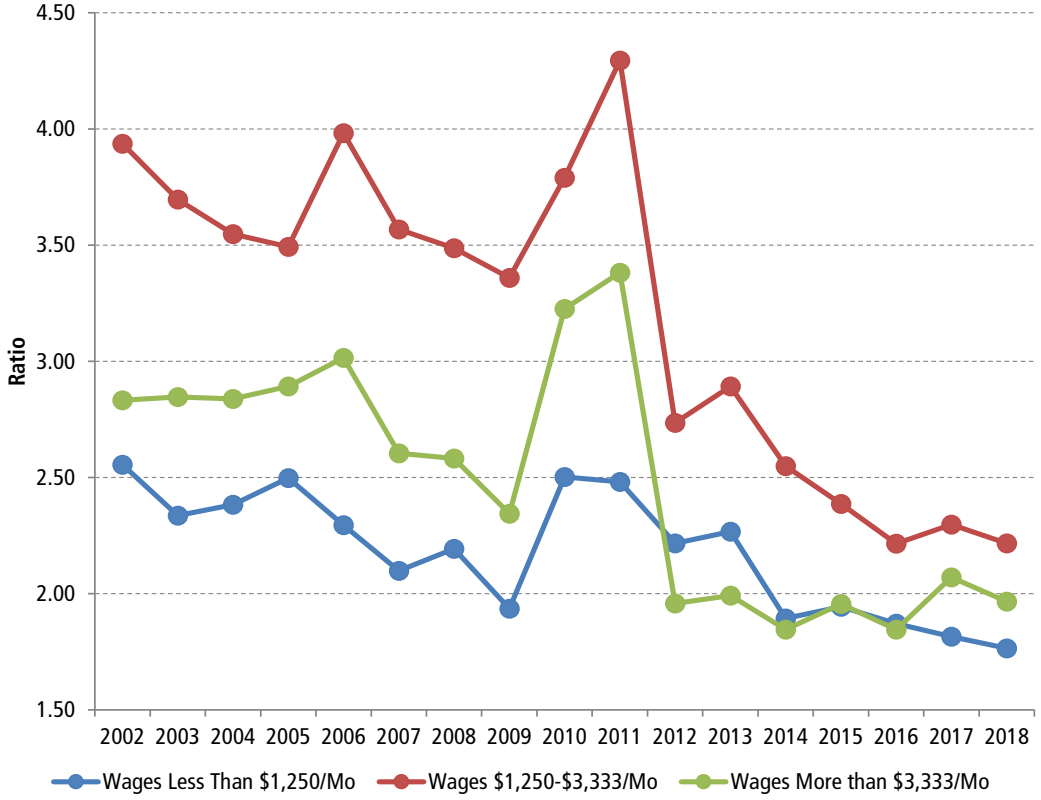


Universe: Workers 16 years and over with earnings
Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.

Figure 15 shows the balance of a jurisdiction's resident workers to the jobs located there for different wage groups as a ratio instead - a value of one means that a city has the same number of jobs in a wage group as it has resident workers - in principle, a balance. Values above one indicate a jurisdiction will need to import workers for jobs in a given wage group. At the regional scale, this ratio is 1.04 jobs for each worker, implying a modest import of workers from outside the region (Figure 15).

[11] *The source table is top-coded at $75,000, precluding more fine grained analysis at the higher end of the wage spectrum.*

Figure 15 Jobs-Worker Ratios, By Wage Group

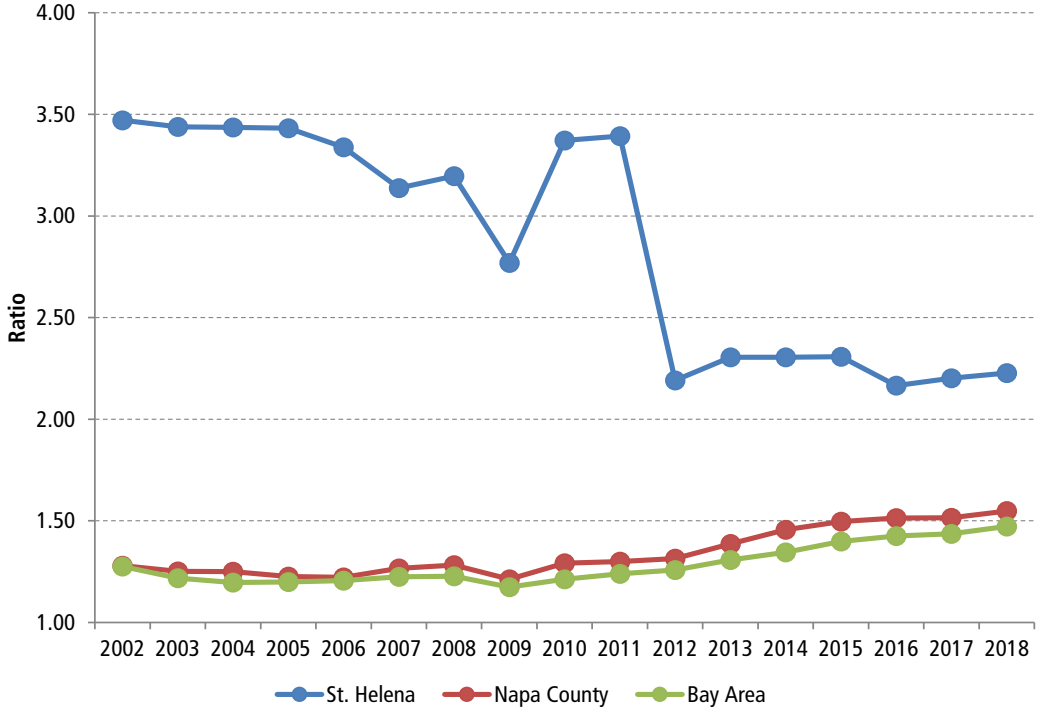


Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment
Notes: The ratio compares job counts by wage group from two tabulations of LEHD data: Counts by place of work relative to counts by place of residence. See text for details.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs); Residence Area Characteristics (RAC) files (Employed Residents), 2010-2018
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-14.

Such balances between jobs and workers may directly influence the housing demand in a community. New jobs may draw new residents, and when there is high demand for housing relative to supply, many workers may be unable to afford to live where they work, particularly where job growth has been in relatively lower wage jobs. This dynamic not only means many workers will need to prepare for long commutes and time spent on the road, but in the aggregate, it contributes to traffic congestion and time lost for all road users.

If there are more jobs than employed residents, it means a city is relatively jobs-rich, typically also with a high jobs to household ratio. Thus, bringing housing into the measure, the jobs-household ratio in St. Helena has decreased from 3.47 in 2002, to 2.23 jobs per household in 2018 (Figure 16).

Figure 16 Jobs-Household Ratio

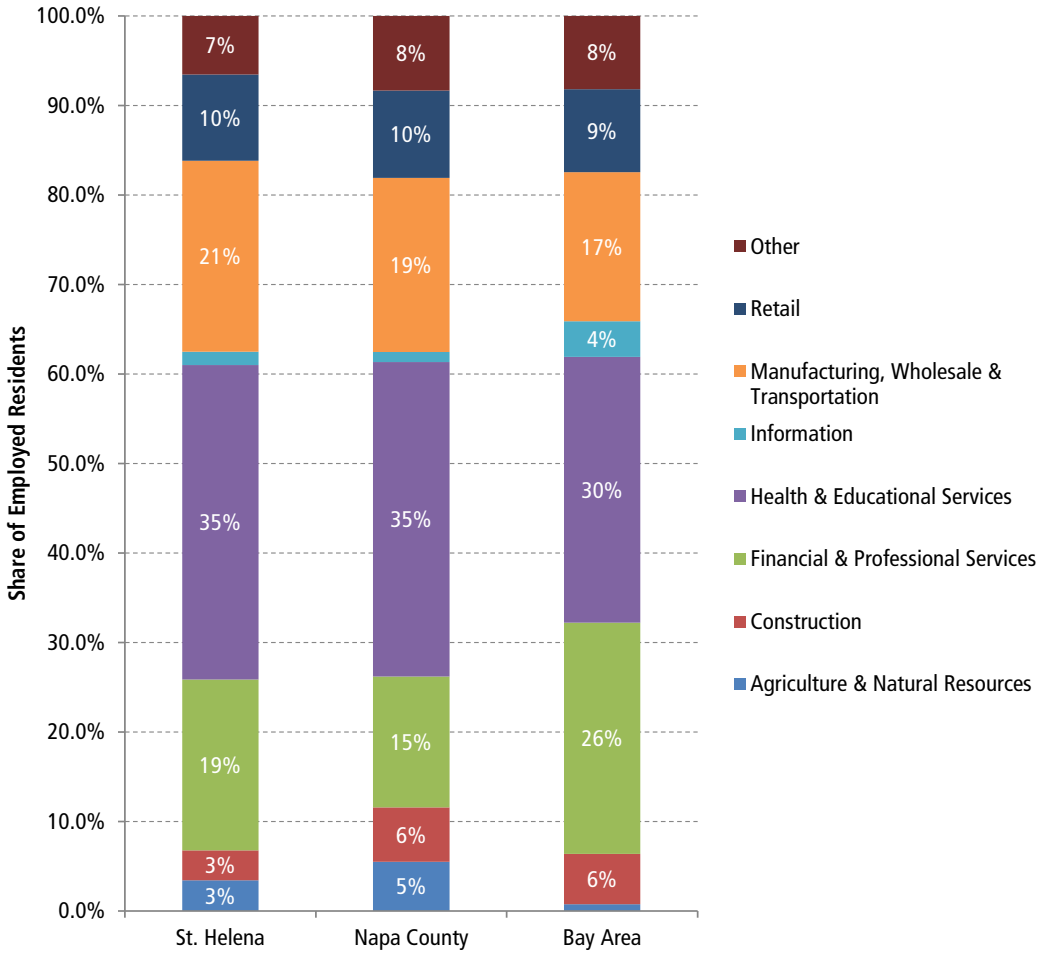


Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment; households in a jurisdiction
Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized. The ratio compares place of work wage and salary jobs with households, or occupied housing units. A similar measure is the ratio of jobs to housing units. However, this jobs-household ratio serves to compare the number of jobs in a jurisdiction to the number of housing units that are actually occupied. The difference between a jurisdiction's jobs-housing ratio and jobs-household ratio will be most pronounced in jurisdictions with high vacancy rates, a high rate of units used for seasonal use, or a high rate of units used as short-term rentals.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs), 2002-2018; California Department of Finance, E-5 (Households)
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-13.

Employment by Industry

In terms of sectoral composition, the largest industry in which St. Helena residents work is Health & Educational Services, and the largest sector in which Napa residents work is Health & Educational Services (Figure 17). For the Bay Area as a whole, the Health & Educational Services industry employs the most workers of any sector.

Figure 17 Resident Employment by Industry

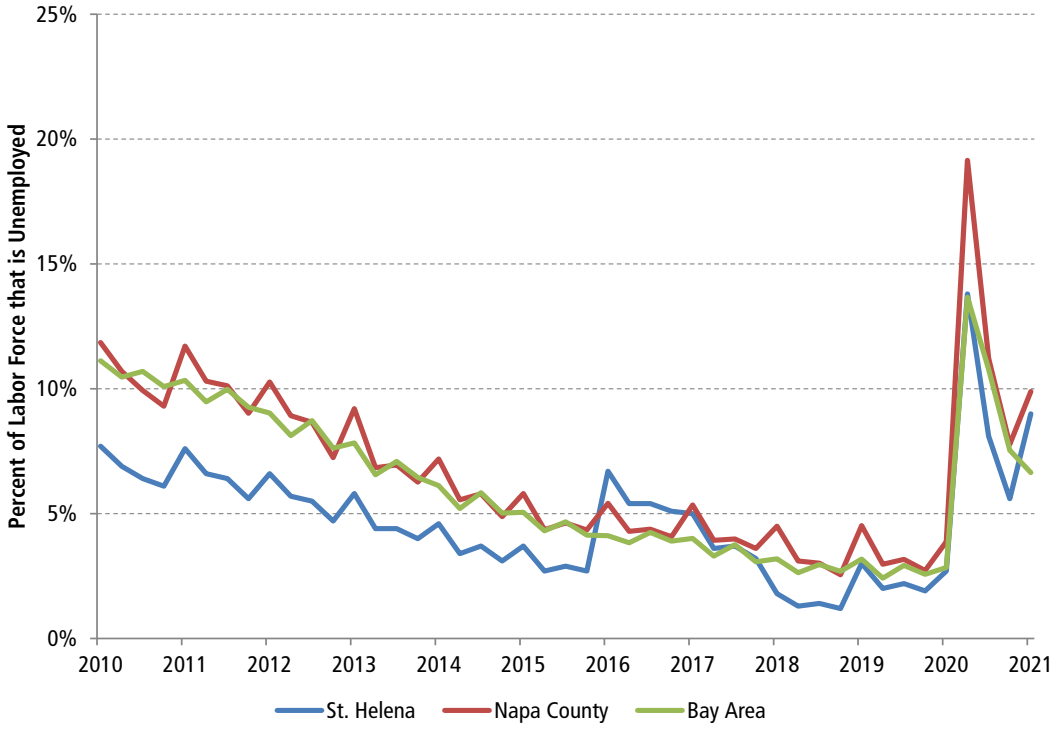


Universe: Civilian employed population age 16 years and over
Notes: The data displayed shows the industries in which jurisdiction residents work, regardless of the location where those residents are employed (whether within the jurisdiction or not). Categories are derived from the following source tables: Agriculture & Natural Resources: C24030_003E, C24030_030E; Construction: C24030_006E, C24030_033E; Manufacturing, Wholesale & Transportation: C24030_007E, C24030_034E, C24030_008E, C24030_035E, C24030_010E, C24030_037E; Retail: C24030_009E, C24030_036E; Information: C24030_013E, C24030_040E; Financial & Professional Services: C24030_014E, C24030_041E, C24030_017E, C24030_044E; Health & Educational Services: C24030_021E, C24030_024E, C24030_048E, C24030_051E; Other: C24030_027E, C24030_054E, C24030_028E, C24030_055E
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24030 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-06.

Unemployment

Figure 18 shows the unemployment rate for St. Helena, Napa County, and the Bay Area. In St. Helena, there was a 1.3 percentage point increase in the unemployment rate between January 2010 and January 2021. Jurisdictions through the region experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020.

Figure 18 Unemployment Rate



Universe: Civilian noninstitutional population ages 16 and older
Notes: Unemployment rates for the jurisdiction level is derived from larger-geography estimates. This method assumes that the rates of change in employment and unemployment are exactly the same in each sub-county area as at the county level. If this assumption is not true for a specific sub-county area, then the estimates for that area may not be representative of the current economic conditions. Since this assumption is untested, caution should be employed when using these data. Only not seasonally-adjusted labor force (unemployment rates) data are developed for cities and CDPs.
Source: California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021.
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-15.

4. Population and Employment Projections

This section uses population, household, and employment projections provided by the Association of Bay Area Governments (ABAG), the California Department of Finance (DoF), and Plan Bay Area. Data specific to St. Helena is used when available (typically from Plan Bay Area 2040) and is supplemented by regional projections for North Napa County (Calistoga, St. Helena, and Yountville) and the Bay Area, available through the recently (2021) released Plan Bay Area 2050.

Key Findings

- ABAG anticipates much higher growth across the Bay Area than in St. Helena. While Plan Bay Area 2050 projects a 35 percent increase in total population from 2015 to 2050 (approximately 2.7 million new residents) across the nine counties of the Bay Area, it projects less than one percent growth in Calistoga, St. Helena, and Yountville.

Population

While Plan Bay Area 2050 does not provide jurisdiction-specific population projections, Plan Bay Area 2040 (2017) projected a 17 percent increase in total population from 2010 to 2040 for St. Helena, which translates to 1,550 new residents, as shown in Table 7. Countywide, Plan Bay Area 2040 projected a similar increase of 16 percent for Napa County.

Table 7 St. Helena, Population Totals and Projections, 2010-2040, Plan Bay Area 2040

Year	2010	2015	2020	2025	2030	2035	2040	Percent Change (2010-2040)
St. Helena	5,830	5,920	6,085	6,415	6,655	6,715	6,800	+17%
Napa County	135,880	136,885	141,240	146,130	151,445	155,860	158,050	+16%

Source: Plan Bay Area 2040.

For comparison, the DoF projects a countywide increase of seven percent in total population between 2010 to 2050, which translates to 9,463 new Napa County residents (Table 8).

Table 8 Department of Finance Population Projections, Napa County, 2010-2050

Year	2010	2015	2020	2025	2030	2035	2040	2045	2050	Percent Change
St. Helena	136,587	141,390	138,711	140,748	143,223	145,444	146,602	146,641	146,050	+7%

Source: California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2010-2060 (Baseline 2019 Population Projections; Vintage 2020 Release). Sacramento: California. July 2021.

ABAG anticipates much higher growth across the Bay Area then in St. Helena. While Plan Bay Area 2050 projects a 35 percent increase in total population from 2015 to 2050 (approximately 2.7 million new residents)

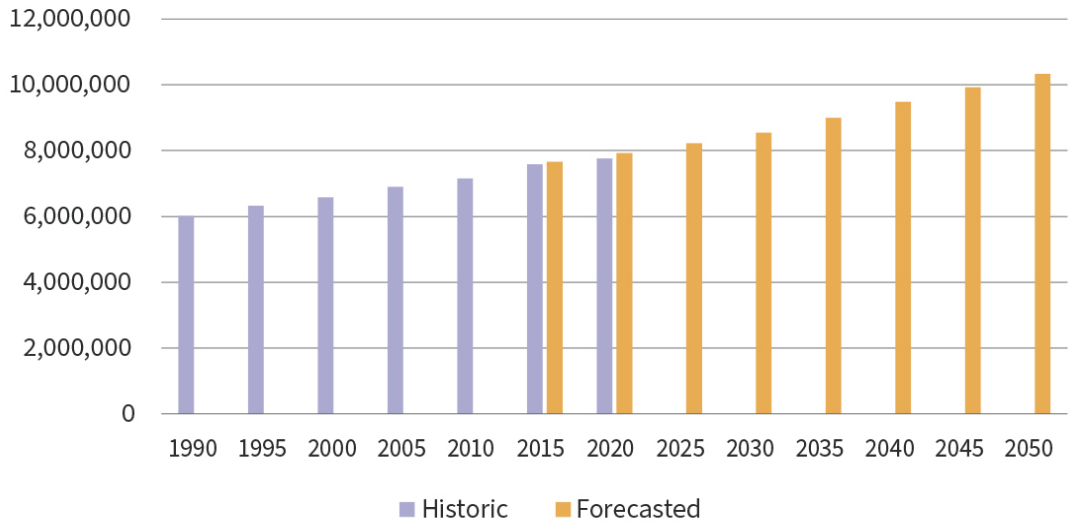
across the nine counties of the Bay Area, the Plan projects less than one percent growth in the North Napa County superdistrict (including Calistoga, St. Helena, and Yountville). Table 9 and Figure 19 show Plan Bay Area 2050 population projections for the Bay Area. While the Plan includes this regional population totals, data for individual subregions, termed superdistricts, is provided for households and jobs rather than population. For more information, please see the discussions on household and job projections below.

Table 9 Plan Bay Area 2050 Population Projections, Bay Area, 2015-2050

	2015	2020	2025	2030	2035	2040	2045	2050	Percent Change
Bay Area	7,660,000	7,940,000	8,230,000	8,560,000	9,010,000	9,490,000	9,930,000	10,330,000	+35%

Source: California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2010-2060 (Baseline 2019 Population Projections; Vintage 2020 Release). Sacramento: California. July 2021.

Figure 19 Bay Area, Population Totals and Projections, 1990-2050, Plan Bay Area 2050.



Source: Plan Bay Area 2050.

Households

In 2017, Plan Bay Area 2040 projected a one percent increase in total households from 2010-2040 in St. Helena, which translates to 300 or more new households (Table 10). Similarly, Plan Bay Area 2050 projects that the number of households in the Northern Napa County superdistrict (including Calistoga, St. Helena, and Yountville) will grow by less than one percent by 2050, compared to 51 percent growth in the projected number of households in the Bay Area (Table 11).

Table 10 Table 2: St. Helena, Household Totals and Projections, 2010-2040, Plan Bay Area 2040

	2010	2015	2020	2025	2030	2035	2040
Total Households	2,150	2,400	2,425	2,490	2,620	2,705	2,700

For 2010, the base year, a tabulation from the 2010 pre-run microdata, designed to approximate (but may still differ from) Census 2010 counts, is used. Numbers may not add to totals due to rounding. 2015 are modeled estimates, not observed.
Source: Plan Bay Area 2040.

Table 11 Household Projections by Region, 2015-2050

Region	2015	2050	Growth	Percent Growth	Share of Regional Growth
North Napa County	16,000	16,000	0	<1%	0%
Bay Area	2,677,000	4,043,000	1,366,000	+51%	100%

Source: Plan Bay Area 2050.

Jobs

According to Plan Bay Area 2040, ABAG projected in increase of 280 jobs (five percent increase) between 2010 and 2040, which calculates to an annual average growth rate of 0.8 percent (Table 12). Employment is projected to increase in three categories: retail (+27 percent), Information, Government, and Construction (+12 percent), and Health, Educational, and Recreational Services Jobs (+5 percent). In contrast, ABAG expects that employment in the areas of manufacturing and wholesale; agriculture and natural resources, and financial and professional services to stagnate or slightly decrease. Countywide, Plan Bay Area 2040 projected an increase of 12,765 jobs (18 percent increase) at annual average employment growth rate of 2.8 percent in the same time period.

Table 12 Job Totals and Projections, St. Helena and Napa County, 2010-2040

Year	2010	2015	2020	2025	2030	2035	2040	Percent Change (2010-2040)
St. Helena	5,700	5,750	5,765	5,805	5,820	5,820	5,980	5%
Napa County	70,680	70,880	71,905	72,580	74,255	77,260	83,355	18%

Source: Plan Bay Area 2040.

Plan Bay Area 2050, however, projects that employment in the North Napa County superdistrict will decrease by 4,000 jobs by 2050 (Table 13). Employment in the region is assumed to be constrained based on limited job centers and transit options, as well as current and potential future wildfire impacts. Regionally however, the Bay Area job totals are projected to increase by 35 percent between 2015 and 2050, which coincides with the expected Bay Area population growth during that time (also 35 percent). This increase translates to 1,403,000 new jobs.

Table 13 Job Totals and Projections, North Napa County and the Bay Area, 2015-2050

Region	2015	2050	Growth	Percent Growth	Share of Regional Growth
North Napa County	24,000	20,000	-4,000	<1%	0%
Bay Area	4,005,000	5,408,000	1,403,000	35%	100%

Source: Plan Bay Area 2050.

5. Housing Conditions

The following section details the housing conditions in St. Helena and, where available, compares the data to Napa County and the Bay Area. Data sources include the Census, the American Community Survey, DoF, HUD, including the Comprehensive Housing Affordability Strategy (CHAS) dataset, and HCD).

ABAG supplied an HCD Preapproved Data Package that provided much of the data included in this analysis for the City. Additionally, ABAG, in coordination with Baird + Driskell Community Planning provided a Housing Needs Data Report that directly informed this section of the Needs Analysis.[12]

Key Findings

- **Number of Homes.** The number of new homes built in the Bay Area has not kept pace with the demand, resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness. The number of homes in St. Helena increased, 4.4 percent from 2010 to 2020, which is above the growth rate for Napa County and below the growth rate of the region's housing stock during this time period.

- **Home Prices.** A diversity of homes at all income levels creates opportunities for all St. Helena residents to live and thrive in the community.

  - **Ownership.** The largest proportion of homes had a value in the range of $1 million-$1.5 million in 2019. Home prices increased by 118.2 percent from 2010 to 2020.

  - **Rental Prices.** The typical contract rent for an apartment in St. Helena was $1,470 in 2019. Rental prices increased by 15.7 percent from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to make $59,160 per year.

- **Housing Type.** It is important to have a variety of housing types to meet the needs of a community today and in the future. In 2020, 63.9 percent of homes in St. Helena were single family detached, 6.1 percent were single family attached, 6.2 percent were small multifamily (2-4 units), and 18.4 percent were medium or large multifamily (5+ units). Between 2010 and 2020, the number of single-family units increased more than multi-family units. Generally, in St. Helena, the share of the housing stock that is detached single family homes is above that of other jurisdictions in the region.

- **Vacancy Rate.** Vacant units make up 17.4 percent of the overall housing stock in St. Helena. The rental vacancy rate stands at 3.1 percent, while the ownership vacancy rate is 5.3 percent. Of the vacant units, the most common type of vacancy is for seasonal, recreational, or occasional use. This statistic highlights how St. Helena contains many "second homes," which may sit unoccupied for a majority of the year. Additionally, with the increasing popularity of short-term rental sites, such as

[12] *ABAG/MTC Staff and Baird + Driskell Community Planning, Housing Needs Data Report: St. Helena, May 2021.*

AirBNB, at vacation destinations such as Napa Valley, many homes may be vacant in the sense of not having permanent residents.

- **Overcrowding.** Overcrowding often disproportionately impacts low-income households. 2.5 percent of very low-income households (below 50 percent AMI) experience severe overcrowding, while none of the households above 100 percent of the AMI experience this level of overcrowding.

- **Cost Burden.** The U.S. Department of Housing and Urban Development considers housing to be affordable for a household if the household spends less than 30 percent of its income on housing costs. A household is considered "cost-burdened" if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered "severely cost-burdened." In St. Helena, 21.1 percent of households spend 30-50 percent of their income on housing, while 16.6 percent of households are severely cost burden and use the majority of their income for housing. Lower-income, Latinx, and large households are disproportionally impacted by housing cost burdens.[13]

Existing Housing Conditions

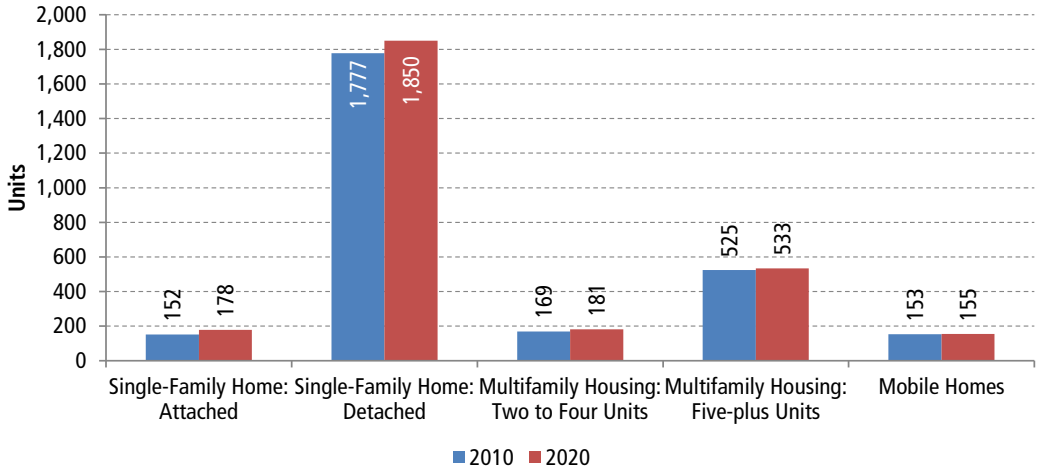
Housing Stock Characteristics

In recent years, most housing produced in the region and across the state consisted of single-family homes and larger multi-unit buildings. However, some households are increasingly interested in "missing middle housing" – including duplexes, triplexes, townhomes, cottage clusters and accessory dwelling units (ADUs). These housing types may open up more options across incomes and tenure, from young households seeking homeownership options to seniors looking to downsize and age-in-place.

The housing stock of St. Helena in 2020 was made up of 63.9 percent single family detached homes, 6.1 percent single family attached homes, 6.2 percent multifamily homes with two to four units, 18.4 percent multifamily homes with five or more units, and 5.4 percent mobile homes (Figure 20). In St. Helena, the housing type that experienced the most growth between 2010 and 2020 was the detached single-family home.

[13] *Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070; U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.*

Figure 20 Housing Type Trends



Universe: Housing units
Source: California Department of Finance, E-5 series
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-01.

Age of Housing Stock

Production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not come close to meeting the population and job growth experienced throughout the region. According to American Community Survey estimates, in St. Helena, the largest proportion of the housing stock was built 1960 to 1979, with 1,217 units constructed during this period (Figure 21). Since 2010, 1.9 percent of the current housing stock was built, which is 63 units. Between 2015 and 2019, 74 housing units were issued permits in St. Helena. During this time, 73.0 percent of permits issued in St. Helena were for above moderate-income housing, 5.4 percent were for moderate-income housing, and 21.6 percent were for low- or very low-income housing (Table 14).

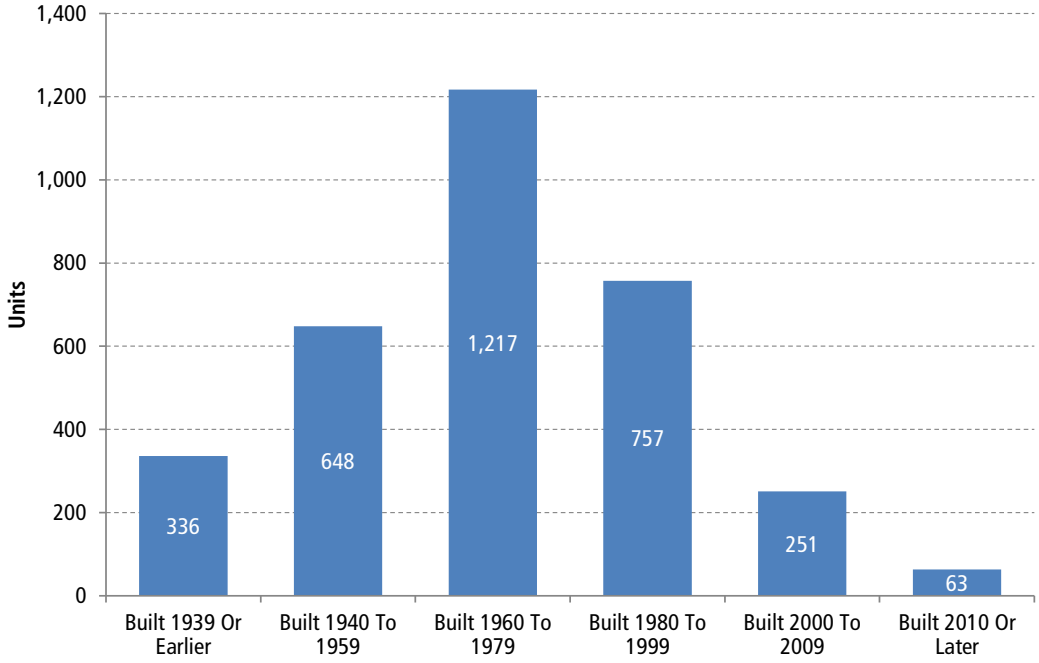
Table 14 Housing Permitting from 2015-2019 St. Helena

Income Group	Value
Above Moderate-Income Permits	54
Low Income Permits	9
Very Low-Income Permits	7
Moderate Income Permits	4

Source: California Department of Housing and Community Development (HCD), 5th Cycle Annual Progress Report Permit Summary (2020)

According to City records, however, these American Community Survey estimates are low. As reported in Table 1 above, the City permitted 110 units between 2015 and 2021, of which all units have been constructed.

Figure 21 Housing Units by Year Structure Built



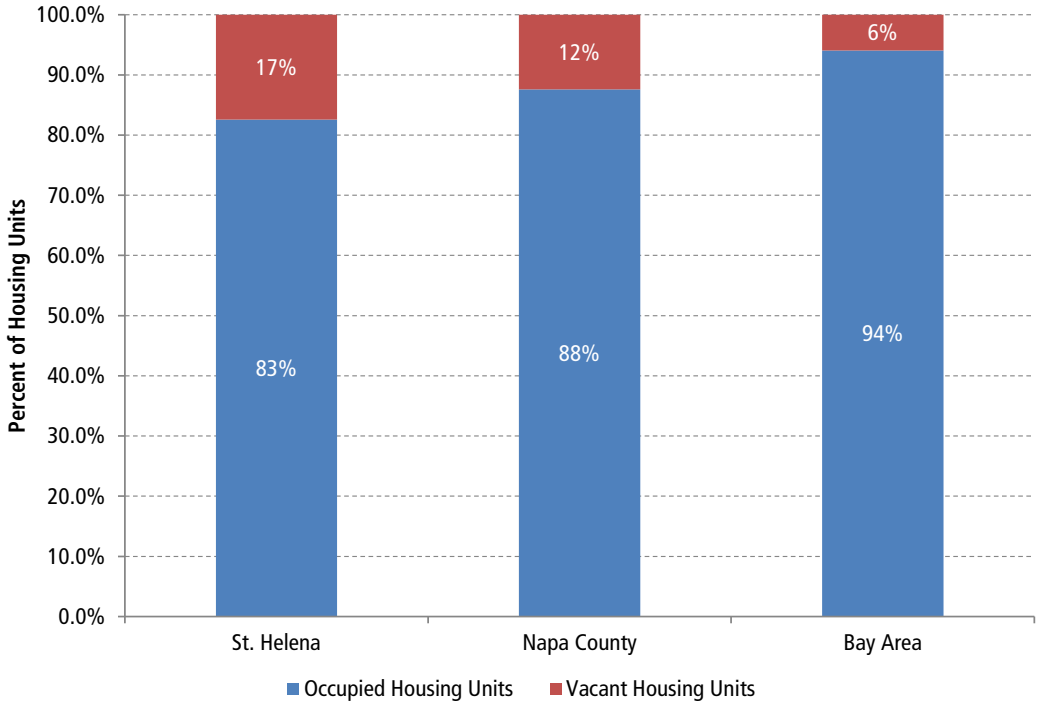
Universe: Housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25034 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-04.

Occupancy Rates

Vacant units make up 17.4 percent of the overall housing stock in St. Helena (Figure 22). The rental vacancy rate stands at 3.1 percent, while the ownership vacancy rate is 5.3 percent. Of the vacant units, the most common type of vacancy is for seasonal, recreational, or occasional use. Figure 23 shows the distribution of vacancies by type.[14]

[14] *The vacancy rates by tenure is for a smaller universe than the total vacancy rate first reported, which in principle includes the full stock (17.4%). The vacancy by tenure counts are rates relative to the rental stock (occupied and vacant) and ownership stock (occupied and vacant) - but exclude a significant number of vacancy categories, including the numerically significant other vacant.*

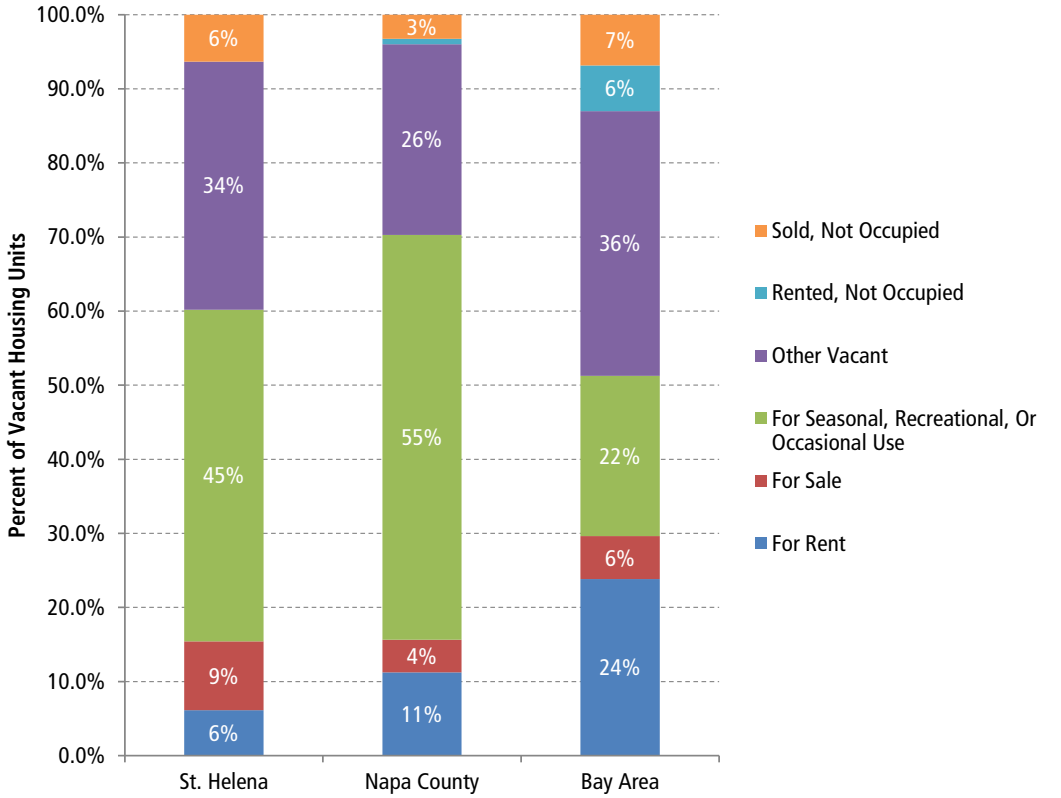
Figure 22 Occupancy Status



Universe: Housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25002Throughout the Bay Area, vacancies make up 2.6 percent of the total housing units, with homes listed for rent; units used for recreational or occasional use, and units not otherwise classified (other vacant) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the American Community Survey or Decennial Census. Vacant units classified as "for recreational or occasional use" are those that are held for short- term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like AirBnB are likely to fall in this category. The Census Bureau classifies units as "other vacant" if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration.[15] In a region with a thriving economy and housing market like the Bay Area, units being renovated/repaired and prepared for rental or sale are likely to represent a large portion of the "other vacant" category.

[15] *For more information, see pages 3 through 6 of this list of definitions prepared by the Census Bureau: https://www.census.gov/housing/hvs/definitions.pdf.*

Figure 23 Vacant Units by Type



Universe: Vacant housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25004 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-03.

Throughout the Bay Area, vacancies make up 2.6 percent of the total housing units, with homes listed for rent; units used for recreational or occasional use, and units not otherwise classified (other vacant) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the American Community Survey or Decennial Census. Vacant units classified as "for recreational or occasional use" are those that are held for short- term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like AirBnB are likely to fall in this category. The Census Bureau classifies units as "other vacant" if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration. In a region with a thriving economy and housing market like the Bay Area, units being renovated/repaired and prepared for rental or sale are likely to represent a large portion of the "other vacant" category

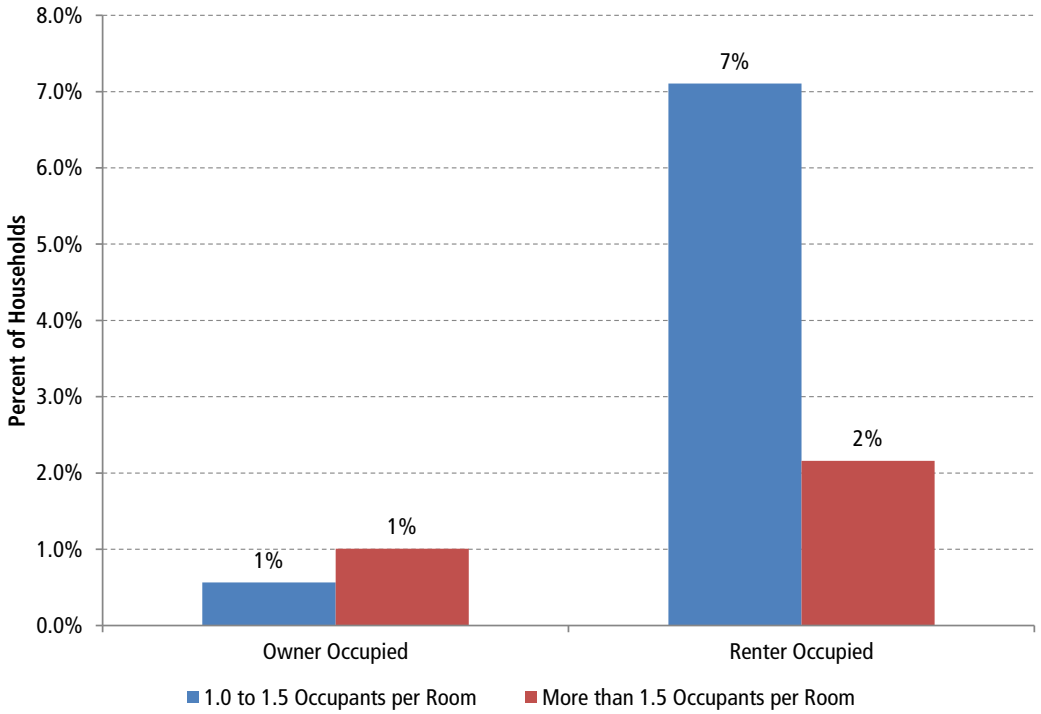
Overcrowding

Overcrowding occurs when the number of people living in a household is greater than the home was designed to accommodate. There are several different standards for defining overcrowding, but this report uses the Census Bureau definition, which is more than one occupant per room (not including bathrooms or kitchens).

Additionally, the Census Bureau considers units with more than 1.5 occupants per room to be severely overcrowded.

Overcrowding is often related to the cost of housing and can occur when demand in a city or region is high. In many cities, overcrowding is seen more amongst those that are renting, with multiple households sharing a unit to make it possible to stay in their communities. In St. Helena, 2.2 percent of households that rent are severely overcrowded (more than 1.5 occupants per room), compared to 1.0 percent of households that own (Figure 24). In St. Helena, 7.1 percent of renters experience moderate overcrowding (1 to 1.5 occupants per room), compared to 0.6 percent for those own.

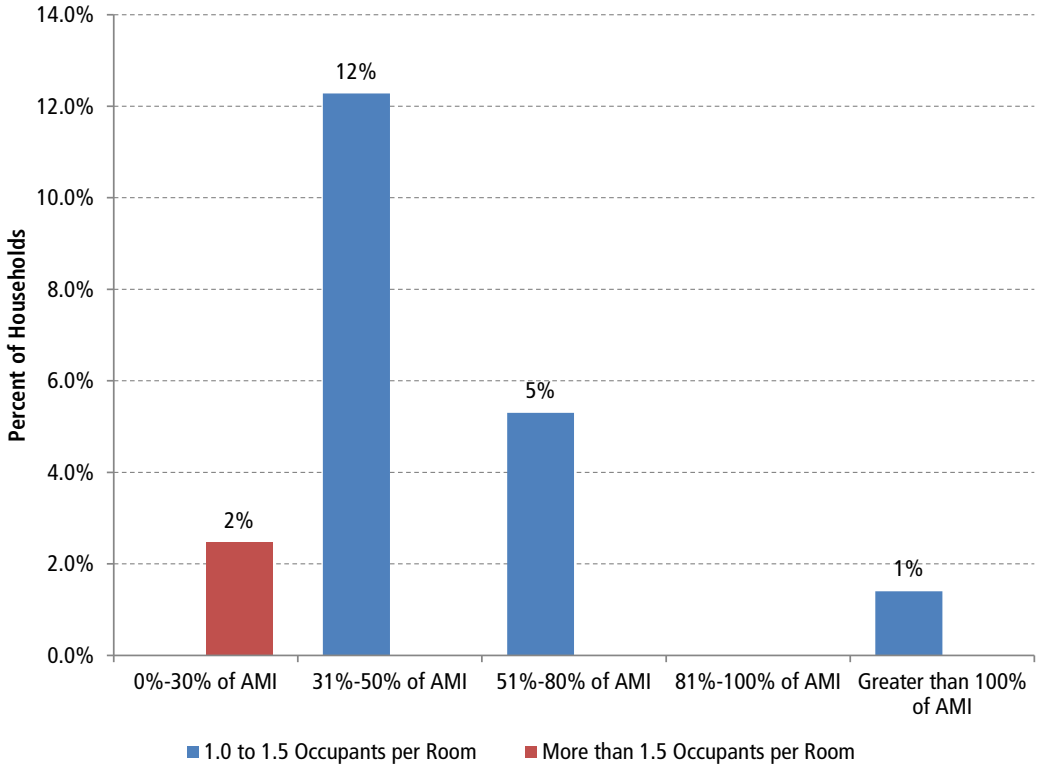
Figure 24 Overcrowding by Tenure and Severity



Universe: Occupied housing units
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-01.

Overcrowding often disproportionately impacts low-income households. 2.5 percent of very low-income households (below 50 percent AMI) experience severe overcrowding, while 0.0 percent of households above 100 percent experience this level of overcrowding (Figure 25).

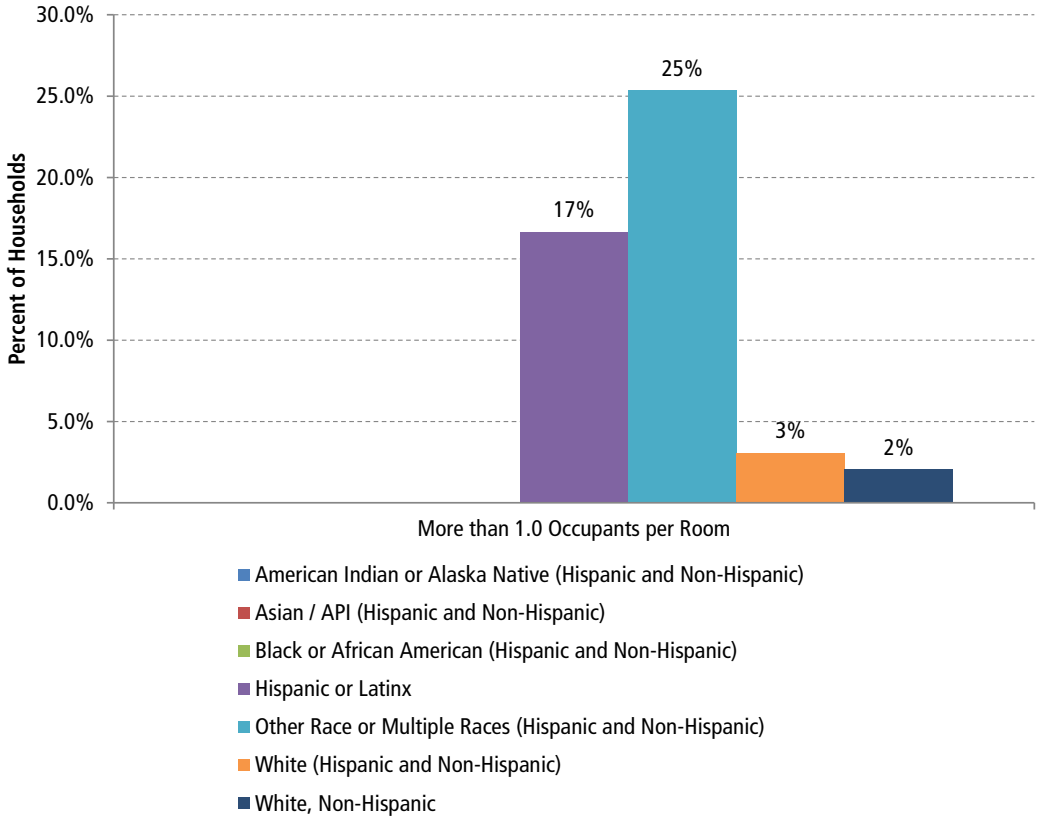
Figure 25 Overcrowding by Income Level and Severity



Universe: Occupied housing units
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-04.

People of color tend to experience overcrowding at higher rates than White residents. In St. Helena, the racial group with the largest overcrowding rate is other race or multiple races (Hispanic and Non-Hispanic) (Figure 26).

Figure 26 Overcrowding by Race



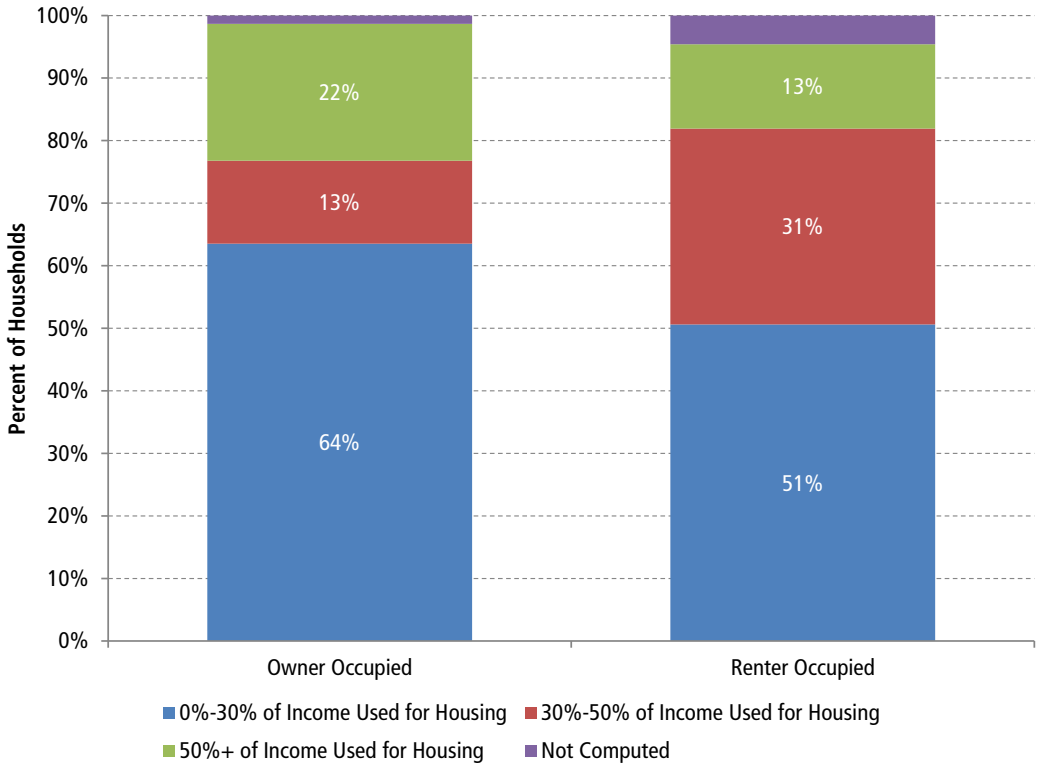
Universe: Occupied housing units
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25014 For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-03.

Housing Cost Burden

A household is considered "cost-burdened" if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered "severely cost-burdened." Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. Spending such large portions of their income on housing puts low-income households at higher risk of displacement, eviction, or homelessness.

Renters are often more cost-burdened than owners. While the housing market has resulted in home prices increasing dramatically, homeowners often have mortgages with fixed rates, whereas renters aremore likely to be impacted by market increases. When looking at the cost burden across tenure in St. Helena (Figure 27), 31.3 percent of renters spend 30 percent to 50 percent of their income on housing compared to 13.3 percent of those that own. Additionally, 13.5 percent of renters spend 50 percent or more of their income on housing,while 21.9 percent of owners are severely cost-burdened.

Figure 27 Cost Burden by Tenure

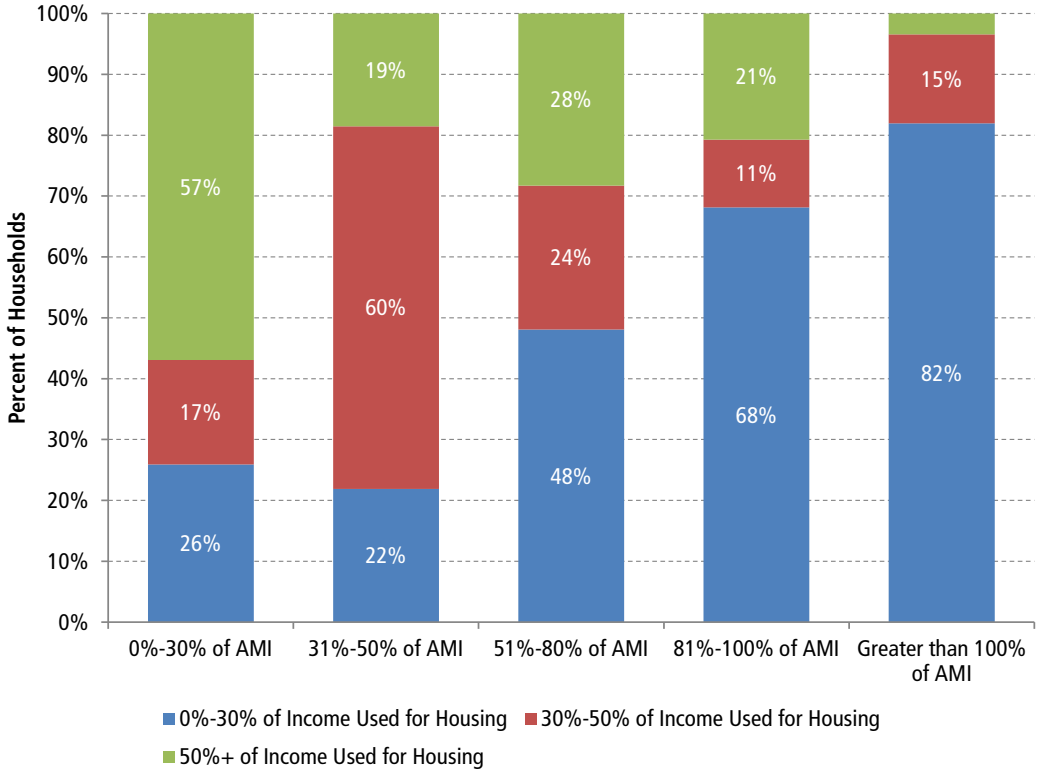


Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070, B25091 For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-06.

In St. Helena, 16.6 percent of households spend 50 percent or more of their income on housing, while 21.1 percent spend 30 to 50 percent. However, these rates vary greatly across income categories (Figure 28). For example, 56.9 percent of St. Helena households making less than 30 percent of AMI spend the majority of their income on housing. For St. Helena residents making more than 100 percent of AMI, just 3.4 percent are severely

cost-burdened,and 81.9 percent of those making more than 100 percent of AMI spend less than 30 percent of their income on housing.

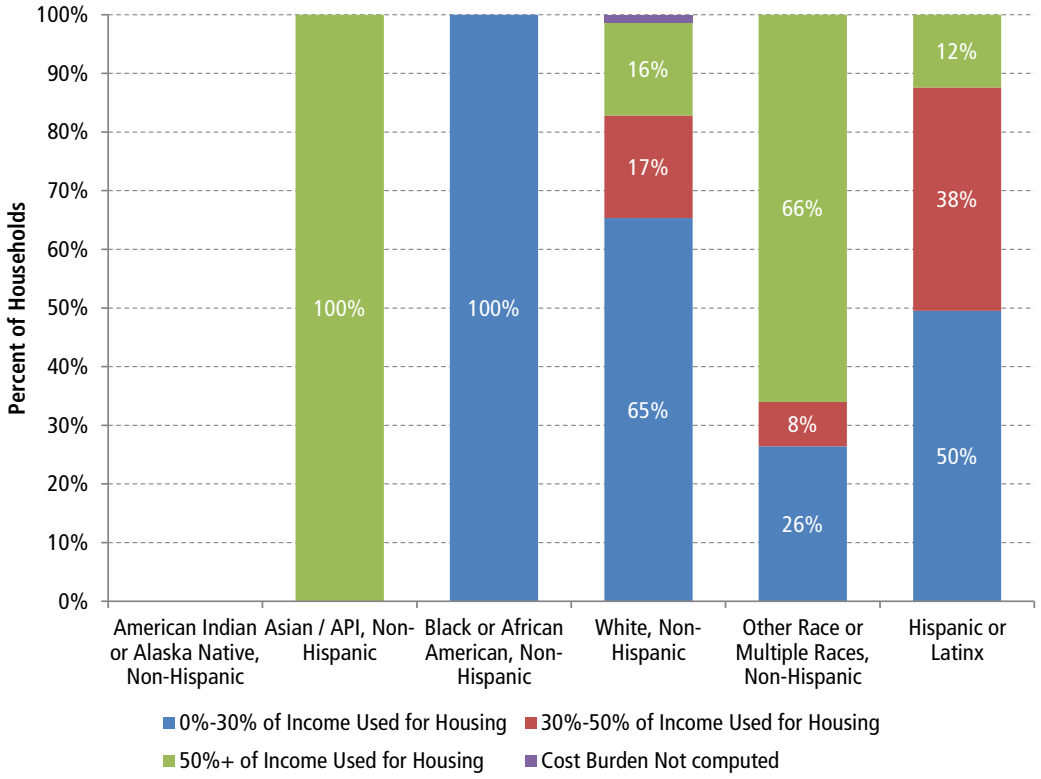
Figure 28 Cost Burden by Income Level



Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-05.

Hispanic or Latinx residents are the most cost burdened with 38.1 percent spending 30 percent to 50 percent of their income on housing, and Asian / API, Non-Hispanic residents are the most severely cost burdened with 100.0 percent spending more than 50 percent of their income on housing (Figure 29).

Figure 29 Cost Burden by Race



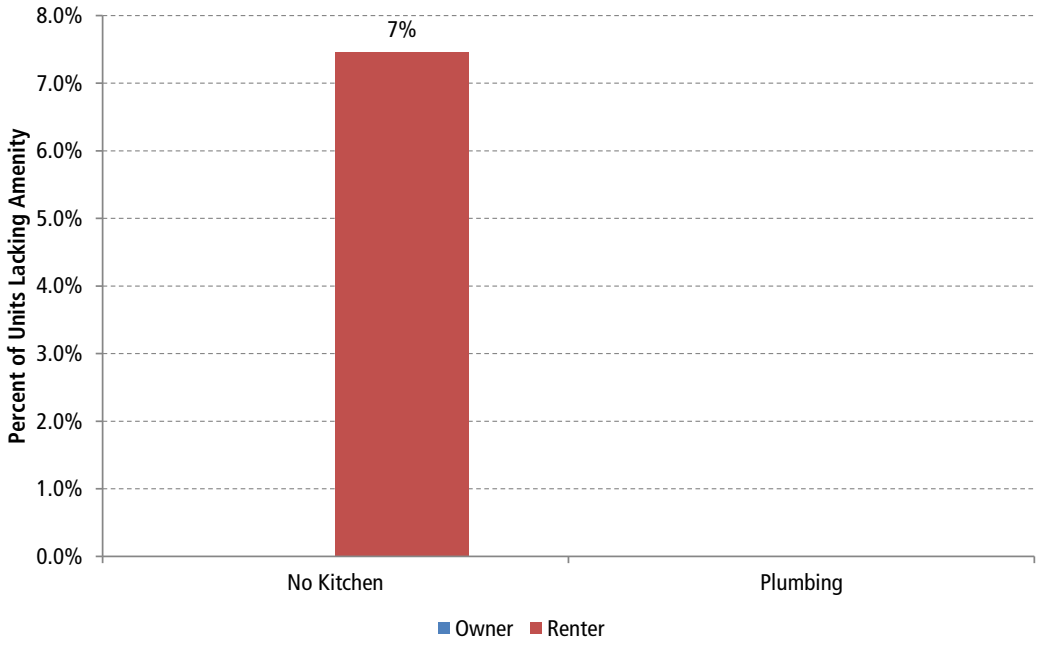
Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly
income. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-08.

Physical Housing Conditions

In general, the condition of the housing stock in St. Helena is good. This is primarily due to the high value of residential property, recent new construction, and minor to extensive remodeling which has been performed within the last ten years. Property owners are motivated to keep housing in good condition because of the high value of houses and rents.

Housing costs in the region are among the highest in the country, which could result in households, particularly renters, needing to live in substandard conditions in order to afford housing. Generally, there is limited data on the extent of substandard housing issues in a community. However, American Community Survey data (Figure 30) gives a sense of some of the substandard conditions that may be present in St. Helena. For example, 7.5 percent of renters in St. Helena reported lacking a kitchen and no renters lack plumbing. No owners reported lacking either a kitchen or plumbing.

Figure 30 Substandard Housing Issues, St. Helena, 2019



Universe: Occupied housing units
Notes: Per HCD guidance, this data should be supplemented by local estimates of units needing to be rehabilitated or replaced based on recent windshield surveys, local building department data, knowledgeable builders/developers in the community, or nonprofit housing developers or organizations.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25053, Table B25043, Table B25049
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-06.

There are scattered areas where housing condition can be an issue. City staff estimates approximately two percent of the single-family houses and one percent of multi-family units need replacement. These units have improvement costs that exceed the estimated replacement cost. Approximately four percent of single-family houses (approximately 85 units) and two percent of multifamily units (approximately 15 units) are in need of significant rehabilitation, which is defined as having major deficiencies that may require immediate repair. About five percent of the housing stock needs limited rehabilitation (approximately 140 units). These structures exhibit minor repair need and are not considered to have major safety issues.

6. Housing Market Conditions

This section provides information on the private housing market in St. Helena and assesses the market's ability to accommodate the housing needs of residents. ABAG supplied an HCD Preapproved Data Package that provided data on home values, affordability, and contract rents in the City. Additionally, ABAG, in coordination with Baird + Driskell Community Planning provided a Housing Needs Data Report that directly informed this section of the Needs Analysis.[16]

Key Findings

- **Home Values.** Home values in St. Helena are high. The typical home value (December 2020) was $1,665,790 in St. Helena, $768,410 in Napa County and $1,077,230 the Bay Area.

- **Affordability.** The current market conditions in St. Helena enable only above moderate-income households to purchase homes, though affordable rental and for-sale housing complexes in St. Helena provide 256 units of affordable housing.

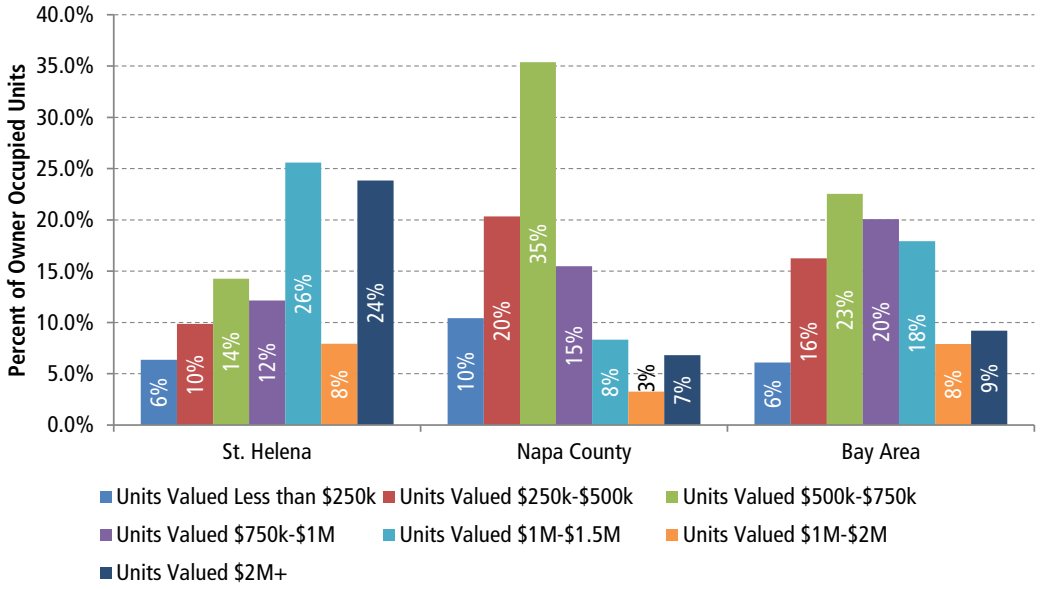
For-Sale Housing

Home prices reflect a complex mix of supply and demand factors, including an area's demographic profile, labor market, prevailing wages and job outlook, and land and construction costs. In the Bay Area, the costs of housing have long been among the highest in the nation. The typical home value in St. Helena was $1,665,790 by December of 2020, per data from Zillow. The largest proportion of homes were between $1 million and $1.5 million (Figure 31). By comparison, the typical home value is $768,410 in Napa County and $1,077,230 the Bay Area, with the largest share of units valued $500,000 to $750, 000.

The region's home values have increased steadily since 2000, besides a decrease during the Great Recession. The rise in home prices has been especially steep since 2012, with the median home value in the Bay Area nearly doubling during this time. Since 2001, the typical home value has increased 156.7 percent in St. Helena from $648,900 to $1,665,790. This change is above the change in Napa County, and above the change for the region (Figure 32).

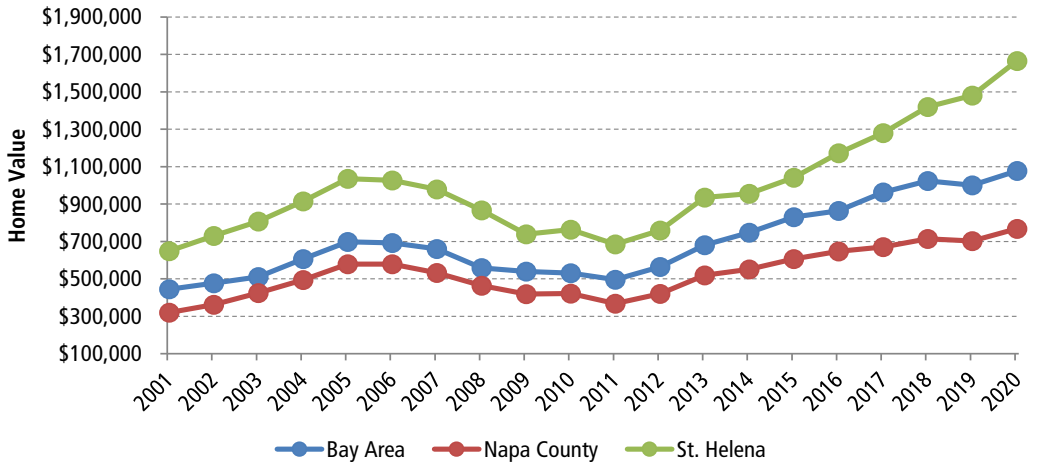
[16] *ABAG/MTC Staff and Baird + Driskell Community Planning, Housing Needs Data Report: St. Helena, May 2021.*

Figure 31 Home Values of Owner-occupied Units



Universe: Owner-occupied units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25075 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-07.

Figure 32 Zillow Home Value Index (ZHVI)



Universe: Owner-occupied housing units
Notes: Zillow describes the ZHVI as a smoothed, seasonally adjusted measure of the typical home value and market changes across a given region and housing type. The ZHVI reflects the typical value for lower to moderate valued homes in a

neighborhood. Specifically, the ZHVI is based upon the valuations of homes between 35th to 65th percentile range on a standardized curve encompassing all owner-occupied housing units, including both single-family homes and condominiums.

More information on the ZHVI is available from Zillow. The regional estimate is a household-weighted average of county-level ZHVI files, where household counts are yearly estimates from DOF's E-5 series For unincorporated areas, the value is a population weighted average of unincorporated communities in the county matched to census-designated population counts.
Source: Zillow, Zillow Home Value Index (ZHVI)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-08.

Affordable Home Purchase Prices

Table 15 examines affordability in another way. Instead of presenting the income required to buy a market rate house in St. Helena, Table 15 examines how much very low-, low-, and moderate-income households in St. Helena could afford to pay for housing, along with the corresponding maximum affordable home price. The table assumes 10 percent down payment, modeling a situation that is more typical of first-time homebuyers who have not amassed sufficient financial resources to make a larger down payment. These buyers are more likely to be in need of affordable housing options than the typical buyers of market rate housing in St. Helena. The lower down payment amount requires the owner to buy mortgage insurance.

As shown, in the case of a three-person household, the affordable home price varies from approximately $203,461 for very low-income, to $325,372 for low-income, and $406,922 for moderate income households. The income limits increase with household size, and a six-person household with very low, low, or moderate income can afford to buy a home priced at $262,243, $419,548, and $542,493, respectively. Based on this data and current market prices, lower-income households have very few options for purchasing a home in St. Helena, while moderate-income households may be able to afford to purchase a condominium or a small single-family home.

Table 15 Affordable Home Purchase Prices by Income Level, Napa County

Extremely Low-Income Households at 30 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$22,950	$24,550	$29,500	$32,750	$38,000	$39,300
Max. Monthly Gross Rent [1]	$574	$614	$738	$819	$950	$983
Max. Purchase Price [2]	$95,004	$101,627	$122,118	$135,572	$157,304	$162,686

Very Low-Income Households at 50 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$38,200	$40,950	$49,150	$54,600	$63,350	$65,500
Max. Monthly Gross Rent (1)	$955	$1,024	$1,229	$1,365	$1,584	$1,638
Max. Purchase Price (2)	$158,132	$169,516	$203,461	$226,022	$262,243	$271,143

Low-Income Households at 80 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$61,150	$65,500	$78,600	$87,350	$101,350	$104,850
Max. Monthly Gross Rent (1)	$1,529	$1,638	$1,965	$2,184	$2,534	$2,621
Max. Purchase Price (2)	$253,136	$271,143	$325,372	$361,593	$419,548	$434,036

Median-Income Households at 100 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$76,450	$81,900	$98,300	$109,200	$126,650	$131,050
Max. Monthly Gross Rent (1)	$1,911	$2,048	$2,458	$2,730	$3,166	$3,276
Max. Purchase Price (2)	$316,472	$339,033	$406,922	$452,043	$524,279	$542,493

Moderate-Income Households at 120 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$91,750	$98,300	$117,950	$131,050	$152,000	$157,250
Max. Monthly Gross Rent/Payments (1)	$2,294	$2,458	$2,949	$3,276	$3,800	$3,931
Max. Purchase Price (2)	$379,808	$406,922	$488,265	$542,493	$629,218	$650,951

Note: Based on 2021 Napa County Area Family Income (Family of 4) of $109,200, per State income limits .
[1]Assumes that 30 percent (35 percent for moderate) of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowners' insurance.
[2]Assumes 90.0 percent loan at 5.0 percent annual interest rate and 30-year term; assumes taxes, mortgage insurance, and homeowners' insurance account for 20 percent of total monthly payments.
Source: Mintier Harnish, 2021.

Current Market Rate For-Sale Housing

Since 2019, the price of for-sale housing in St. Helena has shifted even higher, making home ownership practically unattainable to working class residents of St. Helena. All single-family homes are for sale at prices greater than $1,000,000. The median price of for-sale housing is $1,872,500 and the average price of for-sale housing is $2,965,458, which are both prices unaffordable to lower- and moderate-income households. Currently there are only four units listed for under $1,000,000: three mobile homes and one condominium.

Table 16 Residential Properties for Sale, January 2023

Address	Bedroom	Bathrooms	Square Footage	For-Sale Price	Cost per Square Foot
1210-1250 Oakwood Ln	6	8	6,800	$10,880,000	$1,600.00
1933 Spring St	2	2	1,664	$7,995,000	$4,804.69
1817 Main St	6	6	7,000	$5,500,000	$785.71
1057 Pratt Ave	6	7	3,979	$4,950,000	$1,244.03
2490 Spring Mountain Rd	3	4	4,210	$3,600,000	$855.11
1820 Spring Mountain Rd	3	3	2,520	$3,500,000	$1,388.89
1721 Scott St	3	3	1,950	$2,999,000	$1,537.95
1648 Scott St	3	2	1,458	$2,850,000	$1,954.73
704 Hunt Ave	3	3	2,426	$2,450,000	$1,009.89
1434 Sylvaner Ave	3	2	1,968	$2,250,000	$1,143.29
1362 Stockton St	3	2	1,682	$1,895,000	$1,126.63
1626 Tainter St	2	2	1,758	$1,850,000	$1,052.33
1186 Meadowcreek Cir	3	2	2,078	$1,795,000	$863.81
1291 Sylvaner Ave	3	2	1,511	$1,650,000	$1,091.99
1727 Crinella Dr	3	2	1,683	$1,395,000	$828.88
1344 Magnolia Ave	3	3	2,082	$1,375,000	$660.42
24 Volker Ct	3	2	1,320	$1,150,000	$871.21
1382 Park St	3	2	1,800	$1,084,000	$602.22
16 Henry Ct	2	2	1,000	$1,075,000	$1,075.00
945 Hunt Ave	2	3	1,212	$790,000	$651.82
16 San Juan Ct	2	2	1,440	$439,000	$304.86
55 Laguna Seca Ct	2	2	1,512	$365,000	$241.40
10 Los Robles Ct	2	2	1,248	$360,000	$288.46

Source: Zillow.com, January 9, 2023.

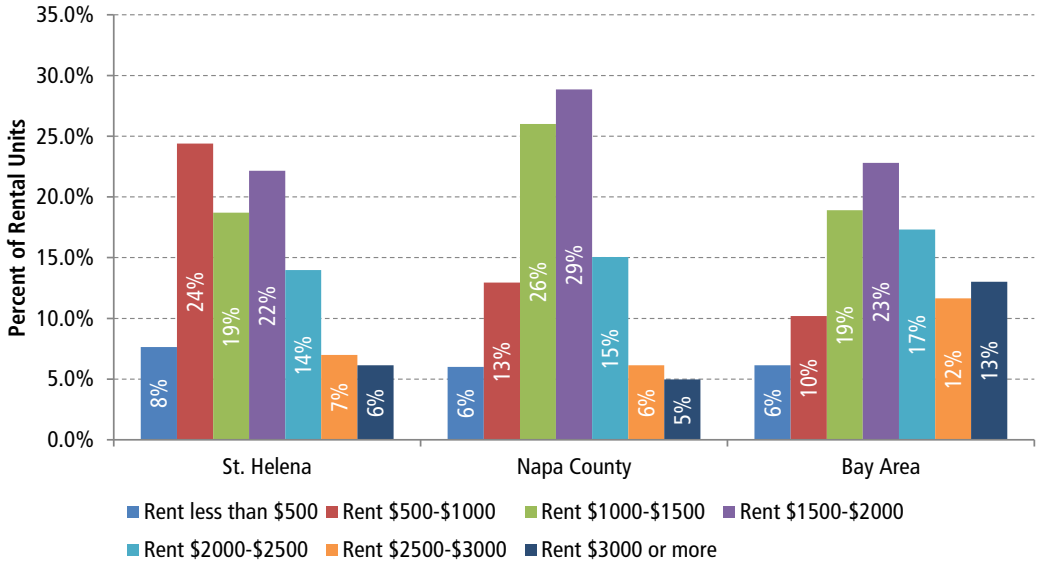
Rental Housing

Similar to home values, rents have also increased dramatically across the Bay Area in recent years. Regionwide, some renters were priced out, evicted, or displaced, particularly communities of color. Residents finding

themselves in one of these situations may have had to choose between commuting long distances to their jobs and schools or moving out of the region, and sometimes, out of the state.

In St. Helena, the largest proportion of rental units rented in the $500 to $1000 per month category, totaling 24.4 percent, followed by 22.2 percent of units renting in the $1500 to $2000 per month category (Figure 33). Both countywide, and in the Bay Area as a whole, the largest share of units is in the $1500 to $2000 per month category.

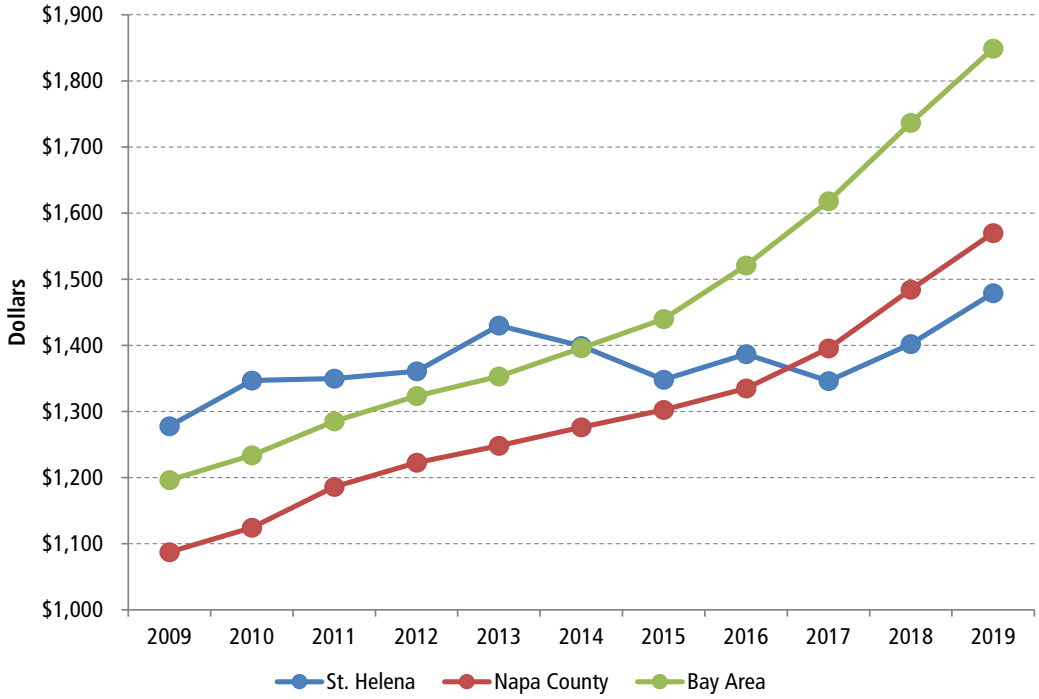
Figure 33 Contract Monthly Rents for Renter-occupied Units



Universe: Renter-occupied housing units paying cash rent
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25056 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-09.

Since 2009, the median rent has increased by 15.7 percent in St. Helena, from $1,390 to $1,470 per month (Figure 34). In Napa County, the median rent has increased 23.0 percent , from $1,270 to $1,560 per month. The median rent in the region has increased significantly during this time from $1,200 to $1,850 per month, a 54 percent increase.

Figure 34 Median Contract Monthly Rent



Universe: Renter-occupied housing units paying cash rent
Notes: For unincorporated areas, median is calculated using distribution in B25056.
Source: U.S. Census Bureau, American Community Survey 5-Year Data releases, starting with 2005-2009 through 2015-2019, B25058, B25056 (for unincorporated areas). County and regional counts are weighted averages of jurisdiction median using B25003 rental unit counts from the relevant year.
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-10.

Affordable Rental Rates

In addition to maximum home purchase price, Table 15 also calculates maximum monthly gross rent. This calculation assumes that 30 percent (35 percent for moderate) of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowners' insurance. Among three-person households, the maximum monthly gross rent that can be paid is calculated at $1,229 for very low-income households, $1,965 or low-income households, and $2,458 for moderate income households. While a studio, one-bedroom, and some of the two-bedroom market rate apartments in St. Helena are affordable to low income and a portion of very low-income households, they are in limited supply. Average apartment rents throughout Napa County are only affordable to low-, moderate-, and above moderate- households. In addition, single family rental units are significantly more expensive and are affordable only to above moderate-income households.

Affordable Housing Complexes

Table 17 lists affordable housing complexes and units in St. Helena, which are shown on Figure 35. These include four rental complexes, five for-sale subdivisions, and 13 regulated affordable units in the City, that increase the supply of housing and focus on meeting the housing needs unmet by the private housing market

- The rental complexes noted in Table 17 provide 214 units of affordable housing to St. Helena residents. Waiting lists for affordable units can be quite long. For instance, as of January 2022, Hunt's Grove Apartments has a five-year waiting list[17] and Stonebridge has a three to four year waiting list.[18] Recently, the City has reduced and deferred fees for a five-unit affordable project at 963 Pope Street, which is currently under construction.

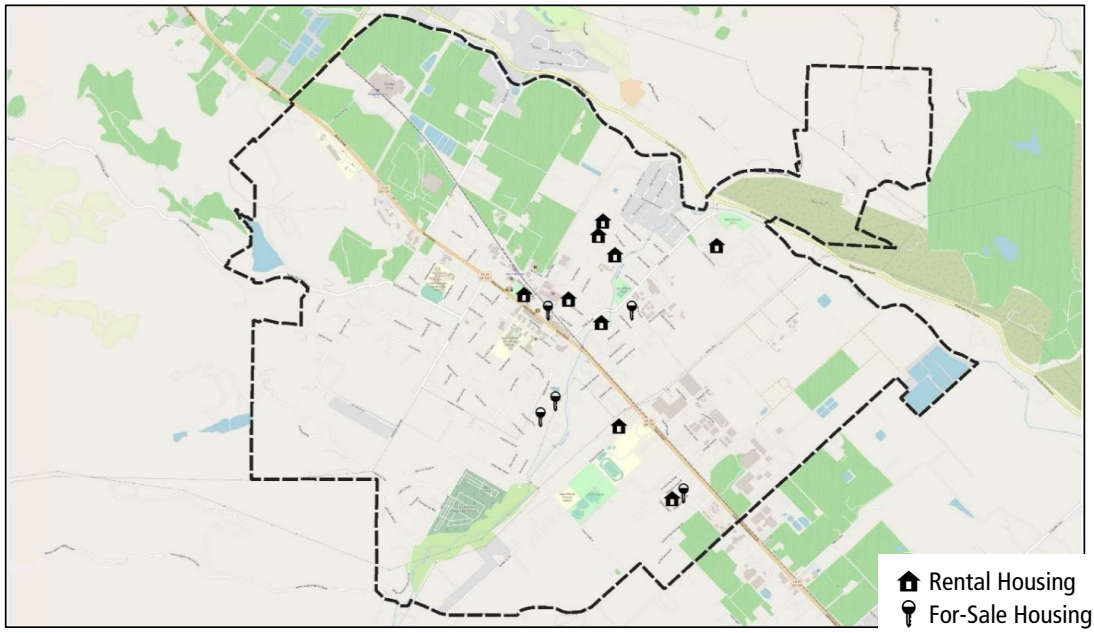
- The five for-sale subdivisions (Marietta Townhomes, Wallis Subdivision, Magnolia Oaks, and Brenkle Court) provide 41 affordable for-sale units with deed restrictions. The City of St. Helena contributed funds to the Marietta townhomes in 1997, including $130,000 in silent second mortgages and $12,500 in building fees. The City also reduced fees and contributed significant funds to the Brenkle Court development in 2016 and approved an additional five deed-restricted affordable units at this location in 2020.

- The 13 regulated affordable apartments in the City are incorporated into the Wydown Hotel, Hunt Street Apartments, Turley Flats, and Grayson Avenue Apartments. The City has both reduced and deferred fees (through a loan from the Affordable Housing Trust Fund) for the Turley Flats Affordable Housing Project, an 8-unit multi-family development.

In addition, mobile home parks like Vineyard Valley, although not officially regulated as affordable housing, do represent a housing option in St. Helena that is affordable to moderate income households.

[17] *Personal communication, January 26, 2022.*
[18] *Personal communication. January 26, 2022.*

Figure 35 Map of Affordable Housing Units, St. Helena



Source: City of St. Helena, 2022. Map data from OpenStreetMap.org Contributors.

Table 17 Affordable Rental Housing Units, St. Helena

Name	Affordable Units	Bedrooms/ Bathrooms	Special Needs	Current Owner	Funding Sources	Status	Affordability Requirement
Hunts Grove	56	14 - 1 bdr/1 bath 28 - 2 bdr/1 bath 14 - 3 bdr/2 bath	n.a.	Bridge Housing	9 percent Tax Credit Equity; Residential Housing Construction Program; Bank of American, First Nationwide Bank, City of St. Helena, First Financial Management	Active	Low and Very Low Income
Stonebridge Apts.	78	8 - 1 bdr/1 bath 23 - 2 bdr/1 bath 28 - 3 bdr/2 bath 8 - 4 bdr/2 bath	n.a.	EAH Nonprofit Housing Corporation	9 percent Tax Credit Equity; HCD; Residential Housing Construction Program; City of St. Helena; Federal Home Loan Bank, Affordable Housing Program	Active	Low and Very Low Income
Woodbridge Apts.	49	48 - 1 bdr/1 bath 2 - 2 bdr/1 bath	Senior Citizens	Woodbridge RAL	CHFA, Section 8	Active	Very Low Income
Magnolia Oaks	14	10 - 2 bdr apartments 4- 1 bdr second units	n.a.	n.a.	Developer Financed	Active	Low and Moderate Income
Wydown Hotel	1	1 - 1 bdr	n.a.	Wydown Hotel	Developer Financed	Active	Very Low Income
Hunt Street Apartments	2	Studio	n.a.	Jack Ibrahim	Owner Financed	Active	Very Low Income
Turley Flats	8	2-3 bdr multifamily	n.a.	n.a.	Private Financing, City and County Loans		
Grayson Apartments	2	2 bdr/1 bath	n.a.	n.a.	Private funds	Active	Low and Moderate Income
Christine Apartments	4	2 bdr/1 bath	n.a.	Our Town St. Helena	Private funds	Active	Very Low and Low Income
					RENTAL TOTAL		214

Source: City of St. Helena, 2022.

Table 18 Affordable For-Sale Housing Units, St. Helena

Name	Affordable Units	Bedrooms/ Bathrooms	Special Needs	Current Owner	Funding Sources	Status	Affordability Requirement
Wallis Subdivision	20	2bdr/2 bath	n.a.	n.a.	Developer Financed	Active	Moderate Income
Marietta Townhomes	10	Unknown	n.a.	n.a.	Napa Valley Community; City of St. Helena	Active	Moderate Income
Sherwin	1	4 bdr single family	n.a.	n.a.	Developer Financed	Active	Moderate Income
Magnolia Oaks	2	3 bdr single family	n.a.	n.a.	Developer Financed	Active	Moderate Income
Brenkle Court	8	3bdr/1.5 bath	n.a.	n.a.	City and County Loans, USDA & sweat equity	Under Construction	Low and Moderate Income
					FOR SALE TOTAL		41

Source: City of St. Helena, 2022.

Current Market Rate Rental Housing

Since the release of the 2019 ACS data, the cost of rental housing in St. Helena has increased dramatically. For most looking to move to St. Helena, the price of market rate housing is almost entirely out of reach. Based on Zillow data, there are two available apartments for rent in St. Helena posted for a contract rent rate of $1,850 and $2,150. Several detached single-family homes are listed for rent at prices which are wholly out of reach of lower, moderate, and most above moderate-income households. The average market rent rate of available single-family homes is $8,356 per month and the median rent is $6,450 per month.

Table 19 Residential Properties for Rent, January 2023

Address	Bedroom	Bathrooms	Square Footage	Monthly Rent	Cost per Square Foot
709 Hunt Ave	4	4	2,915	$24,500	$8.40
679 Dowdell Ln	4	3.5	2,800	$22,000	$7.85
466 Pratt Ave	4	5	4,789	$15,000	$3.13
489 Fulton Ln	3	2	1,645	$14,000	$8.51
1316 Sulphur Springs Ave	3	2	1,648	$9,500	$5.76
925 Pratt Ave	3	3	2,523	$8,500	$3.37
1860 Quail Ct	2	2.5	2,433	$6,500	$2.67
911 Chiles Ave	3	2.5	2,217	$6,500	$2.93
1320 Elmhurst Ave	3	2	1,512	$6,450	$4.27
1629 Madrona Ave	4	3	2,746	$6,000	$2.18
963 McCorkle Ave	3	2	1,378	$5,900	$4.28
1091 Mariposa Ln	3	2	1,316	$5,500	$4.18
1220 Peppertree Cir	3	2	1,450	$4,650	$3.21

1969 Vineyard Ave	3	2	1,000	$4,400	$4.40
1328 Magnolia Ave	3	3	2,082	$3,800	$1.83
210 Nemo Ct	2	2	2,000	$3,200	$1.60
1444 Edwards St, Unit C	2	1	N/A	$2,150	N/A
1444 Edwards St, Unit B	1	1	N/A	$1,850	N/A

Source: Zillow.com, January 9, 2023.

"At Risk" Units

State law requires an analysis of the risk of conversion of affordable housing to market-rate housing within the next ten years. The 2009 Housing Element identified one affordable housing complex, the Woodbridge Apartments, as at-risk for losing its federal subsidies. In 2013, the City worked with the property owners and CalHFA to re-finance and renovate 50 units of affordable housing. Through this effort the Woodbridge Apartment Complex will continue to offer regulated affordable housing through November 2067. The 2014-2022 Housing Element reported no units at-risk of conversion.

The California Housing Partnership provides information on affordable housing developments subsidized through HUD, the U.S. Department of Agriculture, the Low-Income Housing Tax Credit Program, and public housing. Table 20, shows data on assisted affordable units with information on the estimated affordability end year and an estimation of at-risk status. As shown on the table, the California Housing Partnership's Preservation Database (2020) does not identify any affordable housing developments with subsidies expiring during the 2023-2031 planning period.

Table 20 Assisted Affordable Housing Developments by Conversion Risk Status, St. Helena

Universal ID	Name	Address	Zip	Affordable Units	Total Units	Funding Program	Estimated Affordability End Year	Risk Level
CA00001362	Woodbridge Village Apartments	727 Hunt Avenue	94574	49	50	LIHTC; HUD; CalHFA	2067	Low
CA00002539	Hunt's Grove Apartments	548 Hunt Avenue	94574	56	56	LIHTC; HCD	2047	Low
CA00002582	Stonebridge Apartments	990 College Ave	94574	78	80	LIHTC; HCD	2068	Low

Source: California Housing Partnership Preservation Database, 2021.

7. Special Housing Needs

California Government Code Section 65583 (a) (7) requires an analysis of any special housing needs, "such as those of the elderly, persons with disabilities, large families, farm workers, families with female heads of household, and families and persons in need of emergency shelter."[19] This section provides estimates of the prevalence of each of these special needs populations, discusses special housing concerns, and analyzes their housing cost burdens within St. Helena to the extent that available data allows. Data sources include the HCD Preapproved Data Package and Housing Needs Data Report prepared for St. Helena by ABAG, as well as the U.S. Census Bureau, American Community Survey.

Key Findings

- **People with Disabilities.** In St. Helena, people with disabilities make up around 12 percent of the total population. Children (under 18) make up around 38 percent of the developmentally disabled population, while adults make up around 62 percent. Most of the developmentally disabled population reside with their parent, family, or guardian.

- **Senior Households.** Senior households represent a higher percentage of the total households in St. Helena, at about 39 percent of households in the City. There is a large income disparity between seniors who rent housing and seniors who own their home. Most seniors who rent make 0 to 30 percent of AMI, and sixty-eight percent of senior households in this income category have housing cost burdens. By contrast, most seniors who own make greater than 100 percent of AMI; thirteen percent of senior households in this category experience housing cost burdens.

- **Large Households.** In St. Helena, most large households are renters. Among units with three or more bedrooms in St. Helena, approximately 77 percent renter occupied. In St. Helena, 43.2 percent of large family households experience a cost burden of 30 to 50 percent, and an additional 6.8 percent of households spend more than half of their income on housing.

- **Female-headed households.** Female-headed households in St. Helena make up 10 percent of the total population, while married-couple family households make up around 42 percent. In St. Helena, around 23 percent of female-headed households with children fall below the federal poverty line, while around 18 percent of female-headed households without children fall below the federal poverty line.

- **Farmworkers**. The number of permanent farm workers in Napa County has increase from 2,916 in 2002 to 4,290 in 2017, while the number of seasonal farm workers decreased from 7,855 to 5,734. The migrant worker student population totaled 20 during the 2019-20 school year, an increase of two students since the 2016-17 school year.

[19] *California Government Code Section 65583 (a) (7) at https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65583. Accessed March 20, 2022.*

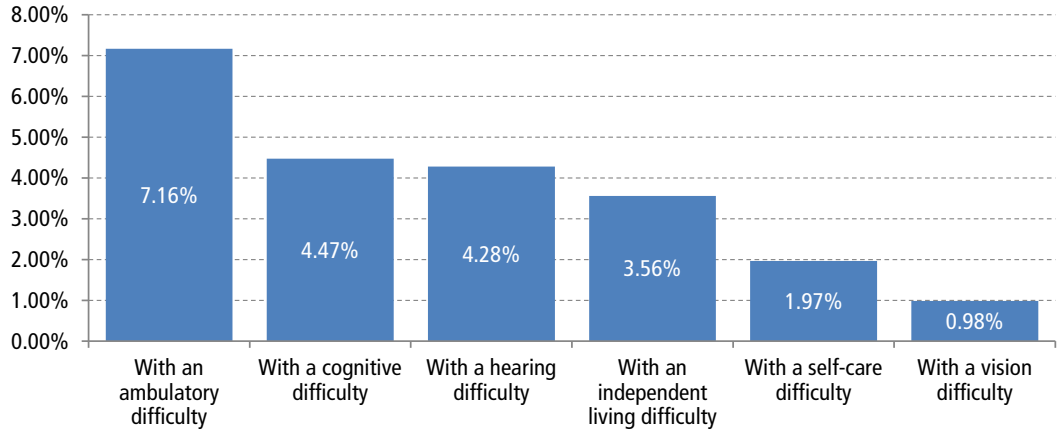
- **Persons experiencing homelessness.** According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. Countywide, many of the persons experiencing homelessness report chronic substance abuse or mental illness.

People with Disabilities

People with disabilities face additional housing challenges. Encompassing a broad group of individuals living with a variety of physical, cognitive and sensory impairments, many people with disabilities live on fixed incomes and need specialized care, yet often rely on family members for assistance due to the high cost of care.

When it comes to housing, people with disabilities are not only in need of affordable housing but accessibly designed housing, which offers greater mobility and opportunity for independence. Unfortunately, the need typically outweighs availability, particularly in a housing market with such high demand. People with disabilities are at a high risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. Figure 36 shows the rates at which different disabilities are present among residents of St. Helena. Overall, 11.9 percent of people in St. Helena have a disability of any kind.

Figure 36 Disability by Type



Universe: Civilian noninstitutionalized population 18 years and over
Notes: These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed. The Census Bureau provides the following definitions for these disability types: Hearing difficulty: deaf or has serious difficulty hearing. Vision difficulty: blind or has serious difficulty seeing even with glasses. Cognitive difficulty: has serious difficulty concentrating, remembering, or making decisions. Ambulatory difficulty: has serious difficulty walking or climbing stairs. Self-care difficulty: has difficulty dressing or bathing. Independent living difficulty has difficulty doing errands alone such as visiting a doctor's office or shopping.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.
For the data table behind this figure, please refer to the Data Packet Workbook, Table DISAB-01.

Existing Resources

In-Home Supportive Services (IHSS), offered by Napa County, is a helpful resource to help allow persons with disabilities to find the help they need. IHSS offers personal in-home care services to low income aged, blind, and persons with disabilities who are at risk for out-of-home placement.

Gaps in Resources and Action Items

To address the unmet needs of people with disabilities in St. Helena, Programs H-BB, H-LL, and H-NN are included to directly improve housing accessibility and increase housing options for persons with disabilities. Program H-BB commits the City to pursuing State and Federal grants to gain funds necessary to construct and rehabilitate housing units accessible to persons with a disability. Program H-NN includes funding to assist with construction and rehabilitation of homes accessible to those with special housing needs. Program H-LL is designed to encourage developers to incorporate the needs of persons with disabilities.

People Living with Developmental Disabilities

Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down's Syndrome, autism, epilepsy, cerebral palsy, and mild to severe mental retardation. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them. Table 21 contains data on people with developmental disabilities in St. Helena. In St. Helena, of the population with a developmental disability, children under the age of 18 make up 38.1 percent, while adults account for 61.9 percent.

Table 21 People with Developmental Disabilities by Age, St. Helena

Age Group	Total
Age 18+	12
Age Under 18	20
Total	32

Universe: Population with developmental disabilities
Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.
Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Age Group (January 2022)

Existing Resources

There are several housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types

of considerations that are important in serving this need group. Incorporating 'barrier-free' design in all, new multifamily housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income. The most common living arrangement for individuals with disabilities in St. Helena is the home of a parent, family member, or guardian (Table 22).

People living with developmental disabilities often face problems finding employment or a supportive housing. In Napa, Sonoma, and Solano counties, North Bay Regional Center aids those with developmental disabilities with the process of gaining employment and establishing independence, along with providing general community access and family support. North Bay Regional Center is one of twenty-one Regional Centers in California dedicated to assisting those with developmental disabilities. North Bay Regional Center is based out of the Napa County Airport Business Park located north of American Canyon, which is accessible from St. Helena via the 10 and 11 bus lines.

Gaps in Resources and Action Items

Recently, an eight-unit market rate fully ADA compliant housing development was completed in St. Helena, providing some much-needed housing to persons with special needs. The City wishes to encourage more ADA compliant developments to address the unmet needs of people with developmental disabilities. To pursue this goal, Program H-LLis included in the Housing Element to encourage new developments to allocate a portion of units being built to meet the needs of special needs groups, including people with developmental disabilities.

Table 22 People with Developmental Disabilities by Residence

Residence Type	Total
Home of Parent / Family /Guardian	31
Foster / Family Home	0
Independent / Supported Living	<11
Intermediate Care Facility	0
Community Care Facility	0
Other	0

Universe: Population with developmental disabilities
Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.
Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (January 2022)

Seniors

Senior households often experience a combination of factors that can make accessing or keeping affordable housing a challenge. They often live on fixed incomes and are more likely to have disabilities, chronic health conditions and/or reduced mobility.

Senior Households

Table 23 shows data for households by age of householder for occupied housing units. As shown, in St. Helena, approximately 39 percent of households are 65 and older.

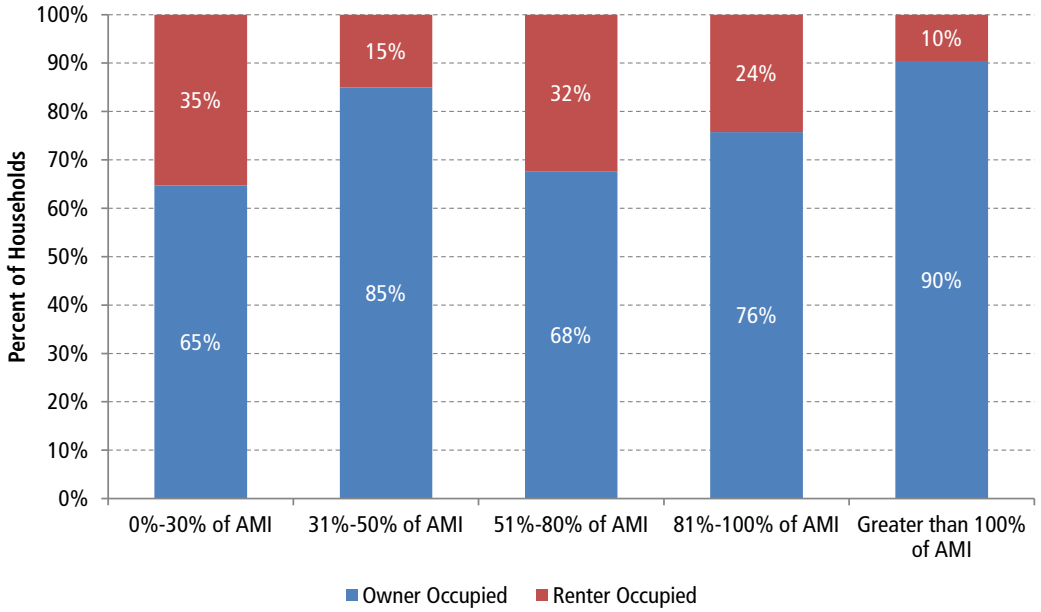
Table 23 Households by Age

Age	Number	Total by Grouping	Percent
Age 15-24	37	1,646	61%
Age 25-34	247		
Age 35-44	272		
Age 45-54	510		
Age 55-59	352		
Age 60-64	228		
Age 65-74	525	1,056	39%
Age 75-84	377		
Age 85+	154		
Total	2,702	2,702	100%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25007

Seniors who rent may be at even greater risk for housing challenges than those who own, due to income differences between these groups. The largest proportion of senior households who rent make 0-30 percent of AMI, while the largest proportion of senior households who are homeowners falls in the income group Greater than 100 percent of AMI (Figure 37).

Figure 37 Senior Households by Income and Tenure

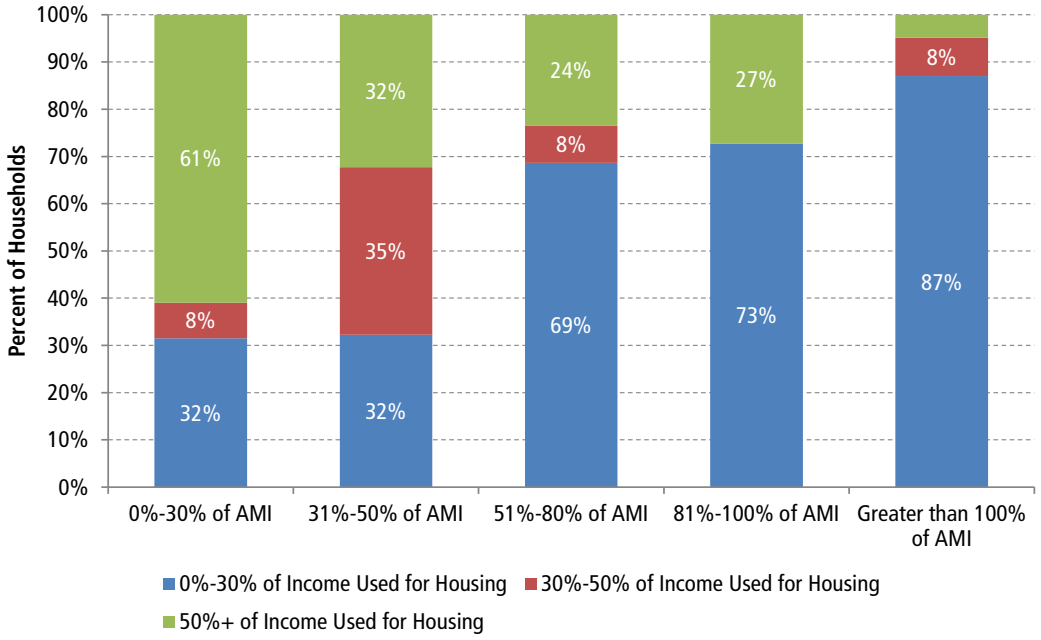


Universe: Senior households
Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-01.

Elderly Housing Cost Burden

When cost-burdened seniors are no longer able to make house payments or pay rents, displacement from their homes can occur, putting further stress on the local rental market or forcing residents out of the community they call home. Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors. 60.9 percent of seniors making less than 30 percent of AMI are spending the majority of their income on housing. For seniors making more than 100 percent of AMI, 87.0 percent are not cost-burdened and spend less than 30 percent of their income on housing (Figure 38).

Figure 38 Cost-Burdened Senior Households by Income Level



Universe: Senior households
Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-03.

Existing Senior Housing Resources

Within St. Helena, there are 159 senior housing units, as shown on Table 24. With approximately 1,056 seniors households in the city, the city has a need for both market rate and affordable senior living facilities. The largest senior living facility, locally owned Silverado Orchards, has a residential capacity of 103. This facility is not income restricted. The only income restricted senior living facility, Woodbridge Village, has 50 units, with most being one-bedroom units. As a stark representation of the high demand and low supply of affordable senior living units, according to a manager at Woodbridge Village, there is a waiting list stretching several years to live in their affordable senior housing complex.

Table 24 Senior Housing Units, St. Helena.

Facility Name	Address	Tenure	Number of Units	Income Restriction
Silverado Orchards	601 Pope Street	Rent	103	No
Saint Helena Home Care	2011 Olive Avenue	Rent	6	No
Woodbridge Village	727 Hunt Avenue	Rent	50	Yes

Source: City of St. Helena, 2022; U.S. News, 2016.

Gaps in Resources and Action Items

Given the high proportion of St. Helena households that are senior, especially seniors aged 75 and older, it is important to work to address their housing needs. The Rianda house provides seniors with a meeting place and valuable information on topics ranging from housing and income-assistance to medical referrals, as a welcome and positive resource for seniors in St. Helena. There are still many needs of seniors that are not being met, however, and changes to St. Helena's housing policies could make it easier for seniors to age in place. Often, when seniors are released from a hospital stay and return to their own homes, they have trouble navigating inside the home and getting to neighborhood services like the grocery store and doctor's office.

The 2023-2031 Housing Element includes three programs directly related the senior housing.

- Program H-BB commits the City to pursuing funding for costs specifically associated with housing rehabilitation for lower income households and seniors. Such funding can help with the conservation of 20 units accessible to seniors, along with other units for persons with a disability.
- Program H-LL commits the city to encouraging new developments accessible to persons with special needs, which includes seniors. This program specifies 10 senior-accessible units being constructed in the next Planning Period.
- Program H-NN commits the City to pursuing federal and State funding for costs associated with both new construction and rehabilitation for lower-income households and seniors. Such funding can support the development of 20 units accessible to seniors.

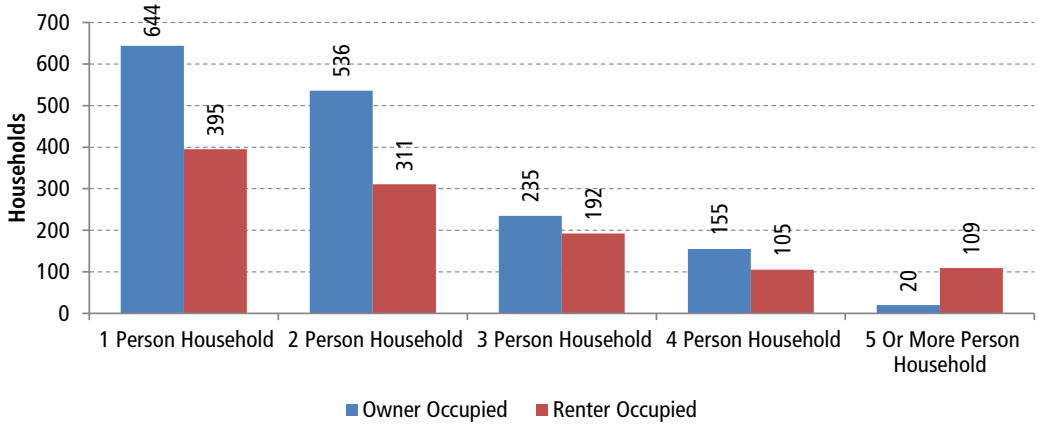
Additional policies and programs that the City should consider include zoning that encourages families to consider ADUs and JADUs to accommodate their aging relatives or caregivers. Such policies could also provide for more elder-friendly neighborhoods, improved lighting to increase visibility, and safe accessible sidewalks and walking paths.

Large Households

Large households often have different housing needs than smaller households. If a city's rental housing stock does not include larger apartments, large households who rent could end up living in overcrowded conditions. In St. Helena, for large households with five or more persons, most units (84.5 percent) are renter occupied

(Figure 39). In 2017, 47.3 percent of large households were very low-income, earning less than 50 percent of the area median income (AMI).

Figure 39 Household Size by Tenure

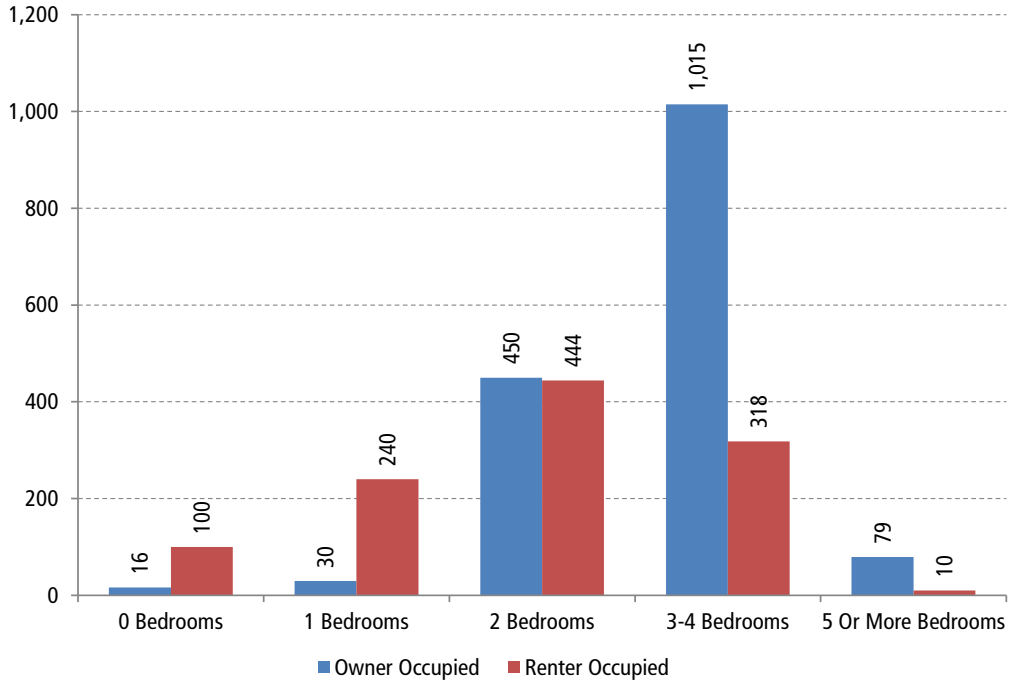


Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25009 For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-01.

Existing Resources

The unit sizes available in a community affect the household sizes that can access that community. Large families are generally served by housing units with three or more bedrooms, of which there are 1,422 units in St. Helena. Among these large units with three or more bedrooms, 23.1 percent are owner-occupied and 76.9 percent are renter occupied (Figure 40).

Figure 40 Housing Units by Number of Bedrooms



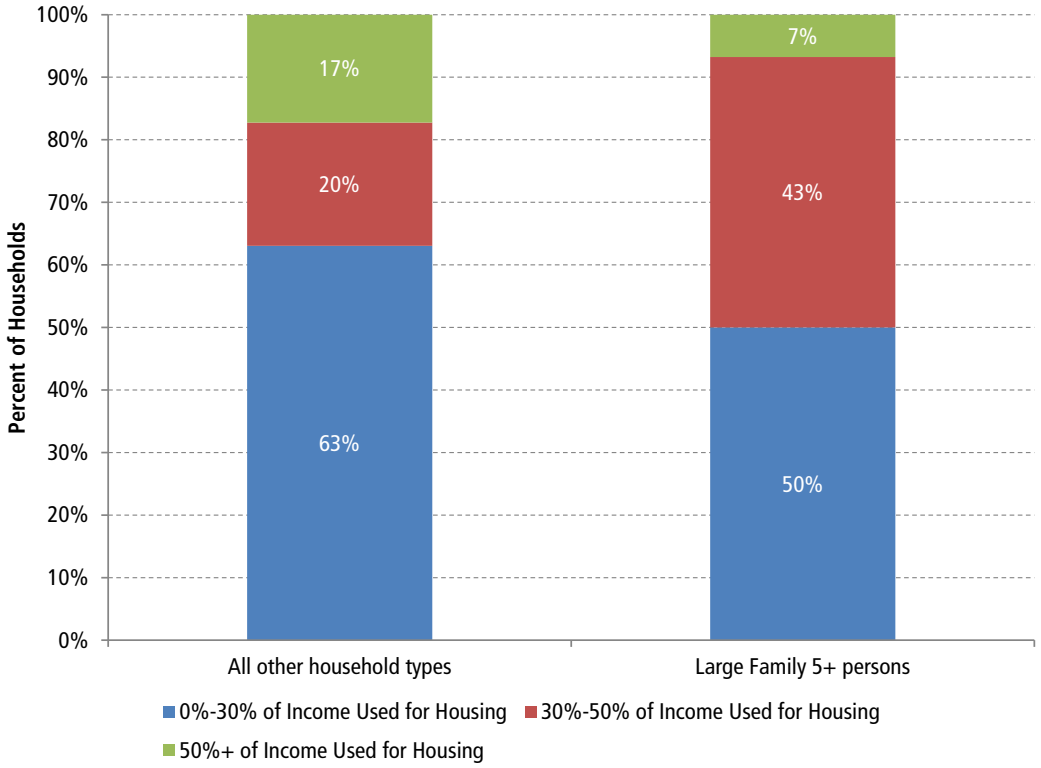
Universe: Housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25042 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-05.

Gaps in Resources

Large family households often have special housing needs due to a lack of adequately sized affordable housing available. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden than the rest of the population and can increase the risk of housing insecurity.

In St. Helena, 43.2 percent of large family households experience a cost burden of 30 to 50 percent, while 6.8 percent of households spend more than half of their income on housing. Some 19.7 percent of all other households have a cost burden of 30 to 50 percent, with 17.2 percent of households spending more than 50 percent of their income on housing (Figure 41).

Figure 41 Cost Burden by Household Size

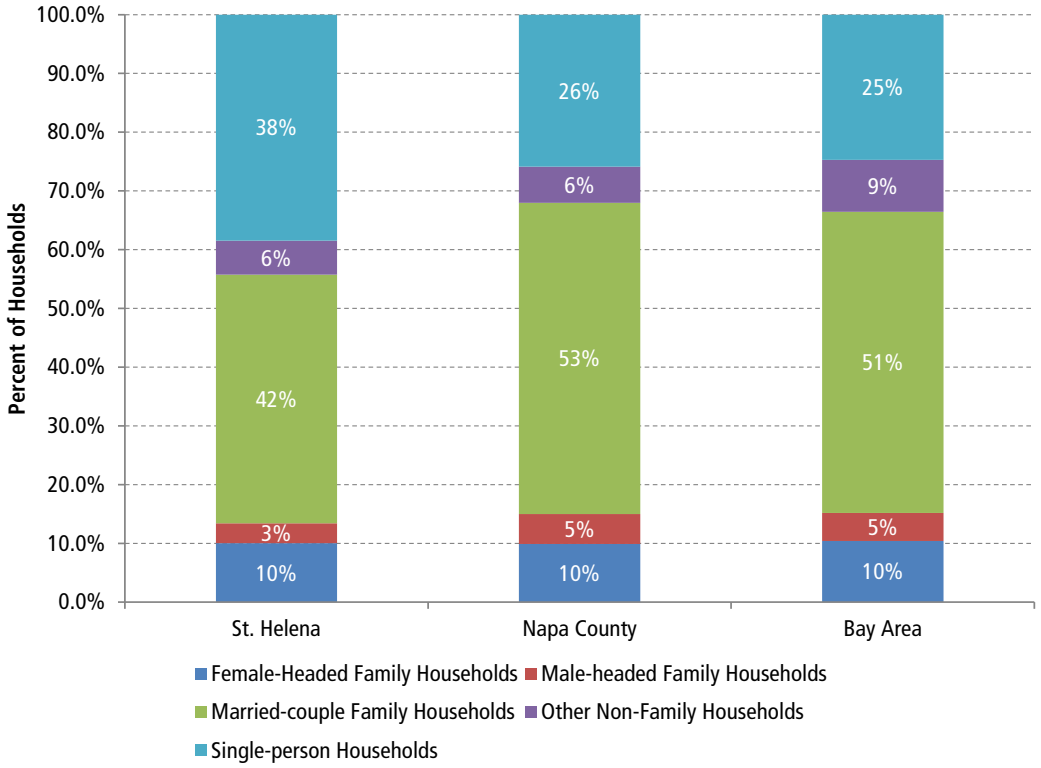


Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-09.

Female-Headed Households

Households headed by one person are often at greater risk of housing insecurity, particularly female- headed households, who may be supporting children or a family with only one income. In St. Helena, the largest proportion of households is Married-couple Family Households at 42.3 percent of total, while Female-Headed Households make up 10.0 percent of all households (Figure 42).

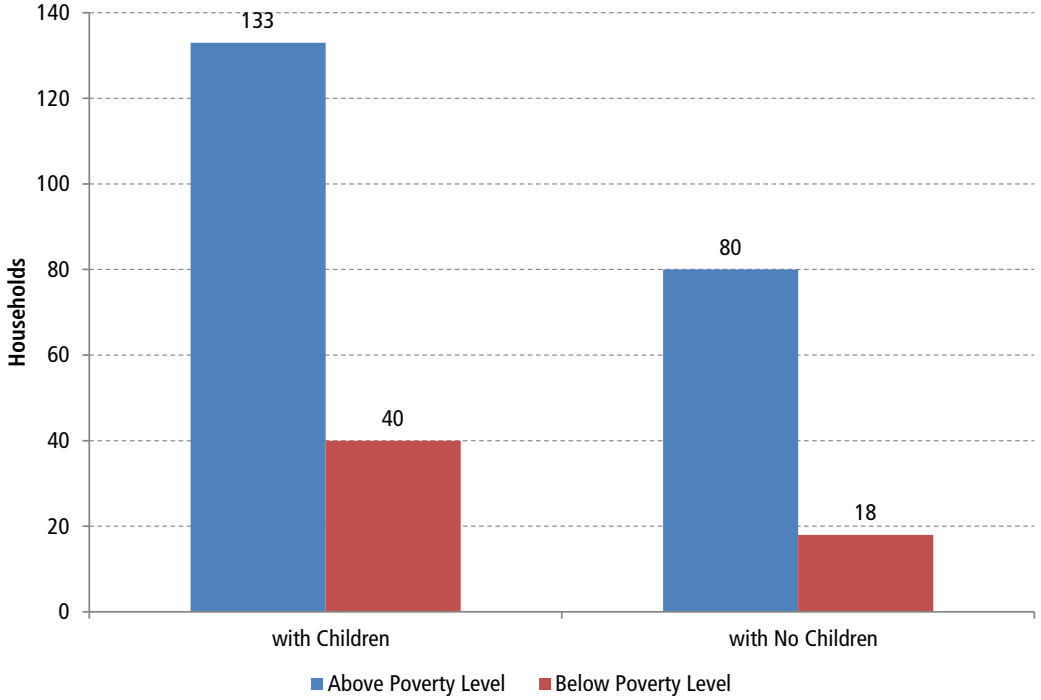
Figure 42 Household Type



Universe: Households
Notes: For data from the Census Bureau, a "family household" is a household where two or more people are related by birth, marriage, or adoption. "Non-family households" are households of one person living alone, as well as households where none of the people are related to each other.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B11001 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-23.

Female-headed households with children may face unique housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging. In St. Helena, 40 female-headed households with children fall below the Federal Poverty Line, while 18 female-headed households without children live in poverty (Figure 43).

Figure 43 Female-Headed Households by Poverty Status



Universe: Female Households
Notes: The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17012 For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-05.

Existing Resources

As discussed previously, childcare is a major concern for female-headed households, especially those with very young toddlers who need constant care and supervision. In St. Helena, the St. Helena Preschool For All, Inc. provides scholarships to low-income families to allow their children will be able to attend two years of preschool from ages 3 to 4. St. Helena Preschool for All, Inc. also partners with local childcare facilities, including Mila's Preschool and Childcare Center, to help facilitate their program.

Gaps in Resources and Action Items

St. Helena's northwestern area contains a higher proportion of female single-parent households compared to the rest of St. Helena and most of Napa County. As such, the City recognizes the importance of meeting the needs of female-headed households within the city. A major cost to female-headed households and single-parent households is transportation. All sites in the sites inventory of this Housing Element, which projects possible housing locations for the planning period, are located within walking distance of the no. 10 bus route, which enables direct connection to Napa or Calistoga. Additionally, all sites are within proximity of the central commercial district of St. Helena, which allows for cheaper, easier access to markets and commercial services.

Farmworkers

Across the state, housing for farmworkers has been recognized as an important and unique concern. Farmworkers generally receive wages that are considerably lower than other jobs and may have temporary housing needs. Finding decent and affordable housing can be challenging, particularly in the current housing market.

Table 25 estimates the migrant worker student population between 2016 and 2020. In St. Helena, the migrant worker student population totaled 20 during the 2019-20 school year, an increase of two students since the 2016-17 school year. The trend for the region for the past few years has been a decline of 2.4 percent in the number of migrant worker students since the 2016-17 school year. The change at the county level is a 19.4 percent increase in the number of migrant worker students since the 2016-17 school year.

Table 25 Migrant Worker Student Population

Academic Year	St. Helena	Napa County	Bay Area
2016-17	18	903	4,630
2017-18	12	1173	4,607
2018-19	22	1,090	4,075
2019-20	20	1,078	3,976

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools
Notes: The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.
Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020)
This table is included in the Data Packet Workbook as Table FARM-01.

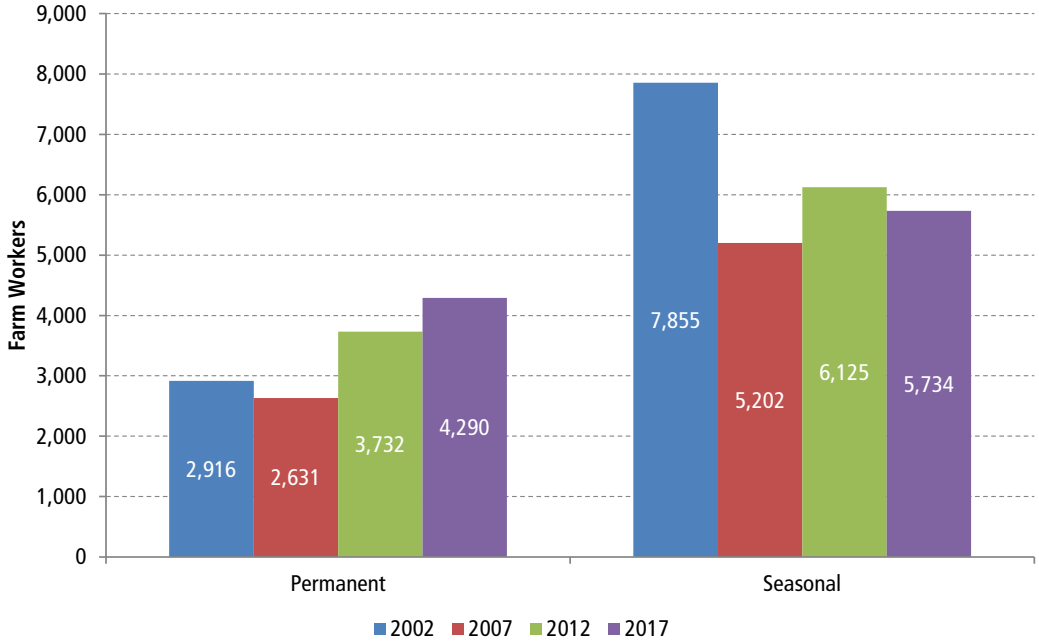
Table 26 presents an estimate of the total farmworkers in Napa County. Since 2007, the county has seen an increase in farmworker jobs. As of 2017, the county is reported to have more than 10,000 hired farm workers, of which 43 percent worked more than 150 days. The number of permanent farm workers in Napa County has increased since 2002, totaling 4,290 in 2017, while the number of seasonal farm workers has decreased, totaling 5,734 in 2017 (Figure 44). Notably, hired farm workers in Napa County represent a large proportion of the Bay Area's permanent (24.8 percent) and seasonal (31.4 percent) farm workers (Table 26).

Table 26 Farm Labor, Napa County

	2002	2007	2012	2017	County Distribution	Percent of Total Bay Area Farmworkers
Permanent	2,916	2,631	3,732	4,290	43%	24.80%
Seasonal	7,855	5,202	6,125	5,734	57%	31.40%
Totals	10,771	7,833	9,857	10,024	100%	28.20%

Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors)
Notes: Farm workers are considered seasonal if they work on a farm less than 150 days in a year, while farm workers who work on a farm more than 150 days are considered to be permanent workers for that farm.
Source: U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor

Figure 44 Farm Labor by County, Napa County



Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors)
Notes: Farm workers are considered seasonal if they work on a farm less than 150 days in a year, while farm workers who work on a farm more than 150 days are permanent workers for that farm.
Source: U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor For the data table behind this figure, please refer to the Data Packet Workbook, Table FARM-02.

Existing Resources

Five different kinds of housing exist for farmworkers in Napa County: farmworker centers, owned and operated by the Napa County Housing Authority (NCHA); private accommodations designated for agriculture employees that accommodate five or more employees and are monitored by the Napa County Department of Environmental Management; private accommodations designated as farm labor dwellings accommodating fewer than five residents, private apartments or other housing rented or owned by farmworkers; and affordable housing projects subsidized by the County and by incorporated cities, some of which have units set aside specifically for farmworker households.

Gaps in Resources and Action Items

Given the special housing needs of farmworkers in the region, the Housing Element contains Program H-H, which specifically encourages the development of more workforce or farmworker housing during the planning period through various incentives. Of the discussed incentives, most impactful is the City's commitment to explore opportunities to use funds from the City's Housing Trust Fund to help assist in the construction of farmworker housing. Additionally, programs H-E, H-I, H-KK, H-LL, H-NN also commit the City to exploring a variety of methods to better meet the housing needs of special needs households, including farmworkers.

Extremely Low-Income Households

Extremely-low income households are defined as households that make less than 30 percent of AMI, which equates to $27,950 for a family of four. Approximately 395 households in St. Helena are extremely-low income households, which includes 215 homeowners and 180 renters (see Figure 11). The City currently estimates that there is a need for 52 additional housing units for extremely low-income households in the current planning period, which is 50 percent of projected very low-income housing needs (see Table 6).

Existing Resources

Currently, St. Helena has an estimated 214 units of deed restricted affordable housing, listed on Table 17. This figure stretches across the need for extremely low, very low, low, and moderate-income housing. Given that there are 52 units needed for extremely low-income households, there is clearly a lack of adequate housing supply for extremely-low income households.

Beyond the availability of deed restricted affordable housing, there are a variety of resources available to assist extremely-low-income households with their recurring expenses. Extremely low-income households who are enrolled in the Supplemental Nutritional Assistance Program (SNAP), or any other qualifying government program, are eligible to be enrolled in the PG&E CARE Program, which allows for the lowest available electricity rates. Additionally, when households are enrolled in CARE, they are also permitted access to a fifty percent discount on their bill from the St. Helena Water District. The City also offers hardship payment agreements that can be arranged in person at City Hall to prevent water or sewer shutoff.

Gaps in Resources and Action Items

To help address the needs of extremely low-income households, numerous programs are included in this Housing Element to commit the City to preserving and expanding access to affordable housing to extremely low-income households. Program H-EE commits the city to continue reducing, deferring, or waiving the development fees for extremely low- and very low-income units. Program H-FF commits the City to prioritizing using the Affordable Housing Trust Fund to preserve existing or develop new extremely low-income housing units. H-II commits the City to continue supporting and participating in the Section 8 housing program with the City of Napa Housing Authority. Program H-OO commits the City to exploring the possibility of working with property owners of market rate multifamily complexes to convert some units to extremely low-income deed-restricted units.

Persons Experiencing Homelessness

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Rising housing costs result in increased risks of community members experiencing homelessness. Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or longer term.

Addressing the specific housing needs for the unhoused population remains a priority throughout the region, particularly since homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction and those dealing with traumatic life circumstances. According to the City of St. Helena, there is one homeless person who resides in St. Helena. This data was provided by a point in time assessment by the Police Chief of the St. Helena Police Department in 2021.

Gaps in Resources

Countywide, the most common type of household experiencing homelessness is those without children in their care. Among households experiencing homelessness that do not have children, 53.7 percent are unsheltered. Of homeless households with children, most are sheltered in transitional housing (Table 27).

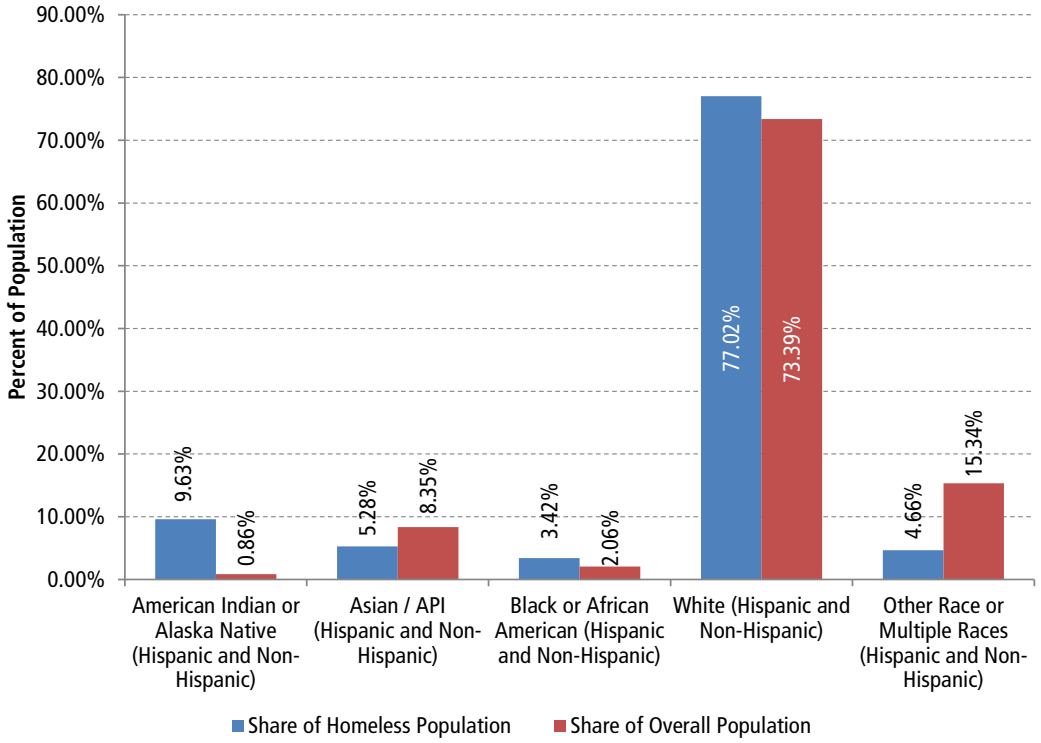
Table 27 Homelessness by Household Type and Shelter Status, Napa County

	People in Households Composed Solely of Children Under 18	People in Households with Adults and Children	People in Households without Children Under 18
Sheltered - Emergency Shelter	0	13	119
Sheltered - Transitional Housing	0	34	6
Unsheltered	0	5	145

Universe: Population experiencing homelessness
Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness.
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-01.

People of color are often disproportionately impacted by homelessness, particularly Black residents of the Bay Area. In Napa County, White (Hispanic and Non-Hispanic) residents represent the largest proportion of residents experiencing homelessness and account for 77.0 percent of the homeless population, while making up 73.4 percent of the overall population (Figure 45).

Figure 45 Racial Group Share of General and Homeless Populations, Napa County

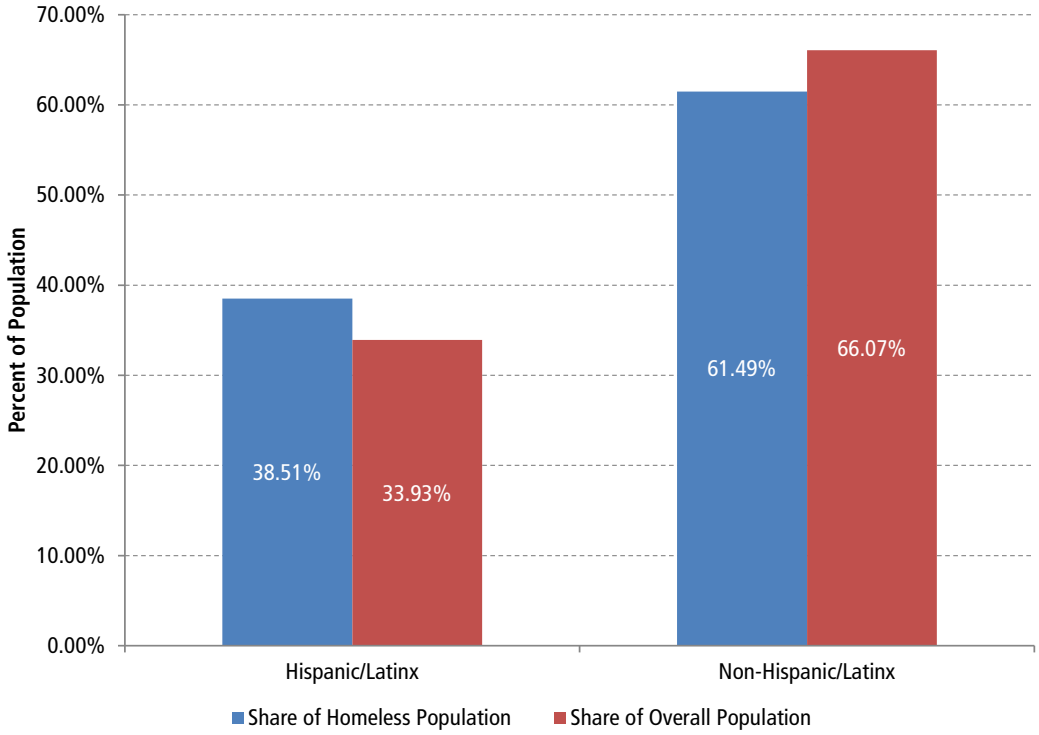


Universe: Population experiencing homelessness

Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. HUD does not disaggregate racial demographic data by Hispanic/Latinx ethnicity for people experiencing homelessness. Instead, HUD reports data on Hispanic/Latinx ethnicity for people experiencing homelessness in a separate table. Accordingly, the racial group data listed here includes both Hispanic/Latinx and non-Hispanic/Latinx individuals.
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-02.

In Napa County, Latinx residents represent 38.5 percent of the population experiencing homelessness, while Hispanic or Latinx residents comprise 33.9 percent of the general population (Figure 46).

Figure 46 Hispanic or Latinx Share of General and Homeless Populations, Napa County



Universe: Population experiencing homelessness
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-03.

Many of those experiencing homelessness are dealing with severe issues – including mental illness, substance abuse and domestic violence – that are potentially life threatening and require additional assistance. In Napa County, homeless individuals are commonly challenged by severe mental illness, with 177 reporting this condition (0). Of those, some 44.1 percent are unsheltered, further adding to the challenge of handling the issue.

Table 28 Characteristics for the Population Experiencing Homelessness, Napa County

	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	Veterans	Victims of Domestic Violence
Sheltered - Emergency Shelter	70	0	91	8	11
Sheltered - Transitional Housing	0	0	8	0	4
Unsheltered	91	1	78	6	17

Universe: Population experiencing homelessness
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019)

In St. Helena, there were no reported students experiencing homelessness in the 2019-20 school year (Table 29). Napa County has seen a 29.1 percent decrease in the population of students experiencing homelessness, and the Bay Areas as a whole experienced an 8.5 percent decrease. However, during the 2019-2020 school year, there were still some 13,718 students experiencing homelessness throughout the region, adding undue burdens on learning and thriving, with the potential for longer term negative effects.

Table 29 Students in Local Public Schools Experiencing Homelessness

Geography	2016-17	2017-18	2018-19	2019-20
St. Helena	0	0	0	0
Napa County	381	433	249	270
Bay Area	14,990	15,142	15,427	13,718

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools
Notes: The California Department of Education considers students to be homeless if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship. The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.
Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020)

Existing Resources & Action Items

Given the documented need for emergency shelters in Napa County, St. Helena is subject to Government Code Section 65583(a) (4). This code section, which became effective as of January 1, 2008, requires jurisdictions to designate zoning districts adequate for facilities to accommodate the identified need for emergency shelters, wherein emergency shelters must be allowed without a conditional use or other discretionary permit.[20] [21] The City is in compliance, as emergency shelters are currently a permitted use by-right in the Service Commercial and Industrial zones.

[20] *Building Block for Effective Housing Elements, "Adequate Sites Inventory and Analysis: Zoning for Emergency Shelters and Transitional Housing". http://www.hcd.ca.gov/hpd/housing_element2/SIA_variety.php. Accessed February 14, 2014.*
[21] *Senate Bill 2, Chapter 633. Amendment to Acts 655582, 65583 and 65589.5. Approved by Governor on October 13, 2007. Effective January 1, 2008. Accessed February 17, 2014.*

The City is in compliance with State laws related to emergency shelters, supportive housing, and transitional housing. Emergency shelters are identified as a by-right use in the I and SC zoning districts. According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. There are several parcels in these zones that can accommodate an emergency shelter, including APN 009-580-022-000 (I zoning district) and APN 009-194-005-000 (SC zoning district). These parcels are vacant, habitable, and in proximity to transportation and services. Combined, they total 1.48 acres and can provide capacity for 15 beds, by conservative assumption of 10 beds/acre. In addition, the City must allow transitional housing, as defined in Section 50675.2 of the Health and Safety Code, and supportive housing, as defined in Section 50675.14 of the Health and Safety Code, as residential uses. As required by state law, transitional and supportive housing must be subject only to the same permitting process as other similar residential uses in the same zone without undue special regulatory requirements. For example, a proposed multifamily supportive housing project would be subject to the same permitting process as any other similar multifamily development in the same zoning district. As required, the City allows transitional and supportive housing in all residential, commercial, and mixed use districts, subject only to the requirements of residential uses.

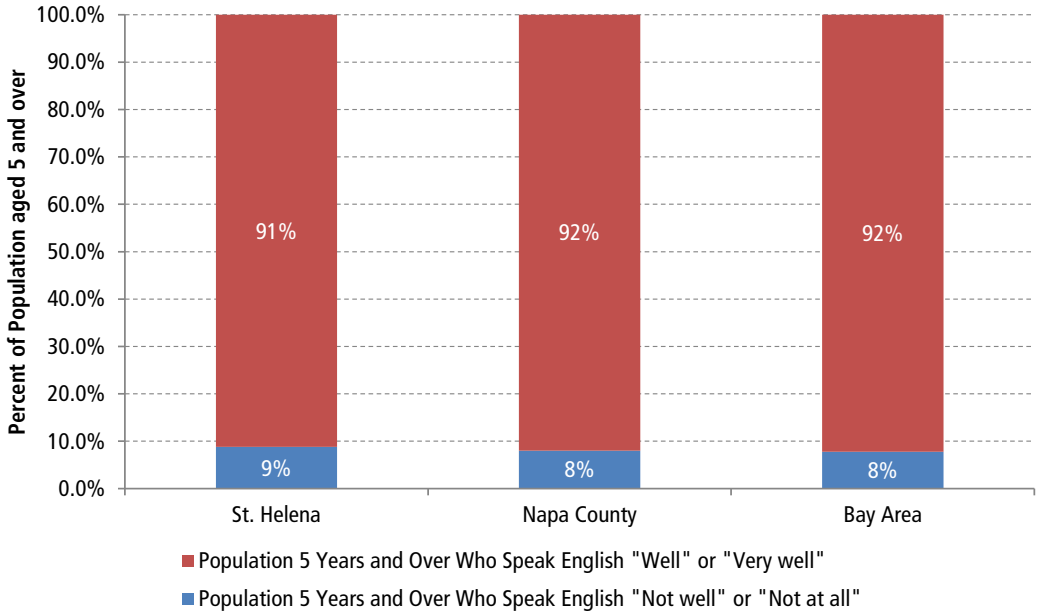
Emergency shelters, transitional housing, and supportive housing are subject to subjective design review, which poses a significant constraint to development. To overcome this constraint, Program H-F commits the City to adopting objective design standards, as well as a by-right streamlined review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330.

Non-English Speakers

California has long been an immigration gateway to the United States, which means that many languages are spoken throughout the Bay Area. Since learning a new language is universally challenging, it is not uncommon for residents who have immigrated to the United States to have limited English proficiency. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights, or they might be wary to engage due to immigration status concerns.

Figure 47 shows population data by English proficiency. In St. Helena, nine percent of residents five years and older identify as speaking English not well or not at all, which is slightly higher than the proportion for Napa County. Throughout the region the proportion of residents five years and older with limited English proficiency is nine percent.

Figure 47 Population with Limited English Proficiency



Universe: Population five years and over
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B16005For the data table behind this figure, please refer to the Data Packet Workbook, Table AFFH-03.

8. Non-governmental and Governmental Constraints

Constraints on the development of housing are divided into non-governmental constraints and governmental constraints. Non-governmental constraints include the price of land, cost of construction, flooding, conservation easements and long-term vineyard leases, and a lack of rental accessory dwelling units. Potential governmental constraints include land use controls, codes and code enforcement, on and off-site improvements, fees and exactions, processing and permit procedures, and regulations affecting housing for persons with disabilities.

Key Findings

- The possible non-governmental constraints discussed include the price of land, cost of construction, flooding, conservation easements and long-term vineyard leases, and a lack of rental accessory dwelling units. Land costs represent a significant component of the cost of housing development in St. Helena because the high price of vacant land. The cost of construction in St. Helena higher than the state average and further constrains development. Overall housing production costs for both single-family and multiple-family rental development indicate that a subsidy would probably be necessary for some moderate-income households, and all lower income households to own or rent new units in St. Helena.

- The governmental controls analyzed in this section were land use controls, codes and enforcements, on-and off-site improvements, fees and exactions, processing and permit procedures, and regulations affecting housing for persons with disabilities. The land use controls including zoning and current General Plan land use designations do not constrain residential development; however, some changes are necessary to streamline the design review process.

- The Growth Management System (GMS) does not appear to place an undue burden on market rate development, since there has never been a year when the demand for residential building permits has exceed the number of available permits. Furthermore, housing projects affordable to households at up to 120 percent of AMI are exempt from the GMS. Due to recent state laws, the GMS is not currently enforceable.

- The on- and off-site improvement standards related to water, sewer, parking, and other miscellaneous regulations impact housing development in a variety of different ways. Sewer capacity is sufficient to support additional development. Water capacity during a normal year is sufficient and is expected to remain sufficient through 2023, but there will always be water shortages in dry years. The City has demonstrated its commitment to providing water and sewer service to affordable housing developments, and has included a program committing the City to continue to do so throughout the planning period.

- Neither the building codes nor the building fees represent a governmental constraint to development. St. Helena adopted the 2019 California Building Codes Standards, and although they have made some

changes to the Code such as seismic control measures, these changes were necessary for safety and do not unduly affect housing production. The fee structure for both single-family and multiple-family development reflects the costs of the development to the City, and therefore does not present an unnecessary constraint on residential development.

- The City works diligently to process applications quickly and without unnecessary delay. Permitting and processing procedures and timelines for residential development, both single and multifamily, are not a constraint to development.

Non-governmental Constraints

Price of Land

According to Zillow.com, there were approximately eighteen vacant lots for sale in St. Helena in March 2022, though many are large and in undeveloped rural areas. Sales are reported between $229,000 and $17,500,000 for properties ranging in size from less than one acre to 280 acres. A public comment made during a community workshop indicated that larger vacant sites tend to be located near or beyond the urban limit.

Table 30 Price of Vacant Land, March 2022

Site	Acres	List Price	Price per Acre
10 Acres or Less	0.35	$525,000	$1,500,000
	0.74	$595,000	$804,054
	1.00	$375,000	$375,000
	1.00	$225,000	$225,000
	1.00	$975,000	$975,000
	1.08	$450,000	$416,667
	1.14	$5,000,000	$4,385,965
	1.58	$475,000	$300,633
	2.40	$1,000,000	$416,667
	5.01	$1,850,000	$369,261
	10.00	$2,695,000	$269,500
Total	25.30	$14,165,000	$559,881

Site	Acres	List Price	Price per Acre
More Than 10 Acres	15.90	$3,995,000	$251,258
	23.09	$2,950,000	$127,761
	32.00	$17,500,000	$546,875
	92.72	$229,000	$2,470
	110.63	$1,795,000	$16,225
	160.69	$549,500	$3,420
	280.00	$649,000	$2,318
Total	715.03	$27,667,500	$38,694

Source: Zillow.com, accessed March 28, 2022.

Construction Costs

Construction costs include both hard costs, such as labor and materials, and soft costs, including architectural and engineering services and development fees. Average residential construction costs in St. Helena begin at $300 to $700 per square foot, which is higher than statewide averages, which are currently ranging between $131 per square foot to $195 per square foot.[22] High-end, custom-built single-family homes, both locally and statewide, can cost more than $500 per square foot. Soft costs (including architectural and engineering fees, property taxes during construction, city and utility fees, and construction loan interest and fees) typically increase these costs by approximately 35 to 40 percent. Construction costs can be higher if lots require substantial site work due to steep slopes, unstable soils, waterways, and other environmental concerns.

Public comments made during Housing Element workshops indicated that construction costs are a major constraint to the production of affordable housing, and that 100 percent affordable projects are not profitable without public subsidies, grant funding, or other public investment.

Flooding

Napa Valley areas near the Napa River and along some of its tributaries are prone to flooding. Napa River flows are largely influenced by precipitation; peak flows generally occur in January and February. Some of the worst flooding in the immediate area of St. Helena has occurred in and around the Vineyard Valley Mobilehome Park, which is near the confluence of Sulphur Creek and the Napa River. Flood hazards also exist in the York Creek and Sulphur Creek Watersheds in St. Helena.

[22] *Local estimate provided by city staff communication with Joe McGrath in March 2022. Statewide estimate sourced from: ProMatcher Home Construction, California Home Construction Costs & Prices, provided at https://home-builders.promatcher.com/cost/california.aspx*

All new construction and substantial improvements in special flood hazard areas as defined by the Federal Emergency Management Agency are required to comply with the provisions of Municipal Code Chapter 15.52 "Flood Damage Prevention." The development standards are intended to meet, if not exceed, minimum National Flood Insurance Program (NFIP) criteria for requirements for floodplain management regulations. New development in these areas is required to assure that proposed development: 1) is designed or modified and anchored to prevent flotation, collapse and lateral movement of the structure; 3) uses construction materials and utility equipment that are resistant to flood damage; and 4) uses construction methods that minimize flood damage. In addition, projects must be elevated 18 inches above the base flood elevation.

Conservation Easements and Vineyard Leases

Agricultural land in St. Helena is valued for both a productive agricultural land and as open space that helps shape the character of St. Helena. Focus Group members and community workshop participants expressed, however, that conservation easements and long-term vineyard leases are a barrier housing production in the City. Sites included in the available sites inventory were screened for these constraints.

Lack of Rental Accessory Dwelling Units (ADUs)

While ADUs are often a less expensive housing option, Focus Group members and community workshop participants expressed that many ADUs in the City are not being rented, but are being used as additional square footage for the primary resident, a friend, a relative, or as a vacation rental. Programs H-Q, H-R, and H-S, work to encourage and incentivize development of accessory dwelling units.

Availability of Financing

A number of funding opportunities are currently available to support affordable housing development and the creation and preservation of homeownership opportunities. The Department of Housing and Community Developments lists active programs with current funding available to developers, non-profits, and local governments online. Statewide programs available for affordable housing development include Community Development and Block Grant (CDBG), Emergency Solutions Grants (ESG), HOME Investments Partnerships Programs (HOME), Housing for Healthy California (HHC), and the Multifamily Housing Program (MHP), among others. Programs available for homeowners or to assist in the creation or preservation of homeownership opportunities include CalHome, the Foreclosure Interventions Housing Preservation Program, and Homeownership Super NOFA. For a complete list, please see https://www.hcd.ca.gov/programs-active. Additionally, policies and programs under Goal 4: Assistance to Support Affordable Housing work to address non-governmental constraints by committing the City to seek additional funding opportunities to support affordable housing development, work to reduce fees for developers for affordable housing developers, and pursue mortgage credit certificates to assist prospective homeowners.

Governmental Constraints

Local government can directly influence housing production cost through land use controls, building codes, on and off-site improvement standards, fees and exactions, processing and permit procedures, regulations affecting housing for persons with disabilities, locally adopted ordinances, and with government codes and enforcement. This section discusses each of these topics and identifies the governmental controls that may adversely affect housing production.

Land-Use Controls

St. Helena has a variety of land use controls to maintain the standard of living, local environment, and safety of its residents. The two major instruments dictating land use control in the City are the Zoning Code and General Plan, which affect housing production because they determine the location, amount of land, development standards, and density of housing. These tools, as well as the City's agricultural preservation measures are discussed in this section.

Preservation of Agricultural Land

One major overarching theme and goal of the City's land use controls is to encourage in-fill development while preserving land for agriculture. The agricultural soils of St. Helena are identified as Prime Farmland by the California State Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. The wines produced from the grapes in this region achieve international recognition for their superb quality, sustaining an industry at the heart of the City and region's economy.

Roughly one-half of the 3,254 acres within the incorporated limits of the City are considered urbanized area. This portion of the St. Helena is defined by an Urban Limit Line (ULL) which denotes the area within which urban development is allowed. Cities use ULLs to establish where they intend to encourage and discourage land development through public-infrastructure investments, land-use regulations, land acquisitions, and other actions. Within the ULL, cities typically adopt land use policies that encourage urban development (i.e., in-fill development). Outside the ULL, cities set aside lands to be used for less urban land uses, such as preserving land for agriculture and open space. There are 1,779 acres of land outside of the ULL, but inside the incorporated limits of the City of St. Helena. Most of this land is farmed and planted for vineyards.

Zoning Code

Title 17 of the St. Helena Municipal Code outlines both the residential and nonresidential zoning designations. Table 31 provides a list of all of the residential zoning districts as well as information on the rights and requirements associated with each district. Residential uses are permitted, subject to design review, in the following zones: Twenty-Acre Agriculture (A-20), Winery (W), Woodland Watershed (WW), Agricultural Preserve (AP), Low Density Residential One Acre Minimum (LR-1A), Low Density Residential (LR), Medium Density Residential (MR), and High Density Residential (HR). Table 31 shows permitted residential uses by zoning district.

Table 31 Zoning Districts that Permit Residential Uses

Residential Use	Zoning District							
	A-20	W	WW	AP	LR-1A	LR	MR	HR
Agricultural Employee Housing	P	P	P	P	P	P	P	P
Dwelling, Accessory Dwelling Unit (ADU)	P	P	P	-	P	P	P	P
Dwelling, Duplex (new)	-	-	-	-	-	-	UP	P
Dwelling, Multiple-Family	-	-	-	-	-	-	-	P
Dwelling, Multiple-Family (key housing sites only)	-	-	-	-	-	-	P	P
Dwelling, Single-Family	P	P	P	P	P	P	P	P
Dwelling, Triplex (new)	-	-	-	-	-	-	UP	P
Intermediate Care Facility (seven or more persons)	-	-	-	-	UP	UP	UP	UP
Intermediate Care Facility (six or fewer persons)	-	-	-	-	P	P	P	P
Mobile/Manufactured Homes	-	-	-	-	P	P	P	P
Residential Care Facility (seven or more persons)	-	-	-	-	UP	UP	UP	UP
Residential Care Facility (six or fewer persons)	-	-	-	-	P	P	P	P
Single Room Occupancy	-	-	-	-	-	-	-	P
Supportive Housing	P	P	P	P	P	P	P	P
Transitional Housing	P	P	P	P	P	P	P	P
P = Permitted; UP = Use Permit Required; (-) = Not Permitted								

Source: City of St. Helena, 2022.
Note: For an expanded table with more uses, notes on conditions, and zones where residential uses are conditionally permitted, see Table 42.

In terms of units per acre, the lowest allowable density is in the AP district. The AP district permits, by right, one single-family dwelling per lot, agricultural employee housing (up to 36 beds or 12 units), supportive housing, and transitional housing. The A-20 and W districts allow one single-family dwelling and one second unit by right on 20 acres of land. With a Use Permit, these districts can accommodate more than one single-family dwelling, as well as farm labor housing above the initially permitted density. Both the LR and LR-1A districts permit by right single-family dwellings, mobile and manufactured homes, and intermediate and residential care facilities for six or fewer persons. In addition, both districts permit as a conditional use single-family dwellings at less than one unit per acre and intermediate and residential care facilities for seven or more persons.

The MR district allows the same uses as the LR district and also allows duplexes and triplexes with a Use Permit. Unlike the previously mentioned districts, the MR district allows multiple-family dwelling projects that are located on "key sites" subject to design review. The HR district, in addition to allowing the same residential uses as the LR and MR districts, permits multiple-family dwellings, apartments, and dwelling groups containing four units or less. With a Use Permit, structures with more than four units, multiple-family dwellings,

apartments, and dwelling groups are permitted. The HR district is the only district that permits single room occupancy units (SROs).

In addition to the residential districts described above, some overlay districts can affect the type and amount of housing that can be built, including the Planned Development, Rural-Residential, Specific Plan, Historic Preservation, and Mobile Home Park overlay district. An overlay district expands upon the regulations already set by the underlying zoning district. For example, the Planned Development Overlay District (PD) allows for a wider variety of development, including mixed-use development not otherwise allowed in the Zoning Code. The PD zone is often applied to large pieces of land and requires approval of a rezoning and a conditional use permit application.

Table 32 shows density and intensity ranges allowed in the Zoning Code for each zoning district in dwelling units per acre (du/ac), or Floor Area Ratio (FAR) for commercial districts. Table 33 shows development standards by zoning district. As shown, density is allowed up to 28 dwelling units per acre and development standards are minimal, required setbacks for residential development are between 10 and 30 feet, depending on the zone, and minimum unit sizes are not regulated in residential zones. Further, the HDR zone, the City's primary multifamily zone, allows three-story developments up to 35 feet in height. Finally, the City is in the process of creating a new Mixed-Use zone to increase residential capacity in previously commercial and professional office districts.

Development standards related to maximum lot coverage and height pose potential constraints to multifamily affordable housing development. Currently the City allows 45 percent lot coverage and a maximum height of 30 feet in the MR and HR zones. Due to the potential to constraint affordable housing development, the City has, in the proposed Draft Zoning Code and in Program H-N: Zoning to Facilitate Higher Density Housing included development standards and actions, respectively, that commit the City to increasing lot coverage to 55 percent and maximum height to 42' (three stories) in the HR zone and on multifamily sites in the MR zone. Please note that the MR zone is a single-family zone, but the zoning code has been updated to allow multifamily uses on housing opportunity sites identified in the 5th Cycle Housing Element Update. Additionally, the program commits the City to allowing minor modifications to these standards that can be approved by the Community Development Director without a public hearing. Minor modifications should include up to 10 percent modification to maximum lot coverage and up to five percent (or two feet, whichever is greater) modification in maximum height.

Table 32 Density/Intensity Standards by Zoning District

Residential Zoning District	Corresponding General Plan Land Use Designation(s)	Minimum Density of Land Use Designation	Maximum Density of Land Use Designation
A-20	Agriculture	Min. 5 acres/parcel	Max. 40 acres/parcel
W	Woodland and Watershed	Min. 5 acres/parcel	No maximum
WW	Woodland and Watershed	Min. 5 acres/parcel	No maximum
AP	Agriculture	Min. 5 acres/parcel	Max. 40 acres/parcel
LR-1A	Low Density Residential	1.0 du/ac	5.0 du/ac
LR	Low Density Residential	1.0 du/ac	5.0 du/ac
MR	Medium Density Residential	5.1 du/ac	16.0 du/ac
HR	Higher Density Residential	16.1 du/ac	28.0 du/ac
CB	Central Business	N/A	Max. FAR 2.0
SC	Service Commercial	N/A	Max. FAR 0.5
BPO	Business and Professional Office	N/A	Max. FAR 0.5
Mixed Use[1]	Mixed Use	12 du/ac	20 du/ac

1: The City has adopted a new mixed-use designation within the 2040 General Plan Update and has released a Draft Comprehensive Zoning Code Update that includes a new Mixed-Use zone. Because the sites inventory assumes rezoning land to the new Mixed-Use zoning district, mixed-use development standards are shown in this table based on the October 2022 Public Review Draft Zoning Code.
Source: City of St. Helena, 2022.

Table 33 Development Standards by Zone

Residential Zone	LR	LR-1A	MR	HR
Development Standards				
Maximum lot coverage	35%	35%	45%	45%
Maximum height of principal building	30 feet	30 feet	30 feet	30 feet (if 4 du or less) 35 feet (if 5 du or more)
Maximum height of accessory building	15 feet	15 feet	15 feet	15 feet
Maximum floor area ratio (FAR)	Dictated by Parcel Size See SHMC 17.32.070	Dictated by Parcel Size See SHMC 17.32.060	Dictated by Parcel Size See SHMC 17.40.070	Dictated by Parcel Size See SHMC 17.40.070
Maximum width	=< 60% of lot width, subject to further requirements in SHMC 17.32.060	=< 60% of lot width, subject to further requirements in SHMC 17.32.030	=< 60% of lot width, subject to further requirements in SHMC 17.32.030	N/A
Minimum Unit Size	N/A	N/A	N/A	N/A
Minimum standards for parcels except for flag lots and small lots				
Lot Area	7,000 sq feet	1 acre	7,000 sq ft	7,000 sq ft
Lot width	70 feet	70 feet	70 feet	70 feet
Lot frontage	70 feet	70 feet	70 feet	70 feet
Minimum standards for structures with a maximum height of twenty-five (25) feet or less				
Front setback	20 feet	20 feet	20 feet	20 feet
Side setback	20 feet	20 feet	20 feet	20 feet

Side yard	10 feet	10 feet	10 feet	10 feet
Rear yard	20 feet	20 feet	20 feet	20 feet
Minimum standards for structures with a maximum height greater than twenty-five (25) feet and thirty (30) feet or less				
Front setback	30 feet	30 feet	30 feet	N/A
Side setback	30 feet	30 feet	30 feet	
Side yard	15 feet	15 feet	15 feet	
Rear yard	30 feet	30 feet	30 feet	

Nonresidential Zones				
Non-Residential Zone	**CB**	**SC**	**BPO**	**Mixed Use[1]**
Development Standards				
Maximum lot coverage	10,000 sq feet. of floor	10,000 sq feet of floor area	N/A	Max. 15,000 sq feet per building
Maximum height of principal building	35 feet or 30 feet if abutting residential use	35 feet	30 feet	Pitched roof: 45 ft/3 stories; 30 ft/2 stories within 20 feet of a residential district. Flat roof: 40 ft/3 stories; 26 ft/2 stories within 20 feet of a residential district
Maximum height of accessory building	35 feet or 30 feet if abutting residential use	35 feet	N/A	16 feet
Maximum floor area ratio (FAR)	2.0	0.5 by General Plan designation	0.5 by General Plan designation	1.0, inclusive of residential uses
Maximum width	N/A	N/A	N/A	Min. 50% of lot width
Minimum Unit Size	200 sq feet	200 sq feet	N/A	N/A
Lot Area	5,000 sq feet	10,000 sq feet	7,000 sq ft	5,000 sq ft
Lot width	N/A	70 feet	N/A	45 feet
Lot frontage	N/A	70 feet	N/A	70 feet
Minimum Setbacks				
Front setback	0 feet, or 10 feet if abutting residential use	35 feet	20 feet	Nonresidential: Max 10 feet; Residential: No setback allowed north of Mitchell Dr.; 5-15 ft everywhere else
Side setback	0 feet, or 10 feet if abutting residential use	25 feet	10 feet	0 feet on street side; 10 ft. abutting a residential district
Side yard	0 feet, or 10 feet if abutting residential use	10 feet/floor	10 feet	N/A
Rear yard	0 feet, or 10 feet if abutting residential use	15 feet, or 20 feet if abutting residential use	15 feet	0 ft; 10 ft. abutting a residential district

** The standards contained in this table are "typical" and are for illustrative purposes only. More specific development regulations and exceptions may apply. See Chapter 17 (Zoning) of the Municipal Code for additional development standards and requirements.*
1: The City has adopted a new mixed-use designation within the 2040 General Plan Update and has released a Draft Comprehensive Zoning Code Update. Because the sites inventory assumes rezoning land to the new Mixed Use zoning district, mixed-use development standards are shown in this table based on the October 2022 Public Review Draft Zoning Code.
Source: St. Helena Municipal Code, Title 17; St. Helena Public Review Draft Zoning Code Update, October 2022.

Overlay Zones

The Zoning Code outlines standards for several overlay zones that allow residential uses. The following summarizes each of these overlay zones.

Historic Preservation Overlay Zone. The purpose of the HP overlay district regulations is to preserve the unique architectural character of those certain specific structures which have contributed to the city's historic development. No permits for remodeling or demolition shall be issued for properties within the HP district which would result in exterior changes to building facades, structures, or to passage ways providing inter-accessibility within a block, unless such change is approved by the planning commission. When it can be demonstrated to the satisfaction of the Planning Commission and City Council that preservation and/or restoration of designated properties cannot and is not economically viable, the City may grant certain incentives in the form of relaxation of certain provisions of this chapter only when it can be shown that such relaxation makes preservation or restoration economically feasible. The HP overlay zone does not impose additional development standards beyond those of the base zoning district.

Mobilehome Park Overlay (MHP) District. The purpose of the MHP mobilehome park overlay district is to provide, when combined with an underlying residential zoning district, a place which allows the establishment and operation of mobilehome parks. The city of St. Helena's MHP mobilehome park regulations are intended to complement and be subordinate to state law. The state law governing mobilehome parks is entitled the "Mobilehome Parks Act" and may be found in Division 13, Parts 2.1 and 2.3 of the California Health and Safety Code. Mobilehome park regulations are contained in the California Code of Regulations, Title 25, Division 1, Chapters 2 and 2.2. The city of St. Helena does not assume responsibility for the enforcement of the regulations contained therein and all mobilehome parks within the city remain subject to the jurisdiction of the California Housing and Community Development Department in its role as the enforcement agency for the above described State laws. Nothing contained in this chapter shall be construed to abrogate, void or minimize such other pertinent regulations and all pertinent state and city regulations concerning the development and operation of mobilehome parks shall be observed. Mobilehomes located within areas of special flood hazard are required to be in compliance with Chapter 15.52, Flood Damage Prevention. The MHP overlay district does not impose additional development standards beyond that of the base zoning district.

Planned Development Overlay (PD) District. It is the purpose of the PD planned development overlay district to encourage high quality, innovative and creative development in the city. The PD planned development overlay district is intended to provide for the consideration and approval of development plans

which serve public objectives more fully than development permitted under conventional zoning regulations. Planned development overlay districts are typically characterized by (in whole or in part): significant variations from the standards of the zoning ordinance, mixed land uses, a variety of housing types, the assembly of small parcels of land into a larger more effective unit, the preservation of open space, natural features or historical structures and structures with diverse building setbacks, lot sizes and building heights. The PD planned development overlay district may be combined with any existing zoning district provided both design and the proposed uses including density for residential land use designations can be found consistent with the policies of the General Plan. Development standards applicable to the zoning district which the planned development district is being combined shall be required unless modified in conjunction with approval of the planned development overlay district. The city shall address issues related to landscaping, parking, site design, ingress and egress, signage, lighting, relationship to adjoining properties and land uses, setbacks and yards and any other items toward achieving an integrated and compatible project within the city and environs.

Specific Plan Overlay (SP) District. The SP district is established to implement the policies of the general plan which call for the preparation and adoption of specific plans in certain areas of the community described in the general plan. In addition, the SP district is established to provide the city with the ability to require and/or to implement specific plans when the city council finds it necessary and appropriate. When applied to properties in advance of the adoption of a specific plan, the SP district serves to alert individuals to the requirement for a specific plan. When applied to properties after the adoption of a specific plan it serves to alert individuals to the policies and regulations of a specific plan. No new development will be approved within the specific plan areas designated in the general plan until a specific plan meeting the requirements of Section 65451 of the Government Code, has been adopted by the city. The city council may determine that a site development plan for a specific property may be prepared in-lieu of a specific plan for the entire specific plan area. The site development plan shall be prepared and adopted prior to approval of new development. The site development plan shall include an analysis of infrastructure improvements as determined during review of a pre-application pursuant to Section 17.84.030. Based on the pre-application review, the city council shall determine the scope of the proposed specific plan or site development plan. The proposed specific plan or site development plan and associated documents shall be prepared under the supervision of the city with all costs paid by the property owners unless the city determines that all or a portion of the costs will be paid by the city. The SP Overlay district does not impose additional development standards, however standards for any specific plan should be developed under the supervision of the City, as stated previously.

Rural Residential Overlay (RR) District. It is the purpose of the RR rural-residential overlay district to identify those parcels within the city which are not serviced by city water or sewer and which have the ability to subdivide into additional parcels. Minimum lot sizes which are larger than the minimum lot sizes established for the underlying zoning district are required for parcels which do not have city water or sewer services. The following regulations shall apply in all districts with which are combined RR district. The only uses permitted shall be those uses permitted in the district with which the RR district is combined; provided, however, where water is available from a private well, the land may not be subdivided into less than one acre or if water is available from a mutual or utility company the land may be subdivided into parcels of twenty thousand (20,000)

square feet or greater as determined by the health officer of the city; or if sanitation and public water are available the land may be subdivided into parcels not less than ten thousand (10,000) square feet. "Health officer of the city" as used in this section, is defined to mean the official or officials of the city charged with the duty of enforcing the health ordinances of the city and the official or officials of any other governmental agency with whom the city has contracted for the enforcement of such ordinances.

Please note, the Rural Residential Overlay (RR) District is being deleted through the Comprehensive Zoning Code Update currently (2023) underway and scheduled for adoption in fall 2023.

General Plan

St. Helena adopted the current General Plan in 2019. The General Plan has a planning horizon of 2040. The city of St. Helena consists of approximately 3,254 acres. Of that total, 19 percent are designated for residential uses, four percent for commercial uses, 2.5 percent for business/industrial uses, and 69 percent for open space and agriculture.[23] Not all the land within the City Limits are available for development; rather approximately 1,475 acres within the Urban Limit Line (ULL) are eligible for development.[24] Thirteen land use designations cover the land in St. Helena.

The ULL contains land use designations including Low, Medium, and High Density Residential, Central Business, Service Commercial, Industrial, Business and Professional Office, Parks and Recreation, Public/Quasi-Public, Open Space and Agriculture. Some land outside, yet contiguous to the ULL has a General Plan designation of Urban Reserve (UR) indicating that it should be considered first if land outside the ULL is needed for development. All lands with a UR land use designation are zoned A-20.

Residential Growth Management System

The Residential Growth Management System (GMS) limits the number of building permits available for residential growth each year.[25] The stated purpose of the system is "to regulate the residential growth of the City to approximately two percent per year, while providing for both market rate and affordable housing units."[26] The GMS previously instituted a cap of 2,800 units by 2010, which resulted in a restriction of nine permits being issued per year. Program H-B commits the city to removing the GMS from the Zoning Code, thus removing this governmental constraint and further encouraging the construction of housing to meet RHNA goals.

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[23] City of St. Helena General Plan Update 2040, Chapter Two Land Use and Growth Management. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3505/final_plan_compiled.pdf January 27, 2022.

[24] City of St. Helena General Plan Update 2040, Chapter Two Land Use and Growth Management. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3505/final_plan_compiled.pdf January 27, 2022.

[25] City of St. Helena Municipal Code. Chapter 17.152. http://www.codepublishing.com/CA/sthelena/. Accessed on January 27, 2022.

[26] City of St. Helena Municipal Code. Chapter 17.152. http://www.codepublishing.com/CA/sthelena/. Accessed on January 27, 2022.

Requests to Develop Below Allowable Density

During the previous housing element cycle (2014-2023) there were no requests to develop housing opportunity sites below allowable density.

Building Codes and Enforcement

For the purpose of establishing proper regulations for the administration of the various codes covered in the Building Code, the City has adopted Chapter 1 of the California Building Code, Chapter 1 of the Plumbing Code, Chapter 1 of the Mechanical Code, and Annex H of the Electrical Code, 2019 Edition, excepting additions, revisions and omissions listed in Section 15.08.020 of the Municipal Code. The major local amendments included the continuation of St. Helena's program for the seismic retrofit of unreinforced buildings and the requirement that all new construction install an approved automatic fire-suppression sprinkler system. Existing residential structures that undergo additions or repairs equal to at least 50 percent of the existing floor area, and units experiencing a change in occupancy to a more hazardous use, also require the installation of an approved sprinkler system.[31] Otherwise, Title 15 of the St. Helena Municipal Code closely adheres to the 2019 California Building Standards Code and places no greater constraints on housing development than any other jurisdiction in the State that follows this model code.

The City has the power to inspect and declare unsafe any structure or piece of equipment, be it existing or under-construction, that does not meet specific Municipal Code standards. These include, but are not limited to, structures with insufficient modes of egress; structures that are unsafe or that have been made structurally unsound due to fire, earthquake, or other natural disaster; buildings that are deemed a public nuisance; and buildings that have been constructed or maintained in violation of local or state law. Once a building has been declared unsafe, the building official may issue notice that the structure be repaired, vacated, or demolished within a reasonable amount of time and with the appropriate permits.[32]

The enforcement of building codes within the City of St. Helena is centered on the inspection of new construction and remodels or renovations requiring building permits. However, for existing structures, City Staff prioritizes code enforcement complaints according to the severity of the violation on the community and individuals. Situations that appear to pose a serious risk to health and safety are given top priority; others are pursued in the order in which they are received, as resources are available. In most cases for non-emergency complaints, a warning letter or courtesy notice is sent to the alleged violator to verify the status of the potential compliant and to obtain compliance. The purpose of this first step is to inform the alleged violator that there is a possible code violation on their property and to give them time to correct it. If the violation still exists after the correction date, the inspector will conduct a subsequent inspection and send a follow up notice with additional correction time. Staff provides detailed instructions on how a violation can be corrected and will

[31] *Municipal Code, 15.36.060 Fire protection systems.*
[32] *City of St. Helena. St. Helena Municipal Code, Title 15. http://www.codepublishing.com/CA/sthelena/. Accessed January 31, 2022.*

meet with the property owner as necessary to assist in getting the violation corrected. The City also contracts with the Napa Housing Authority who assists property owners and tenants with any issues that may arise.

On/Offsite Improvement Standards

The St. Helena Municipal Code lists requirements for new development related t, streets and roadways, including , street widths, sidewalks, curbs, and gutters, as well as water and sewer connections and parking requirements.

Street and Roadway Improvements

The City of St. Helena Standard Specifications for Public Improvements governs the requirements for public infrastructure improvements. Developers are completely responsible for the cost of these general improvements to the properties.

Residential street widths in St. Helena follow the specifications outlined in Table 34. The requirements for street widths in St. Helena do not serve as barriers to housing production as they are significantly less than the requirements of nearby jurisdictions which have much more housing stock available. The City of St. Helena Standard Specifications for Public Improvements allows for developers to construct subdivisions with narrower streets, thus allowing for more homes with less acreage reserved for rights-of-way.

Table 34 Residential Street Width Requirements

Type	St. Helena	Napa Yountville	American Canyon
Residential			
Single-Family Residence	16′	Standard: 56′ (both sides parking) Rural: 29′ With Parking: 48′	40′
2-10 units	20′		
11-60 units	25′		
Over 60 units	30′		
Non-residential			
One-way access drive	16′	60′ to 82′	Not Applicable
Two-way access drive	25′		

Source: Section 902, City of St. Helena Standard Specifications for Public Improvements, 2015.

Sidewalks

According to the City of St. Helena Standard Specifications for Public Improvements, Standard No. 315, the minimum standard sidewalk width is four feet in residential areas and 10 feet in business or commercial areas. This sidewalk standard is compliant with Americans with Disabilities Act (ADA) standards and are only what is necessary for the activities occurring in their respective areas. Curbs are required to be designed with a six-inch top, 12-inch gutter, and six-inch rise above the roadway surface. The sidewalk, curb, and gutter standards do not pose a constraint to housing development.

Landscaping

Landscaping is required for projects subject to design review and the Water Efficient Landscape Ordinance. All open space and common areas are required to be landscaped and landscaping plans must be approved through the design review process. Further, St. Helena requires compliance with California's Model Water Efficient Landscape Ordinance (MWELO), which focuses on several goals, including water conservation and environmental quality. Although the MWELO requirements add additional planning cost to projects, they are State mandated requirements.

Landscaping requirements work to ensure efficient water use and basic environmental quality, health, and safety and are not a constraint to development. However, subjecting landscaping plans to the design review process constrains the development of affordable housing. Through the current (2022) comprehensive zoning code update, the City is revising the code to provide a ministerial review process for projects meeting objective design standards, including standards addressing landscaping.

Street Signs

Street signs are not a required improvement to developments to be paid for by the developer. Street signs, and other signs, are subject to the requirements of Municipal Code Section 17.112.

Other

Other miscellaneous improvements required by the City of St. Helena can include curb, gutter and sidewalk treatments, fire hydrants, and street trees. When new development fronts a public street, the developers may be required to provide curb, gutter, and sidewalk treatments to the specifications supplied by the Public Works Director.[33] If the Fire Chief or Public Works Director decides that there is not sufficient supply of fire hydrants nearby, new development would cover the cost of additional hydrants as necessary.[34] Finally, if a new development fronts a planting strip, the owner must care for and maintain the trees and other vegetation in the strip.

Sewer

The City of St. Helena owns the Wastewater Treatment Plant, which provides secondary-level treatment for domestic and commercial wastewater within the City. The plant has a permitted average dry weather treatment capacity of 0.5 million gallons per day (mgd) and can treat up to 2.8 mgd during wet weather.[35] In 2016, the City initiated planning efforts to upgrade the existing Plant in order to meet stricter environmental requirements. Working with the Regional Water Resources Control Board, the City developed a strategy to

[33] *Municipal Code 12.08.090 Plans and specifications.*
[34] *Municipal Code 16.32.110 Fire protection.*
[35] *California Regional Water Quality Control Boar San Francisco Bay Region. Order No. R2-0210-0105, NPDES No. CA0038016. http://www.waterboards.ca.gov/rwqcb2/board_decisions/adopted_orders/2010/R2-2010-0105.pdf.*

meet the new requirements, and began construction of the needed improvements in 2022. Construction is expected to be completed by fall 2023. [36]

Per Chapter 727, Statutes of 2004 (SB 1087), sewer providers must grant priority for service allocations to proposed development that include housing units affordable to lower-income households. Local public and private wastewater service providers must adopt written policies and procedures that grant priority for service hook-ups to developments that help meet the community's share of the regional need for lower-income housing. In addition, the law prohibits wastewater service providers from denying, conditioning the approval, or reducing the amount of sewer service for an application for development that includes housing units affordable to lower-income households unless written findings are made as specified in Government Code Section 65589.7(c).

Water

The City has three sources of potable water: Bell Canyon Reservoir, water purchased from the City of Napa under a long-term water supply contract, and groundwater from City-owned and operated wells. Bell Canyon Reservoir is the City's primary source of potable water. Bell Canyon is an on-stream reservoir with a physical storage capacity of 2,384 acre-feet, although the maximum amount of water that is available annually to the City is 992 acre-feet (AF). The City also purchases significant water quantities from the City of Napa through a contract, expiring in 2035, which guarantees delivery of a minimum of 600 AF per year. Additionally, the City pumps groundwater from its two wells. The City seeks to limit groundwater withdrawals to 450 AF in normal years.

The City calculates a safe annual yield for its water system as "the quantity of water which can be reliable delivered on an annual basis through most rainfall years, including a dry year (rainfall at 22" to 25.9") without undue hardship on water customers through water shortage restrictions. The City defines "undue hardship" as three or more consecutive months of Phase II water restrictions or Phase III water restrictions. Based on water supplies available in 2020, the City estimates the safe annual yield of its water system is 992 AF.

In 2011, the City adopted a new Water Shortage Emergencies Ordinance. The ordinance establishes three water shortage emergency phases with increasing water use restrictions. Phase I water regulations are triggered when the supply/usage balance is in deficit, meaning that the five-year rolling average of total water usage exceeds the safe annual yield of the City's water system. Under Phase I regulations, water customers are prohibited from expanding or installing new water-using appliances, plumbing, or improvements, such as landscaping and pools, unless the installation will result in no increase in water use. Replacement fixtures must be water efficient. In addition, new water connections for new development may only be approved if the projected water demand for the project can be offset by a corresponding reduction in the existing water

[36] *City of St. Helena. Initial Study. WWTRP Phase I Upgrades Project. November 2020.*
https://www.cityofsthelena.org/sites/default/files/fileattachments/public_works/page/2831/st._helena_wwtrp_public_initial_study_compiled.pdf
Accessed January 28, 2022.

demand on the city water system. New development proposals may demonstrate that the project is water-neutral through a combination of on-site water conservation measures, off-site retrofitting or well water.

Phase II water shortage emergency regulations include all Phase I regulations plus mandatory conservation measures. Under Phase II, residential water users are limited to 65 gallons per person per day. An additional allocation of 2,500 gallons per month for single-family homes landscape irrigation is provided during the April through October billing cycle. Multiple-family or mobile home occupants are permitted up to 70 gallons per day per 1,000 square feet of landscaped area or for dedicated irrigation meters, a 60 percent limit of current reference evapotranspiration. There are strict penalties for non-compliance of these mandatory conservation measures. In addition, no new water connections are permitted during a Phase II water emergency. Phase III water shortage emergency regulations limit water use further to 60 gallons per person per day, and place additional limits on landscape irrigation.[37]

The City has adequate water supply to meet current demand, however the effects of climate change will likely reduce water supply from current sources. The City needs to obtain new water supplies and/or achieve more water savings in order to reliably meet future water demand. At the same time, the City recognizes that any new water supply, even if forthcoming, is likely to be expensive, potentially increasing the unit cost of potable water. The main emphasis within the General Plan (regarding water supply) is on conservation, seeking to reduce demand by all classes of users.

According to the City's Water Shortage Emergency Ordinance, if the City's water balance pursuant to the safe yield calculation is in deficit, then the City must comply with Phase I water restrictions. Most importantly, this requires that any new water demand, such as from a new residential project, must be completely offset by a reduction in current water demand, to the satisfaction of the Director of Public Works. Phases II and III involve the imposition of mandatory water restrictions on customers. If Phase II appears imminent, the City Council must appoint a Water Board which, if Phase II is implemented, will work with the Director of Public Works to ensure compliance by all sectors (residential, commercial, and industrial) with Phase II restrictions. Phase III restrictions are severe.

Per Chapter 727, Statutes of 2004 (SB 1087), water providers must grant priority for service allocations to proposed developments that include housing units affordable to lower-income households. Public and private water providers must adopt written policies and procedures that grant priority for service hook-ups to developments that help meet the community's share of the regional need for lower-income housing. In addition, the law prohibits water providers from denying, conditioning the approval, or reducing the amount of water service for an application for development that includes housing affordable to lower-income households unless written findings are made as specified in Government Code Section 65589.7(c). A city may deny, condition, or reduce water services to developments that include lower-income housing units if the city does not

[37] *City of St. Helena. Report to the City Council. June, 23 2020. https://sthelena.civicweb.net/document/41860/2020 Accessed January 28, 2022.*

have "sufficient water supply" as defined in Government Code Section 66473.7(a) (2) or is operating under a water shortage emergency as defined in Section 350 of the Water Code.

The 2040 General Plan contains Implementation Action PF1-J that commits the City to granting projects that include affordable housing units priority access to water resources over other new projects should the capacity of local water systems become inadequate to meet the full demand for new connections.

Parking

St. Helena is a rural jurisdiction with limited public transport options, making commuting by automobile a common practice among residents of all income groups. Some local employers, such as wineries located off of the State Highways, only have access through roadways without suitable sidewalks or bus service. Thus, for residential developments in St. Helena, it is necessary to have some adequate amount of parking to sustain regular life for residents of the rural town. Additionally, within neighborhoods, it is important to keep enough cars off the street due to some streets having little to no parking availability. For example, many streets in St. Helena's older neighborhoods only offer one-side parking and some roads on the edges of town have no paved side parking at all.

Residential parking requirements vary according to the number of dwelling units, as follows:

- One to two dwelling units: Minimum of two spaces per unit, with one of the spaces in a garage or carport.
- Three or more dwelling units (studio and one bedroom units): One covered space plus a half space per unit
- Three or more dwelling units (two or more bedroom units): One covered space plus one additional whole space per unit
- Rooming, boarding, or lodging house: Minimum of one space per room, and two spaces for the owner-occupied unit.
- Mobile home: Minimum of two spaces per unit plus centralized space for guest parking.[38]

Exceptions to these requirements are provided for housing subject to the affordable housing ordinance (see Locally Adopted Ordinances for more details). Some examples of parking minimum exceptions include projects built for senior citizens and deed-restricted affordable projects built with funding from the Federal or State government.[39] For all other uses not covered in the Municipal Code or State Density Bonus Law, the Planning Commission has the power to set the parking requirements based upon the general parking guidelines of the City.

The City of St. Helena's parking standards do not impose undue constraints to development of multifamily uses with two or more bedrooms. As shown in Table 35, when compared to other nearby jurisdictions, St. Helena's housing requirements are not only less restrictive, but much less complex. However, parking standards for

[38] *Municipal Code 17.124.030 Minimum on-site parking requirements*
[39] *Municipal Code 17.144 Affordable Housing*

multifamily uses with three or more studio or one-bedroom units require 1.5 parking spaces per unit. This requirement is a constraint to development of smaller unit multifamily uses. Program H-N commits the City to limiting parking requirements for these uses to one space per unit through the currently (2023) ongoing Comprehensive Zoning Code Update scheduled for adoption in fall 2023.

Table 35 Parking Requirements, St. Helena, Napa, Yountville

Type	St. Helena	City of Napa	Town of Yountville
1-2 dwelling units	2 spaces per unit with 1 in garage/carport	*Single-family:* 2 spaces per unit with 1 in garage + 1 for each bedroom in excess of 2 and guest parking	2 space, 1 covered and 1 screened; 4 for duplex with 1 covered and 1 screened
3+ dwelling units (studios and 1 bedroom units)	1 covered space + ½ space per unit	1.5 per unit (1-3 units) 1.4 per unit (4-49 units) 1.25 per unit (50+ units)	3 dwelling units – 4 spaces, 2 covered, 2 screened 4 dwelling units – 6 spaces, 3 covered, 3 screened Additional units require 1 additional covered and 1 additional screened space per 2 units
3+ dwelling units (2 or more bedroom units)	2 space per unit with 1 covered	Varies, from 1.75-2 spaces per unit plus 0.4 space for each bedroom in excess of 3	
Rooming, boarding, or lodging house	1 space per room and 2 for owner-occupied unit	1 space per sleeping room with ability for planning commission to override under certain circumstances	1.14 spaces per room
Mobile home	2 spaces per unit with centralized guest parking	*Not specified, however, using single family requirements:* 2 spaces per unit with 1 in garage + 1 for each bedroom in excess of 2 and guest parking	*Not specified, however, using single family requirements:* 2 space, 1 covered and 1 screened; 4 for duplex with 1 covered and 1 screened

Source: Chapter 17.124, City of St. Helena Municipal Code, 2015; Town of Yountville Municipal Code 17.116.020; City of Napa Municipal Code 17.54.040.

Parking requirements are additionally not a constraint given the size of the parcels identified in the Sites Inventory. For example, one site with large capacity identified in the sites inventory is Site 8, a 1.5 acre vacant lot located at 882 and 886 College Avenue. This site is projected to have a capacity of 39 units with 15 lower income and 15 moderate income units. If the complex were to have 15 two-bedroom units, 15 one-bedroom units, and 9 studios, it would need a total of 66 parking spaces with 39 of them being covered. The St. Helena Standard Specifications for Public Improvements, Standard Number 321A and 321B call for parking spaces that are 19 feet long by 9.5 feet wide, which equates to 180.5 square feet per parking space. Thus, for Site 8, there would be an allocation of 11,913 square feet of surface space allocated for parking, which accounts to approximately 18.23 percent of the site. This allocation does not pose an undue constraint on the project and provides sufficient parking for the projected residents of the project. Further, developers can design garages, overhangs, and other architectural features which can allow for greater building footprint and thus less land allocated to uncovered parking.

The City's parking minimums are also in line with State data. According to the Department of Motor Vehicles, there were 147,603 registered vehicles in Napa County in 2021, equating to approximately 1.06 vehicles per

person in Napa County. St. Helena's parking minimums, particularly figures regarding multifamily one-bedroom units, matches the data provided by the DMV.

To help promote the development of emergency homeless shelters, Assembly Bill 671 (2019) was passed which included a variety of measures to incentivize the construction of such facilities, including the requirement that jurisdictions can only require the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones. According to Municipal Code Section 17.124, emergency homeless shelters are considered an unlisted use, which leaves it up to the planning commission to determine the parking requirements. Emergency homeless shelters are permitted in the Industrial and Service Commercial zoning districts, which only conditionally permit housing. Commercial and industrial parking requirements require one parking space per 300 square-feet of office area, one parking space per 650 square-feet of industrial uses, and one parking space per 1,000 square feet of warehouse space., respectively. Based on these standards, the City does not currently comply with State law. The City is committed through Program H-F to amend the Zoning Code to require only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones..

Further, the City is also evaluating and revising, as necessary, parking requirements for multifamily uses as a part of the currently ongoing (2023) Comprehensive Zoning Code Update to identify and remove potential constraints to housing development. The Update is scheduled for adoption in fall 2023.

The City does not impose any on-site and off-site improvement standards beyond those necessary to achieve health and safety requirements. The City's on-and-off site improvements standards, including roadway improvements, water and sewer requirements, and parking standards do not constrain residential development in St. Helena.

Fees and Exactions

The City's building department fee schedule is designed to directly offset the costs incurred by the City when processing and reviewing development applications, and to inspect new construction. Fees are charged when a building permit is issued and are based on building plans and estimated construction costs.

Development impact fees are charged to new projects in order to offset costs for the construction, expansion, and maintenance of off-site improvements that either were built for the purposes of the new project or were existing improvements from which the new developments will benefit. In the case of St. Helena, impact fees are charged for public safety, civic facilities, water and wastewater services, drainage, traffic mitigation, and schools. In 2013, the City conducted a comprehensive study and update of all of its development impact fees. As a result, total impact fees for single-family houses decreased from $19.78 per square foot to $16.32 per square foot, a 17.5 percent reduction. Fees for multiple-family development increased from $13.78 per square foot to $21.37 per square foot, a 55 percent increase.

The single-family fee calculations shown in Table 36 are based on an example 2,300 square foot single family residence with three-bedrooms and two-bathrooms with a total construction cost estimate of approximately

$920,000 ($400 per square foot). The multifamily fee calculations shown in Table 36 are based on an example eight unit, three story 6,780 square foot multi-family development project.

Table 36 Planning and Development Fees

Fee Description	Single-Family	Multiple-Family
Planning and Application Fees		
Variance	$4,500	$4,500
Conditional Use Permit (CUP)	$5,200	$5,200
General Plan Amendment	$13,000 deposit plus staff time	$13,000 deposit plus staff time
Zone Change	$8,200 deposit plus staff time	$8,200 deposit plus staff time
Site Plan Review	$2,578	$2,578
Specific Plan	$25,000 deposit plus staff time	$25,000 deposit plus staff time
Specific Plan Amendment	$4,100	$4,100
Development Agreement	$13,500	$13,500
Building Inspection / Permit	$1,838	$1,838
Home Occupation Permit	$200 standard, $250 expanded	$200 standard, $250 expanded
Lot Subdivision	$6,300 minor; $35,000 major	$6,300 minor; $35,000 major
Lot Line Adjustment	$3,000	$3,000
Tentative Tract Map	$4,500	$4,500
Final Parcel Map	$2,100	$2,100
Design Review	<1,000 square feet: $2,600 >1,000 square feet: $3,700	$3,700
Environmental Fees		
Negative Declaration	$5,600 plus staff time	$5,600 plus staff time
Mitigated Negative Declaration (In-House)	$11,600 plus staff time	$11,600 plus staff time
Mitigated Negative Declaration (Contract)	$3,200 plus staff time	$3,200 plus staff time
Environmental Impact Report	$9,000 deposit plus staff time	$9,000 deposit plus staff time
Permit Fee	$433	$5,503
City Impact Fees		
Public Safety Fee ($1.04/sq ft)	$2,392	$7,051
Civic Facilities Fee ($1.95/sq ft)	$4,485	$13,221
Parks Fee ($7.16/sq ft)	$16,468	$82,580

Water System Fee ($3.05/sq ft)	$7,015	$16,747
Wastewater System Fee ($0.45/sq ft)	$1,035	$4,475
Drainage System Fee ($0.73/sq ft)	$1,679	$4,678
Transportation Fee ($1.94/sq ft)	$4,462	$16,001
Housing Fee (2.5% of construction cost)	$18,400	$27,933
Other District Fees		
School District Fee ($3.20/sq ft)	$6,831	$21,696

Source: City of St. Helena Planning Department, Mintier Harnish, 2022.

City impact fees are included in Table 36 above. Among these, the costliest fee is the Parks fee of $7.16 per square foot. These funds are used to develop and maintain City parks, a critical resource in the community. The City's wastewater impact fee ($0.45 per square foot), drainage system fee ($0.73 per square foot) and public safety fee ($1.04 per square foot) are particularly low. Further, the City's civic facilities and transportation fees are both under $2 per square foot. Importantly, City impact fees for multifamily listed in Table 36 are based on an eight-unit development, as explained previously, and have a lower per unit cost than City impact fees shown for a typical single-family use. These impact fees are based on the City's actual costs and are reevaluated and revised each year. The City's impact fees do not impose undue impacts to housing cost, supply, and feasibility, and are not a constraint to the development of housing.

Continuing with the example single-family and multi-family projects used in Table 36,Table 37 provides a breakdown of the cost-per-unit and estimated proportion of fee cost for the example project. These fees would be $70,830 and $21,525 per unit, respectively. This represents 7.7 percent of the single-family home project's construction cost and 12.3 percent of the multi-family home project's construction cost.

Table 37 Construction Cost Summary, Cost Per Unit and Cost Per Square-Foot

	Single-Family	Multiple-Family
Building Size (square feet)	2,300	6,780
Construction Cost (per square-foot)	$400	$206.49
Valuation	$920,000	$1,400,000
Total Estimated Fees Per Unit	$70,840	$21,525
Fees as % of Construction Cost	7.7%	12.3%

Source: City of St. Helena Planning Department; Mintier Harnish, 2022

The multiple-family development impact fees have increased to reflect the costs of the improvements necessary to serve multifamily residential development. Without the funds collected through the fees, the City could not

afford to make the necessary improvements in infrastructure, and thus the fees do not represent an undue governmental constraint to housing development. In addition, fee reductions and adjustments for affordable and other housing projects are permitted on a case-by-case basis, as approved by City Council under Section 3, Chapter 3.32 of the St. Helena Municipal Code.

In comparison to nearby jurisdictions, St. Helena's planning fees are similar in range, as shown on Table 38. For rezoning, St. Helena has some of the most expensive fees in the region, however for tentative tract or parcel maps, St. Helena has some of the lowest fees in the region. Overall, St. Helena does not have fees that result in an extremely significant cost difference between development projects situated in the city and those situated outside of the city in nearby jurisdictions.

Table 38 Planning Application Fees – Surrounding Jurisdictions, Single-Family and Multiple-Family

Jurisdiction	General Plan Amendment	Zone Change	Tentative Tract Map	Variance
St. Helena	$13,000 deposit plus staff time	$8,200 deposit plus staff time	$4,500	$4,500
City of Sonoma	$16,581	$981	$3,735 plus $395 per lot plus engineering time	$2,279
Yountville	$7,500 deposit plus staff time	$7,500	$5,000 plus staff time	$2,500
American Canyon	$8,312	$3,714	$8,129	$1,896
County of Napa	Established by resolution of the Board of Supervisors	N/A	$622.90 plus staff time	$6,100.90 plus staff time

Source: City of St. Helena Planning Department; Mintier Harnish, 2022

Given similar fee structures to nearby jurisdictions and the development impact fee study in 2013, St. Helena's fee structure does not pose an undue constraint on the production of housing.

Processing and Permit Procedures

St. Helena, as with other jurisdictions, has two primary types of processing and permit procedures: ministerial and discretionary.

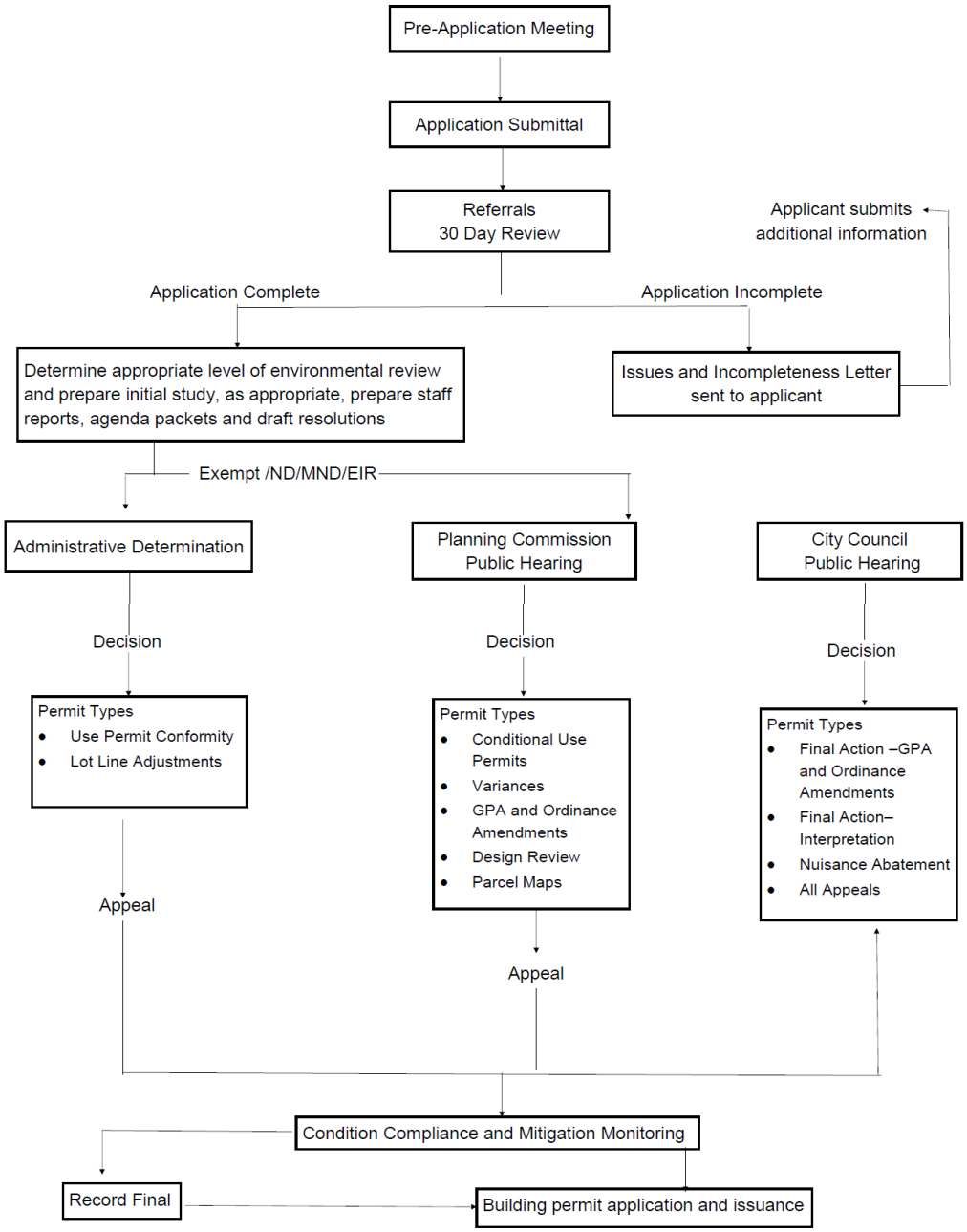
Ministerial Permit Procedures

Ministerial permits are any permits that do not require a decision-making body to provide additional input before its approval. Ministerial permits are handled internally within the planning department and are approved by the planning director. Ministerial permits cover all development that is permitted by right in zones without design review. An example of a common ministerial permit is one for the construction of an accessory dwelling unit on a lot with a preexisting single-family dwelling. Ministerial review typically takes 2-4 weeks. As shown in Table 41, there is very little delay among previous projects. Ministerial permit procedures do not pose a constraint to housing development.

Discretionary Permit Procedures

Discretionary permits are any permits requiring a decision-making body to exercise judgment prior to its approval. As shown in Figure 48, after successfully completing a use permit and passing State environmental review, discretionary permits can be handled administratively through the Planning Director, or through public review with the Planning Commission. If an appeal is made against the project, the project is sent to City Council for review.

Figure 48 Discretionary Permit Process Flowchart



Discretionary permits in St. Helena include general plan amendments, code amendments, specific plans, variances, development agreements, use permits, parcel and subdivision maps, design review, permit/map extensions, lot line adjustments, appeals, revocation of land use permits, and interpretations. As shown in Table 39 and Table 40, most discretionary permits take 3-6 months to process, with some permits taking less time (conditional use permit) or significantly more time (general plan amendment). For the purposes of residential development, conditional use permits (CUPs) and design review are the most pertinent to affecting the affordability, speed, and thus availability of affordable housing.

Table 39 Typical Processing Procedures by Project Type

	Single-Family Unit	Subdivision (20 units)	Multiple-Family (20 Units)
Required Permit Procedures	Ministerial Review - ADU	Tentative Map	Conditional Use Permit
	Design Review – new SFD	Final Map	
		Design Review	Design Review
		Initial Environmental Study	Initial Environmental Study
		Environmental Impact Report	Mitigated Negative Declaration
Estimated Total Processing Time	2 months	12 months	9 months

Source: City of St. Helena, Mintier Harnish, 2022.

Table 40 Timelines for Permit Procedures

Type of Approval or Permit	Typical Processing Time	Approval body
Ministerial Review	2 – 4 weeks	Planning Director
Conditional Use Permit	3 months	Planning Commission
Zone Change	6 months	Planning Commission & City Council
General Plan Amendment	6 months	Planning Commission & City Council
Design Review	3 months	Planning Commission
Subdivision Maps	6 months	Planning Commission & City Council
Parcel Maps	3 months	Planning Commission
Initial Environmental Study	6 months	Planning Commission & City Council, depending on project
Environmental Impact Report	10 months	Planning Commission & City Council

Source: City of St. Helena, Mintier Harnish, 2022.

Actual Project Times

Table 41 outlines a selection of seven projects with their entitlement approval dates and issuance of building permits. The time between entitlement and building permit issuance is negligible in St. Helena and is not a constraint to the city meeting its share of the regional housing need.

Table 41 Timelines for Permit Procedures

Description of Project	Entitlement Approval	Building Permit Issued	Time Elapsed
A single family dwelling with an accessory dwelling unit (601 Fulton)	3/19/2020	3/25/2020	4 days
An accessory dwelling unit (1856 Adams St, B)	3/12/2020	6/2/2020	3 months, 20 days
An accessory dwelling unit (1730 Stockton St, B)	1/6/2020	4/9/2020	3 months, 3 days
An accessory dwelling unit (940 Hunt Ave)	9/17/2020	9/17/2020	Same day
A single family dwelling (222 Pope St)	7/28/2020	7/28/2020	Same day
An accessory dwelling unit (1607 Kearney St, B)	6/1/2020	6/4/2020	3 days
An accessory dwelling unit (1135 Church St, B)	6/8/2020	6/23/2020	15 days

Source: City of St. Helena, Mintier Harnish, 2022.

Conditional Use Permit (CUP)

Conditional use permits (CUPs) are required when a land use is listed as a conditional use for a zoning district in the Zoning Code. Conditional Use Permits are subject to review by the Planning Commission, which considers compatibility with surrounding uses, public input, and staff feedback. Conditional use permits typically take three months to fully process, which is not considered a constraint to residential development. All projects that require a conditional use permit, except for the installation or modification of fences, require design review.

Design Review

Design Review is a process undertaken by the Planning Commission on certain projects to promote environmental quality, foster attractiveness, sustain functional utility, preserve neighborhood character, protect public investments, encourage a mix of uses, and raise the level of community expectations for the quality of the environment. [44] Chapter 17.164 of the St. Helena Municipal Code outlines the City's Design Review policies. The Municipal Code lists 14 specific design criteria considered by the Planning Commission:

1. Consistency and compatibility with applicable elements of the general plan;
2. Compatibility of design with the immediate environment of the site
3. Relationship of the design to the site;
4. Determination that the design is compatible in areas considered by the board as having a unified design or historical character;
5. Whether the design promotes harmonious transition in scale and character in areas between different designated land uses;
6. Compatibility with future construction both on and off the site;
7. Whether the architectural design of structures and their materials and colors are appropriate to the function of the project;

[44] *St. Helena Municipal Code. 17.165 Design Review.*

8. Whether the planning and siting of the various functions and buildings on the site create an internal sense of order and provide a desirable environment for occupants, visitors and the general community;
9. Whether the amount and arrangement of open space and landscaping are appropriate to the design and the function of the structures;
10. Whether access to the property and circulation systems are safe and convenient for pedestrians, cyclists and vehicles;
11. Whether natural features and vegetation are appropriately preserved and integrated with the project;
12. Whether the materials, textures, colors and details of construction are an appropriate expression of its design concept and function and whether they are compatible with the adjacent and neighboring structures and functions;
13. Whether the landscape design concept for the site, as shown by the relationship of plant masses, open space, scale, plant forms and foliage textures and colors, create a desirable and functional environment and whether the landscape concept depicts an appropriate unity with the various buildings on the site; and
14. Whether sustainability and climate protection are promoted through the use of green building practices such as appropriate site/architectural design, use of green building materials, energy efficient systems and water efficient landscape materials.[45]

The Planning Commission examines all proposed new structures and some exterior additions (e.g. additions on historical residential properties, addition of new residential floors) in relation to the above listed design criteria and arrives at one of three recommendations: approve, approve with minor modifications, or disapprove.

Projects that are subject to design review include:

- Any exterior modification to a commercial, multi-family, or designated historic building, including new construction
- The construction of a new single-family home
- Structures, buildings or site modifications requiring use permits in any district, excluding fences
- Additions to a single-family home which create a second or third floor, story or living space where one does not currently exist
- Any new structure prior to the issuance of any future building permits for structures on newly created parcels created on maps approved after January 1992
- Any new public facility, or modification thereof
- Demolition, except when required for emergency protection of public health, safety or welfare

[45] *St. Helena Municipal Code. 17.165 Design Review.*

The following projects are subject to administrative design review, which means that they are ministerially decided on by city planning staff as opposed to the Planning Commission:

- Any form of repair or maintenance where the work solely involves the replacement of materials in like kind and form or to any such work in areas not visible to the public from the public right-of-way or areas accessible to the public
- Accessory dwelling units, subject to requirements identified in SHMC 17.116.030
- Alteration, modification, or addition to an existing single-family home that is not eligible for design review
- Construction of an accessory structure in keeping with all development criteria of the zoning district in which the structure is proposed

Design review is required for practically all projects, including all primary residential structures. The City has not adopted a design review exemption for affordable housing development in the City. Therefore, design review is considered a significant constraint to affordable housing development in the City.

The complex and subjective nature of the design review process is a constraint housing production. Through the current comprehensive zoning code update, the City is working to codify objective design standards for single-family, small lot, and multifamily uses. Program H-F commits the City to amending the Municipal Code to provide objective design standards for residential development and a ministerial, by-right, process for approval of developments meeting all zoning and design standards.

Currently (2023) the MR zone does not allow for multifamily uses without a conditional use permit (CUP), with the exception of 5th Cycle Housing Element opportunity sites. Although the MR zone is primarily a single-family zone, the requirement for a CUP in this zone constrains the development of smaller multifamily uses. Program H-N commits the City to allowing duplexes and triplexes and a density range of 5.1 to 16 dwelling units per acre in the MR zone without a CUP.

Please note: the City implemented 5th Cycle Housing Element program HE1.D which committed the City to eliminating use permit requirement for multifamily projects on Housing Opportunity sites (Key Housing Sites) in the medium density residential zone. Section 17.40.020 was amended to permit the following:

> *N. Multiple-family dwellings, apartments, and dwelling groups at a density up to the maximum allowed by the medium density residential district shall be allowed as a permitted use on the following MR zoned parcels, which are identified as "Key Housing Sites" in Table 42 of the city's 2015-2023 housing element, and are identified as follows by street address and assessor's parcel number (APN): 567 Pope St. APN 009-070-002; 591 McCorkle Ave. APN 009-070-003; 1817 Spring St. APN 009-322-009; Sulphur Springs Ave. APN 009-362-015; Spring St. APN 009-441-023 and 009-552-002; 576 Pope St. APN 009-552-003; 1105 Pope St. APN 009-090-003. (Ord. 17-2 § 6 (part); Ord. 16-8 § 1; Ord. 15-2 § 7 (part): Ord. 12-2 § 6: Ord. 07-5 § 2 (part): Ord. 05-4 § 1 (part): Ord. 03-4 § 11: prior code § 27.51)*

Further, The City has received SB 2 and LEAP grants from the State of California to assist with encouraging and streamlining affordable housing development in the city. The City has applied these funds to the Comprehensive

Zoning Code Update currently underway. The Draft Update works to overcome constraints and encourage development by incorporating objective design standards for residential development and removing CUP requirements for duplexes and triplexes and densities of 5.1 to 16 du/ac in the MR zone, among other efforts.

Table 42 Housing Types Permitted by Base Zoning District

Zone Type	Agricultural			Residential				Commercial/Office			I	WW
Zoning District	A-20	W	AP	LR	LR-1A	MR	HR	CB	SC	BPO		
Design Review Required	No			Yes								
Single-family dwelling	P [1]	P [1,2]	P	P[4]	P	P[4]	P[4]	—	—	—	—	P
Residential units (in a mixed-use setting)	—	—	—	—	—	—	—	C[5]	C[5,7]	C[5]	C[8]	—
Residential Condominium or Townhouse	—	—	—	—	—	C	C	—	—	—	—	—
Duplex or triplex units	—	—	—	—	—	C	P	—	—	—	—	—
Multiple-family dwellings	—	—	—	—	—	P[6]	P	—	—	—	—	—
Mobile homes	—	—	—	P	P	P	P	—	—	—	—	—
Agricultural employee housing	—	—	P	P[3]	P[3]	P[3]	P[3]	—	—	—	—	P[3]
Supportive housing	—	—	P	P	P	P	P	C[5]	C[5,7]	C[5]	—	P
Transitional housing	—	—	P	P	P	P	P	C[5]	C[5,7]	C[5]	—	P
Single room occupancy housing	—	—	—	—	—	—	P	—	—	—	—	—
Intermediate care facility, 6 or fewer persons	—	—	—	P	P	P	P	—	—	—	—	—
Intermediate care facility, 7 or more persons	—	—	—	—	C	C	C	—	—	—	—	—
Residential facility, 6 or fewer persons	—	—	—	P	P	P	P	—	—	—	—	—
Residential facility, 7 or more persons	—	—	—	C	C	C	C	—	—	—	—	—
Emergency Shelter	—	—	—	—	—	—	—	—	P	—	P	—

P=Permitted C=Conditional —=Prohibited

[1]Permitted if the single-family dwelling(s) existed prior to October 1, 1993.

[2]Additional dwellings for occupancy by owners, caretakers and/or other employees, provided density does not exceed one dwelling unit per each five acres of the winery's contiguous property is a Conditional Use.

[3]Six or fewer persons only.

[4]New construction of single-family dwellings where the minimum density of 2 units or greater is a Conditional Use.

[5]Limited to upper floors only.

[6]Permitted only to parcels identified in the adopted Housing Element.

[7]Upper floors only in conjunction with a mixed-use project

[8]Subject to the restrictions outlined in SHMC 17.60.030, including a maximum 850 square feet floor area, one off-street parking space, and residency requirements.

Note: The Zoning Code text takes precedence over this table and there may be additional requirements or limits not noted on this table.

If the zone is not present in the table (PQP, PR, OS), it does not allow any residential uses by right or through any permitting processes.

Source: St. Helena Municipal Code, Title 17.

SB 330 Streamlining

On October 9, 2019, Governor Newsom signed into law SB 330, the Housing Crisis Act of 2019. The act amends existing state laws and creates new regulations around the production, preservation and planning of housing. The bill has been in effect since January 1, 2020 and sunsets on January 1, 2025. SB 330 will affect both project planning procedures and community planning outcomes.

The goal of SB 330 is to create certainty in the development of housing projects, speeding up the review of these projects, preserving affordable housing and preventing certain zoning actions that reduce the availability of housing. SB 330 does the following (not a comprehensive list):

- Creates a new vesting process for zoning and land use ordinances, policies, and standards in place at the time a preliminary application is submitted (with limitations);
- Requires that the historic status or designation of any site be determined at the time an application for a discretionary action is deemed complete;
- Prohibits imposing or enforcing non-objective design review standards established after January 1, 2020;
- Limits the number of public hearings to five for housing projects that meet all objective design standards; and
- Prohibits actions that reduce the total zoned capacity for housing (i.e., down-zoning).

A project that meets any of the following criteria per California Government Code Section 65589.5(h)(2)(B) is subject to the provisions of SB 330:

1. The project consists of residential units only;
2. The project is a mixed-use development consisting of residential and non-residential uses with at least two-thirds of the square footage of the project designated for residential use, including dwelling units and any uses accessory to the residential units; or
3. The project is transitional or supportive housing.

New Preliminary Application Form. SB 330 creates a new vesting process for discretionary housing projects during the five-year period of the bill. It achieves this through the creation of a new "preliminary application" process that establishes a new date for the purposes of locking projects into the ordinances, policies, and standards in effect when a preliminary application (including all required information) is submitted and deemed complete. This vesting does not apply to California Environmental Quality Act (CEQA) determinations, including historic resource determinations pursuant to CEQA.

Once a complete Preliminary Housing Development Application is submitted (along with other required applications if applicable), the zoning, design, subdivision, and fee requirements in effect as of that date will remain applicable to the project for the duration of the review and entitlement process, provided that all the following provisions are satisfied:

- Complete discretionary entitlement applications must be submitted and accepted by the Planning Department within 180 days of the Preliminary Housing Development Application being deemed complete;
- If the entitlement applications are deemed incomplete after filing, the application must submit all missing or incomplete items to the Planning Department within 90 days of being notified in writing by Planning Department staff;
- The project may not increase by more than 20 percent in the number of units or total square footage indicated in the Preliminary Housing Development Application, except as the project may be revised using the State Density Bonus; and
- The project must commence construction within 30 months of site permit issuance.

Note that the following modifications may be required even when a Preliminary Housing Development Application is on file:

- Development impact fees, application fees, capacity and connection fees, or other charges may be annually adjusted based on a published cost index;
- Requirements necessary to avoid an adverse impact to public health or safety, or to avoid or lessen an impact under CEQA may be applied; and
- Applicants may submit a new or amended Preliminary Housing Development Application at any time, in which case the requirements in effect at that time shall apply.

The City has created a preliminary SB 330 process and checklist to streamline the design and approval of by-right multi-family units within the community. Program H-F provides a by-right streamlined review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330.

Procedures for Selected Housing Types

The following section describes the processing and permit procedures for selected housing types that are typically used by lower income households. For more housing types, see the Zoning for a Variety of Housing Types section.

Multifamily Rental Housing

Multifamily rental housing is housing traditionally identified as any housing available for rent that has greater than one dwelling unit in a building. Some examples of multifamily rental housing include duplexes, triplexes, fourplexes, and apartment buildings. Multifamily rental housing is permitted entirely in the High Density Residential (HR) district only. Multifamily rental housing is permitted in the Medium Density Residential (MR) district only on parcels identified in the housing element. MR zoned parcels identified in the fifth cycle housing element are currently codified as being the MR zone parcels that allow multifamily housing. Currently, all multifamily rental housing projects, affordable and market rate, are subject to subjective design review.

Therefore, multifamily rental housing is constrained by the design requirements set forth in the Zoning Code. Program H-F is included to commit the City to adopting objective design standards to reduce barriers to multifamily rental housing and eliminate subjective design standards.

Mobile Homes

Mobile homes, or manufactured homes, are small, prefabricated homes which are often situated on rented portions of land in mobile home parks. Mobile homes can offer affordable pathways to home ownership and stable shelter for many low-income households. Mobile homes, as shown in Table 42 are permitted in all residential zoning districts in St. Helena. Mobile homes in St. Helena are subject to the following conditions in all residential zoning districts:

- To be occupied only as a single-family residential use,
- To be subject to all provisions of the zoning ordinance applicable to conventionally built dwellings,
- To be attached to a permanent foundation system in compliance with all applicable building regulations,
- To be covered with an exterior material customarily used on conventionally built dwellings extending to the top of the foundation,
- To have parapet walls or roofs which utilize shingles or other materials customarily used on conventionally built dwellings;

These requirements do not constitute a constraint to the development of mobile homes. However, mobile homes are subject to subjective design review, which poses a significant constraint to their development. Program H-F is included to commits the City to incorporate objective design standards for single-family, small lot, and multifamily developments, including mobile homes, that provide a ministerial design review process for projects that meet zoning and design standards.

Housing for Agricultural Employees

Housing for agricultural employees is permitted in the agricultural zone for up to 36 persons, thus complying with California Health and Safety Code Section 17026.1. Housing for agricultural employees is also permitted for up to six persons in all residential zones and in the WW zone. Housing for agricultural employees is subject to subjective design review, which poses a significant constraint to development. Program H-F commits the City to incorporate objective design standards for single-family, small lot, and multifamily developments, including farmworker housing, that provide a ministerial design review process for projects that meet zoning and design standards.

Supportive and Transitional Housing

Supportive and transitional housing is permitted in the AP zone, all residential zones, and the WW zone. Supportive and transitional housing is subject to subjective design review, which poses a significant constraint to development. Program H-F commits the City to incorporate objective design standards for single-family,

small lot, and multifamily developments, including transitional and support housing, that provide a ministerial design review process for projects that meet zoning and design standards.

Constraints to Housing for Persons with Disabilities

On January 1, 2002, SB 520 went into effect, requiring local jurisdictions to analyze potential governmental constraints to the development, improvement, and maintenance of housing for persons with disabilities as part of a jurisdictions housing element update. Under SB 520, housing elements must also include one of the following: 1) a program to remove constraints, or 2) provide reasonable accommodations for, "housing designed for occupancy by, or with supportive services for, persons with disabilities." A jurisdiction can fulfill this second clause in a variety of ways including establishing policies that facilitate the provision of housing that is physically accessible to people with mobility impairments, residential care facilities for individuals with Alzheimer's, housing for persons with AIDS/HIV, and transitional housing that serves homeless with disabilities.

Reasonable Accommodation

The City of St. Helena adopted a reasonable accommodation ordinance in 2015 that provides a procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts) in the application of zoning laws and other land use regulations, policies, and procedures.

A request for reasonable accommodation may be made by any person with a disability, their representative or any entity, when the application of a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities. A person with a disability is a person who has a physical or mental impairment that limits or substantially limits one or more major life activities, anyone who is regarded as having such impairment or anyone who has a record of such impairment. This chapter is intended to apply to those persons who are defined as disabled under the Acts.

A request for reasonable accommodation may include a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice. Requests for reasonable accommodation shall be made in the manner prescribed in Section 17.200.030.

Requests for reasonable accommodation are submitted on an application form provided by the Planning Department, or in the form of a letter, to the Planning Director and should contain the following information:

1. The applicant's name, address, and telephone number.
2. Address of the property for which the request is being made.
3. The current actual use of the property.
4. The basis for the claim that the individual is considered disabled under the Acts.
5. The zoning code provision, regulation or policy that is the subject of the applicant's requested reasonable accommodation, and a narrative and graphic (where applicable) description of the specific accommodation requested.

6. Why the reasonable accommodation is necessary to make the specific property accessible to the individual.

Requests for reasonable accommodation shall be reviewed by the Planning Director if no discretionary permit approval is required other than the request for reasonable accommodation. Requests for reasonable accommodation submitted for concurrent review with another discretionary permit application shall be reviewed by the review authority reviewing the discretionary permit application. The Director shall make a written determination within forty-five (45) days and either grant, grant with modifications, or deny a request for reasonable accommodation in accordance with Section 17.200.060. The written decision to grant or deny a request for reasonable accommodation will be consistent with the Acts and shall be based on a consideration of the following factors:

1. Whether the housing which is the subject of the request will be used by an individual considered disabled under the Acts.
2. Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability under the Acts.
3. Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the town.
4. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a town program or law, including but not limited to land use or zoning.
5. Whether the requested reasonable accommodation would adversely impact surrounding properties or uses.
6. Whether there are reasonable alternatives that would provide an equivalent level of benefit without requiring a modification or exception to the City's applicable rules, standards and practices.
7. Whether the accommodation would alter the significance of a historic structure.

In granting a request for reasonable accommodation, the Planning Director may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings required by subsection A of this section, including but not limited to the following:

1. Inspection of the property periodically, as specified, to verify compliance with this chapter and any conditions of approval.
2. Removal of the improvements, where removal would not constitute an unreasonable financial burden, when the need for which the accommodation was granted no longer exists.
3. Time limits and/or expiration of the approval if the need for which the accommodation was granted no longer exists.
4. Recordation of a deed restriction requiring removal of the accommodating feature once the need for it no longer exists.
5. Measures to reduce the impact on surrounding uses.
6. Measures in consideration of the physical attributes of the property and structures.
7. Other conditions necessary to protect the public health, safety and welfare.

A determination by the Planning Director to grant or deny a request for reasonable accommodation may be appealed to the City Council in compliance with Section 17.08.180.

The City's required finding *"5. Whether the requested reasonable accommodation would adversely impact surrounding properties or uses"* poses a potential constraint to housing for residents with disabilities seeking equal access to housing under the federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts). HCD indicates that, given its importance in addressing barriers to housing for persons with disabilities, reasonable accommodation should not impose discretionary findings similar to that of a Conditional Use Permit, such as impacts to surround uses. Program H-F commits the City to update the municipal code to remove this discretionary finding.

Zoning and Land Use

The City of St. Helena allows residential care facilities serving six or fewer persons as a permitted use in the LR-1A, LR, MR, and HR residential zones. For compliance with state law, the City must allow these uses in any zone allowing single-family uses, subject only to the conditions imposed upon residential uses in the same zone. The City currently allows single-family homes in the A-20, W, and WW zones. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.

Residential care facilities serving seven or more persons require the approval of a Conditional Use Permit. A use permit requirement in zones allowing multifamily uses is a constraint to the development of these uses. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.[46]

Program H-F commits the City to updating the municipal code to allow residential care facilities in all zones, subject only to the requirements imposed upon single-family uses; and facilities of seven or more in all zones, subject only to the same requirements as multifamily uses.[47]

The City's parking and loading requirements do not have specific provisions related to persons with disabilities, but there is a provision stating that "rest homes, convalescent hospitals, residential care and similar group care facilities" require only one space for each four beds, which is a reduced requirement compared to the two parking spaces required for typical "one-and two-family dwelling units."[48] Consequently, the reduced parking requirements for group care facilities decrease the parking requirements for some disabled persons, but parking requirements for residential development need to serve all disabled persons.

Permits and Processing

The City's permitting and processing procedures do not negatively affect the ability to design or retrofit homes that will be accessible for the disabled or constrain the siting of group homes. The City, however, applies the

[46] *City of St. Helena Municipal Code, Title 17.*
[47] *City of St. Helena Municipal Code, Title 17.*
[48] *City of St. Helena Municipal Code, Chapter 17.124: Parking and Loading Requirements*

same process required for other renovations to retrofitting homes for accessibility, and the City does not have a special process for such retrofits.

As discussed above, residential and intermediate care facilities with fewer than six persons are permitted in residential zones. Although care facilities with seven or more persons are permitted with a Conditional Use Permit in the residential zones, no additional permits are required. This is consistent with the City's requirements for other multifamily uses such as condominiums, townhomes, apartments, and dwelling groups containing more than four units, which also require a Conditional Use Permit. There are no additional requirements placed on residential or intermediate facilities.

Building Codes

In 2019, the City of St. Helena adopted the 2019 California Building Code with minor amendments. The changes made to this Code by the City, enumerated in the Governmental Constraints section of this document, do not unfairly treat residential and intermediate care homes differently than other residential uses. Nevertheless, no specific exemptions to the 2019 California Building Code exist for housing for disabled persons. The City of St. Helena does not have local universal design requirements but adopted a reasonable accommodate ordinance in 2015 which provides a reasonable accommodation procedure related to "a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities", including building codes and the issuance of Building Permits.

Definition of Family

The Municipal Code currently (2022) defined "family" as:

"Family" means any of the following groups living together in the same dwelling unit as a single housekeeping unit:

1. Any number of persons related by blood, marriage or legal adoption;
2. A nuclear family identified by extended cohabitation;
3. A group not exceeding five persons whose interpersonal relationships relating to shared household expenses, duties and private lives are indistinguishable from groups listed in subsections 1 and 2 above.

The definition of family in a jurisdiction's municipal code can pose some challenges for persons with special needs who may have live-in caregivers, group home arrangements, or other arrangements not reflective of the typical nuclear family. Additionally, the definition used by a city can cause confusion or difficulty when applying to programs such as Community Development Block Grants, which use a more inclusive definition of a family unit.

In the previous element, Program 1.K was included to amend the zoning ordinance to define "family" as one or more persons living together as a single housekeeping unit in a dwelling unit, as required by State law. This change has not been made to the Zoning Code, however, all City actions are made in keeping with California

State law, as it has precedence over any in-consistent locally adopted land use definitions. The City is undergoing a comprehensive Zoning Code update, which will address the existing outdated adopted definition of "family." Further, Program H-Fis included in this Housing Element, committing the City to updating this definition specifically.

Spacing or Concentration Requirements

The City of St. Helena does not have any additional spacing or concentration requirements for housing for persons with disabilities. There are no spacing requirements for group homes, residential care facilities, transitional housing facilities, and supportive housing facilities.

In the Service Commercial (SC) and Central Business (CB) districts, supportive housing is permitted only on the upper floors, which is the same requirement imposed on all other residential developments in these zone.

Locally Adopted Ordinances

St. Helena has passed five development-related local ordinances to help ensure growth of quality housing and to create a balance between the need for affordable housing and the market demands of the tourism industry.

Bed and Breakfast Inns

Bed and breakfast inns, a common sight in many tourist-oriented towns like St. Helena, are regulated by a use permit process that requires certain findings to be made, including that:

A. The establishment of a bed and breakfast inn is consistent with the purpose of the general plan, including policies regarding the displacement of rental units in the housing stock.

B. The establishment of a bed and breakfast inn will not be detrimental to a building, structure or feature of significant aesthetic, cultural, architectural or engineering interest or value of a historical nature.

C. The establishment of a bed and breakfast inn is compatible with and will not be detrimental to the character of the neighborhood and surrounding land uses. [49]

Additionally, bed and breakfast inns are required to only use up to four bedrooms, a requirement that helps ensure that larger homes are still partially available for use as a permanent residential dwelling. Such affordances can be considered helpful to special needs groups, such as large households. Given these strict requirements, St. Helena's bed and breakfast inns ordinance does not pose additional constraints to housing and helps limit potential reduction of housing units in the case of a homeowner wishing to convert their residential property to a bed and breakfast.

Short-Term Rentals

Short term rentals are strictly regulated in the City of St. Helena to reduce the impact on the area's already scarce housing inventory. The City allows only twenty-five short-term rental permits at a time with a maximum

[49] *City of St. Helena. St. Helena Municipal Code, Title 17. http://www.codepublishing.com/CA/sthelena/. Accessed January 9, 2023.*

of four bedrooms in the household being used for short-term rentals. Additionally, the City restricts uses of the propety by guests and enforces additional regulations on sounds and general activities during the hours of 10 P.M. to 7 A.M. Given the strict measures in place, the short-term rentals ordinance doesn't pose additional constraints to housing. Instead, the ordinance incentivizes property owners to use their homes for other uses with less stringent requirements, which may include long-term rentals.

Time-Share Uses

Time-shares are strictly regulated in the City of St. Helena, are considered commercial uses, and are permitted only in commercial zoning districts. Any existing housing stock in the city is prohibited from being converted into a time-share. As such, the time-share ordinance is not a constraint to housing, but instead assists with ensuring residential land is being put to more productive, residential purposes that assist with alleviating the existing housing crisis.

Affordable Housing

The City's affordable housing ordinance is a codified ordinance that specifies how the City will provide density bonuses, concessions, and incentives for the construction of affordable housing projects that are designed for seniors, low-income, very low-income, and moderate-income (in the case of condonminiums) persons and families. The affordable housing ordinance also specifies how the City will grant priority for the provision of water and sewer services to affordable developments, a requirement stated in California Government Code Section 65589.7. The affordable housing ordinance also describes the process in which a person voluntarily donates land to the City for residential development use. The ordinance additionally allows for vehicular parking ratios to be beneath those required by the city, subject to Californai Government Code 65589.7 and a recorded covenant against the property.

The affordable housing ordinance does not pose any constraint to housing, but instead acts to formalize State mandated programs and laws designed to incentivize affordable housing.

Housing Trust Fund, Housing Impact Fee and Inclusionary/In-Lieu Fee Requirements

In September 2004, the City Council passed Ordinance 2004-7 adding Chapter 17.146 Housing Trust Fund, Housing Impact Fee, and Inclusionary/In-Lieu Fee Requirements to the St. Helena Municipal Code. The regulations are designed so that new non-residential developments and additions are required to pay a housing impact fee and new residential developments containing five units or more are required to include 20 percent of their units as affordable housing, and developments with less than five units pay an in-lieu fee. The fees collected from the nonresidential and residential development then go into a Housing Trust Fund. The use of Housing Trust Fund monies is directed exclusively to "increase and improve the supply of housing affordable to households of moderate, low and very low income" including costs such as land, construction, financing, and reimbursements to the City.[50] The monies are available for both ownership and rental projects and services.

[50] *St. Helena Municipal Code. 17.146.030*

These affordable housing requirements do add additional cost to market rate residential development in the process of creating additional affordable housing in St. Helena. To minimize the impact on the price of market rate housing, the Municipal Code allows developers to submit an "alternative equivalent proposal" and offers a series of concessions or incentives.[51] An "alternative equivalent proposal" enables developers to meet the affordable housing requirements through alternative means like dedicating vacant land as long as the proposed alternative aligns with the purpose of the Municipal Code and is approved by the City Council. Concessions and incentives that are automatically available to residential developers who construct inclusionary units include the opportunity to submit a preliminary development proposal, priority in the City application process, and fee deferment. In addition, the City Council can grant additional concessions and incentives including extra density bonuses, changes to City standards, and monetary assistance. The automatic and discretionary concessions and incentives help expedite the process of building affordable housing and therefore minimize the cost to developers.

[51] *St. Helena Municipal Code. 17.146.050*

9. Opportunities for Energy Conservation

Government Code Section 65583(a) (7) requires the "analysis of opportunities for energy conservation with respect to residential development." [55] This is important due to the key role played by energy efficiency in determining the relative affordability of housing. Lower rates of energy usage decrease utility costs for residents, making a housing unit more affordable. The discussion that follows outlines current State policies and development standards along with local City policies that promote energy conservation for new and existing development in the City of St. Helena.

Instituted by legislative action in 1978 to reduce overall energy consumption statewide, the California Building Energy Efficiency Standards set thresholds and guidelines for energy efficiency for both residential and nonresidential construction. The revised standards for 2022 went into effect August 11, 2021, under Title 24, Part 6, of the California Code of Regulations. Title 24 is otherwise known as the California Building Standards Code. The energy requirements of the new State code are significantly more stringent than the prior codes (heat pump requirements for single-family and multi-family homes and businesses; electricity-ready requirements for single-family homes; and new solar power requirements for high-rises, hotels/motels, tenant spaces, offices, stores, restaurants, schools, and civic spaces) and are intended to progress to 100 percent clean electricity and carbon neutrality by 2050 or earlier.

In addition to the Building Energy Efficiency Standards, Part 11 of Title 24 contains California's Green Building Standards Code (CALGreen). St. Helena adopted the revised standards in 2019, with amendments to require all new indoors plumbing fixtures to meet the 20 percent reduction in water use, a 20 percent reduction in cement use in foundations, and certified U.S. EPA Phase II certified wood-burning devices or pellet-fueled device. These amendments are not considered an impediment to housing development.

On a local level, the 2040 City of St. Helena General Plan Climate Change Element addresses energy conservation for residential development by including goals such as:

- reducing energy demand through improved building and design;
- reducing consumption and divert waste; and
- increasing community engagement and advocacy.

The City participates in an AB811 program that allows commercial and residential property owners to finance renewable energy, water efficiency, and energy efficiency improvements through a property tax assessment. Additionally, the City of St. Helena is currently implementing a program to reduce GHG emissions from City facilities and has an Active Transportation and Sustainability Committee and a Water Advisory Board that oversee its natural resources for energy conservation.

[55] *HCD Building Blocks for Effective Housing Elements, "Opportunities for Energy Conservation." Accessed September 24, 2008. http://www.hcd.ca.gov/hpd/housing_element/index.html.*

The City has included Programs H-RR through H-UU to educate, encourage, and fund pushes for energy conservation within the community. Through education provided by the City, residents, contractors, and property owners can learn about various ways to integrate energy conservation programs into St. Helena residential developments. The City also intends to stay up to date on State efficiency and building code standards to ensure new and rehabilitated housing developments provide future owners and tenants with long-term cost-savings and energy efficiency.[56] Additionally, to further encourage energy efficiency, the City also aims to explore the possibility of offering low-interest loans for energy conservation measures, in addition to continuing to participate in AB-811 programs to finance local efforts.

[56] *See St. Helena Municipal Code Chapter 15.18*

10. Zoning for a Variety of Housing Types

Key Findings

- St. Helena's Zoning Code allows for a variety of housing types in the City including multiple-family units, transitional and supportive housing, single-room occupancy units, manufactured and mobile homes, and accessory dwelling units. However, to comply with Section 65915 through 65918 of the California Government Code, St. Helena should amend the Zoning Code to reflect the new maximum density bonus provisions that were adopted by the State in 2020. Additionally, St. Helena must also amend the Zoning Code to allow for low barrier navigation centers, consistent with State law.

Multiple-Family Rental Housing

The St. Helena Zoning Code allows multiple-family dwellings subject to design review in the High Density Residential (HR) zoning district. In addition, the Medium Density Residential (MR) district permits the construction of attached duplex or triplex units with a Conditional Use Permit.[57] Multiple-family rental housing is subject to subjective design review, which poses a constraint to development. For more information regarding the design review process and development standards applied to multi-family housing, see the Governmental Constraints section.

Density Bonuses for Affordable Housing

Per California Government Code Sections 65915 through 65918, local governments are required to provide density bonus provisions to projects that comply with specific standards. Legislation approved in 2020 increased the maximum density bonus amounts for very-low-, low-, and moderate-income housing. The California Government Code describes how maximum densities shall be calculated for very low-, low-, and moderate-income housing in a tabular format. Additionally, local governments are also required to provide one or more incentives for qualifying projects and are required to accept an incentive proposed by a developer unless the incentive proposal is found to cause environmental harm, a health and safety issue, a cost reduction, a detriment to historical property, or otherwise contrary to law. Both density bonuses and incentives are granted based on the number of affordable units present in each project.

The City of St. Helena currently establishes density bonus provisions for affordable housing in Chapter 17.144 (Affordable Housing). The provisions in that Chapter do not reflect the new maximum density bonus tier framework that was adopted by the State in 2020. Because of this, the City is not currently in compliance and has included Program H-F to commit the City to amend the Zoning Code for compliance with California Government Code Sections 65915 through 65918. The City is currently (2023) undertaking a Comprehensive Zoning Code Update. Density bonus provisions in the Draft Zoning Code have been revised for compliance with State law. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023.

[57] *City of St. Helena. St. Helena Municipal Code, Title 17.*

Housing for Permanent and Seasonal Agricultural Employees

Sections 17021.5 and 17021.6 of the California Health and Safety Code establish specific requirements for the permitting of agricultural employee housing in a jurisdictions' zoning code. Specifically, Section 17021.5 mandates that "employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use." [58] Furthermore, designated employee housing, as defined above, cannot be subject to Conditional Use Permit requirements, zoning variance, fees, taxes, or any other requirement other than those pertaining to a traditional single-family structure. Section 17021.6 pertains to larger employee housing facilities featuring a maximum of 36 beds in group quarters, or 12 single-family units. Under this legislation, such units are deemed an agricultural land use and cannot be subject to any restrictions, conditional use requirements, zoning variance, fees, taxes, or other requirements not imposed on other agricultural uses in the same zone.

The City is in compliance with Sections 17021.5 or 17021.6 of the California Health and Safety Code. The A-20, AP, and W zoning districts allow large employee housing facilities (12 units or 36 beds) by right. Whereas, the WW, LR-1A, LR, MR, and HR zoning districts allow agriculture employee housing for six or fewer persons subject to design review. Housing for permanent and seasonal agricultural employees is subject to subjective design review, which poses a significant constraint to development. Program H-F commits the City to amending the Zoning Code to replacing subjective design review with objective design standards and SB 330-compliant streamlined review. The City is currently (2023) undertaking a Comprehensive Zoning Code Update. The Draft Zoning Code incorporates objective development and design standards for residential development. These standards will apply to housing for permanent and seasonal agricultural employees. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023.

Zoning for Emergency Shelters, Transitional Housing, and Supportive Housing

AB-139 requires local government to identify a zone(s) where emergency shelters are allowed by-right without a conditional use or other discretionary permit. Local governments are authorized to impose only those development standards that apply to residential or commercial development within the same zone. However, a local government may impose specified objective standards, including standards for off-street parking based on demonstrated need, as specified. The intent of these regulations is to help streamline the development of varying housing types.

AB-139 requires the need for emergency shelter to be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time count, the number of shelter beds available on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing. The bill also requires sufficient parking for employees and one space per two beds in the shelter. Under AB-139 and California Government Code Section 65651, local governments shall allow supportive and transitional housing as a by-right use in all districts where

[58] *California Government Health and Safety Code 17021.5 (b)*

single-family and multiple-family dwelling unit uses are allowed. Additionally, the State requires that these uses be subject only to those regulations that apply to other residential dwellings (i.e., single-family dwellings, multiple-family dwellings) of the same type in the same district.

The City is in compliance with State laws related to emergency shelters, supportive housing, and transitional housing. The Zoning Code allows both supportive and transitional housing by-right in all residential zoning districts, and allowed in non-residential and mixed use zones subject to the same requirements imposed upon residential uses. Emergency shelters are identified as a by-right use in the I and SC zoning districts. According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. There are several parcels in these zones that can accommodate an emergency shelter, including APN 009-580-022-000 (I zoning district) and APN 009-194-005-000 (SC zoning district). These parcels are vacant, habitable, and in proximity to transportation and services. Combined, they total 1.48 acres and can provide capacity for 15 beds, by conservative assumption of 10 beds/acre. Emergency shelters, transitional housing, and supportive housing are subject to subjective design review, which poses a significant constraint to development. Program H-F commits the City to amending the Zoning Code to replacing subjective design review with objective design standards and SB 330-compliant streamlined review through the currently ongoing (2023) Comprehensive Zoning Code Update. The Draft Zoning Code (released October 2022) incorporated objective development and design standards for residential development. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023.

Residential Care Facilities

California Government Code Section 65583 requires that housing elements provide a program to "address and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing for persons with disabilities. The program shall remove constraints to and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities." In line with encouraging the development of housing for those with disabilities, the State requires that small, licensed residential care facilities (defined as facilities with six or fewer residents) be allowed "by right" in all residential zones. Additionally, the State, through HCD, requires that cities consider constraints to reasonable accommodation for large, licensed residential care facilities (defined as facilities with seven or more residents).[59]

The City of St. Helena allows residential care facilities serving six or fewer persons as by-right uses in the LR-1A, LR, MR, and HR residential zones. For compliance with state law, the City must allow these uses in any zone allowing single-family uses, subject only to the conditions imposed upon residential uses in the same zone. The City currently allows single-family homes in the A-20, W, and WW zones. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones. Just like all other residential uses, residential care facilities are subject to design review, which poses a significant constraint to development. Program H-F is included to commit the City to amending the Zoning Code to replacing subjective design review

[59] *HCD Building Blocks for Effective Housing Elements, "Constraints for People with Disabilities." Accessed May 19, 2022. https://www.hcd.ca.gov/community-development/building-blocks/constraints/constraints-for-people-with-disabilities.shtml*

with objective design standards and SB330-compliant streamlined review through the currently ongoing (2023) Comprehensive Zoning Code Update. The Draft Zoning Code (released October 2022) incorporated objective development and design standards for residential development. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023.

Residential care facilities serving seven or more persons require the approval of a Conditional Use Permit. A use permit requirement in zones allowing multifamily uses is a constraint to the development of these uses. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.[60]

Program H-F commits the City to updating the municipal code to allow residential care facilities in all zones, subject only to the requirements imposed upon single-family uses and facilities of seven or more in all zones, subject only to the same requirements as multifamily uses.

Low Barrier Navigation Centers

California Government Code Section 65660 identifies low barrier navigation centers are facilities that focus on moving people into permanent housing and connecting temporary residents with opportunities for income, public benefits, health services, shelter, and housing. Similar to displaced persons shelters, these facilities are intended to accommodate people with disabilities, pets and their owners, partners (if not a gender-specific site), the storage of possessions, and survivors of domestic violence. Specifically, the State mandates that low barrier navigation centers have services "to meet the diverse needs of (the) population." As of 2018, low barrier navigation centers are allowed, subject to design review, wherever multiple-family dwellings and mixed-use development are allowed. In addition, local governments may not impose parking requirements onto low barrier navigation centers.

The City is not currently in compliance and has included Program H-F to commit the City to amend the Zoning Code for compliance with California Government Code Section 65660. In updating the Code the City shall list low barrier navigation facilities as allowed by-right wherever multiple-unit dwellings and mixed-use development are allowed.

Single Room Occupancy (SRO)

Single-room occupancy residential units are a traditional form of affordable housing for very low- and low-income individuals. These units consist of a single room, often between 80 and 250 square feet in size, with or without cooking and sanitary facilities, that is rented out, often on a daily, weekly, or monthly basis. The St. Helena Municipal Code currently permits single-room occupancy type units in the form of Lodging Houses serving up to two paying occupants in an owner-occupied dwelling, as an accessory use in the LR and MR zoning districts. The HR zoning district currently allows single room occupancy units, subject to design review. As defined under Chapter 17.04 of the Municipal Code, lodging houses are buildings other than hotels, motels or bed and breakfast inns, where individuals can pay a rent in exchange for accommodations, including room and board, or board alone. Lodging houses serving more than two and up to five occupants require a use

[60] *City of St. Helena Municipal Code, Title 17.*

permit. Accessory structures featuring cooking and sanitation facilities are required to meet design and building standards like those of standard single-family and second units. Units without such facilities are subject to significantly fewer requirements and are more likely to address very low- and low-income housing needs.[61]

Factory Built Housing and Mobile Homes

Government Code Section 65852.3(a) requires that manufactured and mobile homes, including the lots on which they are installed, meeting certain standards of construction and be subject to the same development standards that apply to conventional, stick built, single-family homes.[62] In accordance with this legislation, the St. Helena Municipal Code, Title 17, defines a single-family dwelling to include a "mobilehome constructed to meet 1976 HUD standards, when placed on a permanent foundation, which is designed or used exclusively as a residence, including only one dwelling unit." [63] Mobile units meeting the above definition are permitted under single-family site development standards in all zones that allow single-family housing units.

In addition, the Low Density Residential (LR), Low Density Residential One Acre Minimum (LR-1A), Medium Density Residential (MR) and High Density Residential (HR) districts specifically permit as an allowed use, permanent mobile homes constructed in accordance with the 1974 safety standards and installed on a permanent foundation. Chapter 17.100 of the Municipal Code sets forth requirements for the Mobilehome Park Overlay (MHP) zoning district that applies the State Mobilehome Parks Act to the establishment and operation of mobilehome parks within the boundaries of the City of St. Helena.[64] Under these provisions of the Municipal Code, St. Helena fully adheres to the State standards regarding manufactured and mobile homes, and mobile home parks. Factory built housing and mobile homes are subject to subjective design review, which poses a significant constraint to development. Program H-F is included to commit the City to amending the Zoning Code to replacing subjective design review with objective design standards and SB 330-compliant streamlined review through the currently ongoing (2023) Comprehensive Zoning Code Update, scheduled for adoption in fall 2023. The Draft Zoning Code (released October 2022) incorporated objective development and design standards for residential development in compliance with State law.

Accessory Dwelling Units

Accessory dwelling units (ADUs) are defined as attached or detached dwelling units that provide independent living facilities on the same parcel as a legal single-unit or multiple-family unit dwelling, and which include permanent provisions for living, sleeping, eating, cooking, and sanitation. Due to the lower cost of construction and reduced environmental impact, the State has enacted many laws aimed at incentivizing the development of ADUs to help combat the worsening housing crisis. The State requires local governments to treat all ADUs that comply with specific standards as ministerial approvals. Local governments reserve the exclusive right to impose

[61] *City of St. Helena. St. Helena Municipal Code, Title 17.*
[62] *GCS 65852.3(a) standards include the constructed or purchased after October 1976, certified under the National Manufactured Housing Construction and Safety Standards Act of 1974, and installed on a foundation system pursuant to Section 18551 of the Health and Safety Code.*
[63] *City of St. Helena. St. Helena Municipal Code, Title 17.*
[64] *City of St. Helena. St. Helena Municipal Code, Title 17.*

specific design and development standards, which include, but are not limited to setbacks, minimum and maximum parcel size, and maximum height. Second units are exempt from the GMS in Municipal Code Section 17.152.040.

On January 10, 2023, the City adopted a new ADU Ordinance for compliance with California Government Code Sections 65852.2 and 65852.22. The City now permits ADUs or JADUs on any lot that is zoned to allow single-family dwelling residential use or multifamily dwelling residential use (including all residential, mixed-use, and agriculturally zoned parcels). The updated Ordinance also addressed compliance issues related to the definition of a cooking facility, definition of an efficiency kitchen, allowing both an ADU and JADU for conversions on a lot with an existing or proposed single-family dwelling, separate conveyance of an ADU or JADU, and restricting bedroom count, to meet the requirements of State law.

The City is currently undertaking a Comprehensive Zoning Code Update that will address any remaining compliance issues that HCD may find in their review of the newly Adopted ADU Ordinance. Program H-F in this Housing Element commits the City to revising the code for additional compliance with State law by 2026, though the City expects to adopt the Zoning Code Update in summer/fall 2023.

11. Housing Resources

Future Housing Need

State Housing Element law requires that a local jurisdiction accommodate a share of the region's projected housing needs for the planning period, called the Regional Housing Needs Allocation (RHNA). Compliance with this requirement is measured by the City's ability to providing adequate land with adequate density and appropriate development standards to accommodate the RHNA. The Association of Bay Area Governments (ABAG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within the region.

For the sixth Housing Element cycle, the City of St. Helena has been allocated a RHNA of 256 units, divided into four income levels as follows:

- Very Low Income: 104 units (41 percent)[65]
- Low Income: 59 units (23 percent)
- Moderate Income: 26 units (10 percent)
- Above Moderate Income: 67 units (26 percent)

The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units by income category.

Credits Towards RHNA

Projects with housing units approved or permitted that would not be occupied before the start of the planning period can be credited towards meeting the City's RHNA. These units can count towards the RHNA based on affordability and unit count provided it can be demonstrated that the units can be built within the planning period of February 2023 through February 2031. Affordability (income category) is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability of the units within the project. In addition, the City can project the number of Accessory Dwelling Units (ADUs) that may be built between 2023 and 2031, based on trends of ADU permitting during the last three years.

Pending or Approved/Entitled Projects

Currently there is one single-family residence and four moderate-income units, not to exceed 120 percent of the AMI, that are approved and undergoing building permit processing. In addition, there are 87 units that are pending planning/entitlement approval under the Hunter Subdivision project. While the Hunter Subdivision

[65] *The City has a RHNA allocation of 104 very low income units (inclusive of extremely low income units). Pursuant to State law (AB 2634), the City must project the number of extremely low income housing needs based on Census income distribution or assume 50 percent of the very low income units as extremely low. Therefore, the City generally estimates 52 extremely low and 52 very low income units.*

project is proposing approximately 25 affordable units, because the affordable agreements are not in place at the time of Housing Element, all unit credits were assumed to be above moderate.

On February 7, 2023, the Planning Commission approved a resolution recommending that the City Council approve the Hunter Subdivision project . The Project is going before the City Council on May 1, 2023 where it is anticipated to receive City Council approval. Once approved by the City Council, the applicant will need to record the tentative tract map with Napa County Recorders Office which is expected in the fall of 2023 and then submit for final map approval by the City Council in late 2023 to early 2024. The project may then undergo Design Review which could be completed within 12 months of final map approval; with the issuance of building permits expected in 2025. As referenced in Chapter 8, *Non-Governmental and Governmental Constraints*, recent trends show building permits were issued within four months of entitlement approval for recent housing unit developments, with many projects receiving building permits within a week of entitlement approval. Program H-A further ensures the City is committed to supporting the Hunter Subdivision project through completion and finding alternative solutions if the project is not meeting timelines for the 6th Cycle. As an alternate strategy should there be delays with the Hunter Subdivision beyond control of the City, such as developer financing challenges, the City has also included surplus capacity of 116 units in the above moderate-income category to ensure capacity to meet the RHNA is sustained throughout the planning period. Table 43 details the pending and entitled projects with housing units.

Table 43 Pending and Entitled Projects

Project Number	Address	APN	Zoning	Project Description	Net Units
PL20-046	777 Pratt Ave.	009-030-060	Twenty-acre Agriculture District (A-20)	Construction of a single-family residence	1 above moderate-income
PL20-015	963 Pope St.	009-090-012/013	Medium Density Residential	Construction of four (4) new deed restricted affordable housing units on a site with one (1) existing deed restricted unit.	1 moderate and 4 lower-income
#2010-40	Terminus of Adams Street	009-030-057	Medium Density Residential	Hunter Subdivision Tentative Map to subdivide the 16.9-acre parcel into 51 single-family lots and a 3.4-acre multi-family parcel. The applicant intends to construct 51 single-family residences, 11 ADUs, and 25 multi-family units.	87 above moderate-income*

**The project is subject to Inclusionary Housing requirements with 20% affordable housing.*

Projected Accessory Dwelling Units

Pursuant to Government Code Section 65583.1, the City can satisfy its regional housing need using ADU and junior accessory dwelling unit (JADU) trends and existing resources and incentives that promote their development. Using 2018-2021 data on ADUs/JADUs, the City has issued permits for approximately 9 ADUs on average. Extending this trend over the next 8 years, the City can assume approximately 72 ADU units will be permitted over the next planning period. Feedback from public outreach and research on ADU rental prices indicated that ADUs are typically rented at market rate and should be considered above moderate.

Remaining RHNA

Accounting for the entitled, approved and pending projects, as well as projected ADUs, the City has a remaining RHNA of approximately 184 units, including 159 lower- and 25 moderate-income units. Existing pending and approved projects and ADU trends currently meets the City's above moderate RHNA requirement. Table 44 details the existing progress towards the 6th cycle RHNA and the remaining RHNA that the City must demonstrate the availability of sites with appropriate zoning and development standards.

Table 44 Progress Towards RHNA

Income/ Affordability Category	RHNA Allocation	Pending or Approved	Estimated ADUs	Remaining RHNA
Lower	163	4	0	159
Moderate	26	1	0	25
Above Moderate	67	88	72	0
Total	256	92	72	184

Residential Site Inventory

Following the analysis of RHNA credits, specific sites throughout the city were considered for potential for housing development. Site selection for the residential site inventory started with City owned sites where residential development is in line with short-term City goals, then vacant and nonvacant sites zoned for residential use, and lastly sites that could be rezoned to accommodate residential development or residential development at a higher density. Several constraints were considered for each site, including environmental concerns, utility or infrastructure access, feasibility of redevelopment during the next planning period, and realistic capacity assumptions. Sites identified for lower income housing must meet certain density and site requirements, including a minimum density of 20 units per acre, parcel size between 0.5 and 10 acres, and access to high performing schools, jobs, amenities, health care facilities, and grocery stores. Zoning designations with allowable density appropriate for lower income housing capacity include Mixed Use (12-20 du/ac) and High Density Residential (16-26 du/ac).

City-Owned Sites

A review of City-owned properties for sites that are feasible for housing and reflect City priorities was conducted by the City Council in 2021. There are three City-owned properties (1480 Main Street, 1572 Railroad Avenue, and Adams Street/Library Lane) where near-term affordable housing development is in line with community and City priorities for these sites. In 2015, Vernazza Wolfe Associates, Inc conducted a *Feasibility Analysis and Comparison of Sites for New Affordable Housing Development* which looked at site feasibility and capacity for each of the three City-owned sites. The study evaluated potential risks and time to develop each site and identified the number of units, cost per unit, and funding gaps associated with each site. The analysis determined the three City-owned sites included in the site inventory are suitable for development of housing with 100 percent of units dedicated to lower-income housing. The capacity analysis factored in the size of the site, buildable footprints, maximum allowable floor area ratio and height, a ground-floor commercial

assumption, and required open and support services spaces. The inventory incorporated the 2015 site feasibility and capacity analysis and revised certain assumptions as needed based on land use changes and new density bonus law. The City is interested in redeveloping these sites and intends to conduct studies to determine the most efficient use of these sites for housing and proceed with the findings for housing development by 2025, consistent with Program H-L. In 2022, the City hired an appraiser to get the most current real estate valuation of all city surplus sites. The City is engaging the services of a consultant in spring 2023 to help begin the surplus land act process.

Site 1: 1480 Main Street (APN 009-211-016)



Table 45 Site 1 Summary

Current Use	Fire Stations and Vacant City Hall Structures
Parcel Size	1.66 acres (0.9 acres available for redevelopment)
Existing General Plan Land Use	Central Business and Public/Quasi-Public
Existing Zoning	Public/Quasi-Public
Proposed Land Use and Zoning	Mixed-Use
Allowed Density	12 to 20 units/acre
Site Capacity	22 units

Assumed Capacity and Income Category	6 Lower Income units

Site 1 is a 1.66-acre property owned by the City of St. Helena located at 1480 Main Street. City goals for the site include redevelopment of the portion of the site fronting Main Street with a visitor-serving commercial uses as a primary use and housing as a secondary use. The site is currently developed with the St. Helena Fire Department on the northern portion of the site and a vacant one-story building on the southwestern portion of the site. Only the vacant components of the site are proposed for redevelopment. A General Plan Amendment and Rezone change is proposed to change the land use and zoning designation from Central Business & Public/Quasi-Public to Mixed-Use. While the Mixed-Use Zone could potentially support 100 percent commercial development, the City has identified this site as suitable for mixed use housing development with intentions to develop.

The 2015 site feasibility and capacity analysis evaluated housing capacity of the site by analyzing current and adjacent land uses and zoning, site topography, environmental sensitivities, service connection feasibility, as well as setback, height, lot coverage, FAR, density, parking, and landscape requirements. The analysis identified two development scenarios for the site, resulting in a maximum capacity of approximately 44 units in scenario one or 46 units in scenario two. The assessment also accounted for the required number of-site parking spaces, 82 spaces in scenario one and 88 in scenario two. No environmental constraints or service connection obstacles were identified on the site. According to the analysis, development of 44 housing units would result in a building lot coverage of approximately 39 percent in both development scenarios. In the Draft Zoning Code there is currently no standard for building coverage in the proposed Mixed-Use zone, therefore the resulting lot coverage would not conflict with the City's Zoning Ordinance. Due to the existing Fire Department, the site developable area is assumed to be approximately 0.9 acres (the location of the vacant building on the southwestern portion of the site), which is approximately half the area assumed in the 2015 analysis. The inventory conservatively assumes a maximum of 6 housing units, as the site area could approximately 22 units based on half the units assumed in the 2015 study.

Site 2: 1572 Railroad Avenue (APN 009-193-002)



Table 46 Site 2 Summary

Current Use	Temporary City Hall
Parcel Size	0.93 acres
Existing General Plan Land Use	Business and Professional Office
Existing Zoning	Business and Professional Office
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	24 units
Assumed Capacity and Income Category	20 Lower Income units

Site 2 is a 0.93-acre property owned by the City of St. Helena located at 1572 Railroad Avenue. City goals are in line with affordable housing development on the site. This site is currently used as a temporary location for City Hall. A General Plan Amendment and Rezone is proposed to change the land use and zoning designation to High Density Residential.

The entire 0.93-acre site is able to be redeveloped with the removal of the existing buildings. Based on allowed density under High Density Residential, 24 units would be permitted as a baseline. Density bonus provisions allowed with affordable housing projects would increase the number of units permitted on-site. However, 20 lower-income units were assumed in order to ensure adequate off-street parking capacity. According to the 2015 site feasibility and capacity analysis, which evaluated housing capacity of the site by analyzing current and adjacent land uses and zoning, site topography, environmental sensitivities, service connection feasibility, as well as setback, height, lot coverage, FAR, density, parking, and landscape requirements, the site can accommodate a total of 20 housing units with adequate area for the required 38 parking spaces. According to

the 2015 assessment, development of 20 housing units on the site would result in a building lot coverage of approximately 31 percent and would be consistent with the maximum lot coverage allowed in High Density Residential zone, 45 percent. The 2015 feasibility analysis and site assessment did not identify any environmental constraints or service connection obstacles that would affect redevelopment of the site. Twenty housing units is slightly higher than 80 percent of the maximum allowable density, at 83 percent. However, given that the City owns and intends to redevelop the site for housing and that this is consistent with the findings 2015 site feasibility and capacity analysis, the development of 20 housing units on-site is considered feasible.

Site 3: Adams Street (APN 009-150-006)

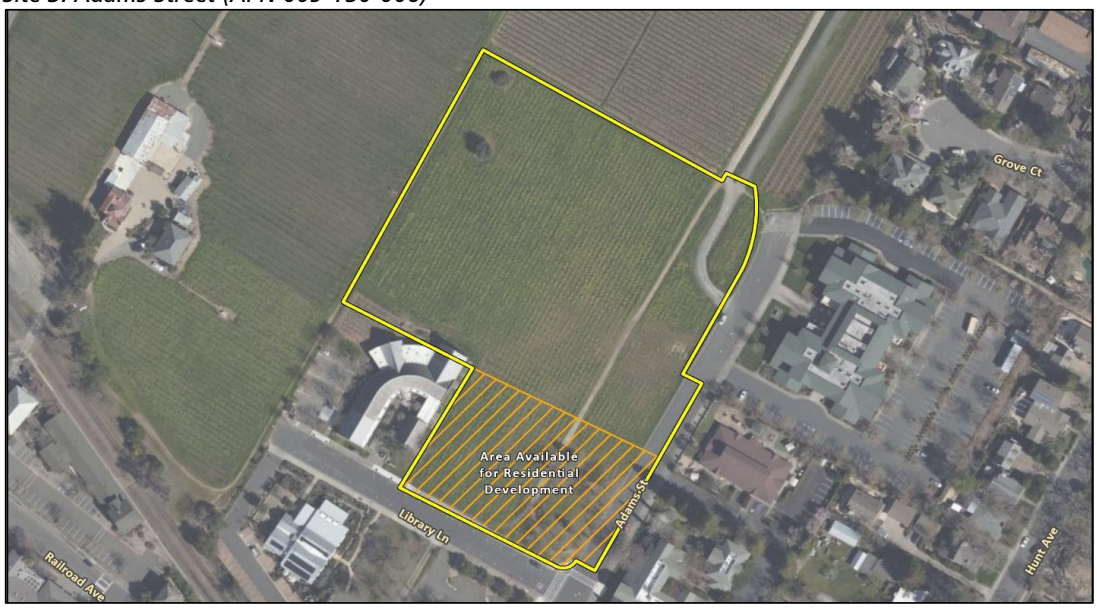


Table 47 Site 3 Summary

Current Use	Vacant
Parcel Size	5.6
Existing General Plan Land Use	Central Business
Existing Zoning	Central Business
Proposed Land Use and Zoning	Central Business
Allowed Density	n/a
Site Capacity	n/a
Assumed Capacity and Income Category	31 Lower Income units

Site 3 is a 5.6-acre property owned by the City of St. Helena located at the terminus of Adams Street and the crossroads of Adams Street/Library Lane. City priorities of the site include a mix of public, commercial, and residential uses. The site is currently vacant but being leased for a small vineyard operation. No land use changes are proposed as residential uses are permitted on upper stories within the Central Business district.

The site inventory assumes a portion of the site, approximately 1.3 acres, would be dedicated for affordable housing, while the remainder of the site would be used for other public and commercial uses such as a potential location for City Hall and Police station. Based on the 2015 site feasibility and capacity analysis, which evaluated housing capacity of the site by analyzing current and adjacent land uses and zoning, site topography, environmental sensitivities, service connection feasibility, as well as setback, height, lot coverage, FAR, density,

parking, and landscape requirements, approximately 31 units could be accommodated on the portion of the site adjacent to the Public Library. The site would also accommodate 58 parking spaces where only 53 are required. According to the 2015 site feasibility and capacity analysis, development of 31 housing units on the 1.3 acre portion of the site would result in a building lot coverage of 28 percent. There is no standard for building coverage in the Central Business zone, therefore the resulting lot coverage would not conflict with the City's Zoning Ordinance. No environmental sensitivities or service connection constraints were identified for the site. This site was identified as a housing opportunity site in the 5th housing element cycle.

Privately Owned Vacant and Nonvacant Properties

After reviewing the pending and approved projects, existing ADU/JADU trends, and City-owned properties, additional capacity is needed to fully accommodate the City's RHNA and to allow for a buffer. A desktop and City tour of parcels that could accommodate more housing and meet the City's regional housing needs was conducted. Pursuant to Government Code section 65583.2(a), these included:

- Vacant sites zoned for residential use
- Vacant sites zoned for nonresidential use that allow residential development
- Residentially zoned sites that are capable of being developed at a higher density than existing conditions
- Commercially zoned sites that are capable of being developed at a higher residential density than existing conditions
- Sites suitable for rezoning to allow for residential uses or allow residential uses at a high density
- Sites zoned for residential use or suitable for rezoning to allow residential uses with expressed property owner interest for residential development

Suitability of Nonvacant Sites

The City has recently seen redevelopment of nonvacant, residentially zoned parcels for housing development. Recently redeveloped parcels included those with existing single-family residences. In addition, the City has recently seen the development of housing on sites with existing vineyards. Examples of recent development trends in residential zones and on properties with existing vineyards include the following:

- 632 McCorkle Avenue: The completed project demolished an existing single family residence to construct 8 new housing units
- 684 McCorkle Avenue: The completed project demolished an existing single family residence to construct 8 new, affordable housing units
- 963 Pope Street: The approved project merged two existing parcels with an existing single family home and constructed 4 new multi-family housing units; all 5 units will be affordable
- 500 Mills Lane: The completed project constructed a single-family residence, ADU, and barn on a property with an existing vineyard

- 601 Fulton lane: The completed project constructed a single-family residence, ADU, and barn on a property with an existing vineyard

The site inventory identified nonvacant residentially zoned sites with similar conditions to trends detailed above (nonvacant sites with existing, single-family residences). The projects listed above were infill sites that redeveloped parcels with existing single family residences with multi-family developments and affordable housing. These projects were located on parcels zoned Medium and High Density Residential. The conditions and characteristics of these projects are similar to Sites 6, 7, and 9 which each have one existing single-family residence and are zoned Median and High Density Residential.

The 632 McCorkle Avenue project had a density of 14.9 units per acre which is 57 percent of the maximum allowed density of the site, the 684 McCorkle Avenue project had a density of 14.7 units per acre which is 56 percent of the maximum allowed density, and the 601 Fulton Lane project had a density of 17.1 units per acre which is 107 percent of the maximum allowed density. The recent redevelopment projects have an average density of 15.5 units per acre, which equates to an average of 73 percent of the maximum allowed density on each site. The site inventory assumes a capacity of approximately 80 percent of the maximum allowed density on each site. This is slightly higher than the average density of recently constructed and approved projects. However, the sites identified in the inventory are larger than the recent redevelopment projects listed above which allows for more efficient layout and greater capacity for development. In addition, two of the three recently redeveloped sites were narrow parcels where the parcel size and shape limited the configuration and available area for housing development on-site.

Other jurisdictions in the region have also seen redevelopment of nonvacant, residentially zoned parcels for housing development as well. Additional redevelopment projects on nonvacant, residentially zoned parcels in the region include the following:

- City of Calistoga – 2008 Grant Street: The approved project includes demolition of an existing residential structure, a three-sided wooden garage, and a large, fire-damaged shed on a 5.84-acre parcel and construction of 15 single-family homes
- City of Calistoga – Yellow Rose Ranch: The proposed project consists of the demolition of an existing single-family residence, barn, and four accessory buildings and construction of 46 single-family homes, 33 attached ADUs, and 12 detached ADUs
- City of Napa - Browns Valley Subdivision: The proposed project includes the demolition of a single-family residence, barn, and several outbuildings and construction of 11 single-family homes
- City of Napa – Old Sonoma Road Mixed Use: The proposed project includes the demolition of nine existing non-historic buildings and rehabilitation of three existing historic buildings into two townhome clusters, six new condominium structures, eight single-family homes, and commercial space. The project proposes a total of between 155 and 162 housing units.

- City of Napa – Redwood Grove Housing: The proposed project includes the removal of an existing single-family residence and construction of a two-story, 34-unit, multi-family, 100 percent affordable housing development.

Site 4: 905 Main Street (APN 009-180-008)



Table 48 Site 4 Summary

Current Use	Vacant
Parcel Size	0.27 acres
Existing General Plan Land Use	Mixed-Use
Existing Zoning	Service Commercial
Proposed Land Use and Zoning	Mixed-Use
Allowed Density	12 to 20 units/acre
Site Capacity	5 units
Assumed Capacity and Income Category	4 Above Moderate Income units

Site 4 is a 0.27-acre property located at 905 Main Street. The property is a vacant site in a location prime for development along Main Street. The property owner has expressed interest in development of the site with housing and community members have expressed support for this use. A zoning change is proposed to change the zoning designation from Service Commercial to Mixed-Use, which would bring the property into conformance with the existing General Plan land use designation and incentivize owner redevelopment of the site due to the new allowed on-site uses. In addition, mixed-use development incentives anticipated under Program H-P, such as streamlined design review and fee waivers, would further encourage development of housing on the site. The Mixed-Use land use designation is a new designation introduced in the City's recent 2040 General Plan Update. The City is currently in the process of updating the Zoning Ordinance to include a Mixed-Use zone consistent with the General Plan and anticipates to adopt these changes in Fall of 2023. Because the Mixed-Use zone has not yet been adopted in the Zoning Ordinance, there are no recent development trends in the city for sites zoned Mixed-Use. According to the City of Napa's Housing Element Update, two recent mixed-use projects in the city had an average of 92 percent of the maximum allowed

density of the sites. Napa's sites inventory assumed a realistic density of 80 percent of the maximum allowed density of each site based on the density of recent mixed-use developments, which averaged 83 percent of the maximum allowed density.[66] There is potential that Site 4 could be developed with 100 percent commercial uses. However, the inventory only includes one site with a Mixed Use land use and only a total of four above-moderate housing units. In addition, the property owner has expressed to the City that they are interested in developing housing on the site. The site is vacant, and the entire 0.27-acre site is able to be developed. Based on 80 percent of the maximum allowed density under Mixed-Use, four above-moderate income units are feasible.

[66] City of Napa. 2022. Housing Element Update. file:///C:/Users/lsegal/Downloads/Napa%20Housing%20Element%20Rev%2002%2020230216.pdf

Site 5: Main Street between Mills Lane and Dowdell Lane (APN 009-660-005)



Table 49 Site 5 Summary

Current Use	Vacant
Parcel Size	1.8 acres
Existing General Plan Land Use	Service Commercial
Existing Zoning	Service Commercial
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	45 units
Assumed Capacity and Income Category	45 Lower Income units

Site 5 is a 1.8-acre property located on Main Street between Mills Lane and Dowdell Lane. The property is a vacant site in a location prime for development along Main Street. The site is privately owned currently but a local affordable housing non-profit has secured an exclusive option to purchase the property to develop affordable housing, consistent with an approved development agreement for the Farmstead Hotel. A General Plan Amendment and Rezone is proposed to change the land use and zoning designation from Service Commercial to High Density Residential to allow for affordable housing development. The affordable housing project is in the preliminary site design phase which is pending pursuant to adoption of the Housing Element Update and subsequent rezoning of the property to accommodate multi-family housing.

The entire 1.8-acre site is vacant and able to be developed. Based on allowed density under High Density Residential, a total of 45 housing units would be permitted. The affordable housing non-profit organization that owns the site intends to develop a housing project affordable to households earning between 30 percent and 60 percent of the AMI (very low- and low-income). A conceptual site plan was analyzed which determined

four-story development along Fountain Court and three-stories along Main Street with structured parking could yield approximately 45 units and all required parking spaces. The inventory assumes 45 units. While this is greater than 80 percent of the maximum allowable density of the site, it is consistent with the non-profit's project plans and less than the maximum density of the project site (46 units).

Site 6: 709 McCorkle Avenue (APN 009-100-031)



Table 50 Site 6 Summary

Current Use	Single Family Residences
Parcel Size	0.9 acres
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	Medium Density Residential
Proposed Land Use and Zoning	Medium Density Residential
Allowed Density	14 units/acre
Site Capacity	5 units
Assumed Capacity and Income Category	4 Above Moderate Income units

Site 6 is composed of a 0.9-acre property located at 709 McCorkle Avenue. The property is underutilized with one existing single family residence and a large undeveloped space. The site is considered underutilized based on the additional density, FAR, height, and lot coverage available. The property owner along with community members and local nonprofit groups expressed interest in developing more housing on the site. The property owner inquired with the City regarding the possibility of subdividing the property pursuant to SB9, which would allow the lot to be split into two lots with development of up to two units on each lot. The current land use and zoning designation is Medium Density Residential and no changes to land use or zoning are proposed.

The site is composed of a single family lot which could accommodate 14 units under current land use regulations. Due to the existing residence on the site, the inventory conservatively assumed additional units would be added pursuant to SB 9. Each lot can be split into two lots with development of up to 2 units on each

lot, for a total of 4 above moderate units (a net increase of 3 units). In addition, each lot could develop ADUs for a total net capacity of 5 units. However, a total of 4 above moderate income units were assumed, given the property owner's development interests.

Site 7: 821 Pope Street (APN 009-503-001)



Table 51 Site 7 Summary

Current Use	Single Family Residence
Parcel Size	1.0 acres
Existing General Plan Land Use	High Density Residential
Existing Zoning	High Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	26 units
Assumed Capacity and Income Category	10 Lower Income and 10 Moderate Income units

Site 7 is a 1.0-acre property located at 821 Pope Street. The site is underutilized with one existing single-family residence and large undeveloped areas on-site. The site is considered underutilized based on the additional density, FAR, height, and lot coverage available. Land use designations and existing development surrounding the site consist of multi-family housing. The current land use and zoning designation is High Density Residential and no changes to zoning are proposed. This site mirrors the condition of properties that were recently redeveloped with multi-family housing in the city. Similar to the 632 McCorkle Avenue, 684 McCorkle Avenue, and 963 Pope Street projects, this site contains existing single family residences on a large parcel but is underutilized as it is located on a High Density Residential zone

The entire 1.0-acre site is able to be redeveloped. Based on allowed density under High Density Residential, development of 26 units would be permitted. However, a total of 20 units, 10 lower income units and 10 moderate income units, is assumed in order to accommodate off-street parking capacity.

This site was included in the 5th Cycle Housing Element and is considered non-vacant, therefore requiring by-right approval for projects with at least 20% affordable units.

Site 8: 882 and 886 College Avenue (APN 009-070-043, -044, -045)



Table 52 Site 8 Summary

Current Use	Vacant
Parcel Size	1.5 acres
Existing General Plan Land Use	Public/Quasi-Public
Existing Zoning	A-20 (Agriculture)
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	39 units
Assumed Capacity and Income Category	15 Lower Income and 15 Moderate Income units

Site 8 is composed of three adjacent properties that total 1.5 acres located at 882 and 886 College Avenue. All three properties are vacant and are owned by a single property owner who has expressed interest in residential development on these properties. The site is adjacent to areas with existing multi-family development. A General Plan Amendment and zoning change is proposed to change the land use and zoning designation from Public/Quasi-Public and Agriculture to High Density Residential.

The entire 1.5-acre site is able to be redeveloped. Based on allowed density under High Density Residential, 39 units would be permitted. However, a total of 30 units, 15 lower-income units and 15 moderate income units, is assumed in order to accommodate off-street parking capacity. Future development of the site would not be dependent upon lot consolidation as all three parcels are under the same ownership. Furthermore, Program H-ZZ would incentivize lot consolidation at the time the property is developed.

Site 9: 1447 and 1515 Spring Street (APN 009-590-003, -010)



Table 53 Site 9 Summary

Current Use	Single Family Residences
Parcel Size	2.4 acres
Existing General Plan Land Use	High Density Residential
Existing Zoning	High Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	62 units
Income Category	24 Lower Income and 24 Above Moderate Income units

Site 9 is composed of two adjacent properties that total 2.4 acres located at 1447 and 151 Spring Street. Both properties are underutilized with one existing single-family residence and large undeveloped areas on each parcel. The overall site is considered underutilized based on the additional density, FAR, height, and lot coverage available. This site mirrors the condition of properties that were recently redevelopment with multi-family housing in the city. Similar to the 632 McCorkle Avenue, 684 McCorkle Avenue, and 963 Pope Street projects, this site contains existing single family residences on large parcels but is underutilized as it is located on a High Density Residential zone. The site is surrounded by single- and multi-family development and sites zoned High Density Residential, similar to the 632 McCorkle Avenue and 684 McCorkle Avenue projects. The current land use and zoning designation is High Density Residential and no changes to zoning are proposed.

The entire 2.4-acre site is able to be redeveloped. Based on allowed density under High Density Residential, 62 units would be permitted. However, a total of 48 units, 24 lower income units and 24 above moderate income units, is assumed in order to accommodate site circulation improvements and adequate off-street parking

capacity. The site is currently underutilized and does not meet the minimum density of the High Density Residential Zone (16.1 units/acre) with a current density of 0.83 units/acre. The site has two existing housing units, which equals approximately three percent of the total allowed capacity of the site (62 units). The existing building lot coverage is approximately eight percent and the maximum allowed lot coverage is 45 percent. Future development of the site would not be dependent upon lot consolidation as all three parcels are under the same ownership. Furthermore, Program H-ZZ would incentivize lot consolidation at the time the property is developed.

This site was included in the 5th Cycle Housing Element, therefore requiring by-right approval for projects with at least 20% affordable units.

Site 10: Spring Street between Hudson Avenue & Valley View Street (APN 009-441-023)



Table 54 Site 10 Summary

Current Use	Vineyard
Parcel Size	4.4 acres
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	Medium Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	114 units
Assumed Capacity and Income Category	44 Lower Income and 44 Moderate Income units

Site 10 is a 4.4-acre parcel located on Spring Street between Hudson Avenue and Valley View Street. Recent property owner interest in residential development of the site indicates opportunity for housing. Additionally, Focus Group meetings showed interest in High Density Residential uses on this residentially zoned parcel in the form of town homes, which is compatible with the surrounding residential neighborhoods. The site is considered underutilized as it has a residential land use designation but is currently used as vineyards. As previously discussed, the City has seen recent development of housing on properties with existing vineyards. Site 10 has greater development potential than the recently developed vineyard parcels since it is is located on a residentially zoned parcel, while the 500 Mills Lane and 601 Fulton Lane projects were located on parcels with a land use and zoning designation of Agriculture and therefore are only allowed to develop one housing unit and one ADU per parcel. A General Plan Amendment and zoning change is proposed to change the zoning from Medium Density Residential to High Density Residential.

The entire 4.4-acre site is able to be redeveloped. Based on allowed density under High Density Residential, 114 units would be permitted. However, a total of 88 units, 44 lower income units and 44 moderate income units, is assumed in order to accommodate adequate off-street parking capacity.

This site was included in the 5th Cycle Housing Element and is considered non-vacant, therefore requiring by-right approval for projects with at least 20% affordable units.

Site 11: 1637 Spring Street (APN 009-600-018)



Table 55 Site 11 Summary

Current Use	8 Detached Residential Housing Units
Parcel Size	1.1 acres
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	High Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	28 units
Assumed Capacity and Income Category	8 Additional Lower Income units

Site 11 is a 1.1-acre parcel located at 1637 Spring Street. Recent property owner interest in adding housing units on-site indicates there is opportunity to develop additional housing. The property owner emailed City Staff on March 7, 2022, interested in the development of additional housing units on the property . The property owner stated a desire to double the number of housing units on the site and expressed support for changing the land use designation from Medium Density Residential to High Density Residential, to match the current zoning. Further, correspondence with the property owner confirmed they are interested in including the site in the site inventory. The land use designation of the site is currently Medium Density Residential, changed from High Density Residential during the latest General Plan Update in 2019. However, the site is still zoned High Density Residential and is adjacent to other parcels zoned High Density Residential. A General Plan Amendment is proposed to change the land use designation from Medium Density Residential to High Density Residential, in conformance with the current zoning designation.

Based on allowed density under High Density Residential, a total of 28 units would be permitted. With the existing 8 units and current on-site structures, the site is underutilized based on density, FAR, and lot coverage. Based on discussions with the property-owner and existing site layout, approximately 8 additional units could

be accommodated on-site. Therefore, the inventory assumed 8 lower income units, resulting in 16 units total on-site, based on the property owner's development interests. The site is underutilized and currently does not meet the minimum density of the High Density Residential Zone (16.1 units/acre) with a current density of 7.3 units/acre. The site has 8 existing housing units, which equals approximately 29 percent of the total allowed capacity of the site (28 units). The existing building lot coverage is approximately 30 percent and the maximum allowed lot coverage is 45 percent.

Site 12: 620 McCorkle Avenue (APN 009-502-003)



Table 56 Site 12 Summary

Current Use	Single Family Residence
Parcel Size	0.76 acres
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	Medium Density Residential
Proposed Land Use and Zoning	Medium Density Residential
Allowed Density	5.1 to 16 units/acre
Site Capacity	12 units
Assumed Capacity and Income Category	3 Additional Above Moderate Income units

Site 12 is a 0.76-acre parcel located at 620 McCorkle Avenue. The site is considered underutilized as it is zoned medium density residential but is currently developed with a single family residence. The site is considered underutilized based on the additional density, FAR, height, and lot coverage available. The site is surrounded by single- and multi-family development and properties zoned Medium and High Density Residential. In addition, community feedback from public meetings and public comment letters have shown the site is a strategic location for housing and the community is interested in including this site in the site inventory. The current land use and zoning designation is Medium Density Residential and no changes to zoning are proposed. This site also is adjacent to recent redeveloped sites at 632 McCorkle Avenue and 684 McCorkle Avenue, which removed an existing single-family residence with multi-family units.

The entire site could accommodate approximately 12 units based on allowed density alone. However, three additional above-moderate income units are assumed in order to accommodate adequate off-street parking capacity and existing residential uses. Therefore, the inventory assumed three additional above moderate income units, resulting in four units total onsite.

Summary of Site Inventory

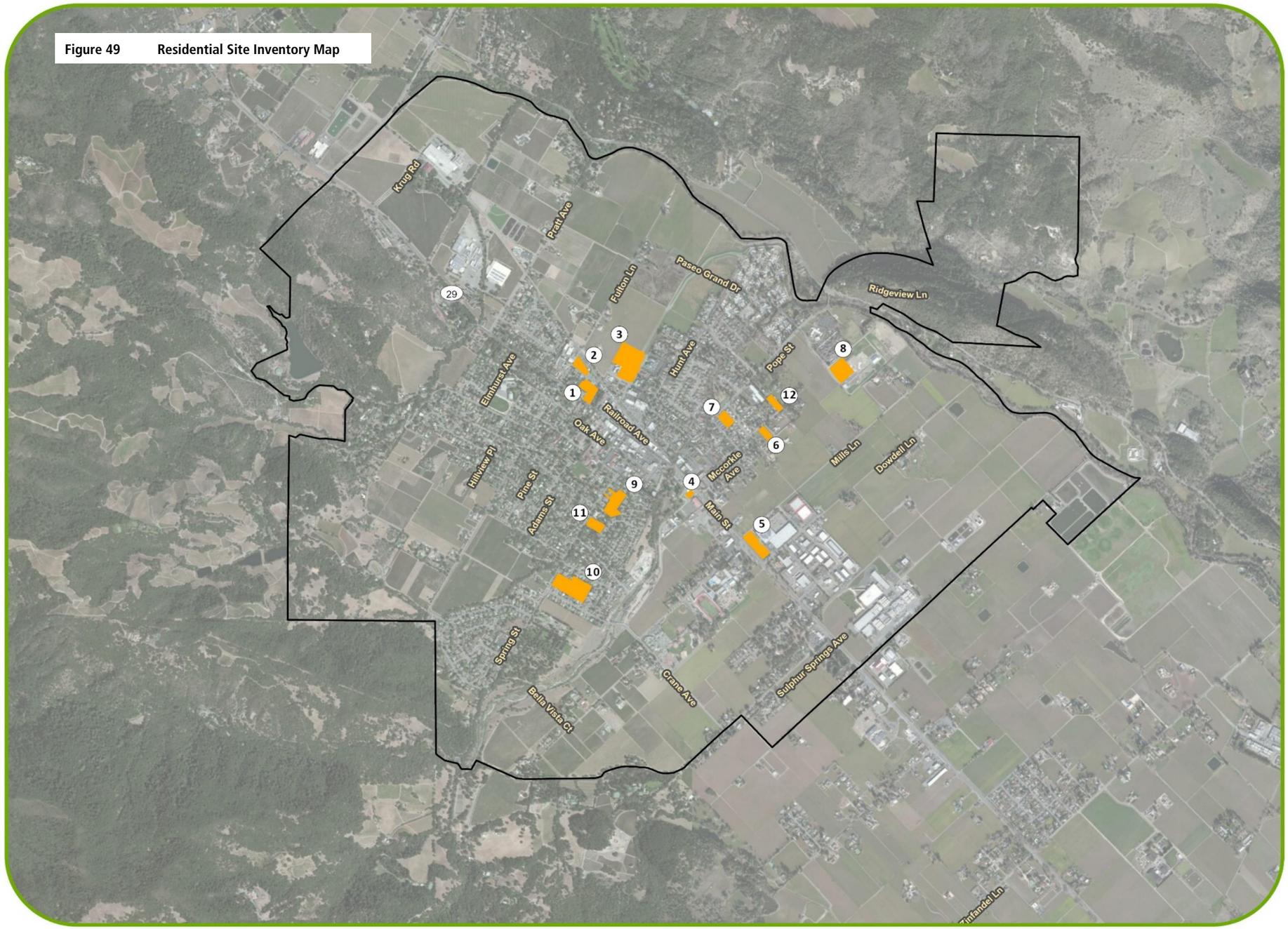
In combination with the City's pending projects and ADU development trends, the site inventory provides adequate sites to meet the City's RHNA allocation and buffer requirements. Between these three methods, the city can accommodate a total of 472 housing units, including 207 lower-income, 70 moderate-income, and 195 above moderate-income units. Table 57 shows a summary of the number of housing units accommodated by pending projects, ADU trends, and the site inventory.

Table 57 Summary of Housing Units

	Lower Income	Moderate Income	Above Moderate Income	Total
Pending Projects	4	1	88	93
ADU Trends	0	0	72	72
Site Inventory				
Site 1 (1480 Main St.)	6	0	0	6
Site 2 (1572 Railroad Ave.)	20	0	0	20
Site 3 (Adams St.)	31	0	0	31
Site 4 (905 Main St.)	0	0	4	4
Site 5 (Main St. btw Mills Ln. and Dowdell Ln.)	45	0	0	45
Site 6 (709 McCorkle Ave.)	0	0	4	4
Site 7 (821 Pope St.)	10	10	0	20
Site 8 (882 and 886 College Ave.)	15	15	0	30
Site 9 (1447 and 1515 Spring St.)	24	0	24	48
Site 10 (Spring St. btw Hudson Ave. And Valley View St.)	44	44	0	88
Site 11 (1637 Spring St.)	8	0	0	8
Site 12 (620 McCorkle Ave.)	0	0	3	3
Total	**207**	**70**	**195**	**472**
St. Helena RHNA plus 20% Buffer	192	31	79	302
Surplus	15	39	116	171

.

Figure 49 Residential Site Inventory Map



City Boundary
Selected Sites

1 - 1480 Main Street
2 - 1572 Railroad Avenue
3 - Adams Street
4 - 905 Main Street
5 - Main Street (between Mills & Dowdell)
6 - 709 McCorkle Avenue
7 - 821 Pope Street
8 - 882 and 886 College Avenue
9 - 1447 and 1515 Spring Street
10 - Spring Street (between Hudson & Valley View)
11 - 1637 Spring Street
12 - 620 McCorkle Avenue

ST. HELENA CALIFORNIA

0 0.2 0.4 N
Miles

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Additional data provided by County of Napa, 2022.

Table 58 Vacant and Nonvacant Sites

Site Address	APN	Developable Acres	Existing Zoning	Rezone Proposed	Proposed Zoning	Minimum Density	Maximum Density	Used in Previous HE?	Nonvacant	City-Owned	Lower Income	Moderate Income	Above Moderate Income	Total
Site 1 (1480 Main St.)	009-211-016	0.90	Public/Quasi-Public	Yes	Mixed-Use	12	20	No	Nonvacant	Yes	6	0	0	**6**
Site 2 (1572 Railroad Ave.)	009-193-002	0.93	Business and Professional Office	Yes	High Density Residential	16.1	26	No	Nonvacant	Yes	20	0	0	**20**
Site 3 (Adams St.)	009-150-006	5.6	Central Business	Yes	High Density Residential	16.1	26	Yes (Moderate Income and Above)	Vacant	Yes	31	0	0	**31**
Site 4 (905 Main St.)	009-180-008	0.27	Service Commercial	Yes	Mixed-Use	12	20	Yes (Moderate Income and Above)	Vacant	No	0	0	4	**4**
Site 5 (Main St. btw Mills Ln. and Dowdell Ln.)	009-660-005	1.8	Service Commercial	Yes	High Density Residential	16.1	26	No	Vacant	No	45	0	0	**45**
Site 6 (709 McCorkle Ave.)	009-100-032	0.9	Medium Density Residential	No	Medium Density Residential	5.1	16	No	Nonvacant	No	0	0	4	**4**
Site 7 (821 Pope St.)	009-503-001	1.0	High Density Residential	No	High Density Residential	16.1	26	Yes (Lower Income)	Nonvacant	No	10	10	0	**20**
Site 8 (882 and 886 College Ave.)	009-070-043, 009-070-044, 009-070-045	1.5	Agriculture	Yes	High Density Residential	16.1	26	No	Vacant	No	15	15	0	**30**
Site 9 (1447 and 1515 Spring St.)	009-590-010, 009-590-003	2.4	High Density Residential	No	High Density Residential	16.1	26	Yes (Lower Income)	Nonvacant	No	24	0	24	**48**
Site 10 (Spring St. btw Hudson Ave. And Valley View St.)	009-441-023	4.4	Medium Density Residential	Yes	High Density Residential	16.1	26	Yes (Moderate Income and Above)	Vacant	No	44	44	0	**88**
Site 11 (1637 Spring St.)	009-600-018	1.1	High Density Residential	No	High Density Residential	16.1	26	No	Nonvacant	No	8	0	0	**8**
Site 12: 620 McCorkle	009-502-003	0.76	Medium Density Residential	No	Medium Density Residential	5.1	16	No	Nonvacant	No	0	0	3	**3**
		Total									**203**	**69**	**36**	**308**

	Lower Income Capacity
Lower Income RHNA with 20 percent buffer:	**192**
Pending and Approved Projects (lower income)	**4**
Existing HDR capacity: Site 7	**10**
Existing HDR capacity: Site 9	**24**
Existing HDR capacity: Site 11	**8**
Remaining lower income shortfall	**146**
Sites with proposed rezone to HDR (Sites 2, 3, 5, 8, 10)	**156**

Availability of Infrastructure and Services

The City of St. Helena is dedicated to improving existing and new infrastructure and facilities to support existing and future development. The City's annual budget devotes funds towards the Public Works Department which provides design, construction, maintenance, and operation of public facilities and infrastructure within the city. Public Works is responsible for infrastructure including streets, storm drains, parks, water treatment, water distribution, wastewater collection, and wastewater treatment. Environmental compliance services provided by Public Works also includes storm water pollution prevention, sustainability, protection of public trees and floodplain administration, response to infrastructure and weather emergencies. The city's existing infrastructure system may require minor upgrades to address age and condition-related issues. New construction would be located in areas served by existing infrastructure.

The Integrated Urban Master Plan analyzed future infrastructure and water supply capacity accounting for planned development within the city, including the Hunter Subdivision project, and estimated buildout proposed under the 2040 General Plan, which would be about 7,400 residents by the year 2040. The City's RHNA plans for the addition of a total of 256 housing units within the planning period. Currently the city has a population of approximately 6,073. Therefore, the additional 256 units would not exceed buildout assumed in the Master Plan.

Wastewater System

The City's Integrated Utility Master Plan was adopted in 2021 and serves as the guiding document for planning and implementing sewer system improvements through the year 2040. The plan is consistent with the population, land use, employment, and housing projections presented in the 2040 General Plan. The City also has a Sewer System Management Plan that was developed in 2006 and last updated in April 2016. The City's sewer system service area consists of the City limits and includes approximately 24 miles of active gravity sewer pipelines, 0.4 miles of force mains, and two lift stations that convey flow to the Wastewater Treatment Plant. Improvements to the Wastewater Treatment Plant began in 2022 to adhere to stricter environmental requirements and are expected to be completed in 2023.

A capacity analysis of the existing wastewater collection system showed a storm event would result in multiple pipeline capacity deficiencies and sanitary sewer overflows at several locations with the existing system. Wastewater collection systems improvement projects proposed by the Utility Master Plan included gravity main improvements with pipeline replacement and lift station improvements. These improvements would be constructed based on prioritization within the Master Plan and developed as a Capital Improvement Project. The improvements would be financed through City budgeting and collection of project impact fees. As discussed under the Government Constraints section, impact fees in the city do not represent a constraint to housing.

Potable Water System

The City's Integrated Utility Master Plan serves as the guiding document for planning and implementing water system improvements through the year 2040, consistent with growth under the 2040 General Plan. Previously, the City utilized the Water Master Plan, developed in 2006, to identify infrastructure need to the year 2020. The City's water system service area extends beyond the City limits to unincorporated areas in the Meadowood Napa Valley Resort/Neighborhood area and area between Chaix Lane and Zinfandel Lane along Main Street. There are three main water supply sources: Bell Canyon Reservoir, Stonebridge wells, and an interconnection with the City of Napa. The City's water system consists of approximately 47 miles of water distribution pipelines.

A capacity analysis of the existing water distribution system showed there is one pump station, the Holmes pup station, that does not have sufficient firm pumping capacity to meet maximum day demand. Evaluation of the existing treated water storage system capacity found one area that does not have adequate capacity to meet peak hour demand, fire flow storage, and emergency storage. Improvement projects proposed by the Utility Master Plan to prevent system failures caused by leaks, fails, and main breaks include rehabilitation and replacement of water main and transmission lines, which would enable the City to meet potable water demands. The potable water improvements would be constructed based on prioritization within the Master Plan and developed as a Capital Improvement Project. The improvements would be financed through City budgeting and collection of project impact fees. As discussed under the Government Constraints section, impact fees in the city do not represent a constraint to housing.

Storm Water System and Drainage System

The City's Integrated Utility Master Plan guides planning and implementing the storm drainage system improvements through the year 2040 with growth projections consistent with the 2040 General Plan. Previously, the Storm Drainage Master Plan, developed in 2000, served as the City's guide to analyze the existing storm drain system and plan for implementation of improvements. The City's storm drainage collection system service area consists of the city limits and includes street drainage, inlets, gravity pipelines, open channels, one storm water detention basin, and 33 outfalls that discharge in Sulphur Springs Creek, York Creek, or Napa River.

Evaluation of existing storm drainage capacity showed there would be multiple areas of flooding throughout the system in the event of a 10-year, 50-year, and 100-year storm. Improvement projects proposed by the Utility Master Plan to mitigate storm water system capacity issues include implementing an annual storm drain rehabilitation and replacement program with the assumption that approximately 1.25 percent of the system would be replaced per year until 2040. Storm water infrastructure upgrades would be constructed based on prioritization within the Master Plan and developed as a Capital Improvement Project. The improvements would be financed through City budgeting and collection of project impact fees. As discussed under the Government Constraints section, impact fees in the city do not represent a constraint to housing.

Dry Utilities

PG&E is responsible for supplying electricity and natural gas to the City and surrounding areas. Other dry utilities such as telephone and data services and cable television are serviced by contracted providers within the city, including Xfinity and AT&T.

Circulation System

The City's Circulation Element, updated in 2019 along with the General Plan, identifies the principal components of the City's circulation system and issues related to parking, public transit, and pedestrian and bicycle infrastructure. The Circulation Element also includes standards and guiding principles for implementing transportation improvements.

The City's street network is largely grid based with some streets east of State Route 29 that are not fully connected to the network. State Route 29 (Main Street) is the main street used for traveling north-south throughout the city and is the main route for vehicles traveling between Lake County, northern Sonoma County, and the City of Napa and other destinations further south. It runs northwest to southeast through the city and divides the city in two. Congestion along State Route 29 is a major issue within the city and pushes traffic onto local city streets. Much of the traffic congestion seen in the city is caused by tourists traveling throughout the region. The primary transit option in the city is the Vine bus service, however ridership is low with only 0.9 percent of St. Helena residents commuting via transit. Future improvements to the City's transportation network include improvements aimed at reducing congestion along State Route 29 and enhancing alternative modes of travel, including the addition of pedestrian and bicycle infrastructure.

Environmental Constraints

In 2019, the City certified a FEIR with the 2040 General Plan Update that analyzed all potential environmental impacts associated with the population and development growth proposed under the plan. City Council also adopted CEQA Findings and a Statement of Overriding Considerations identifying public benefits that override the significant and unavoidable impacts of the General Plan, including agricultural preservation, a balanced mix of land uses and sustainable land use pattern, creation of construction jobs, managing effects of regional traffic, and a shift to a multi-modal circulation system. Environmental clearance for future development projects may tier from the General Plan FEIR, thereby expediting the approval process. Mitigation measures set forth in the FEIR include measures to minimize impacts associated with potential flooding, and other environmental constraints.

There are no known conditions that would preclude any of the selected sites from being developed within the planning period. Sites 4 and 7 are located in the Federal Emergency Management Agency (FEMA) flood hazard zone, Zone X, an area of moderate- to low-risk. Development within Zone X would not preclude the properties from development, as future development would be subject to development standards contained within the Saint Helena Municipal Code, which incorporates FEMA standards for construction in flood hazard zones, as well as relevant policies within the City's General Plan which regulate development in flood risk areas. In

addition, future development would comply with applicable mitigation measures within the 2040 General Plan EIR, including HYDRO-1 which ensures that no development will impede waters in the floodway, raises base flood levels, or expose housing to undue risk from flooding. The remaining sites are not located within a FEMA flood zone. None of the sites are located within a state of local fire hazard severity zone.

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Appendix A:
Affirmatively Furthering Fair Housing

Public Hearing Draft

April 2023

ST. HELENA
CALIFORNIA
HOUSING ELEMENT
2023 - 2031



AFFH Contents

1. Introduction and Overview A-5

1.1 Approach to Analysis A-5

1.2 Fair Housing Methodology A-6

2. Summary of Fair Housing Issues A-9

2.1 Regional Trends A-9

2.2 Local Trends A-9

2.3 Enforcement and Outreach Capacity A-10

3. Segregation and Integration Patterns and Trends A-14

3.1 Race and Ethnicity A-14

3.2 Persons with Disabilities A-15

3.3 Familial Status A-25

3.4 Household Income A-37

3.5 Racially and Ethnically Concentrated Areas of Poverty A-45

3.6 Disparities in Access to Opportunities A-52

3.7 Disproportionate Housing Needs A-74

4. Local Area of Knowledge A-99

4.1 Stakeholder Input A-99

5. Sites Inventory Analysis A-102

5.1 Opportunity Areas A-102

5.2 Improved Conditions A-103

6. Contributing Factors A-107

Tables

Table 1 Domains and List of Indicators for Opportunity Maps A-8

Table 2 Fair Housing Organizations Active in Napa County A-11

Table 3 Racial/Ethnic Dissimilarity Trends (Napa County) A-15

Table 4 Household Type and Tenure (Napa County) A-25

Table 5 Household Type and Tenure (St. Helena) A-27

Table 6 Tenure by Household Type and Presence of Children (St. Helena) A-27

Table 7 Housing Cost Burden of Lower-Income Households (2014-2018) A-85
Table 8 Substandard Housing Units (2019) A-89
Table 9 Overcrowding by Tenure A-91
Table 10 Proposed Sites Inventory Housing Unit Allocation A-103
Table 11 Factors that Contribute to Fair Housing Issues A-107

Figures

Figure 1 Percent of Total Non-White Population (Napa County) A-17
Figure 2 Percent of Total Non-White Population (St. Helena) A-18
Figure 3 Predominant Populations (St. Helena) A-19
Figure 4 Percent of Population with a Disability (Napa County) A-20
Figure 5 Disability by Type (St. Helena) A-21
Figure 6 Percentage of Population with One or More Disabilities (St. Helena) A-23
Figure 7 Children in Married-Couple Households (Napa County) A-29
Figure 8 Female Headed Households with Children, No Spouse/Partner Present (Napa County) A-30
Figure 9 Population of Adults Living with Spouse/Partner (Napa County) A-31
Figure 10 Population of Adults Living Alone (Napa County) A-32
Figure 11 Children in Married-Couple Households (St. Helena) A-33
Figure 12 Female Headed Households with Children, No Spouse/Partner Present (St. Helena) A-34
Figure 13 Population of Adults Living with Spouse/Partner (St. Helena) A-35
Figure 14 Population of Adults Living Alone (St. Helena) A-36
Figure 15 Median Household Income (2015-2019) A-38
Figure 16 Median Household Income (Napa County) A-41
Figure 17 Low and Moderate Income Population (Napa County) A-42
Figure 18 Median Household Income (St. Helena) A-43
Figure 19 Low to Moderate Income Population (St. Helena) A-44
Figure 20 Areas of High Poverty (Napa County) A-47
Figure 21 Poverty Status (St. Helena) A-48
Figure 22 Neighborhood Segregation (St. Helena) A-49
Figure 23 Racially Concentrated Areas of Affluence (Napa County) A-55
Figure 24 Racially Concentrated Areas of Affluence (St. Helena) A-56
Figure 25 Predominant White Population (Napa County) A-57

Figure 26 Predominant Populations and Median Household Income (St. Helena) A-58
Figure 27 Walkability Index (St. Helena) A-61
Figure 28 TCAC Opportunity Areas – Education Outcomes (Napa County) A-65
Figure 29 TCAC Opportunity Areas – Education Outcomes (St. Helena) A-66
Figure 30 TCAC Opportunity Areas – Economic (Napa County) A-69
Figure 31 TCAC Opportunity Areas – Economic (St. Helena) A-70
Figure 32 Job Proximity Index (St. Helena) A-71
Figure 33 CalEnviroScreen 4.0 Percentile Scores (Napa County) A-77
Figure 34 TCAC Opportunity Areas – Environment (Napa County) A-78
Figure 35 CalEnviroScreen 4.0 Percentile Scores (St. Helena) A-79
Figure 36 TCAC Opportunity Areas – Environment (St. Helena) A-80
Figure 37 Overpayment By Renters (Napa County) A-81
Figure 38 Overpayment By Homeowners (Napa County) A-82
Figure 39 Overpayment By Renters (St. Helena) A-83
Figure 40 Overpayment By Homeowners (St. Helena) A-87
Figure 41 Housing Stock Age (2015-2019) A-89
Figure 42 Overcrowded Households (Napa County) A-93
Figure 43 Overcrowded Households (St. Helena) A-94
Figure 44 Sensitive Communities (Napa County) A-97
Figure 45 Sensitive Communities (St. Helena) A-98
Figure 46 Mortgage Applications and Acceptance by Race A-101
Figure 47 Location of Sites Inventory in Relation to TCAC/HCD Opportunity Areas A-105


1468

1. Introduction

In 2018, the California State Legislature passed Assembly Bill (AB) 686 to expand upon fair housing requirements and protections outlined in the Fair Employment and Housing Act. The law requires all State and local public agencies to facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns of segregation to foster more inclusive communities. AB 686 created new requirements that apply to all housing elements due for revision on or after January 1, 2021. The passage of AB 686 protects the requirement to affirmatively further fair housing within State law.

AB 686 defined "affirmatively further fair housing (AFFH)" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity." AB 686 added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity
- An analysis of segregation patterns and disparities in access to opportunities
- An assessment of contributing factors
- An identification of fair housing goals and actions.[67]

1.1 Approach to Analysis

This AFFH analysis is consistent with the 2021 California Department of Housing and Community Development's Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance Memo) which provides guidance on the preparation of housing elements and ensures statutory requirements are satisfied, pursuant to Government Code Section 65583(c)(10).

This AFFH analysis evaluates fair housing issues on the following topics:

1. Fair Housing Enforcement and Outreach Capacity
2. Integration and Segregation Patterns and Trends
3. Racially and Ethnically Concentrated Areas of Poverty
4. Disparities in Access to Opportunity
5. Disproportionate Housing Needs

[67] *Housing and Community Development (HCD). 2021. https://www.hcd.ca.gov/community-development/affh/index.shtml*

6. Other Relevant Factors, including historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

Fair housing priorities goals and actions are also provided specific to St. Helena to address as implementation actions for the Housing Element. The goals and actions address the major contributing factors for the topics above.

1.2 Fair Housing Methodology

The California Government Code Section 65583 (10)(A)(ii) requires cities and counties to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

To conduct this analysis, the City utilized data from a variety of sources, including:

- The Housing and Community Development (HCD) AFFH Data Viewer
- AFFH Segregation Report by ABAG
- Napa Sonoma Collaborative
- Urban Displacement Project (UDP)
- U.S Housing and Urban Development (HUD)
- CalEnviroscreen
- California Tax Credit Allocation Committee (TCAC)
- The Comprehensive Housing Affordability Strategy (CHAS)
- US Census American Community Survey (ACS)
- AllTransit
- Walk Score

Additionally, the analysis includes input from sources of local knowledge, including special needs groups, housing advocacy organizations, housing and services providers, and residents.

1.2.1 Housing and Community Development's AFFH Viewer

The AFFH Data Viewer is a tool developed by HCD that features census block group and tract level data from an expansive collection of sources including ACS, HUD, TCAC, UDP, and CHAS. The Data Viewer tool serves as a resource for local and regional governments and provides the ability to explore spatial data patterns concerning fair housing enforcement, segregation and integration, racially and ethnically concentrated areas of poverty, and disparities in access to opportunities and housing. The Data Viewer is

intended to assist in the creation of policies that alleviate disparities, combat discrimination, and increase access to safe and affordable homes.

1.2.2 AFFH Segregation Report

The University of California, Merced and STIR Labs, on behalf of ABAG, prepared reports for jurisdictions in California studying segregation patterns and current land use policies that correlate with patterns of racial segregation. The report for St. Helena addresses racial and income segregation using the racial isolation index, racial dissimilarity index, and Thiel's H-Index at the neighborhood level within and regional level.

1.2.3 Napa Sonoma Collaborative

The Napa Sonoma Collaborative (NSC) is a collaboration between Napa and Sonoma Counties that aims to address housing challenges within the region. NSC is made up of housing staff from jurisdictions within Napa and Sonoma Counties and is working to raise awareness and increase participation in the Housing Element update process. The collaborative conducted outreach to gather information on fair housing issues within local communities and discuss constraints to affordable housing.

1.2.4 Urban Displacement Project (UDP)

The UDP was developed to track neighborhood change and identify areas that are vulnerable to gentrification and displacement in California. Indicators of gentrification and displacement are measured at the census tract level based on data from the 2015 ACS. UDP indicators examine census tracts to identify areas that qualify as disadvantaged neighborhoods. Additionally, census tracts identified as disadvantaged neighborhoods by UDP's criteria are further analyzed to explore changes in the percentage of college educated residents, non-Hispanic White population, median household income, and median gross rents over time to determine levels of gentrification and displacement risk.

1.2.5 CalEnviroscreen

The California Office of Environmental Health Hazard Assessment developed a screening methodology to identify communities disproportionately burdened by multiple sources of pollution. This tool, called the California Communities Environmental Health Screening Tool (CalEnviroScreen), utilizes existing environmental, health, and socioeconomic data to rank census tracts based on 20 distinct indicators. In general, if a community has a high score for that indicator, it is more impacted by pollution burdens and population vulnerabilities compared to other communities. Designated disadvantaged communities are those with CalEnviroScreen percentile scores of 75 or higher, meaning that they scored within the highest 25 percent of census tracts across California. There are no disadvantaged communities in St. Helena.

1.2.6 California Tax Credit Allocation Committee (TCAC)

HCD and the TCAC created the California Fair Housing Task Force to provide research, evidence based policy recommendations, and other strategic recommendations to HCD and other related state

agencies/departments to further the fair housing goals.[68] The Task Force created the AFFH Data Viewer, an interactive mapping tool to assess population and housing characteristics related to fair housing and access to opportunity to aid in the development of policy for the promotion of equitable and inclusive communities. The data viewer includes Opportunity Maps made from composite scores of three different domains made up from a set of indicators data shown in Table 1. The Opportunity Maps include a measure or "filter" to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- **Poverty Status.** Census tracts with at least 30 percent of population that earned an income that was below the federal poverty level.
- **Racial Segregation.** Census tracts with a location quotient that is higher than 1.25 for Black, Hispanic, Asians, or all non-White populations in comparison to the county.

Table 1 Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty, Adult Education, employment, Job proximity, median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency, reading proficiency, high school graduation rates, student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020

1.2.7 AllTransit

AllTransit is an online database that details transit opportunity for communities. The website explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The AllTransit performance score explores metrics that reveal the social and economic impact of transit, such as connectivity, access to jobs, and frequency of service.

1.2.8 Walk Score

Walk Score provides walkability services and apartment search tools to addresses across the United States, with the mission "to promote walkable neighborhoods." Walk Score measures walkability by assigning a numerical walkability score based on distance to amenities within a 30-minute walk and evaluates pedestrian friendliness by analyzing population density and road metrics, including block length and intersection density.

[68] *Office of The State Treasurer (STO). 2021. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf*

1.2.9 Community Engagement and Outreach

As part of the Housing Element Update, the City implemented a community engagement program, soliciting input from the general public, housing stakeholders, and City decision makers. Results and feedback obtained during the community engagement program have been incorporated into the Housing Element, including this section on affirmatively furthering fair housing practices. Please see Chapter 1 for more details on the City's outreach efforts.

2. Summary of Fair Housing Issues

This summary guides the prioritization of contributing factors to fair housing issues and the creation of goals and actions to address these issues. Fair housing issues are conditions that restrict fair housing choice or access to opportunity in the geographic area of interest. Fair housing choice means realistic housing opportunities exist, can be accessed without discrimination towards protected characteristics such as race, color, religion, sex, disability, etc., and are informed with adequate information regarding options.

2.1 Regional Trends

Impediments to fair housing within Napa County, and the Bay Area as a whole, include the following:

- Residential segregation between White residents and non-White residents has increased in the last decade.
- Areas with higher percentages of non-White residents generally have less access to proficient schools, jobs, and cleaner air and water.
- Median rental prices rose an approximately $483 (unadjusted for inflation) since 2009, from $1,087 to $1,570, an increase of 44.4 percent in a 10-year period.
- The average home value increased from approximately $319,926 to $768,414 in less than 20 years, from 2001 to 2020 (unadjusted for inflation).
- Housing Choice Voucher holders and those with disabilities often find it difficult to find an appropriate housing unit based on located a unit of appropriate size and/or cost.
- Disability, race, and familial status are the most common bases of housing discrimination complaints forwarded to the California Department of Fair Employment and Housing and the Office of Fair Housing and Equal Opportunity.

2.2 Local Trends

Contributing factors identified as impediments to fair housing in St. Helena are discussed in detail below and include descriptions of how each impediment is addressed in this Housing Element.

2.2.1 Concentrations of Lower- and Moderate-Income Earning Populations

HUD defines a Lower and Moderate Income (LMI) area as a census tract or block group where over 51 percent of the population earn an income that is considered lower or moderate relative to the area median income. In St. Helena, residents with low and moderate household incomes are concentrated in the eastern portion of the city. The Housing Element ensures available land to accommodate all income levels on sites located across the city. Efforts to combat this impediment are outlined in Programs H-A, H-B, H-N, H-O, H-R, H-U, H-V, H-W and H-OO, which focus on maintaining an inventory of sites suitable for residential development and prioritize and incentivize housing development for lower- and moderate-income residents in the western portion of the city.

2.2.2 Insufficient Housing Stock for Farmworkers

Farmworker housing is a critical need in Napa County and St. Helena due to the presence of year-round agricultural production. The migratory and sometimes seasonal nature of farm workers pose housing challenges for a community and are seen as an impediment for St. Helena as the City tries to house its entire population. Efforts to combat this impediment are outlined in Programs H-E, H-H, H-I, and H-KK, which work to support regional and City farmworker housing efforts, including creating incentives and fast-tracking development for workforce/farmworker housing.

2.2.3 Lack of Affordable Housing Types

There is a lack of diversity in housing types that restricts development of affordable housing in St. Helena. Local land use and zoning regulations perpetuate this deficiency by limiting the form of housing that can be developed on a particular site. Much of the residentially zoned parcels within the city are zoned low and moderate density residential and are not compatible with the construction of duplexes, triplexes, quadplexes and multifamily housing developments. The City is upzoning a number of parcels as a part of the Housing Element Update to allow higher density residential development. Efforts to combat this impediment are outlined in Programs H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-N, H-P, H-Q, H-V, H-X, H-AA, H-DD, H-EE, H-FF, H-GG, H-LL, H-NN, and H-OO, which focus on maintaining an inventory of sites suitable for residential development, updating municipal code for developing workforce/farmworker housing, ADUs, housing for disabled and homeless persons, and non-traditional housing types, increasing development density, and fast-tracking housing development.

2.3 Enforcement and Outreach Capacity

Fair housing enforcement and outreach capacity is the ability of a local jurisdiction and fair housing agencies to distribute fair housing and tenants' rights information to their community. Enforcement and outreach capacity also includes the ability to address compliance with fair housing laws, such as investigating complaints, resolving issues, and conducting fair housing testing.

2.3.1 Regional Resources

Several organizations in Napa County provide aid for fair housing issues and outreach. Table 2 shows organizations and agencies that collaborate with local governments, including St. Helena to address housing and community needs and provide the following services:

- Housing Need Assessment
- Homelessness Needs
- Market Analysis
- Fair housing testing and complaints
- Fair housing counseling and education
- Tenant/landlord counseling and mediation
- Homeless prevention program
- Rental assistance program
- Rent/deposit grant program
- Home seeking services
- Shared housing counseling placement
- Homebuyers' education learning program

Table 2 Fair Housing Organizations Active in Napa County

Organization	URL	Phone Number
Abode Services	https://www.abodeservices.org/napa-county	(510) 657-7409
Bay Area Legal Aid (BALA)	https://baylegal.org/	(800) 551-554
CA Department of Fair Employment and Housing	https://www.dfeh.ca.gov/	(800) 884-1684
EAH Housing	https://www.eahhousing.org/	
Fair Housing Advocates of Northern California (FHANC)	https://www.fairhousingnorcal.org/	(415) 457-5025
Fair Housing Napa Valley (FHNV)	https://napafairhousing.org/	(707) 224-9720
Napa Continuum of Care	https://homelessnapa.com/	
Napa County Housing and Homeless Services Division	https://www.countyofnapa.org/272/Homeless-Services	(707) 271-7818
Napa Valley Community Housing	https://nvch.org/	(707) 253-6140
North Bay Housing Coalition	https://www.northbayhousingcoalition.org/	(707) 289-7000

Source: City of Napa AI, 2020; Napa Sonoma Collaborative Fair Housing Enforcement, Outreach Capacity and Resources, 2022

2.3.2 Local Resources

The City of St. Helena contracts with the non-profit organization Fair Housing Napa Valley (FHNV), a regional non-profit fair housing agency, to assist residents with fair housing counseling services, connections to rental assistance and homelessness prevention programs, and to conduct fair housing testing. FHNV assists residents and landlords throughout the city, providing mediation, investigation, and referral services. In addition to the fair housing services provided by active organizations, the Napa County Housing Authority administers the Housing Choice Voucher program for St. Helena and other jurisdictions in the county.

The City complies with existing fair housing laws and regulations. The City does not place more scrutiny or deny projects or individuals of their right to tenancy, residence, or entitlement based on memberships of protected class, in compliance with Government Code section 65008. Implementation of the 6th Cycle Housing Element would bring the City's adopted regulations and policies into compliance with other fair housing regulations such as Program H-F which would bring density bonus provisions into compliance and allow for greater incentives for affordable housing. The City is also proposing updates to their existing Inclusionary Ordinance to promote more housing choices for residents.

2.3.2.1 Ability to Address Complaints

The Department of Justice's Civil Rights Division initiated fair housing testing in 1991. This is a technique used to uncover evidence of discrimination in rental housing. Fair housing testing involves one or more individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, State, and federal fair housing laws. Enforcement actions may be taken when investigations yield evidence of a pattern or practice of illegal housing discrimination. Testing may be initiated following the filing of a specific housing discrimination complaint or, as is the case when testing for disability discrimination, as part of an overall effort to determine whether the design or architectural features of a specific rental facility comply with state and federal accessibility requirements. In Napa County, fair housing testing is used to identify unlawful housing discrimination practices based on the real or perceived race, ethnicity, color, religion, gender identity or expression, national origin, disability, familial status, marital status, age, ancestry, sexual orientation, and source of income of prospective renters. Fair Housing Napa Valley conducts fair housing testing of rental properties to assess how well rental properties are conforming to fair housing laws, assists residents in filing fair housing complaints, provides education and technical assistance to housing providers, and provide conciliation services for tenants and landlords.

The Department of Fair Employment and Housing (DFEH) maintains a record of housing discrimination complaints filed in local jurisdictions. From 2015 - 2019, 256 fair housing complaints originating in Napa County were filed with DFEH. Overall, disability-related discrimination comprised the largest proportion of cases (56 percent). The next highest basis for discrimination were race and familiar status, comprising nearly 8 percent each. According to the HCD AFFH Data Viewer, no fair housing inquiries for the City of St. Helena were received between 2013 and 2021. Fair housing inquiries are comments or questions related to fair housing received by HUD's Office of Fair Housing and Equal Opportunity (FHEO), not formal

discrimination complaints. The lack of inquiries is low for the region, as seen when compared to the cities of Santa Rosa (received 61), Sonoma (received 8), and Napa (received 33).

2.3.3 Findings, Lawsuits, and Enforcement Actions

There are currently no active fair housing lawsuits or enforcement actions in the city. However, historically, low-income and minority populations have struggled to procure affordable housing opportunities in the city. In addition, residents have challenged the City for not doing enough to combat housing segregation issues between the western and eastern portions of the city.

In 2013, the City of St. Helena signed a settlement agreement with Esvin Calderon as well as other residents and fair housing providers who had filed a lawsuit against the City on the basis that the City "promoted or maintained policies, practices, or actions that had the purpose of effect of displacing or excluding Latino residents and low-income residents from the City". According to the settlement the City would comply with a list of requirements that would promote the development of affordable housing units in the city, including depositing $500,000 to the City's Affordable Housing Trust Fund and amending the St. Helena Municipal Code to support and prioritize affordable housing development, and to host fair housing workshops in collaboration with Napa Valley Fair Housing.

In 2016, St. Helena Residents For An Equitable General Plan, the McCorkle East Side Neighborhood Group, and the Protect the St. Helena Vineyard Riverwalk Community Group filed a claim with the City citing that the city is "a segregated city, with an affluent White west and diverse east side where most Hispanics, seniors, and members of other protected groups live largely in a concentrated area near the Napa River."

The City is in the process of adopting a new Zoning Ordinance to be consistent with the 2040 General Plan, which would permit duplexes and triplexes within the MR District (see Program H-N). This would create additional housing choices and affordability levels in the MR Districts on the western side of the city. In addition, several programs, including H-BB, H-EE, and H-XX would implement placemaking strategies to outreach and work with the more diverse and older populations living in the east due to the historic development patterns.

3. Segregation and Integration Patterns and Trends

To inform priorities, policies, and actions, the housing element must include an analysis of integration and segregation, including patterns and trends. Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability in a specific geographic area. Segregation generally means the opposite condition, in which there is a high concentration of the characteristics described above in a specific geographic area. To adequately assess the patterns of integration and segregation, this section identifies trends at the regional scale (Napa County) and at the local scale (St. Helena).

3.1 Race and Ethnicity

The ethnic and racial composition of a community relates to other housing characteristics including household size, locational preference, and economic opportunity. Additionally, race/ethnicity is a known contributor to unfair housing practices. Historical patterns of racial/ethnic segregation were results of governmental policies from the federal to local level that promoted exclusionary actions and disparate treatment of people of color such as redlining, racially restrictive covenants, and mortgage lending practices. The existence of concentrations of minorities living in one location may be an indicator that some minority groups do not have as many housing choices as non-minority residents.

3.1.1 Regional Trends

Regionally, the urbanized areas of Napa County are more diverse, with a minimum of 40 percent of the population consisting of non-White residents, as demonstrated in the geographic depiction of 2014-2018 ACS data shown in Figure 1. Comparatively, populations in the less urbanized and less densely populated areas of Napa County are generally more predominantly White with populations consisting of about 60 percent or greater of White residents.

HUD utilizes the racial/ethnic dissimilarity index as a measure of segregation. The racial/ethnic dissimilarity index represents the extent of which any two racial/ethnic groups differ across a defined geographical area. The index ranges from 0-100, where 0 represents perfect integration between the two racial/ethnic groups and 100 representing perfect segregation. An index value below 40 is generally considered low segregation, a value between 40 and 54 is considered a moderate level of segregation, and a value above 55 is a high level of segregation.[69] Racial/ethnic segregation in Napa County slightly increased between 2010 and 2019. Table 3 shows racial/ethnic segregation in Napa County using the dissimilarity index using data from HUD's AFFH mapping tool. Black and Asian/Pacific Islander residents are the most segregated compared to other racial and ethnic groups. Segregation between Black and White residents and between Asian/Pacific Islander and White residents is high, since their racial dissimilarity index scores are above 55 for 2019. Segregation between Non-White and White residents and between Hispanic and White residents

[69] *HUD, 2020. https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf*

is considered low, since their racial dissimilarity index scores are below 40 for 2019. In Napa County, there has been an increase in segregation across all measured racial/ethnic groups between 2010 and 2019.

Table 3 Racial/Ethnic Dissimilarity Trends (Napa County)

Racial/Ethnic Dissimilarity Index	1990	2000	2010	2019
Non-White/White	19.58	26.18	31.24	36.84
Black/White	56.22	52.61	58.76	67.86
Hispanic/White	21.86	28.94	30.13	35.61
Asian or Pacific Islander/White	37.11	38.97	57.35	64.47

Source: Affirmatively Furthering Fair Housing Mapping Tool – Table 3, Version AFFHT0006, 2022

3.1.2 Local Trends

St. Helena is more diverse compared to rural areas of Napa County, which are predominantly White, and less diverse than the cities of Napa and American Canyon. According to 2015-2019 ACS estimates, White residents comprise the largest racial/ethnic group in St. Helena, followed by Hispanic/Latino residents. The predominant population throughout the entire city is White, as shown in Figure 3. The northwest area of the city has the highest predominance of White residents, although the southeast area of the city is predominantly White as well. The eastern areas of the city have the largest non-White populations, as shown in Figure 3.

3.2 Persons with Disabilities

Persons with disabilities include those with a physical or mental impairment including hearing, vision, mobility, cognitive function. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs as required under federal civil rights law, including equitably provided disability-related services that an individual needs to live in such housing. For example, persons with disabilities who are unable to use stairs or need a zero-step shower may not have actual housing choice without the presence of housing units with these accessibility features.[70]

High spatial segregation of persons with disabilities may indicate fair housing issues related to both physical needs and economic disparities. According to the *2020 Annual Report on People with Disabilities in America*, more than 25 percent of persons with disabilities (including physical, intellectual, and developmental; sensory; and other disability categories) live below the Census Bureau-designated poverty line, which is 14.5 percentage points higher than people without a disability.[71] Persons with disabilities may be more reliant than persons without disabilities on fixed incomes or access to public transit.

[70] *HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf*
[71] *The Rehabilitation Research and Training Center on Disability Statistics and Demographics. 2020. https://disabilitycompendium.org/annualreport*

3.2.1.1 Regional Trends

According to 2015-2019 ACS estimates, a total of 16,244 Napa County residents had one or more disabilities, which represents approximately 11.8 percent of the county's total population. Figure 4 shows the percentage of the population living with one or more disabilities throughout Napa County. The western areas of the county, which includes the urban areas of the cities, have higher concentrations of persons living with one or more disabilities compared to the eastern areas of the county. The southeastern area of the City of Napa has the highest concentration of persons living with one or more disabilities in the county.

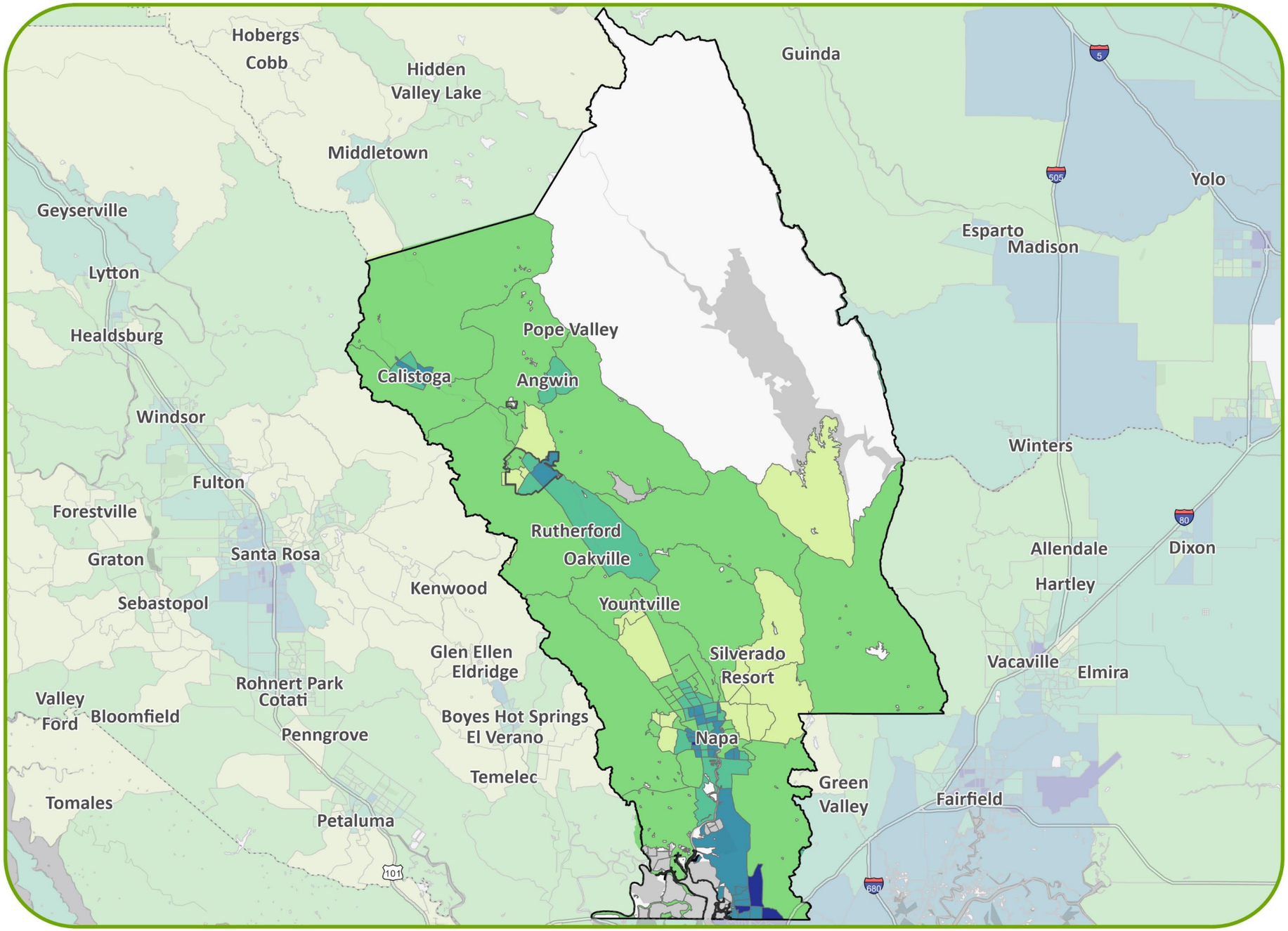


Figure 1:
Percent of Total Non-White Population (Napa County)

City Boundary
County Boundary
(R) Racial Demographics (2018) - Block Group
Percent of Total Non-White Population
≤ 20%
21 - 40%
41 - 60%
61 - 80%
> 81%

ST. HELENA
CALIFORNIA

0 3 6
Miles
N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

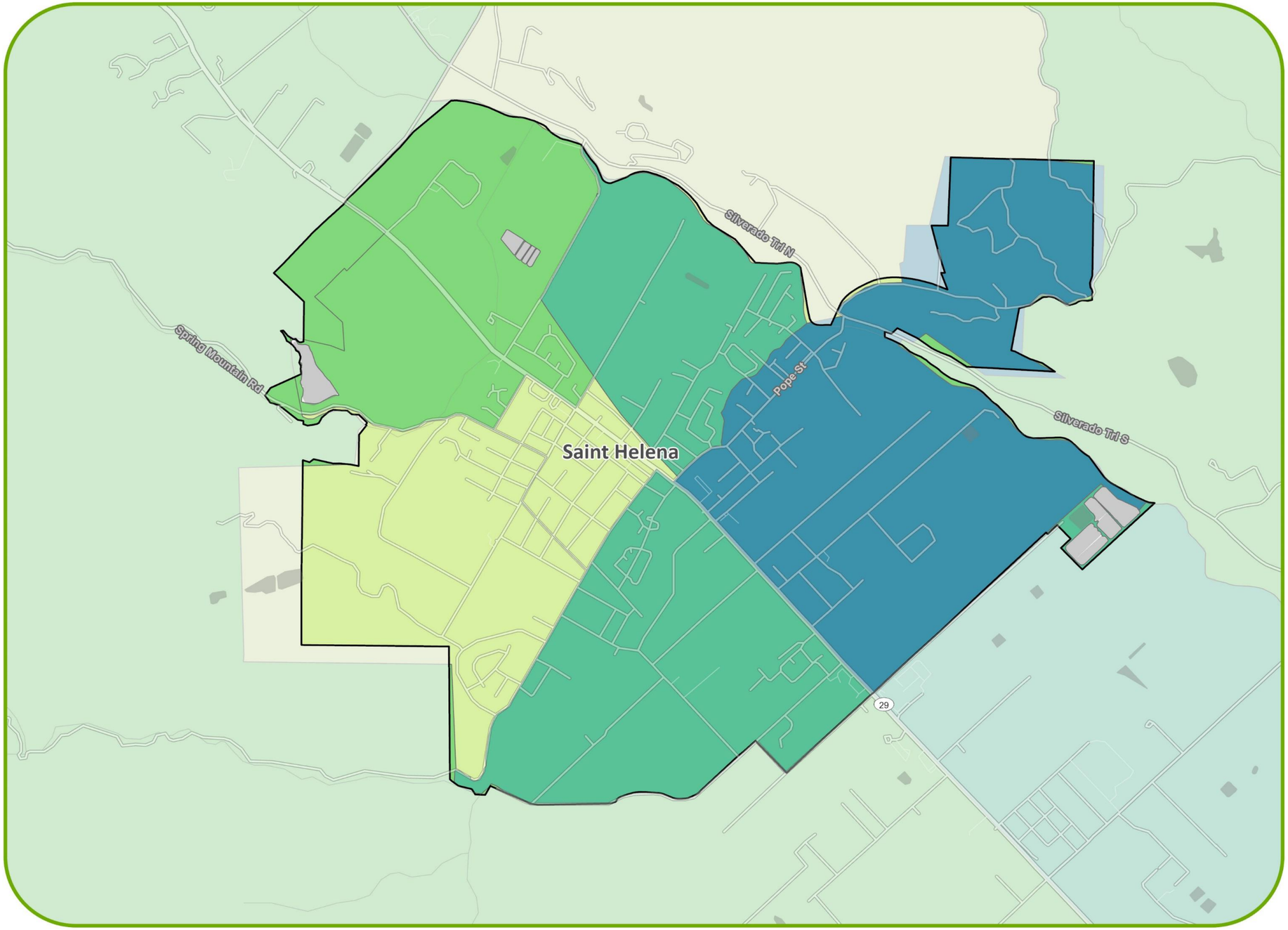


Figure 2: Percent of Total Non-White Population (St. Helena)

City Boundary
(R) Racial Demographics (2018) - Block Group
Percent of Total Non-White Population
- ≤ 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 81%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

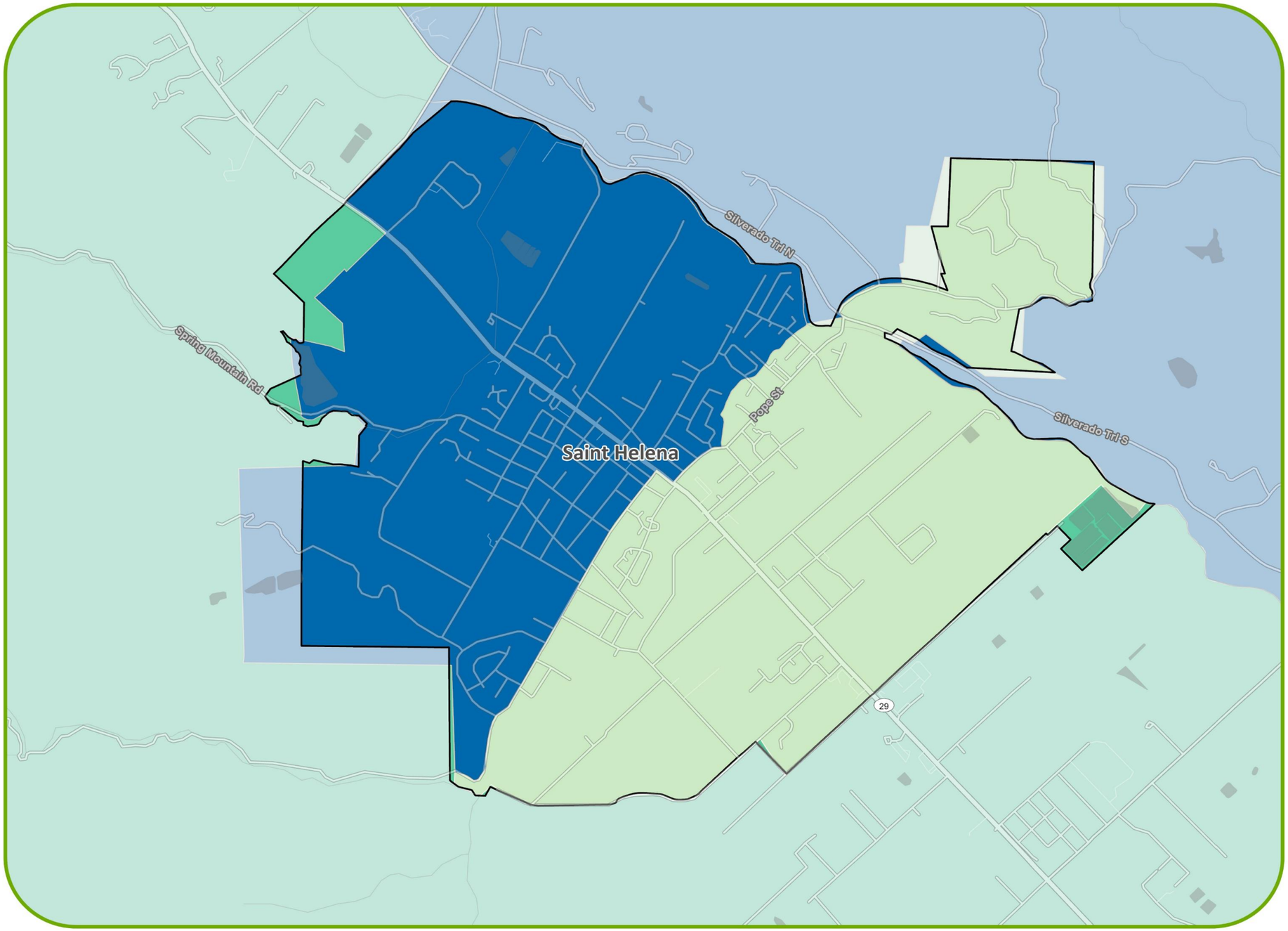


Figure 3:
Predominant Populations (St. Helena)

City Boundary

(R) Predominant Population - White Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - Hispanic Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - Asian Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - African American Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - Native American Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

0 0.2 0.4 Miles

N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

Figure 4 **Percent of Population with a Disability (Napa County)**

Source: AFFH Viewer, 2022

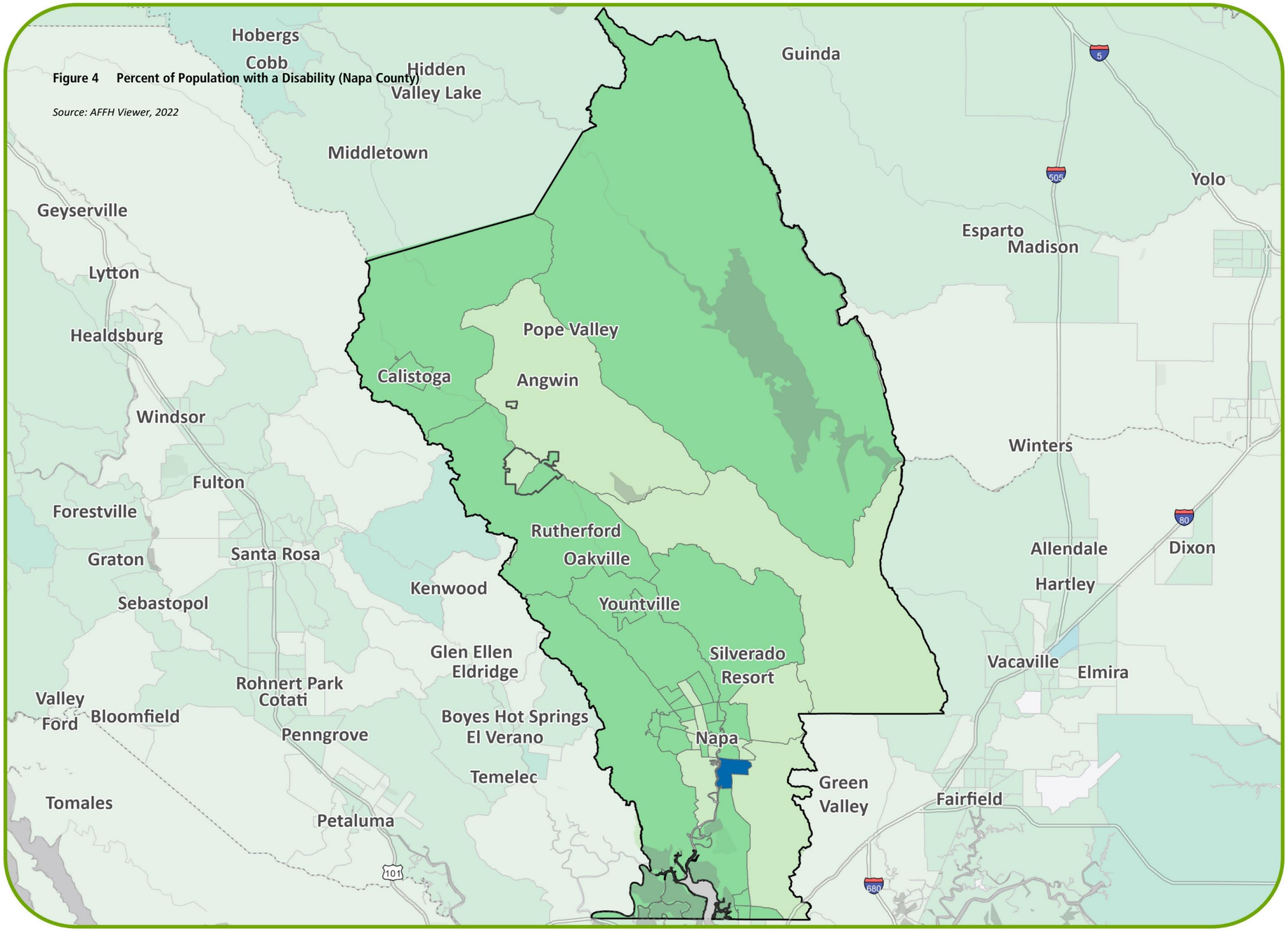


Figure 4: Percent of Population with a Disability (Napa County)

City Boundary
County Boundary
(R) Population with a Disability (ACS, 2015 - 2019) - Tract
Percent of Population with a Disability
< 10%
10% - 20%
20% - 30%
30% - 40%
> 40%

0 3 6 Miles

N

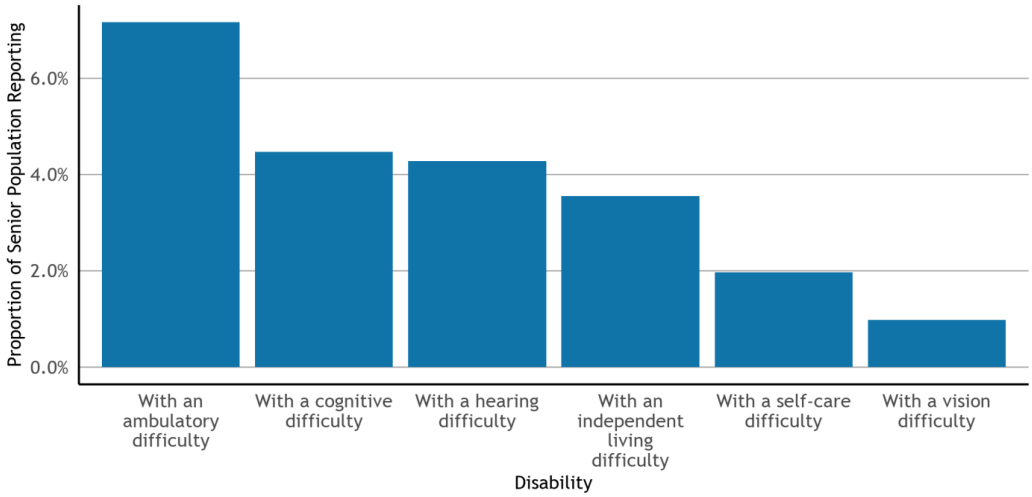
County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

3.2.2 Local Trends

The 2015-2019 ACS estimated a total of 726 residents in St. Helena were living with one or more disabilities, which is approximately 11.9 percent of the total population. Of the 726 individuals living with a one or more disabilities, 466 (64.2 percent) are age 65 or older. The most common type of disability in St. Helena is ambulatory difficulty, defined as those who have serious difficulty walking or climbing stairs, as shown in

Figure 5. Persons with ambulatory disability have specific housing needs and may require housing that is wheelchair accessible or lacks stairs or steps.

Figure 5 Disability by Type (St. Helena)



Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.

Figure 6 highlights the percentage of the population living with one or more disabilities in the city by census tract. The southeastern parts of the city, east of Spring Street and Pope Street, have higher concentrations of residents with one or more disabilities (between 10 and 20 percent living with at least one disability).

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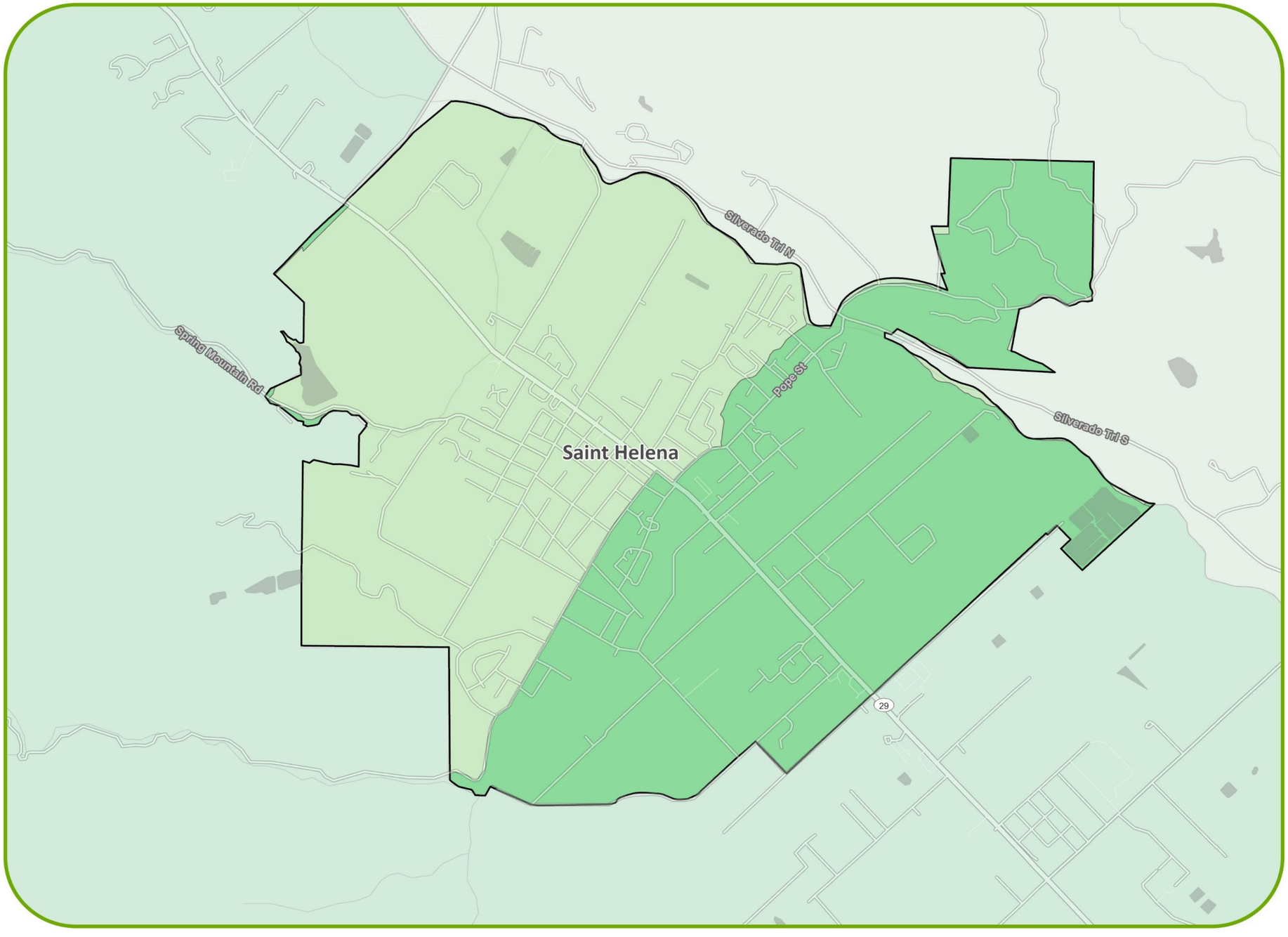


Figure 6: Percentage of Population with One or More Disabilities (St. Helena)

City Boundary
(R) Population with a Disability (ACS, 2015 - 2019) - Tract
Percent of Population with a Disability
< 10%
10% - 20%
20% - 30%
30% - 40%
> 40%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.

Page 326 of 1246

3.3 Familial Status

Familial status refers to families with children under the age of 18, including those with legal custody of a child, pregnant persons, and those in the process of adopting or gaining legal custody. Families with children may face housing discrimination by landlords, including being denied housing due to the presence of children or being subject to special restrictions or fees. Differential treatments such as limiting the number of children in a complex or confining children to a specific location or unit are also fair housing concerns. In a 2016 housing discrimination study, researchers found that compared to households without children, households with children were shown slightly fewer units and were commonly told about units that were slightly larger, and as a result, slightly more expensive to rent.[72] Additionally, female-headed households with children require special consideration and assistance because of generally greater needs for affordable housing and accessible day care, health care, and other supportive services.

3.3.1 Regional Trends

Most households in Napa County are family households, comprising approximately 68 percent of the total 48,705 households in the county. Households with children present comprise 28.1 percent (13,699 households) of the total households or 41.4 percent of all family households in the county. Married couples without children represent 46.9 percent of family households. The majority of family households with children are married couple households with fewer numbers of female and male single parent households. Single-parent households are more often at risk for housing issues because they rely on a single income and may require access to affordable childcare. Table 4 shows a breakdown of household type by tenure (owned versus rented) and presence of children in Napa County. Single-parent households are more likely to rent than own, especially female, single-parent households. There are 1,008 single-parent households that own and 2,323 single-parent households that rent in Napa County.

Table 4 Household Type and Tenure (Napa County)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married Couple Family, with Children Present	6,257	20.0%	4,036	23.2%
Single-Parent, Male Householder, no Spouse Present	383	1.2%	577	3.3%
Single Parent, Female Householder, No Spouse Present	700	2.2%	1,746	10.0%
Total Households with Children Present	7,340	23.5%	6,359	36.5%
Total Households	31,276	100%	17,429	100%

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table B25115 Tenure by Household Type (Including Living Alone) and Age of Householder, 2015-2019 Estimates.

[72] *HUD. 2016. https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf.*

Figure 7 shows the percentage of children in married couple households in Napa County. The less urban areas of the county have higher concentrations of children residing in married couple households while the urban areas have a lower percentage of children residing in married couple households. In most areas of the county the majority of children live in married couple households, however the northern half of the county generally has a higher percentage of children living in married couple households compared to the southern half.

Figure 8 shows the estimated percentage of children in households with a female head of household with no spouse or partner. Urban areas of the county, especially areas of the City of Napa and Town of Yountville, have higher concentrations of children in female single-parent households with between 20 and 40 percent of family households headed by a single parent female. The southern area of the City of Napa has the highest concentration of children in households with a female head of household with no spouse or partner, with between 40 and 60 percent of families headed by a single parent female. Less urban areas of the county, outside of incorporated cities, have less than 20 percent of families headed by a single female.

Figure 9 shows the percentage of adults living with a spouse or partner in Napa County. In most areas of the county 40 to 60 percent of adults are living with a spouse/partner. In areas in the southeast portion of the county, and on the west side of the City of Napa, there is a higher concentration of adults living with a spouse/partner, consisting of approximately 60 to 80 percent of adults.

Figure 10 shows the percentage of adults living alone, with less than 20 percent adults living alone in most areas in Napa County. In several of the more urban areas, specifically portions of the City of Napa, Yountville, and St. Helena, there is a higher concentration of adults living alone (greater than 20 percent).

3.3.2 Local Trends

Approximately 58 percent of the total 2,702 households in St. Helena are family households, as shown in Table 5. The majority of families are married couple families with more renters than homeowners. However, more single-parent households own their home than rent. Table 6 shows the breakdown of families with children by tenure and household type.

Non-family households are the second most common household type; a total of 42 percent of households fall into this category. These are primarily individuals living alone. Female single parent families make up about 10 percent of both owner-occupied units and rented units. Compared to the entire county, St. Helena has a greater percentage of non-family households, especially those living alone.

Table 5 Household Type and Tenure (St. Helena)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Family Households	920	58	586	53
Married couple family	735	46	408	37
Male householder, no spouse present	29	2	63	6
Female householder, no spouse present	156	10	115	10
Non-family households	670	42	526	47
Living Alone	644	41	395	36
Not Living Alone	26	2	131	12
Total Households	1,590		1,112	

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table S2501 Occupancy Characteristics, 2015-2019 Estimates.

Table 6 Tenure by Household Type and Presence of Children (St. Helena)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married Couple Family, with Children Present	164	10.3%	230	20.7%
Single-Parent, Male Householder, no Spouse Present	17	1.1%	11	0.1%
Single Parent, Female Householder, No Spouse Present	114	7.2%	50	4.5%
Total Households with Children Present	295	18.6%	291	26.2%
Total Households	1,590	100%	1,112	100%

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table B25115 Tenure by Household Type (Including Living Alone) and Age of Householder, 2015-2019 Estimates.

The majority of children in St. Helena live in married couple households; however this percentage is less than in rural areas of Napa County. Figure 11 shows the percentage of children in married couple households in St. Helena is between 60 and 80 percent, while more than 80 percent of children in the surrounding rural areas live in married couple households.

Figure 12 shows the percentage of children in female single-parent households in St. Helena. In the northwest areas of St. Helena, 20 to 40 percent of children live in female single-parent households. In the southeast areas of the city less than 20 percent of children live in female single-parent households.

Figure 13 provides estimates regarding the percent of the adult population living with a spouse in St. Helena. Throughout the city, 40 to 60 percent of adults are living with a spouse. Figure 14 shows the

percentage of the adult population living alone in St. Helena. In the western half of the city, 20 to 40 percent of adults live alone while in the eastern half of the city less than 20 percent of adults live alone.

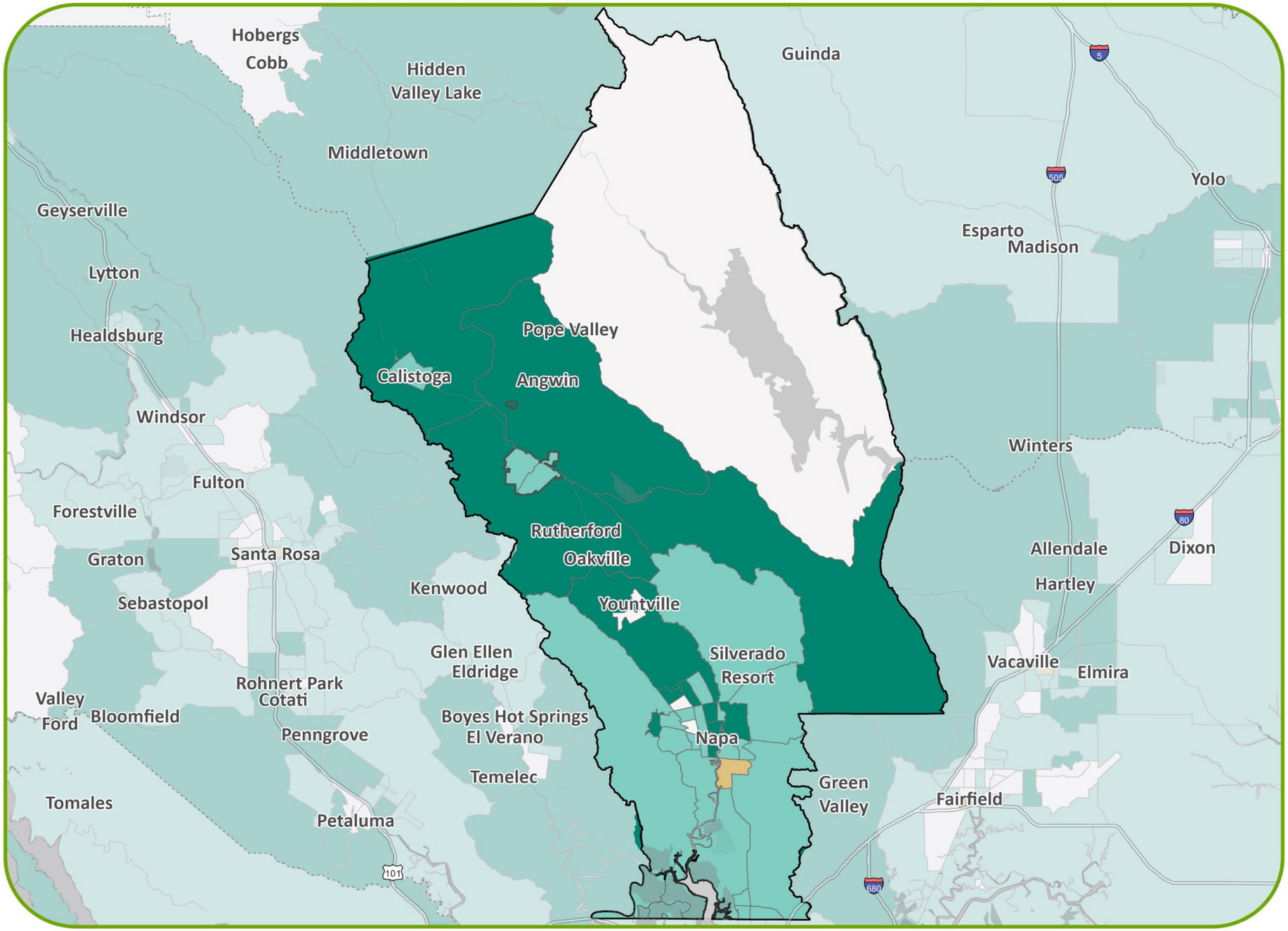


Figure 7: Children in Married-Couple Households (Napa County)

City Boundary
County Boundary
(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract
Percent of Children in Married-Couple Households
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6
Miles
N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

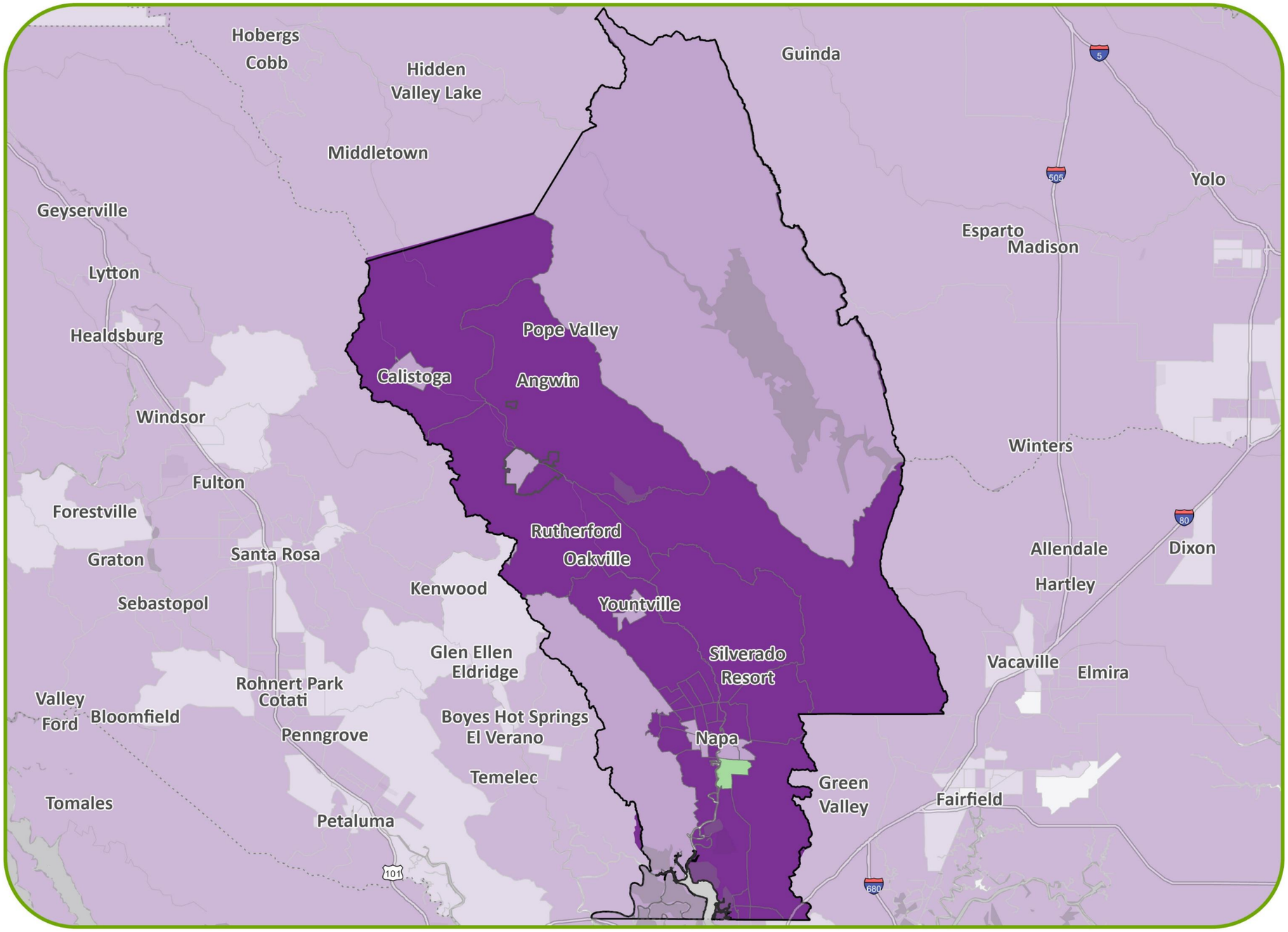


Figure 8: Female Headed Households with Children, No Spouse/Partner Present

City Boundary
County Boundary
(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract
Percent of Children in Female Householder, No Spouse/ Partner Present Households
≤ 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

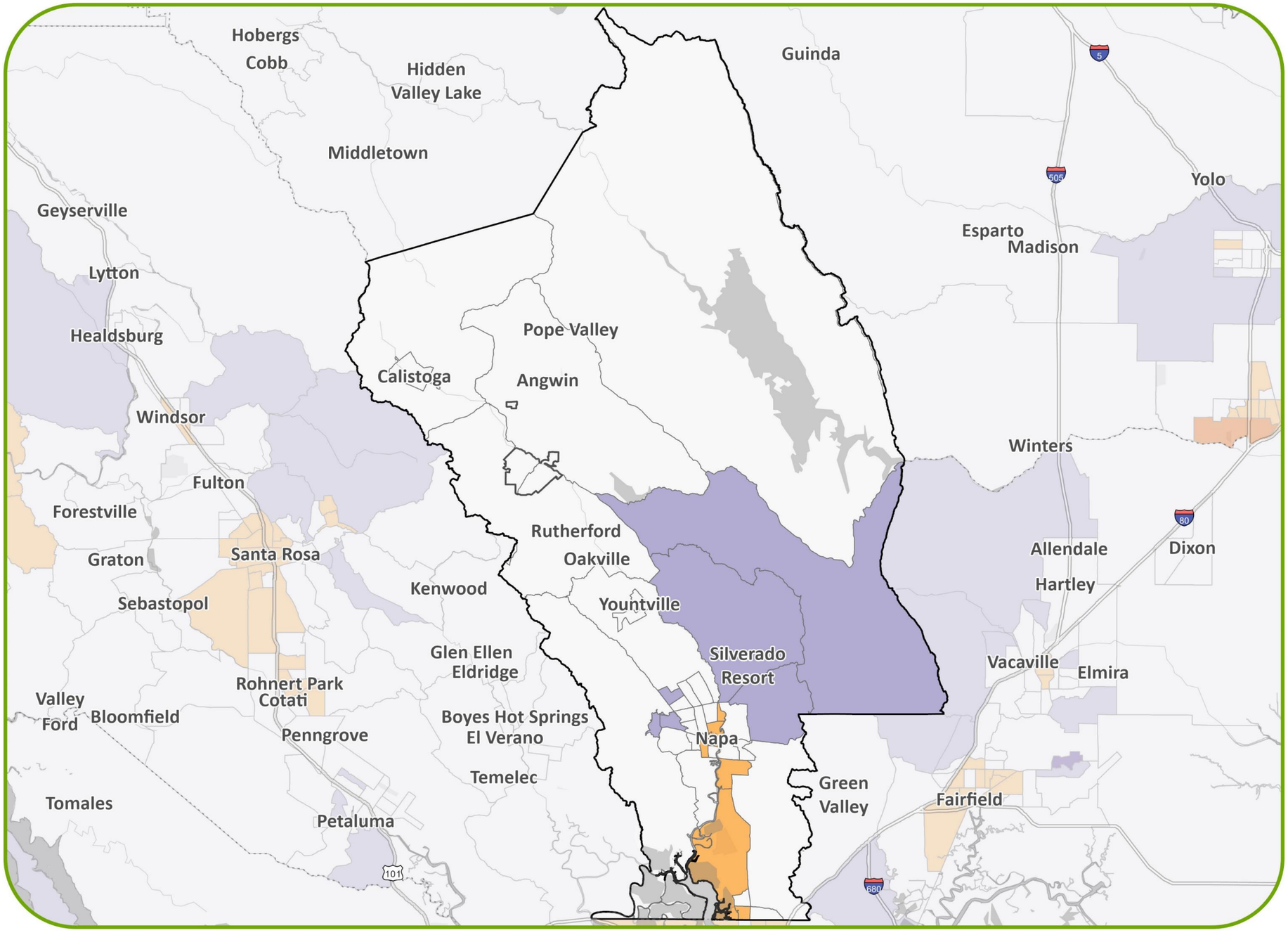


Figure 9: Population of Adults Living with Spouse/ Partner (Napa County)

City Boundary
County Boundary
(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract
Percent of Population 18 Years and Over in Households Living with Spouse
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6 N
Miles

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

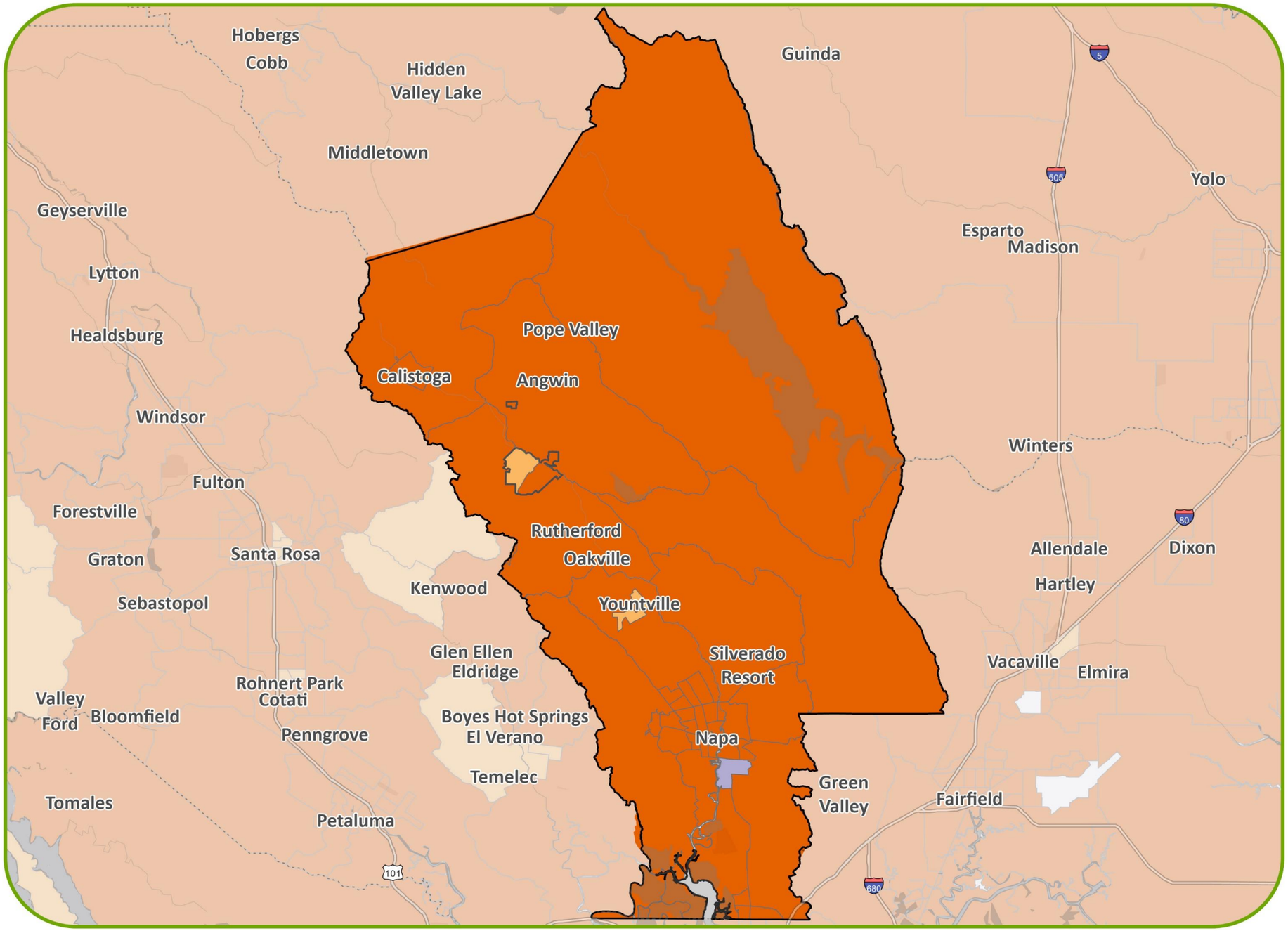


Figure 10: Population of Adults Living Alone (Napa County)

City Boundary

County Boundary

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

Percent of Population 18 Years and Over in Households Living Alone

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

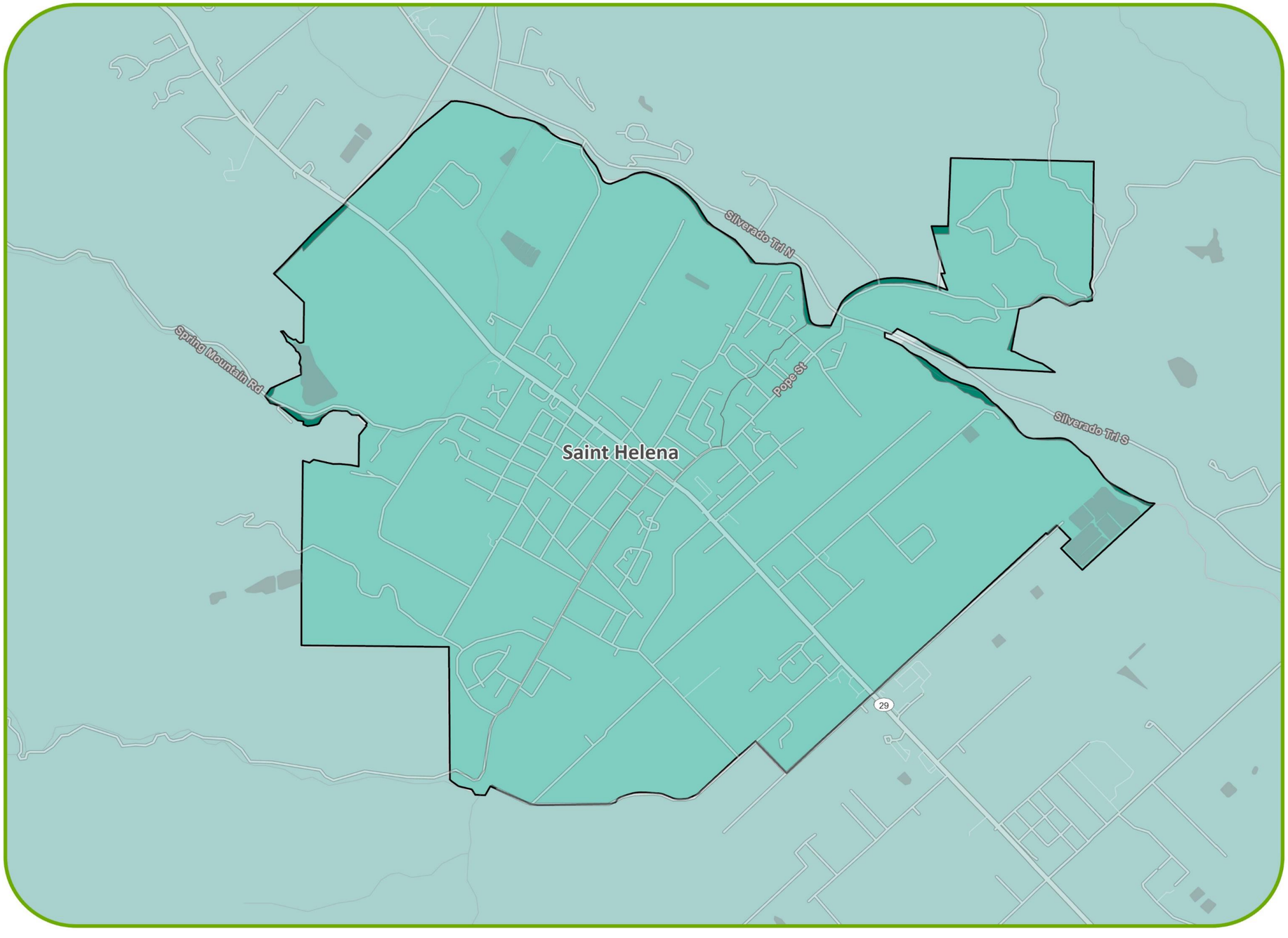


Figure 11: Children in Married-Couple Households (St. Helena)

City Boundary

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

Percent of Children in Married-Couple Households

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles

N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

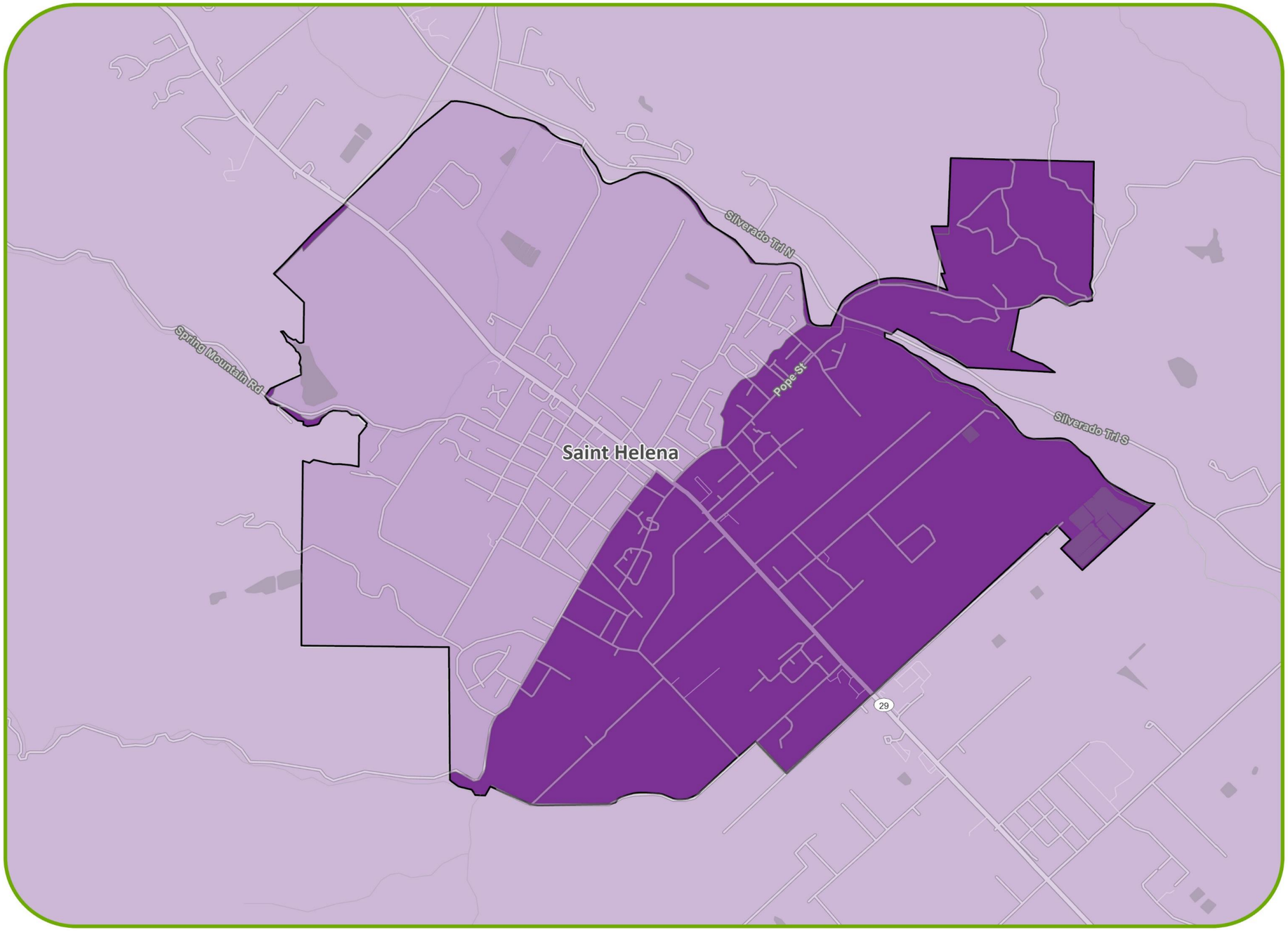


Figure 12: Female Headed Households with Children, No Spouse/ Partner Present (St. Helena)

City Boundary

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

Percent of Children in Female Householder, No Spouse/ Partner Present Households

- ≤ 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.



Figure 13: Population of Adults Living with Spouse/Partner (St. Helena)

City Boundary

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

Percent of Population 18 Years and Over in Households Living with Spouse

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

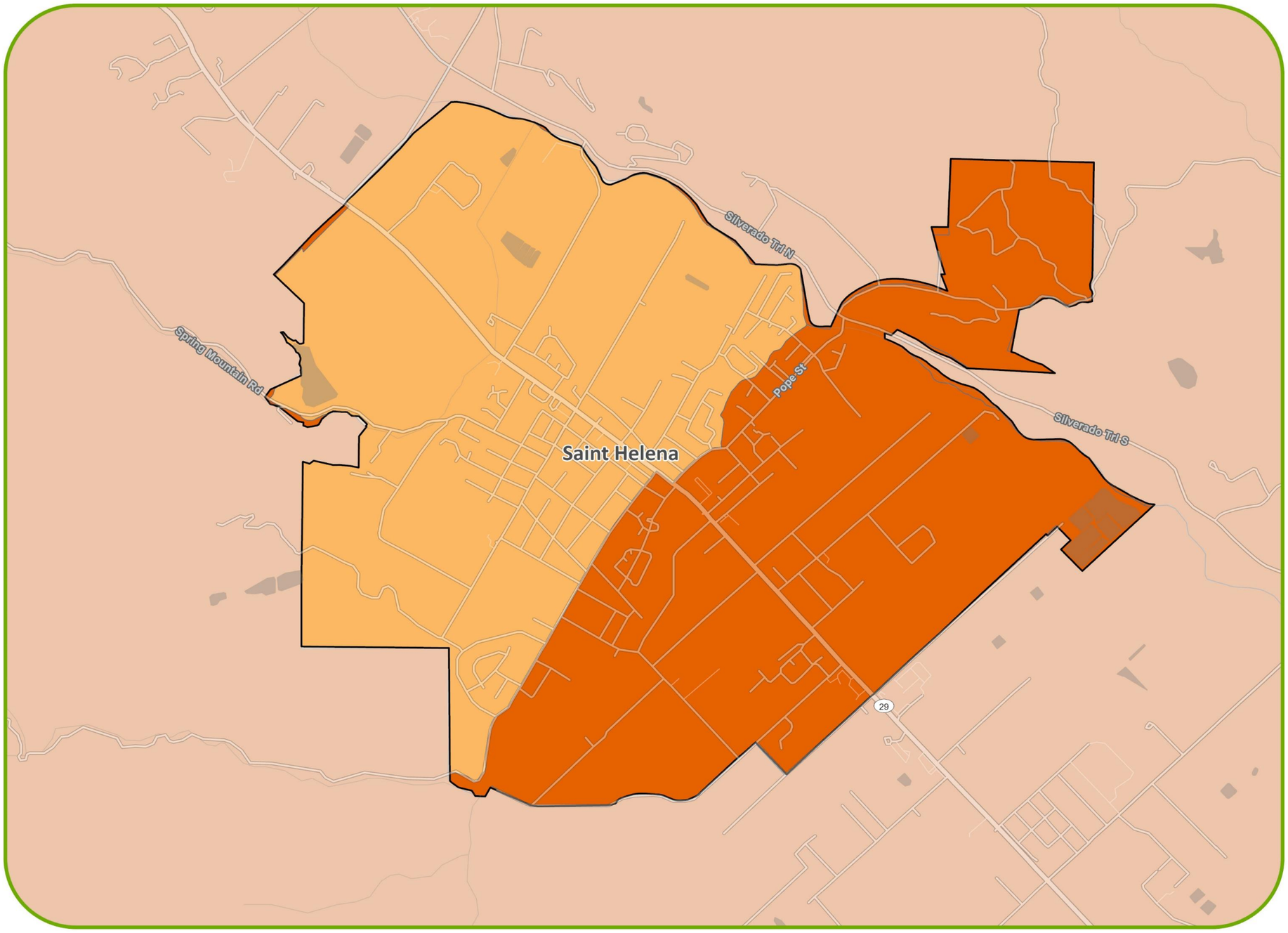


Figure 14: Population of Adults Living Alone (St. Helena)

City Boundary

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

Percent of Population 18 Years and Over in Households Living Alone

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

Overall, the northwest portion of the city has a higher proportion of children living in female single-parent households and a higher proportion of adults living alone compared to the southeast portion of the city. The percentages of children living in married couple households and adults living in with a spouse/partner are high throughout the city.

3.4 Household Income

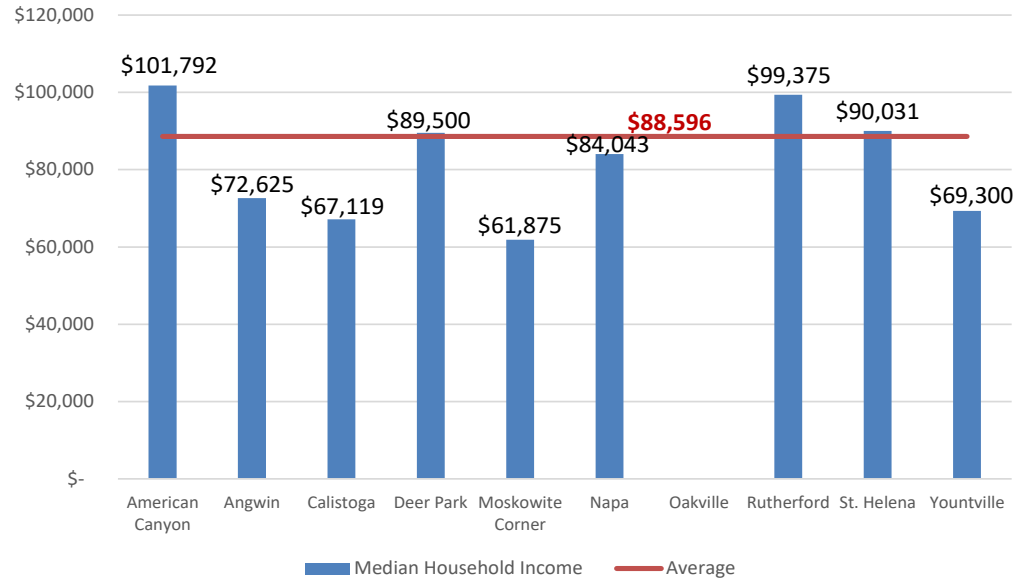
Household income is directly related to the ability to afford housing. Higher income households are more likely to own rather than rent housing. However, as household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of persons occupying unsound and overcrowded housing increases. To achieve fair housing objectives, people in low-income households must have actual choice in housing opportunities – that is, they are able to locate units that are affordable and well maintained in all parts of a jurisdiction and region.

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the area median income).

3.4.1 Regional Trends

The median household income of Napa County is $88,596. LMI areas are concentrated in the more urbanized areas of the county, including the City of Napa, St. Helena, and Calistoga. Rural areas of the county tend to have higher income households. Figure 15 shows the median household income for cities within Napa County.

Figure 15 Median Household Income (2015-2019)



Source: Bureau of the Census, American Community Survey American Community Survey, 2015-2019.

Figure 16 shows median household income by block group using 2015-2019 ACS estimates. Block groups with the lowest median income are the eastern area of St. Helena, the area south of Yountville, and areas within the City of Napa.

LMI populations by census tract for Napa County are displayed in Figure 17. Census tracts within Cities of Napa, St. Helena, and Calistoga have the highest percentages of populations with low to moderate income. These areas are the same areas with the highest percentages of non-White population.

3.4.2 Local Trends

Household incomes in St. Helena tend to be higher than the region as a whole, with a median income of $90,031 compared to the median household income of Napa County ($88,596). St. Helena has a higher median income than many of the surrounding cities, including the cities of Napa, Yountville, and Calistoga, as shown in Figure 15.

Figure 18 provides an overview of median household income by block group in the city. The census blocks with the lowest median income are located on the northeast and east side of St. Helena with median incomes of $47,083 and $51,544, which is less than the state median income of $87,100. Community input identified that many of the property owners in this area are not lower income and are in fact very wealthy. The low-medium income trends in this area of the city may partially be attributed to the three affordable housing developments (Stonebridge Apartments, Woodbridge Village Apartments, and Hunt's Grove

Apartments), Vineyard Valley Mobile Home Park, and a senior living community (Silverado Orchards Retirement Community) all located within these two census blocks. The census block with the highest median income is located in the downtown area in the center of the city with a median income of $158,500. The AFFH Data Viewer has no information on median income of the northwest area of St. Helena.

The LMI populations in St. Helena are concentrated on the east side of the city, as shown in Figure 19. According to HUD estimates, in the eastern area of the city 68 percent of the population are LMI populations. In contrast, on western side of city less than 20 percent of the population is LMI. This pattern closely corresponds with areas of the city that have a greater non-White population concentration, which is also greater on the eastern side of the city.

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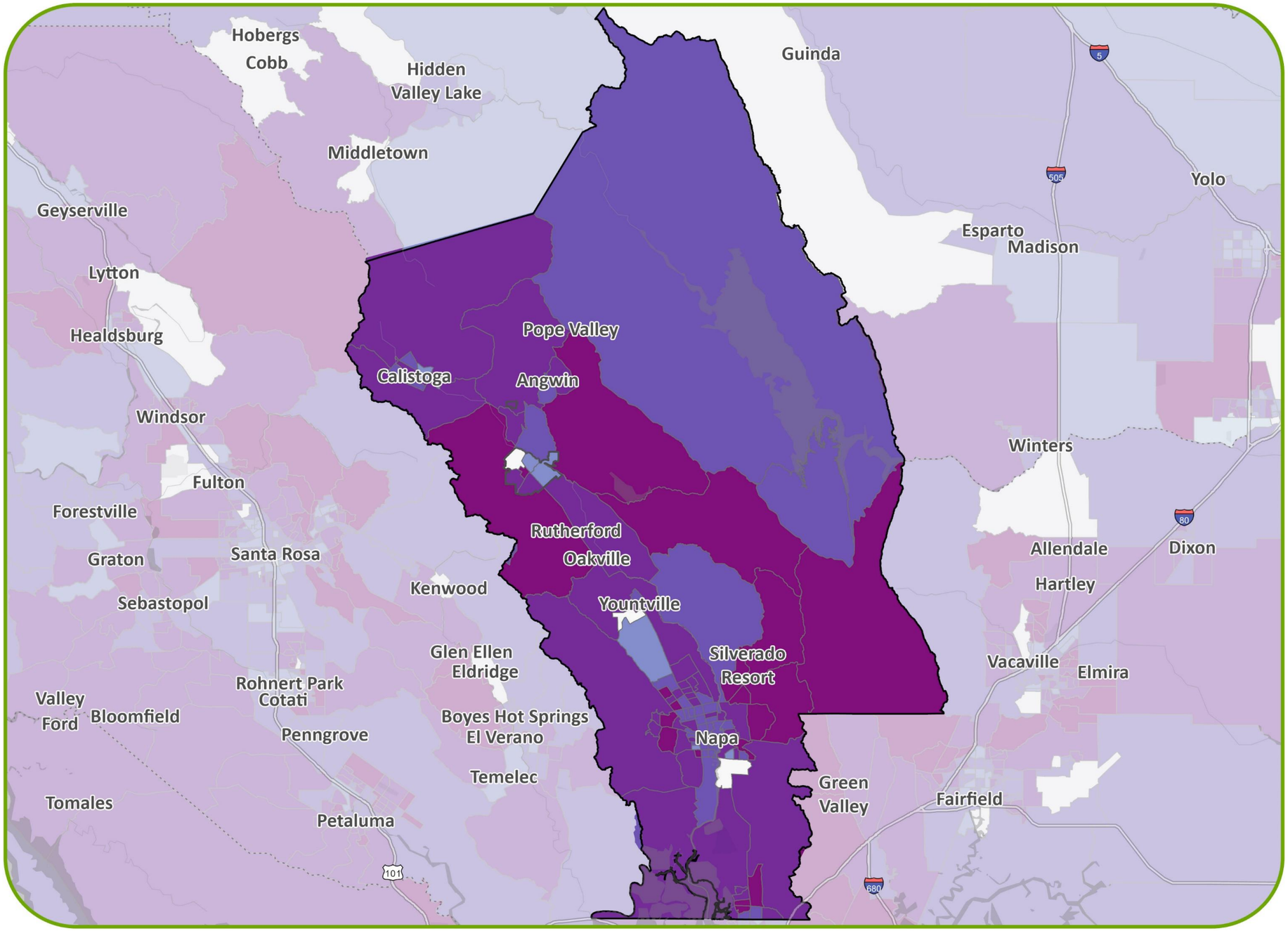


Figure 16: Median Household Income (Napa County)

City Boundary
County Boundary
(R) Median Income (ACS, 2015-2019) - Block Group
Median Income
< $30,000
< $55,000
< $87,100 (HCD 2020 State Median Income)
< $125,000
Greater than $125,000

0 3 6
Miles

N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

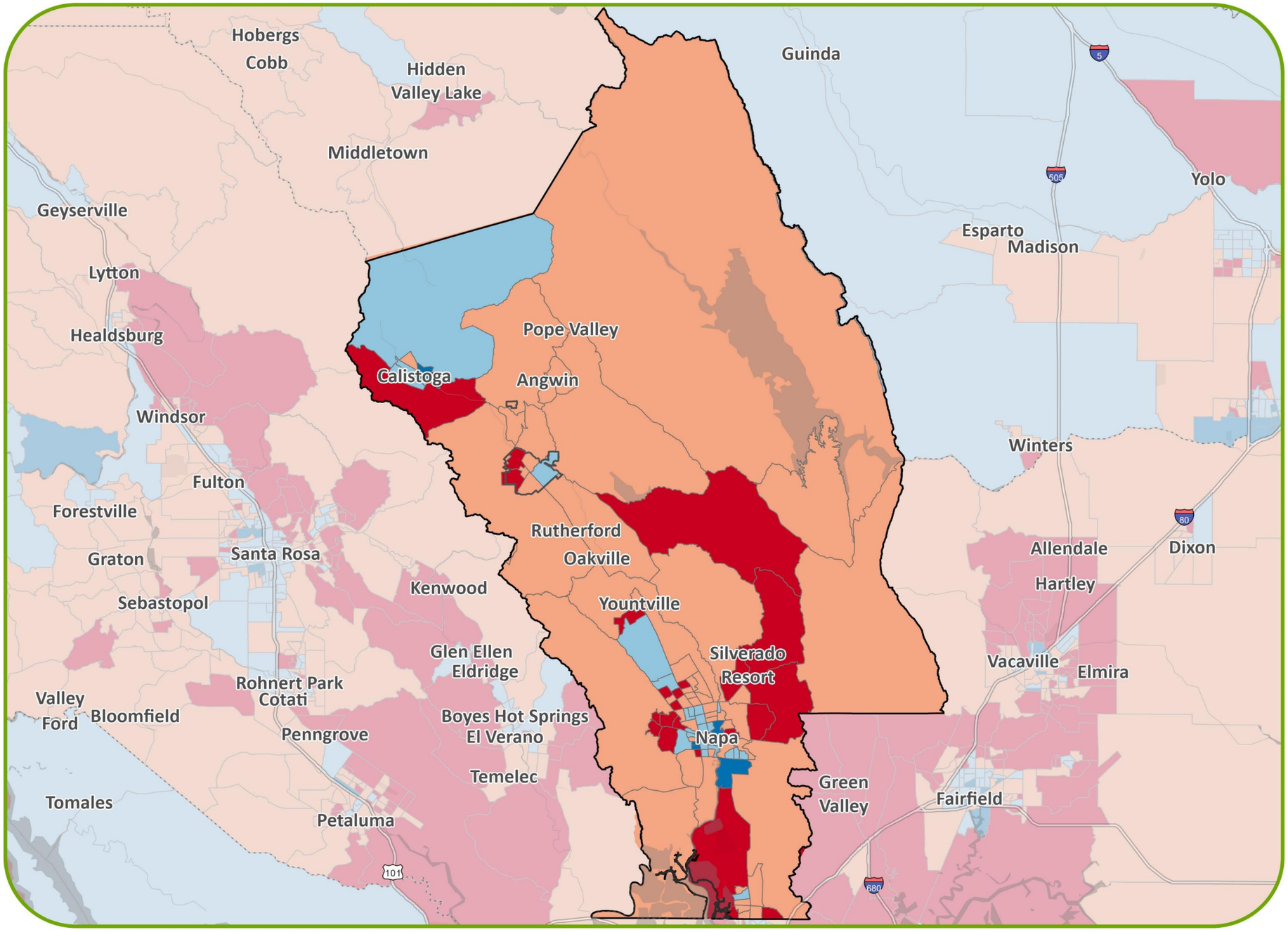


Figure 17: Low and Moderate Income Population (Napa County)

City Boundary
County Boundary
(A) Low to Moderate Income Population (HUD) - Block Group
Percent of Low-Moderate Income Population
< 25%
25% - 50%
50% - 75%
75% - 100%

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

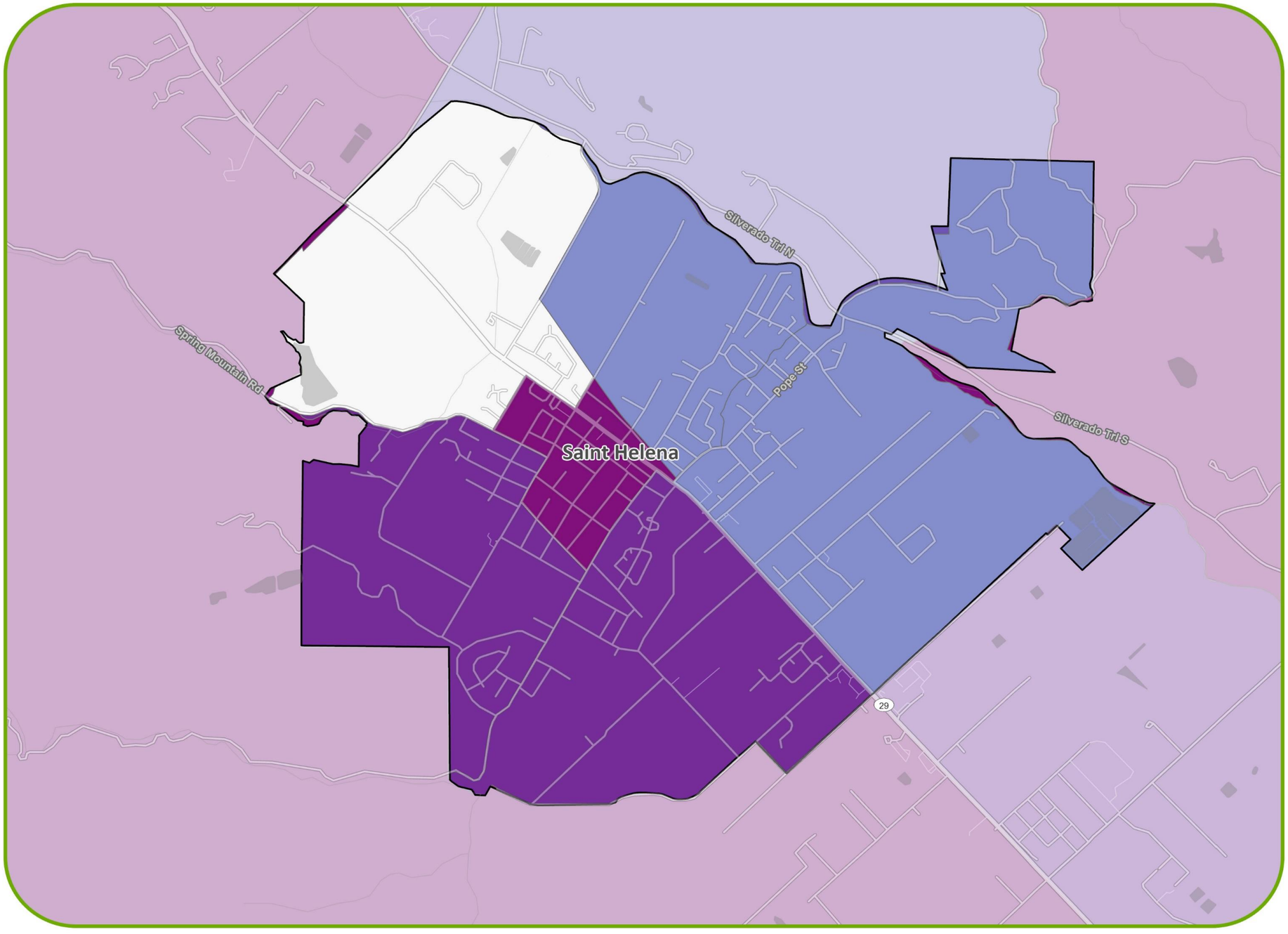


Figure 18: Median Household Income (St. Helena)

City Boundary
(R) Median Income (ACS, 2015-2019) - Block Group
Median Income
< $30,000
< $55,000
< $87,100 (HCD 2020 State Median Income)
< $125,000
Greater than $125,000

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

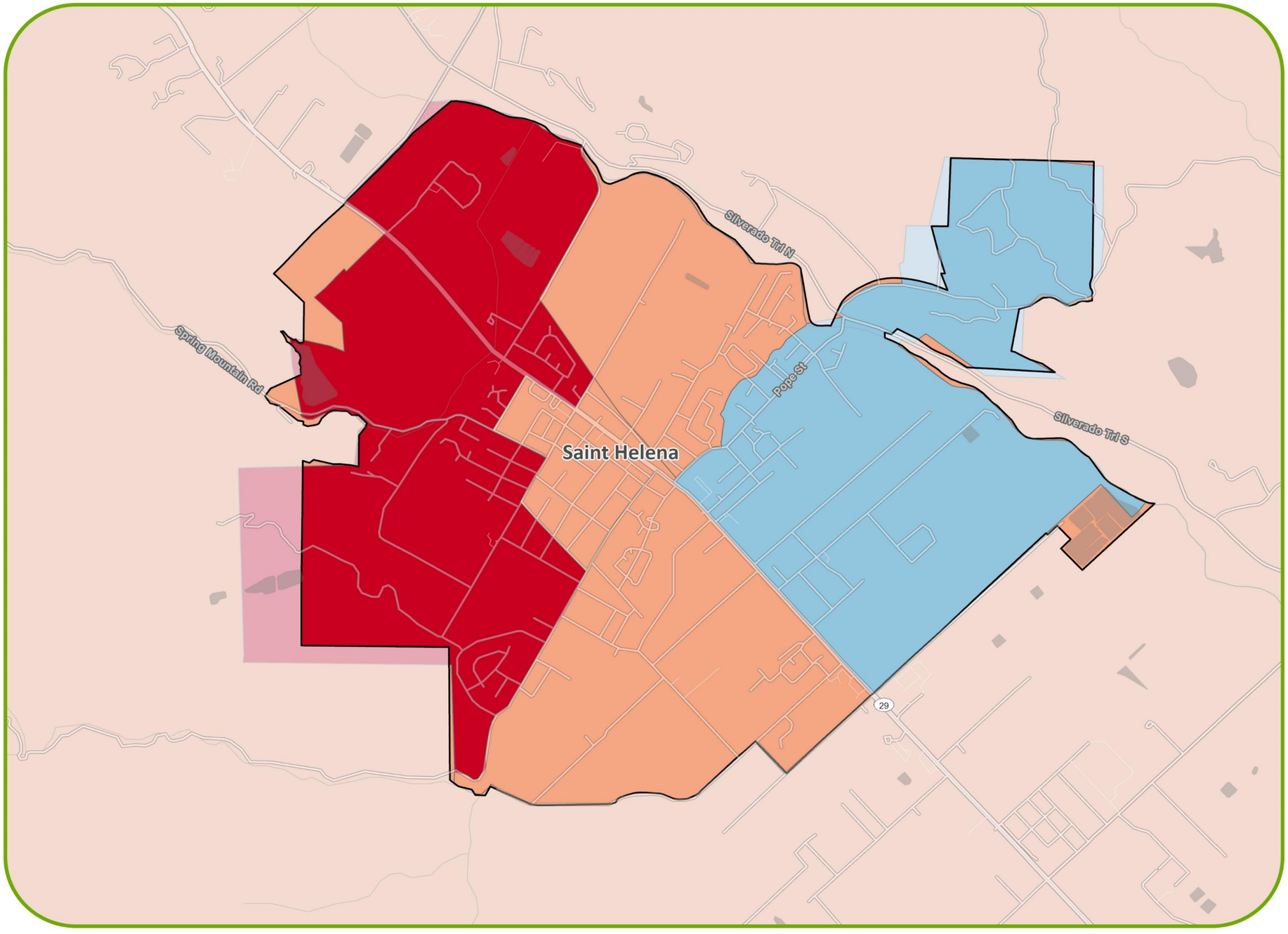


Figure 19: Low to Moderate Income Population (St. Helena)

City Boundary
(A) Low to Moderate Income Population (HUD) - Block Group
Percent of Low-Moderate Income Population
< 25%
25% - 50%
50% - 75%
75% - 100%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

3.5 Racially and Ethnically Concentrated Areas of Poverty

To identify racially and ethnically concentrated areas of poverty (known as R/ECAPs), HUD developed thresholds based on racial and ethnic concentration and income level. The threshold for racial and ethnic concentration is a non-White population of 50 percent or more within metropolitan or micropolitan areas (in rural areas it is 20 percent). Areas of "extreme poverty" are defined using the poverty test as those with more than 40 percent of the population at or below the poverty line or a poverty rate or three times the average of the metropolitan area, whichever is less. Areas that meet both the racial/ethnic concentration threshold and the "extreme poverty" threshold are considered R/ECAPs.

3.5.1 Poverty and Segregation

3.5.1.1 Regional Trends

There are no R/ECAPs within Napa County, however there is a small area of in the southern portion of the City of Napa that would be considered an area of extreme poverty with more than 40 percent of the population below the poverty line. According to 2015-2019 ACS estimates, approximately 8 percent of the population of Napa County are below the poverty level. Several areas within county have 10 and 20 percent of the population below the poverty line, including areas in the southern region of the county, in and around the Cities of Napa, American Canyon, and St. Helena. Figure 20 shows the poverty status within Napa County.

3.5.1.2 Local Trends

St. Helena does not have any R/ECAPs. According to 2015-2019 ACS estimates, approximately 8 percent of the population of St. Helena are living below the poverty level, consistent with poverty rates of Napa County. The western half of the city has a greater percentage of the population below the poverty line, between 10 and 20 percent. This area also had a higher percentage of children in a female single parent household.

Figure 21 displays the percentage of the population whose income is below the poverty line in St. Helena. The poverty rates in St. Helena have shifted over time. The 2010-2014 ACS estimated the eastern half of the city had a greater percentage of the population below the poverty line, opposite of the trend shown by the 2015-2019 ACS estimates.

Figure 22 shows neighborhood segregation in St. Helena using to data from UC Berkeley's Urban Displacement Project (UDP). According to the UDP the predominant racial/ethnic composition in St. Helena is Latinx-White. ABAG's Segregation Report also analyzed neighborhood segregation in St. Helena between 2010 and 2020 using the racial isolation index, racial dissimilarity index, and Thiel's H-Index. The isolation index showed White residents are the most segregated racial group in the city, followed by Latinx residents. The dissimilarity index showed segregation is greatest between Asian/Pacific Islander and White residents, followed by Latinx and White residents. However, the dissimilarity index is an unreliable measure for Asian/Pacific Islander and Black/African populations in St. Helena because their populations are too

small for accurate calculation. Thiel's H-index for neighborhood level segregation indicated racial segregation between all racial groups within the city is less than in the average Bay Area jurisdiction. Compared to all Bay Area jurisdictions, St. Helena is less diverse, with a smaller percentage of the population consisting of people of color.

ABAG's Segregation Report also analyzed neighborhood level income segregation between 2010 and 2015 in St. Helena using the income group isolation index, income group dissimilarity index, and Thiel's H-index. The isolation index showed above moderate income residents are the most segregated income group in the city followed by very low income residents. Among all income groups, segregation of the moderate income population has changed the most between 2010 and 2015, becoming less segregated. The dissimilarity index showed income segregation is greater in St. Helena than in the average Bay Area jurisdiction between lower income residents and non-lower income residents and between very low income residents and above moderate income residents. Overall, segregation between lower income residents and residents who are not lower income increased between 2010 and 2015. According to Thiel's H-index for neighborhood level income segregation, income segregation in the city is less than the average Bay Area city and remained about the same between 2010 and 2015. Compared to all Bay Area jurisdictions, St. Helena has a similar share of very low income residents, lower share of low and moderate income residents, and a higher share of above moderate income residents.

In summary, ABAG's segregation report found White residents and above moderate income residents are the largest and most segregated racial and income groups in St. Helena.

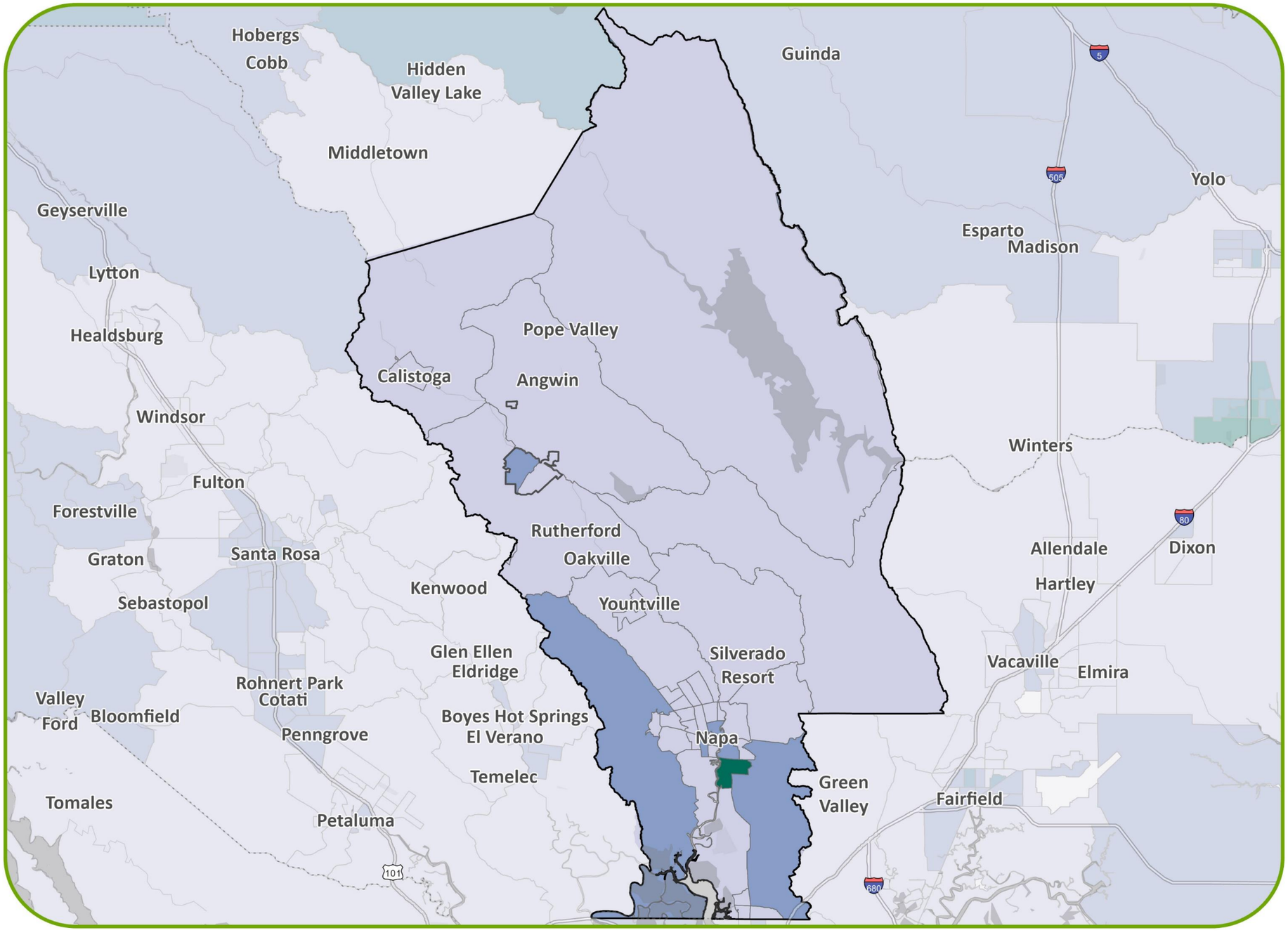


Figure 20:
Areas of High Poverty (Napa County)

City Boundary
County Boundary
(R) Poverty Status (ACS, 2015 - 2019) - Tract
Percent of Population whose income in the past 12 months is below poverty level
< 10%
10% - 20%
20% - 30%
30% - 40%
> 40%

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

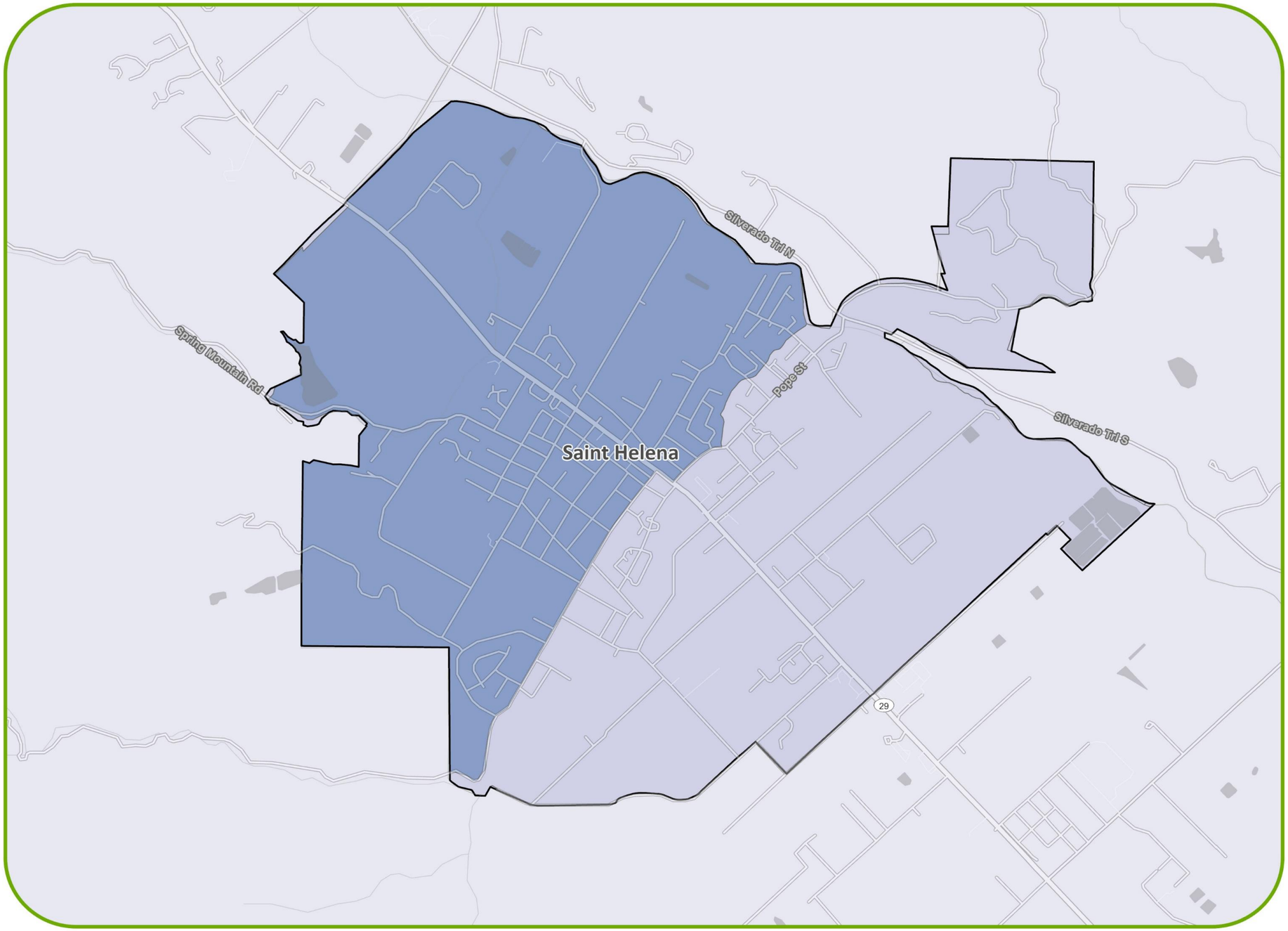


Figure 21:
Poverty Status
(St. Helena)

City Boundary
(R) Poverty Status (ACS, 2015 - 2019) - Tract
Percent of Population whose income in the past 12 months is below poverty level
< 10%
10% - 20%
20% - 30%
30% - 40%
> 40%

ST. HELENA
CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

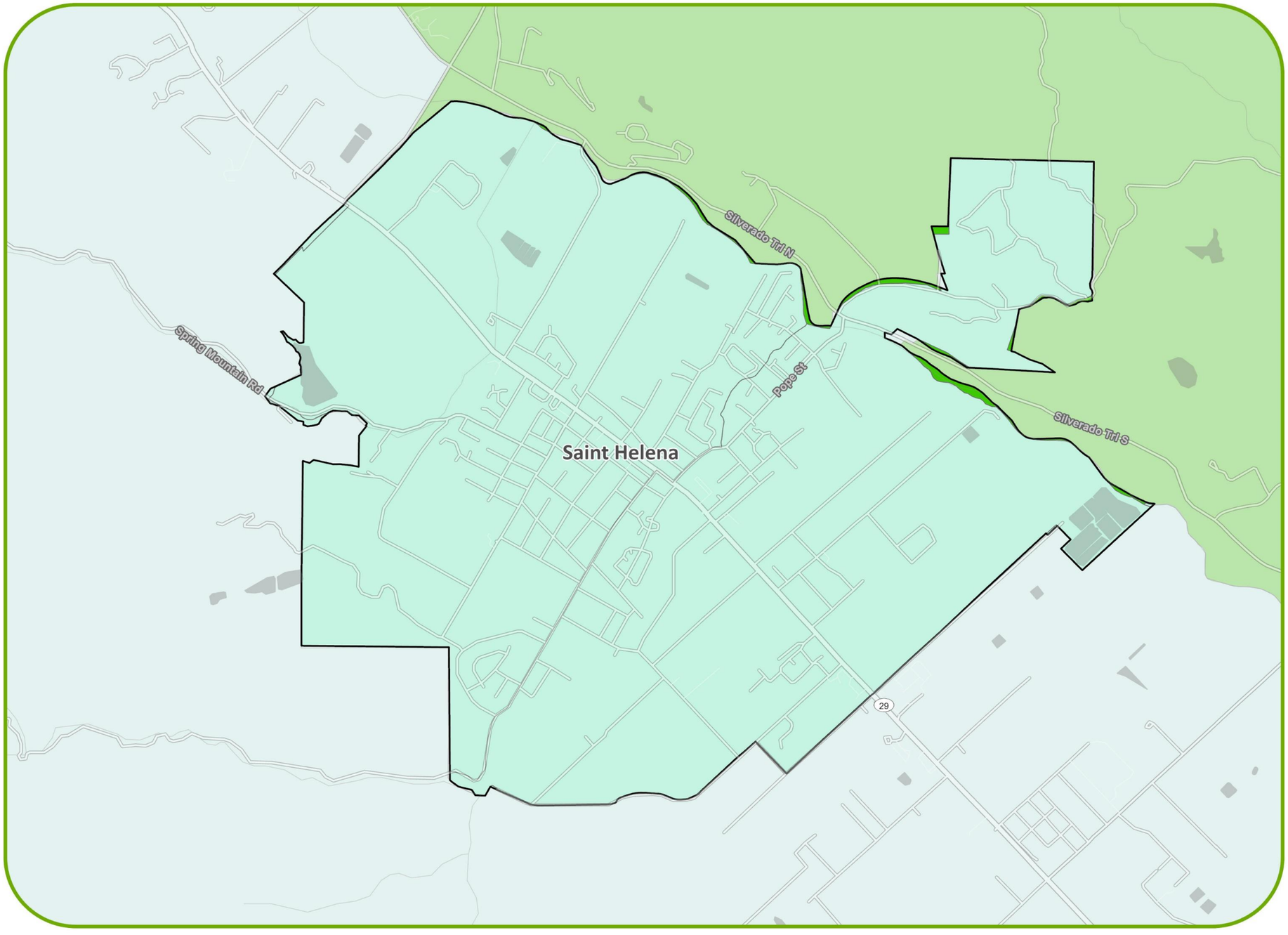


Figure 22: Neighborhood Segregation (St. Helena)

City Boundary
(A) Neighborhood Segregation (UC Berkeley, 2019) - Tract
Latinx-White
3 Group Mix

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.

Page 352 of 1246

3.5.2 Concentrated Areas of Affluence

While racially R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed. Racially concentrated areas of affluence (RCAAs) are affluent communities that are predominantly White.[73] According to a policy paper published by HUD, White residents are the most racially segregated group in the United States and are typically more affluent than majority non-White communities. In addition to having a higher median income, areas of affluence experience less overcrowding, less housing cost burden on renters, and are generally less susceptible to displacement compared to LMI areas.

RCAAs have not been studied extensively, nor has a standard definition been published by HCD or HUD. HCD has created a metric to identify RCAAs by analyzing the total White population for each census tract and comparing it to the average percentage of total White populations for all census tracts within a given Council of Government (COG) region. This compared value is referred to as the Location Quotient (LQ). For example, a census tract with an LQ of 1.5 has a percentage of total White population that is 1.5 times higher than the average percentage of total White population within the COG region. HCD identifies RCAAs as census tracts with an LQ of more than 1.25 and a median income 1.5 times higher than the COG AMI (or 1.5x the State AMI, whichever is lower).

3.5.3 Regional Trends

There are several RCAAs in Napa County, which are primarily located in more rural areas of the county. Most of the RCAAs are concentrated along the western portion of the county with several RCAAs located within the northwest part of the City of Napa as well as in the rural areas northeast of the City of Napa. shows RCAAs in Napa County.

The population of Napa County is predominantly White, with the highest concentration of White residents residing in rural areas of the county. Figure 23 highlights the predominantly White census tracts in Napa County. Areas with a lower concentration of White residents are generally located within the valley where population density is higher. The more rural areas along the eastern boarder of Napa County have high concentrations of White populations, which corresponds with areas that have the highest median incomes in the county.

3.5.4 Local Trends

There are no RCAAs identified within St. Helena. However, similar to patterns of affluence throughout Napa County, areas of St. Helena with higher median incomes correspond to areas with higher proportions of White residents. The northwestern area of the city has a larger proportion of White residents and a higher median income, while the southeastern area has greater racial/ethnic diversity and a lower median income. The northwestern area of the city has a predominant White population (over 50 percent) and the

[73] *Goatz, Damanio and Williams, "Racially Concentrated Areas of Affluence: A Preliminary Investigation" https://www.huduser.gov/portal/periodicals/cityscpe/vol21num1/ch4.pdf, (2019).*

southeastern area of the city has a large White population and large Hispanic population (approximately 48 percent each). Figure 26 shows the overlap of high median income and predominant White population in St. Helena.

In addition to having a higher median income, areas of affluence in St. Helena experience lower percentages of overpayment by homeowners, more positive economic outcomes, and more positive environmental outcomes compared to LMI areas.

3.6 Disparities in Access to Opportunities

According to HCD guidance, land use policies and planning often translate into the ability of residents to access neighborhoods of opportunity, with high-performing schools, greater availability of jobs that afford entry to the middle class, and convenient access to transit and services. The limits on housing choice and access experienced by people within protected classes, such as race, sexual orientation, or disability, have far-reaching impacts on access to job opportunity, quality education, and mental and physical health.[74] Access to opportunity often means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to 'high resource' neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food, and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).

The analysis of place-based characteristics linked to opportunity indicators, quality education, employment, transportation, and healthy environment, seeks to understand the disparity between communities in terms of access to real and potential economic benefits and quality of life.

3.6.1 Transit Access

Reliable access to public transit is crucial, especially for low-income residents and/or persons with disabilities, to provide connections to employment opportunities. Access to employment via public transit can reduce income burden and increase housing mobility, which enables residents to locate housing in more areas.[75] The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice. Persons who depend on public transit may have limited choices regarding places to live.

3.6.2 Regional Trends

As Napa County is largely rural, residents mainly depend on their personal vehicles for commuting and traveling. Public transit options do exist in Napa County, primarily Vine Transit, a fixed route bus service

[74] *HCD. 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf*
[75] *Ong, Paul and Evelyn Blumenberg, "Job Accessibility and Welfare Usage: Evidence from Los Angeles." UCLA Department of Policy Studies, (1998).*

operated by the Napa Valley Transportation Authority. Vine Transit operates fixed bus route service throughout the county from American Canyon to Calistoga and provides connections to the Vallejo Ferry Terminal, and El Cerrito Del Norte BART station, SolTrans stations in Vallejo and Fairfield, and the Suisun/Fairfield Train Station. Lake Transit Authority connects southern areas of Lake County to northern Napa County, with bus stops in Calistoga, St. Helena, and Deer Park. Additionally, several low cost, on demand shuttle services are available to the public providing fixed route and door-to-door transit within the city limits of their operating city, including the Yountville Trolley, St. Helena Shuttle, Calistoga Shuttle, and American Canyon Transit. Residents and visitors with physical and/or cognitive disabilities may be eligible to participate in VineGo Paratransit Service, a shared ride service providing curb-to-curb transportation. VineGo offers rides within and between cities throughout the county as well as to Kaiser Vallejo Medical Center.

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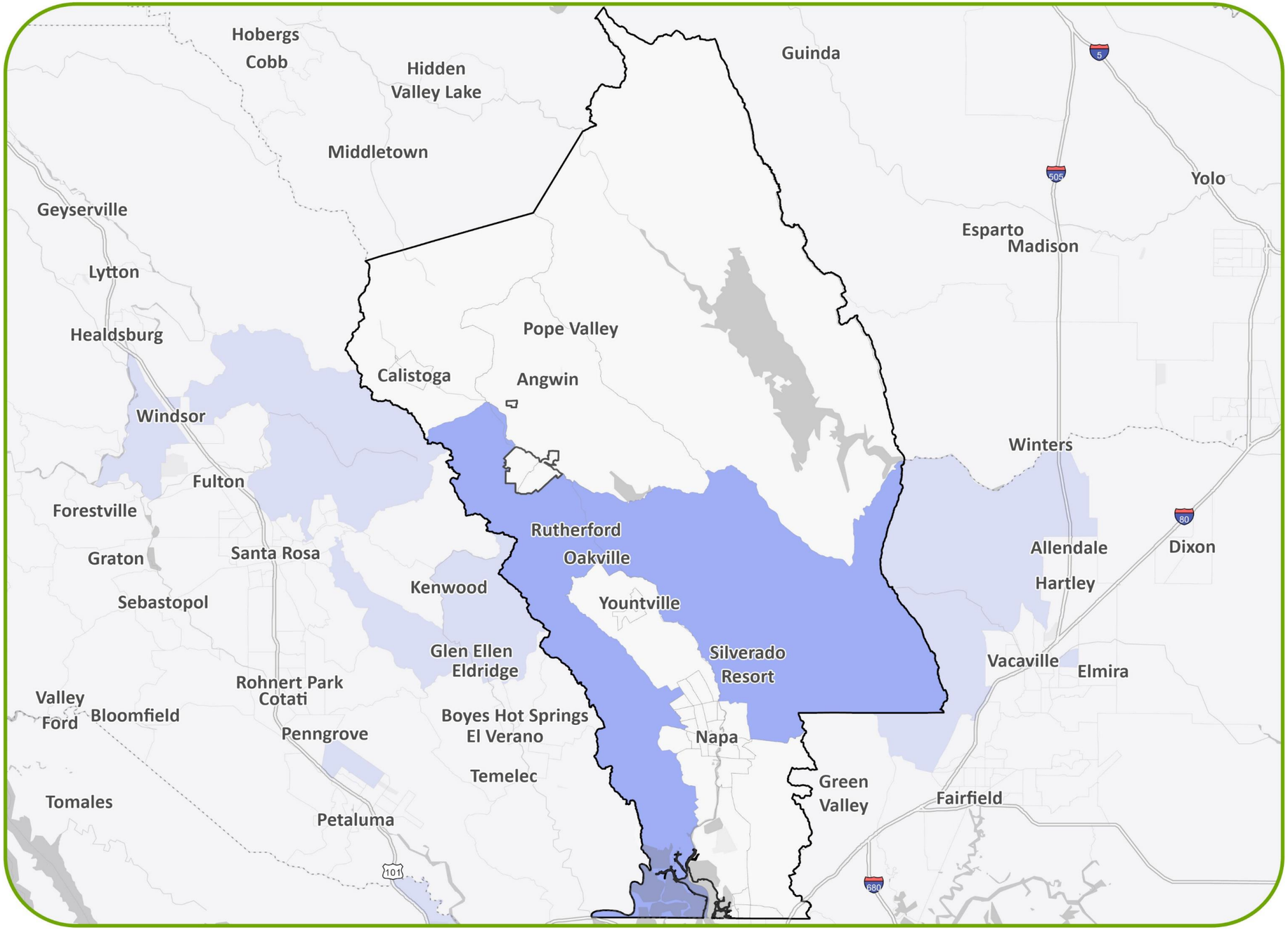


Figure 23: Racially Concentrated Areas of Affluence (Napa County)

City Boundary
County Boundary
(R) Racially Concentrated Areas of Affluence RCAA (ACS, 2015 - 2019) - Tract
0 - Not a RCAA
1 - RCAA

0 3 6 N
Miles

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

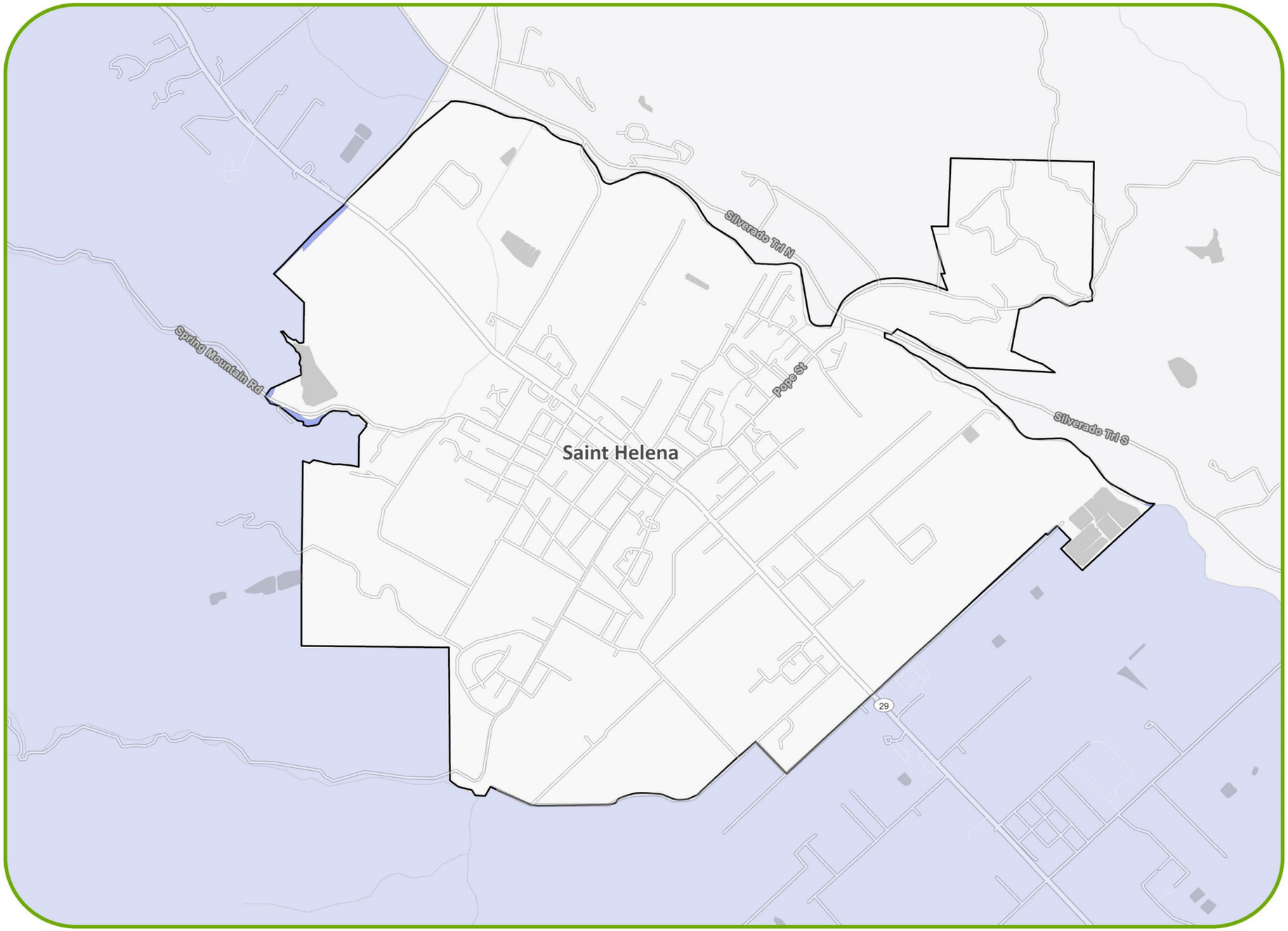


Figure 24: Racially Concentrated Areas of Affluence (St. Helena)

City Boundary
(R) Racially Concentrated Areas of Affluence RCAA (ACS, 2015 - 2019) - Tract
0 - Not a RCAA
1 - RCAA

ST. HELENA CALIFORNIA

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

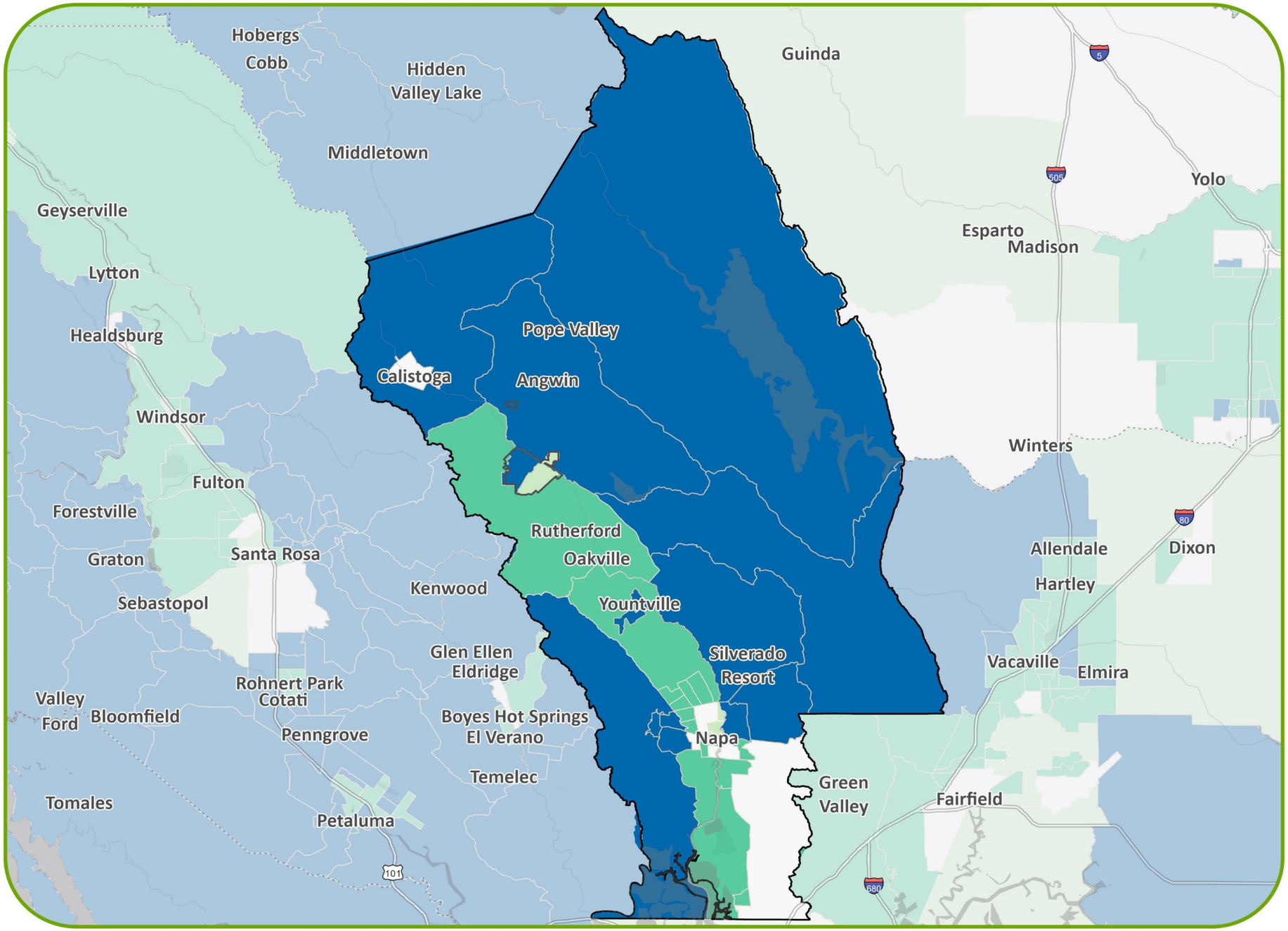


Figure 25: Predominant White Population (Napa County)

City Boundary
County Boundary
(R) Predominant Population - White Majority Tracts
Dominance Value
Slim (gap < 10%)
Sizeable (gap 10% – 50%)
Predominant (gap > 50%)

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

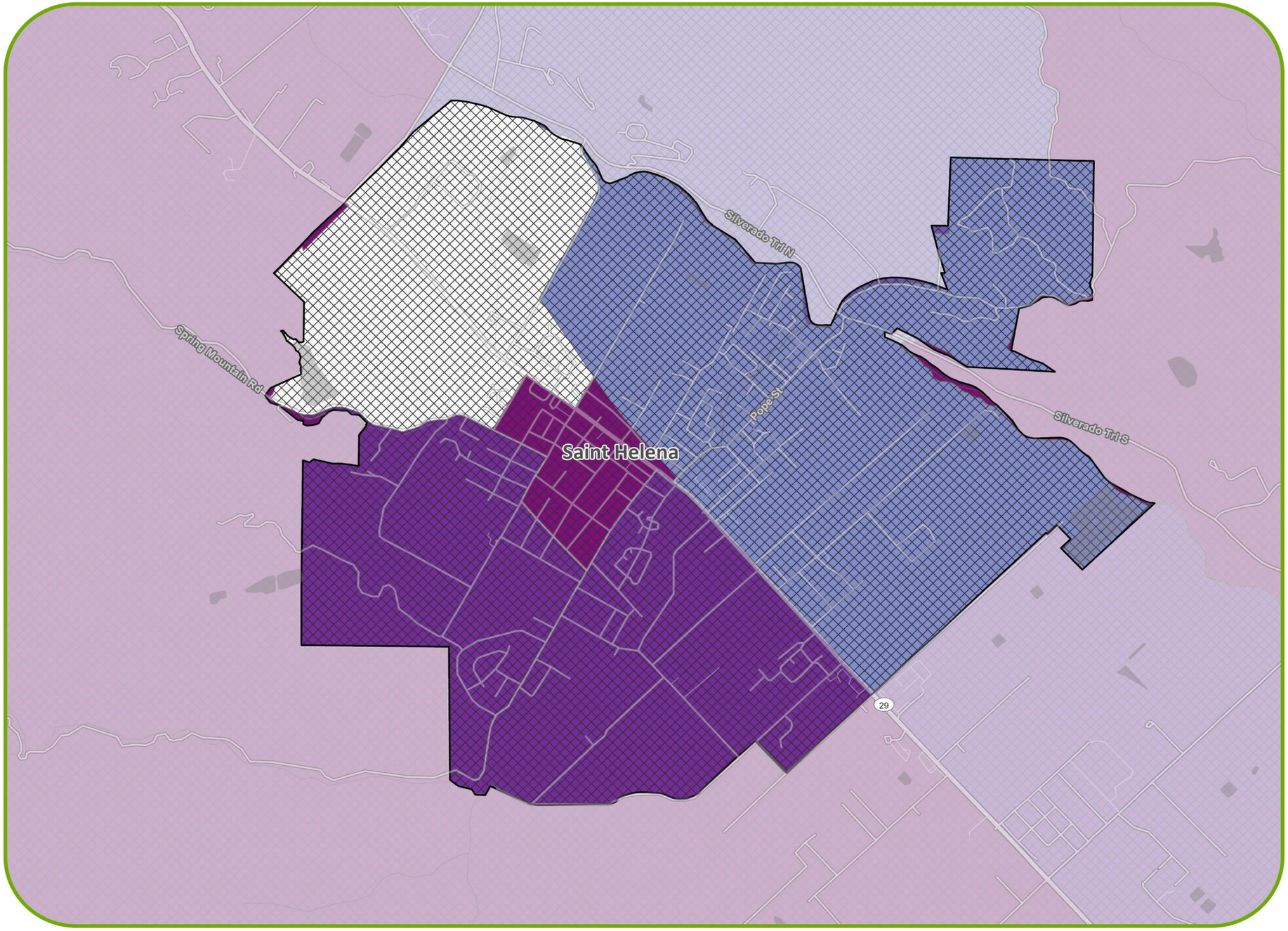


Figure 26: Predominant Populations and Median Household Income (St. Helena)

City Boundary
(R) Predominant Population - White Majority Tracts
White Majority Tract
(R) Predominant Population - Hispanic Majority Tracts
Hispanic Majority Tract
(R) Predominant Population - Asian Majority Tracts
Asian Majority Tract
(R) Median Income (ACS, 2015-2019) - Block Group Median Income
< $30,000
< $55,000
< $87,100 (HCD 2020 State Median Income)
< $125,000
Greater than $125,000

ST. HELENA CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

The Commuter Bike Path (Vine Trail) runs parallel to the Napa Valley Railroad and provides an off-street route walking/biking path for recreation and commuting. Ultimately the Vine Trail will cover 47 miles from Vallejo to Calistoga. Currently 12.5 miles of the path has been completed from Kennedy Park in the City of Napa to Yountville. Sections of the Vine trail have also been completed in American Canyon and Calistoga.

AllTransit is an online database that provides details on transit opportunity throughout the United States, specifically looking at connectivity, access to jobs, and frequency of service. Napa County received an AllTransit performance score of 3.3 which equates to a low combination of trips per week and number of jobs accessible by transit.[76] Approximately 1.5 percent of commuters use public transit in Napa County. The cities of Napa (4.6), Yountville (4.6), and Calistoga (4.0) have the highest scores with a slighter greater combination of number of trips per week, accessible jobs, and available transit routes.

3.6.3 Local Trends

The City of St. Helena has an AllTransit performance score of 2.4 with approximately 1.0 percent of workers who commute using public transit. This score is lower than the County score of 3.3. One Vine Transit bus route passes through St. Helena, providing connections to the City of Calistoga to the north and City of Napa to the south. Additionally, the St. Helena Shuttle Service provides both a fixed route and an on-demand, door-to-door transit service option within the city limits.

Walk Score is a tool that produces a walkability index by assigning a numerical walkability score to cities and neighborhoods. Walkability is measured by analyzing population density, distance to amenities, and road metrics such as block length and intersection density. St. Helena has a walk score of 83, which is considered very walkable, and most errands can be accomplished by foot[77]. St. Helena's walkability score is most negatively affected by the limited number of parks within walking distance from different areas of the city.

The Environmental Protection Agency (EPA) also has a walkability index, which ranks block groups according to their relative walkability. The EPA walkability map, shown in Figure 27, shows that walkability varies across the city. The highest walkability scores are in downtown and along Main Street where most of the commercial areas are concentrated. Further from downtown and in the western and eastern parts of the city, walkability scores are below average.

[76] *https://alltransit.cnt.org/*
[77] *https://www.walkscore.com/*

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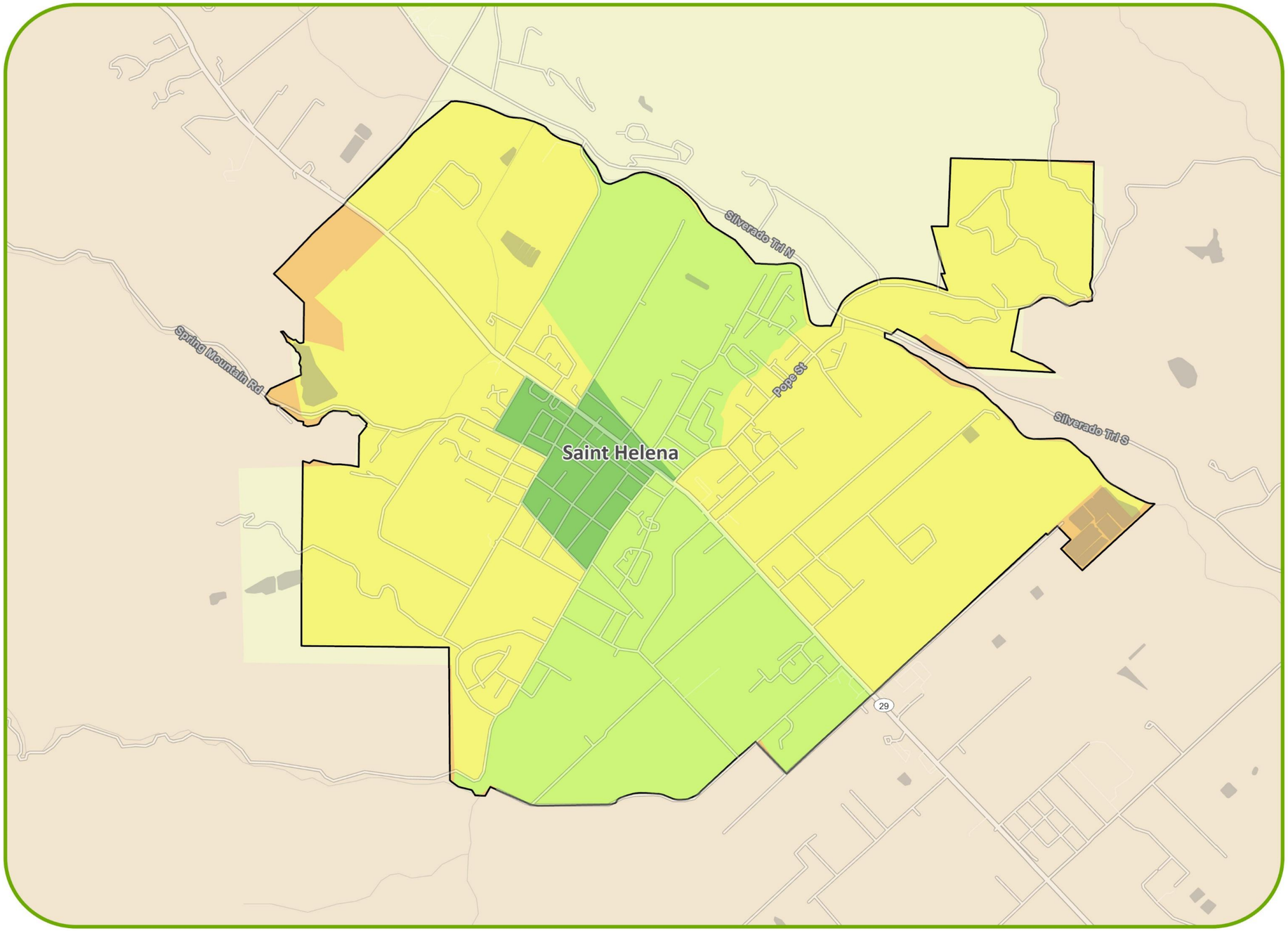


Figure 27: Walkability Index (St. Helena)

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3.6.4 Access to Quality Education

Economics literature has consistently found about a 10 percent increase in wages/salary with each additional year of education.[78] Educational attainment is directly linked to housing opportunities. TCAC education domain scores, which are used to identify areas of higher or lower education opportunities, incorporate a variety of indicators including math and reading proficiency scores, high school graduation rates and student poverty rates to assess educational outcomes at the census tract level.

3.6.5 Regional Trends

Napa County is served by five school districts: Napa Valley Unified School District, St. Helena Unified School District, Calistoga Joint Unified School District, Howell Mountain School District, and Pope Valley School District. An overview of education outcomes across the Napa County is illustrated in Figure 28 which shows the TCAC Opportunity Areas map. Education outcomes vary throughout the county. Areas in the western portion of the county and portions of the more urban areas have more positive education outcomes compared to eastern portions of the county and southern parts of the City of Napa.

3.6.6 Local Trends

The City of St. Helena is served by the St. Helena Unified School District which is comprised of four schools: a primary school, elementary school, middle school, and high school. Altogether, approximately 1,243 students were enrolled in 2020 from the City St. Helena and the surrounding areas. Approximately 45 percent of students were White and 52 percent were Hispanic/Latino. St. Helena Unified School District reported a high school graduation rate of 92.9 percent in 2020, 90.1 percent in 2019, and 94.1 percent in 2018. The district reported all students who did not receive high school diplomas in 2019 were Long Term English Learners and socio-economically disadvantaged students.[79]

Figure 29Figure 28 shows TCAC scores for education outcomes for St. Helena at the census tract level. St. Helena has better education outcomes than other areas of Napa County. At the city level, the southern and eastern areas of the city have better education outcomes than the western areas.

3.6.7 Economic Outcomes

Housing opportunities are directly related to economic opportunities. Access to high quality employment close to desired and affordable housing results in more housing opportunities and shorter commute times. The analysis for economic opportunities uses TCAC economic indicators, employment participation data

[78] *The Rehabilitation Research and Training Center on Disability Statistics and Demographics. 2020. https://disabilitycompendium.org/annualreport*

[79] *St. Helena Unified School District 2021-22 Local Control and Accountability Plan https://www.sthelenaunified.org/cms/lib/CA50000465/Centricity/Domain/36/LCAP%20Control%20Accountability%20Plan%202021%202022.pdf*

from the ACS, Metropolitan Transportation Commission (MTC) Equity Priority Communities (EPC), and the HUD Jobs Proximity Index.

TCAC economic opportunities are measured by census tract. They consider poverty, adult education, employment, job proximity, and median home values. A higher economic index score reflects more positive economic outcomes. The MTC EPC identifies concentrations of underserved populations in order to direct funding for housing and transportation equity. The HUD Jobs Proximity Index assesses the accessibility to job opportunities at the census block group level.

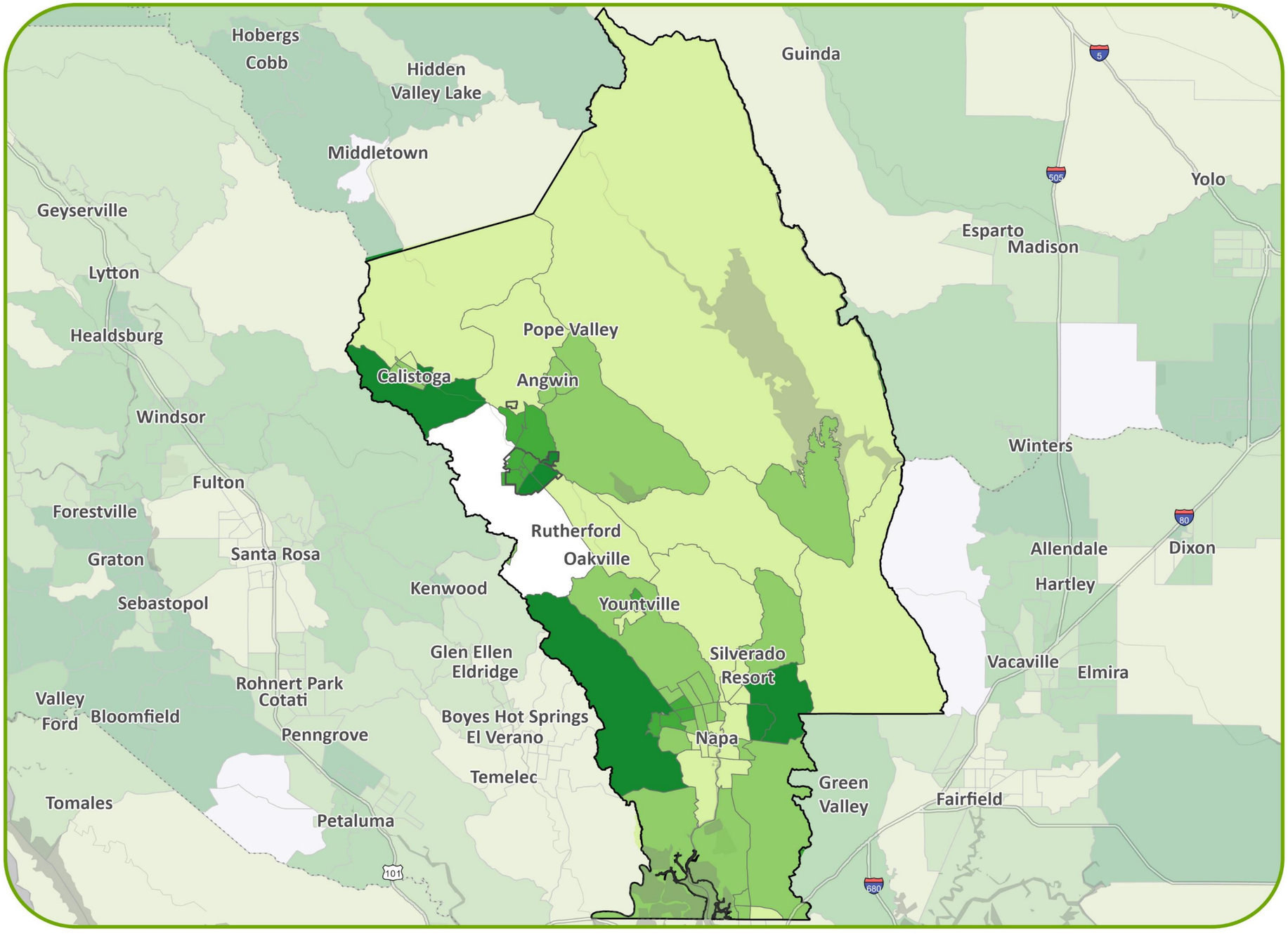


Figure 28:
TCAC Opportunity Areas – Education Outcomes (Napa County)

City Boundary
County Boundary
(R) TCAC Opportunity Areas (2021) - Education Score -Tract
Education Domain Score (by region)
< 0.25 (Less Positive Education Outcomes)
0.25 - 0.50
0.50 - 0.75
> 0.75 (More Positive Education Outcomes)
No Data

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

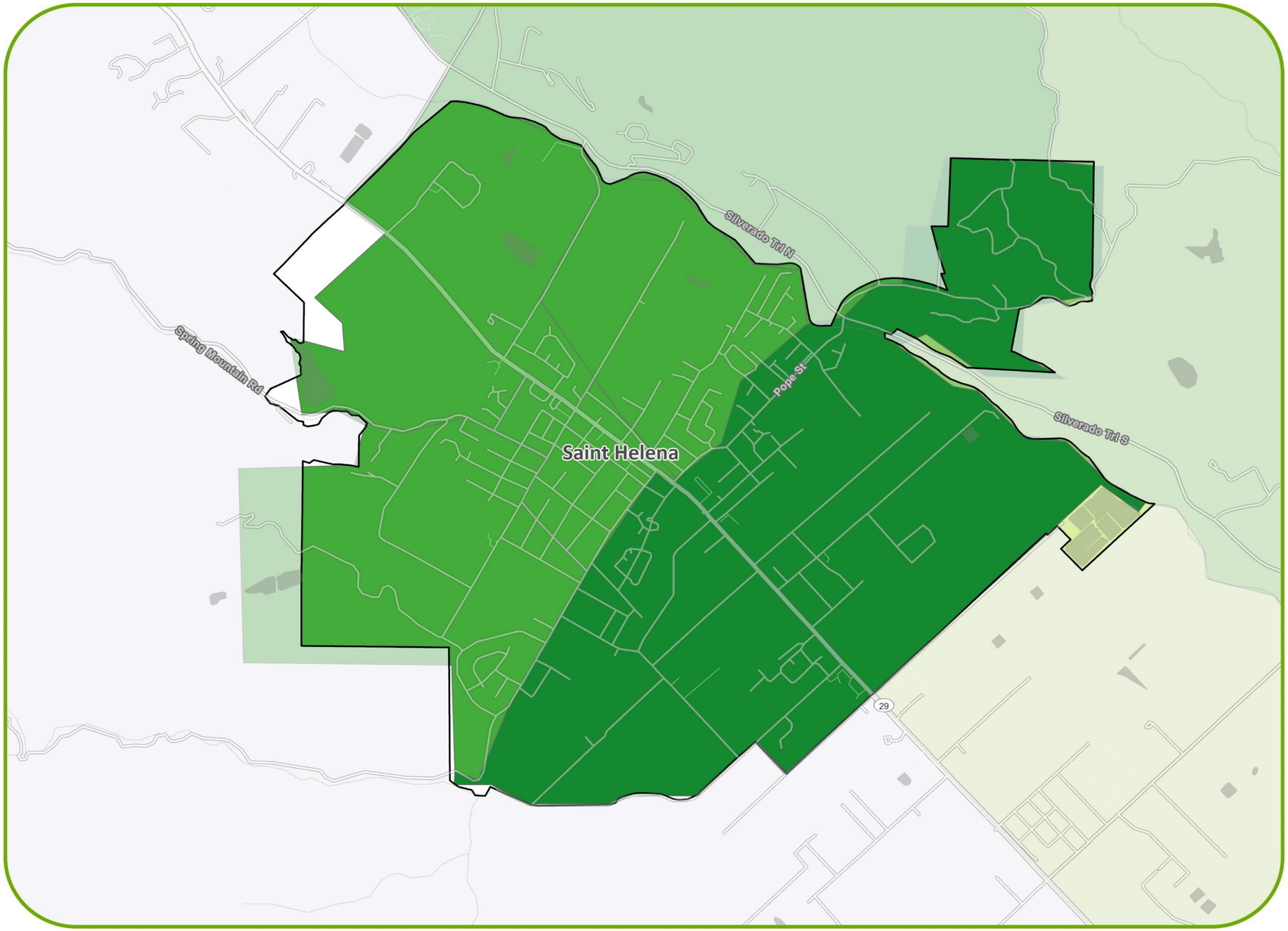


Figure 29: TCAC Opportunity Areas – Education Outcomes (St. Helena)

3.6.8 Regional Trends

According to the California Employment Development Department, the unemployment rate of Napa County was 3.9 percent in February 2022 (not seasonally adjusted). Top employers in the county include manufacturing (including large- and small-scale wine manufacturing), healthcare, and accommodation and food service. The 2015-2019 ACS estimates reported 74,549 workers in the County of Napa with a labor force participation rate of 65 percent of persons 16 years and older. Approximately 33.7 percent of workers commute 30 or more minutes to work with a countywide mean commute time of 25.6 minutes.

Figure 30 shows the TCAC Opportunity Areas map for economic outcomes across the county. Economic outcomes are varied with more positive outcomes generally located in the western areas of the county and less positive outcomes in the eastern areas of the county. This trend may be attributed to the high concentration of vineyards and wineries in the western and central areas of the county and low population density in eastern areas of the county.

3.6.9 Local Trends

According to the 2015-2019 American Community Survey (ACS), there are 3,159 persons in the labor force in St. Helena with a labor force participation rate of 61 percent. The California Employment Development Department reported the unemployment rate was 3.1 percent in December 2021 (not seasonally adjusted), slightly less than the county. Top industries in the city reflect county trends, with the highest number of workers in manufacturing, healthcare, and accommodation and food service.

Figure 31 shows the TCAC Opportunity Areas map for economic outcomes in St. Helena. Much like the county, economic outcomes are varied across the city. Western areas of the city have more positive economic outcomes and eastern areas have less positive economic outcomes. This pattern of lower economic outcomes in the eastern areas of the city reflects the lower median incomes and greater ethnic diversity that is also experienced in these areas. The eastern areas of the city contain affordable housing developments, a mobile home park, and senior living community which may be contributing to lower median incomes and lower median home values.

ACS 2015-2019 estimates show approximately 22.4 percent of workers commute 30 or more minutes to work and the mean commute time is 19.6 minutes. Figure 32 shows the job proximity index in St. Helena which assesses the accessibility of employment opportunities based on distance, a higher index score corresponds to closer job proximity. Job proximity throughout St. Helena is consistently high (closest proximity), especially when compared to the southern and eastern areas of the county.

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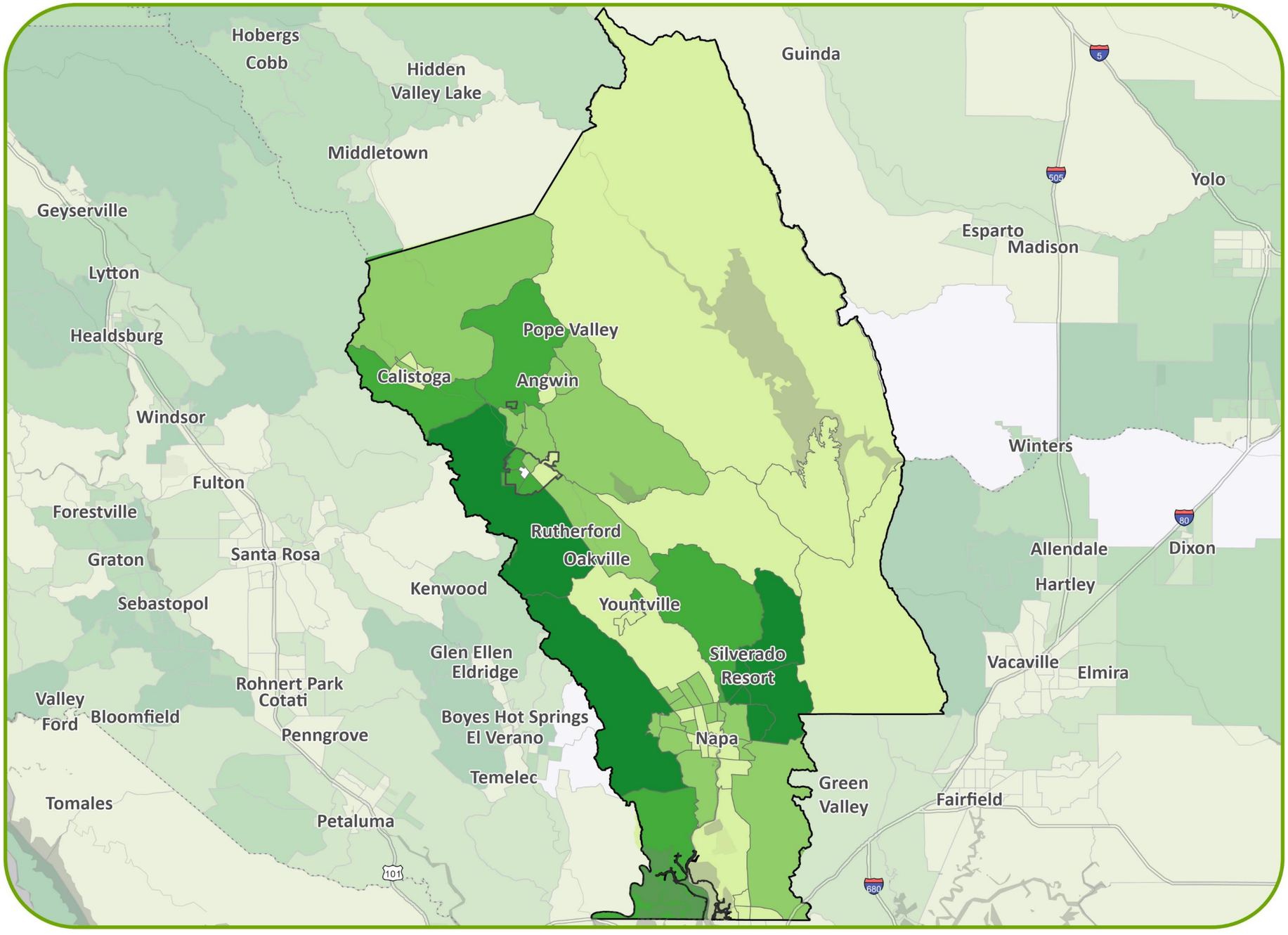


Figure 30:
TCAC Opportunity Areas – Economic (Napa County)

City Boundary
County Boundary
(R) TCAC Opportunity Areas (2021) - Economic Score - Tract
Economic Domain Score (by region)
< 0.25 (Less Positive Economic Outcome)
0.25 - 0.50
0.50 - 0.75
> 0.75 (More Positive Economic Outcome)
No Data

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

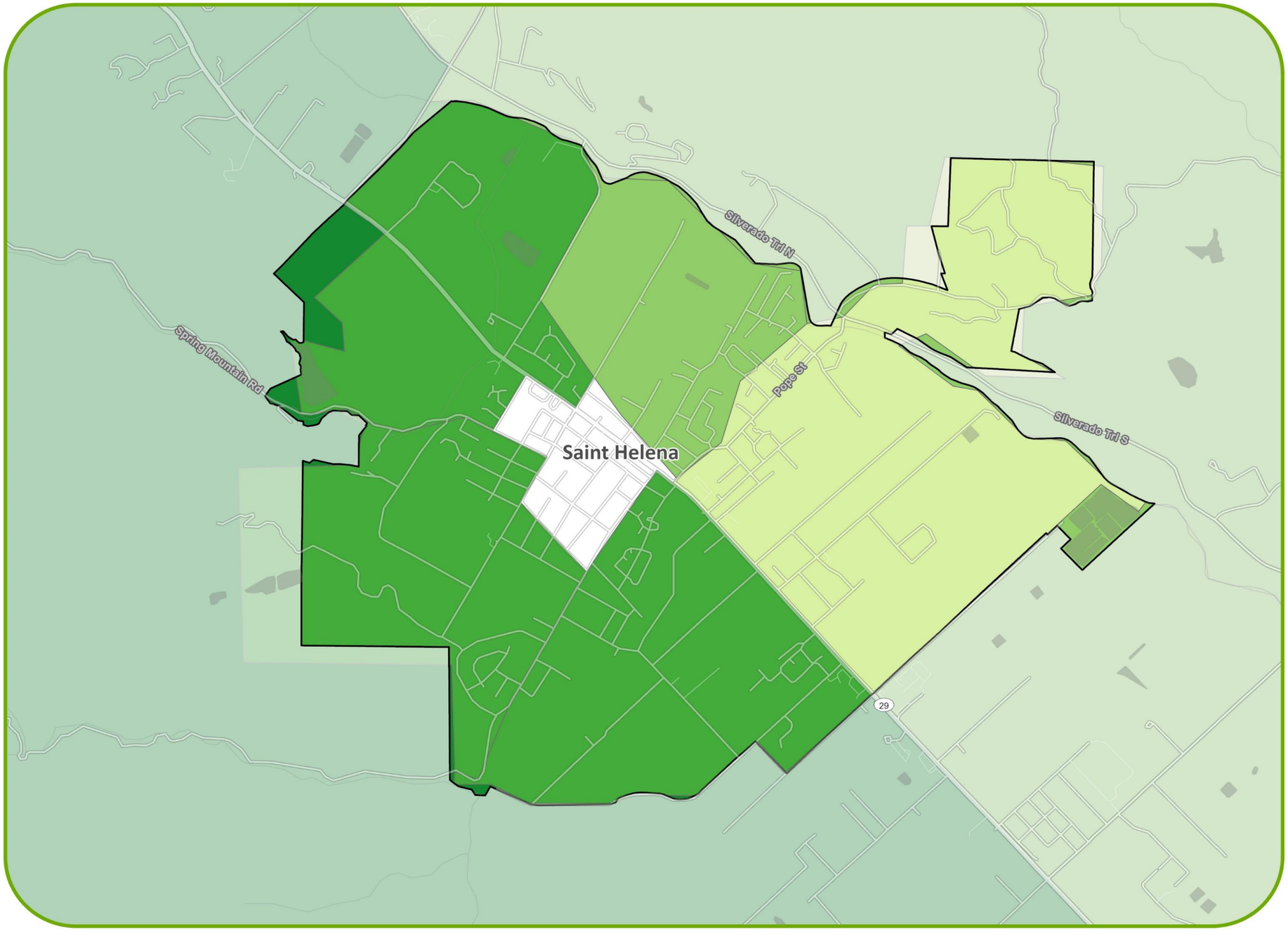


Figure 31:
TCAC Opportunity Areas – Economic (St. Helena)

City Boundary
(R) TCAC Opportunity Areas (2021) - Economic Score - Tract
Economic Domain Score (by region)
- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

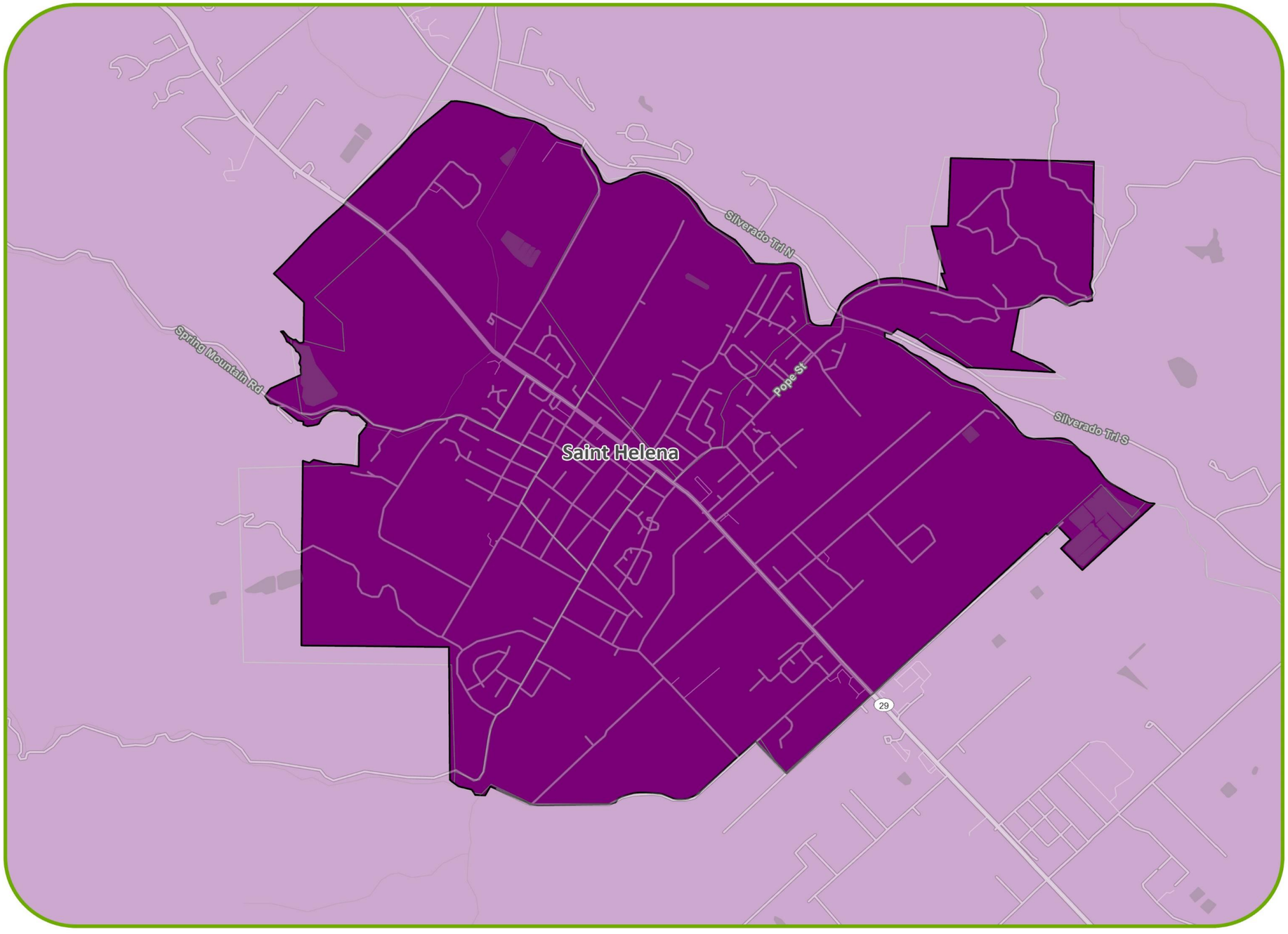


Figure 32:
Job Proximity Index (St. Helena)

City Boundary
(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group
Index Score
< 20 (Furthest Proximity)
20 - 40
40 - 60
60 - 80
> 80 (Closest Proximity)

ST. HELENA CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.

Page 374 of 1246

3.6.10 Healthy Environment

Access to a healthy environment is necessary for communities within a city to thrive. Healthy environment analysis considers patterns in the disparities found within individual neighborhoods and protected area groups. These disparities can vary in a number of categories, including air quality, water quality, safe neighborhood, environmental hazards, social services, and cultural institutions. Recent California laws, AB 1550, Senate Bill (SB) 535 and SB 1000 emphasize the importance of environmental justice as a fair housing issue. Environmental Justice, as defined by HUD, means ensuring the environment and human health are protected fairly for all people regardless of race, color, national origin, or income, and consideration the means by which federally assisted projects may have disproportionately adversely affect human health or the environmental on minority and low income populations.[80] The California Office of Environmental Health Hazard Assessment developed the California Communities Environmental Health Screening Tool (CalEnviroScreen) a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called. High scoring census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status.

3.6.11 Regional Trends

The CalEnviroScreen map for Napa County identifies the degree to which communities are considered burdened by pollution. Figure 33 below shows the pollution burden for Napa County, representing the potential exposure to pollutants and resulting adverse environmental conditions. The more urban areas on the western side of the county have a higher pollution burden, especially within and to the south of the City of Napa. Figure 34 shows TCAC Opportunity Map for environmental outcomes in the county. Similar to the CalEnviroScreen map, the TCAC Opportunity Map shows that the western areas of the county have less positive environmental outcomes compared to the eastern areas of the county. This may be caused by the mountains flank the valley which block wind flow and trap pollution. Additionally, the western and central areas of the county have a higher concentration of people, traffic, and agriculture which produces greater levels of pollution and pesticides. Eastern areas of the county tend to be forested and are less populated

3.6.12 Local Trends

Pollution Burden in St. Helena is lower than many other areas in the county, as shown in Figure 35. However, the eastern areas of the city have a slightly higher pollution burden (overall score of 40) compared to the rest of the city, with high burdens of pesticides, cleanups, and groundwater threats. The western areas have a slightly lower burden (overall score of 33) with high burdens of pesticides, cleanups, groundwater threats, and solid waste. Pesticide use is considered high throughout the city likely due to pesticide applications on nearby vineyards. There are two cleanup sites located within the city including one site with an active dry-cleaning business and one site with a manufactured gas plant that was dismantled in 1930. These two cleanup sites are also sources that pose groundwater threats to the city. A

[80] *HUD, 2021. https://www.hudexchange.info/programs/environmental-review/environmental-justice/*

third cleanup site is located outside the city limits, southeast of the city, with a food market that has detected high pesticides in the soil beneath the building. A solid waste facility is located in the eastern area of the city which may potentially expose neighboring communities to environmental burdens such as odor, pests, and truck traffic. The southern and eastern areas of the city have a higher pollution burden, which corresponds with areas with higher ethnic diversity, higher populations with a disability, and lower median incomes discussed in the previous sections.

Figure 36 shows the TCAC Opportunity map for environmental outcomes in the City of St. Helena. The southern and eastern areas of the city have less positive environmental outcomes compared to the western areas.

3.7 Disproportionate Housing Needs

Disproportionate housing needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions

3.7.1 Housing Cost Burden

Housing cost burden is defined as the proportion of a household's total gross income spent on housing costs. Households that spend at least 30 percent of their total gross income on housing costs (rent, mortgage, utilities, and other housing-related costs) are considered cost burdened, and households spending over 50 percent on housing costs are considered severely cost burdened. The higher the housing cost burden, the more likely residents are to live in overcrowded and substandard conditions and are less likely to afford to relocate. Low-income households and persons in protected classes disproportionately experience severe housing problems. Housing problems are households that has one or more of the following problems: lacks a complete kitchen facility, lacks complete plumbing facility, a household that is overcrowded, or a household that is cost burdened.

3.7.2 Regional Trends

Figure 37 shows areas of Napa County where renter households overpay for housing (spend more than 30 percent of household income on housing costs). Overpayment by renters is a widespread issue across the county, especially in the more urban areas of the county as well as the northeast and southeast areas of the county. Similar to overpayment by renters, overpayment by homeowners is common throughout the county, highlighting that the costs of housing are too high for both renters and homeowners. Figure 38 shows areas of the county where homeowners overpay for housing, which is most prevalent in the urban areas of the county as well as the northwest and southeast areas of the county.

3.7.3 Local Trends

Housing cost burden among renters is widespread in St. Helena. Figure 39 shows that 40 to 60 percent of renters overpay for housing in all areas of the city. Additionally, data from HUD's Comprehensive Housing Affordability Strategy (CHAS) indicates lower income households are disproportionately overpaying for housing.

Lower-income households experience higher cost burden than moderate income and above households in St. Helena. Approximately 41 percent of extremely low-income households (those earning 30 percent or less of the local area median income (AMI)) are considered severely cost burdened (spend 50 percent or more of their income on housing). Both renters and owners experience cost burden in St. Helena, with higher proportions of lower income households spending greater than 30 percent or 50 percent on housing. Table 7 shows housing cost burden of lower income households in St. Helena. Generally, a higher percentage of renters than owners experience cost burden, however, more owners than renters experience severe cost burden.

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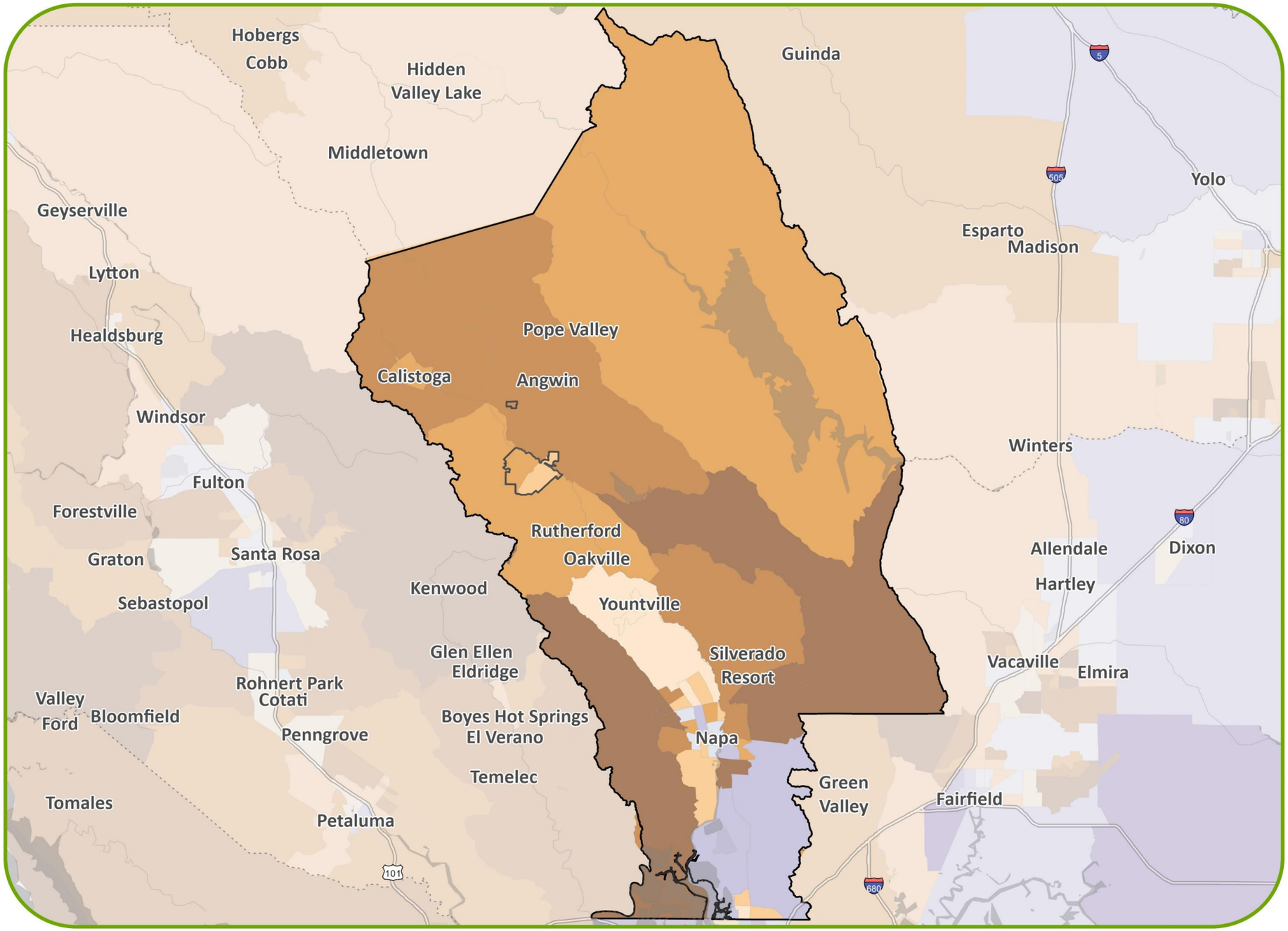


Figure 33: CalEnviroScreen 4.0 Percentile Scores (Napa County)

City Boundary
County Boundary
(A) CalEnviroScreen 4.0, 2021 - Tract
CalEnviroScreen 4.0 Percentile
1 - 10% (Lowest Scores)
11 - 20%
21 - 30%
31 - 40%
41 - 50%
51 - 60%
61 - 70%
71 - 80%
81 - 90%
91 - 100% (Highest Scores)

ST. HELENA CALIFORNIA

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Miles

N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

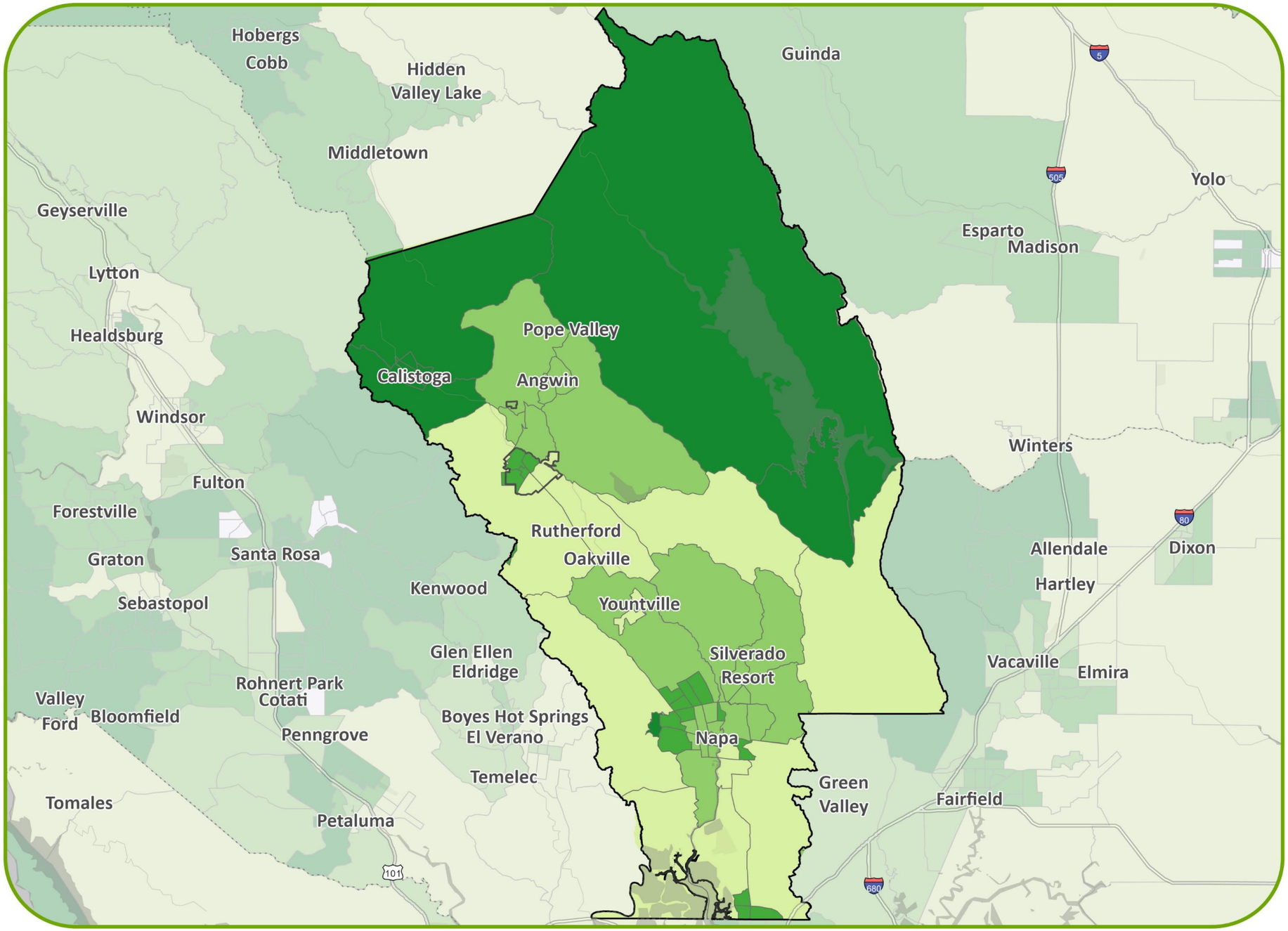


Figure 34:
TCAC Opportunity Areas – Environment (Napa County)

City Boundary
County Boundary
(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract
Environmental Domain Score
< .25 (Less Positive Environmental Outcomes)
.25 - .50
.50 - .75
.75 - 1 (More Positive Environmental Outcomes)
No Data

ST. HELENA CALIFORNIA

0 3 6 Miles

N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

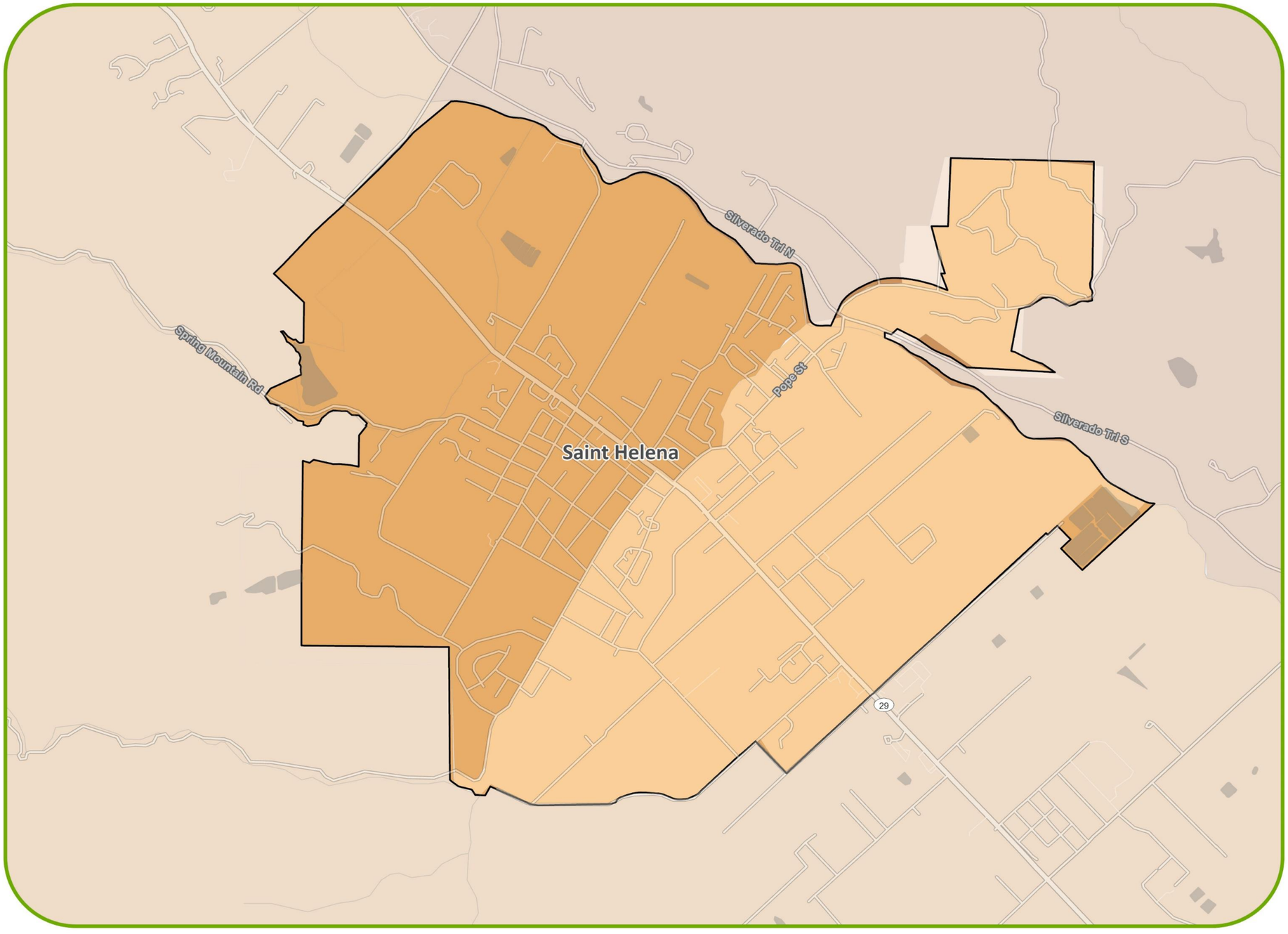


Figure 35: CalEnviroScreen 4.0 Percentile Scores (St. Helena)

City Boundary
(A) CalEnviroScreen 4.0, 2021 - Tract
CalEnviroScreen 4.0 Percentile
- 1 - 10% (Lowest Scores)
- 11 - 20%
- 21 - 30%
- 31 - 40%
- 41 - 50%
- 51 - 60%
- 61 - 70%
- 71 - 80%
- 81 - 90%
- 91 - 100% (Highest Scores)

ST. HELENA CALIFORNIA

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County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

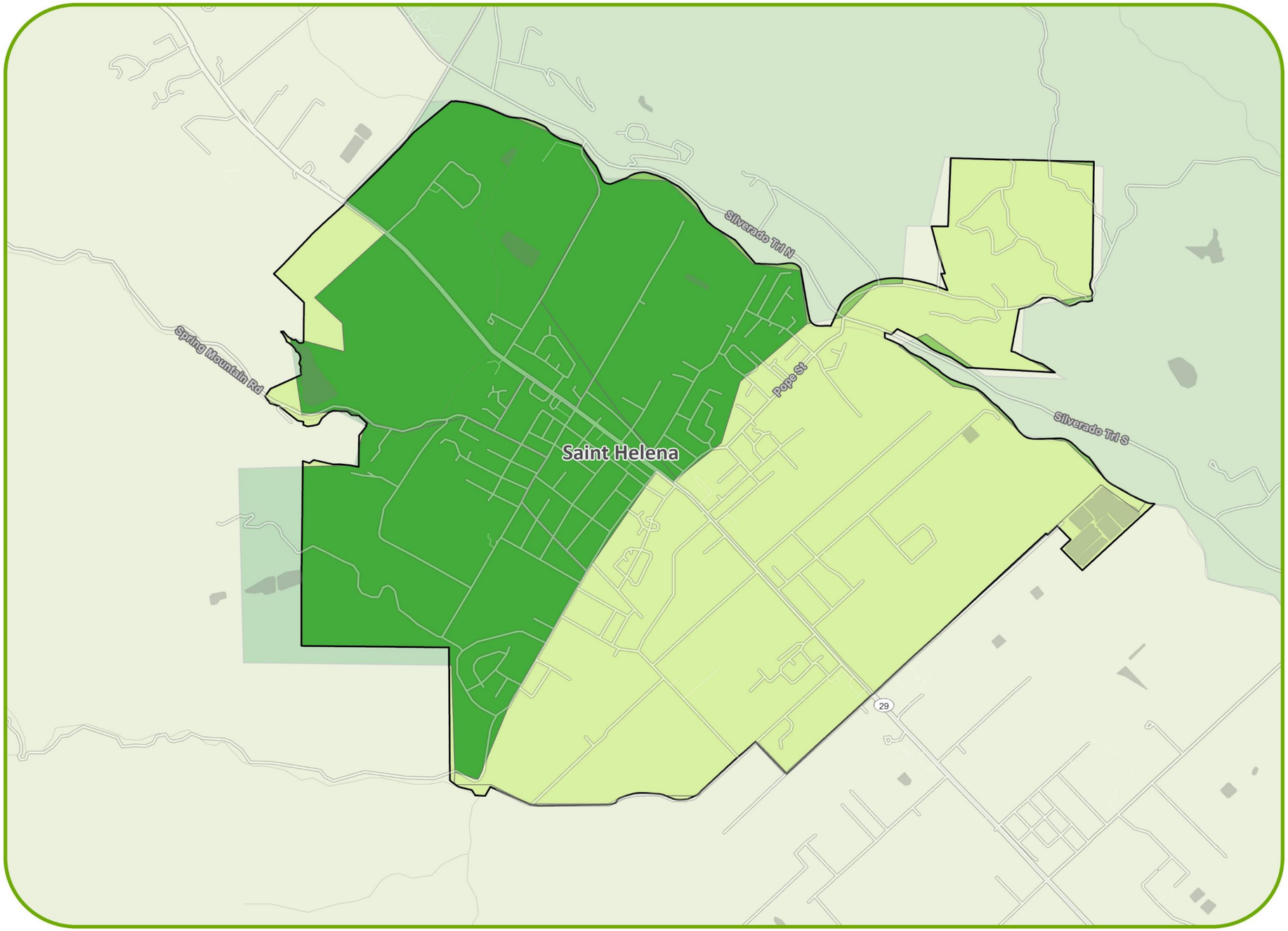


Figure 36:
TCAC Opportunity Areas – Environment (St. Helena)

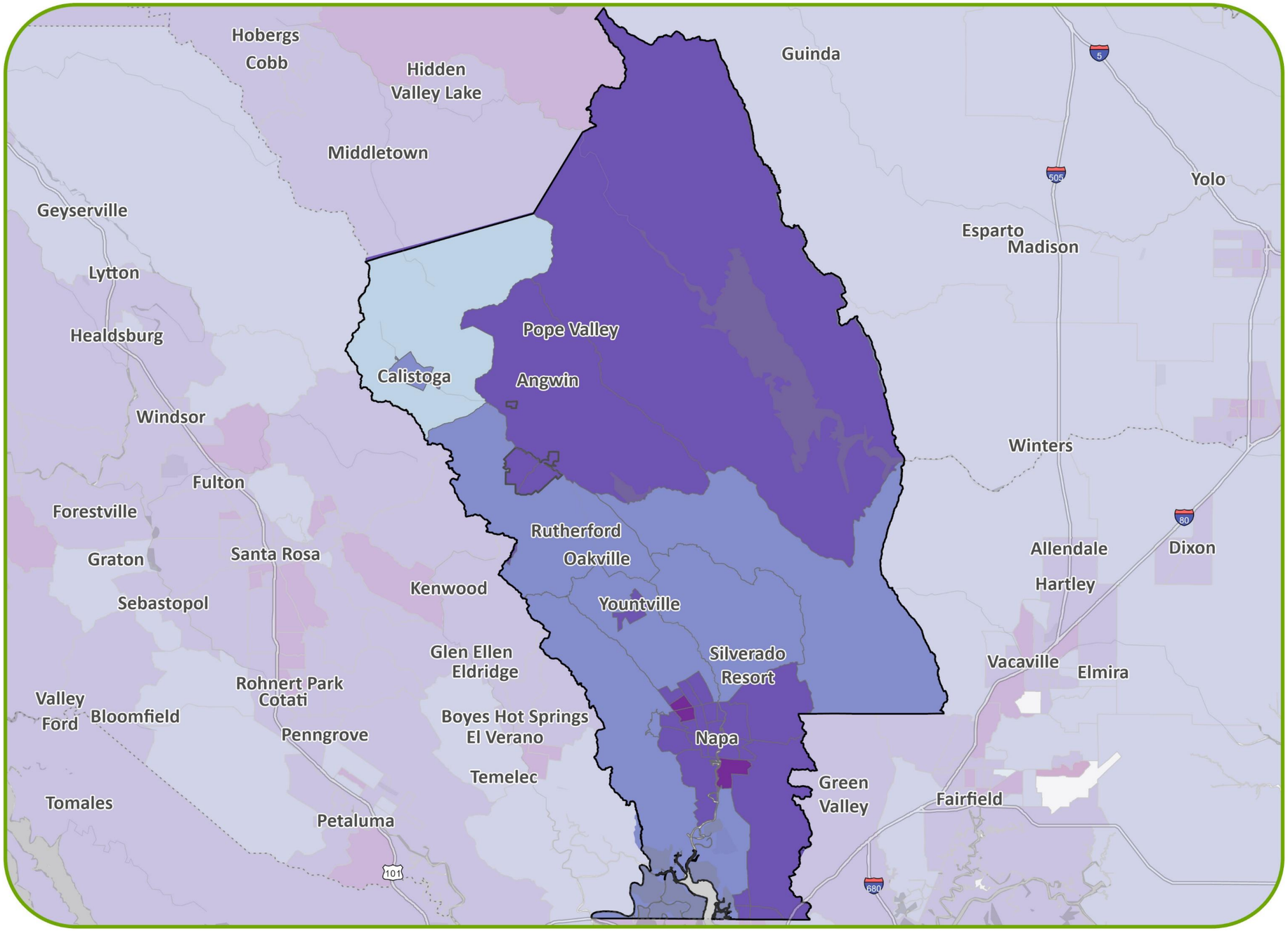


Figure 37: Overpayment By Renters (Napa County)

City Boundary
County Boundary
(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract
Percent of Renter Households for whom Gross Rent (Contract Rent Plus Tenant-Paid Utilities) is 30.0 Percent or More of Household Income
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

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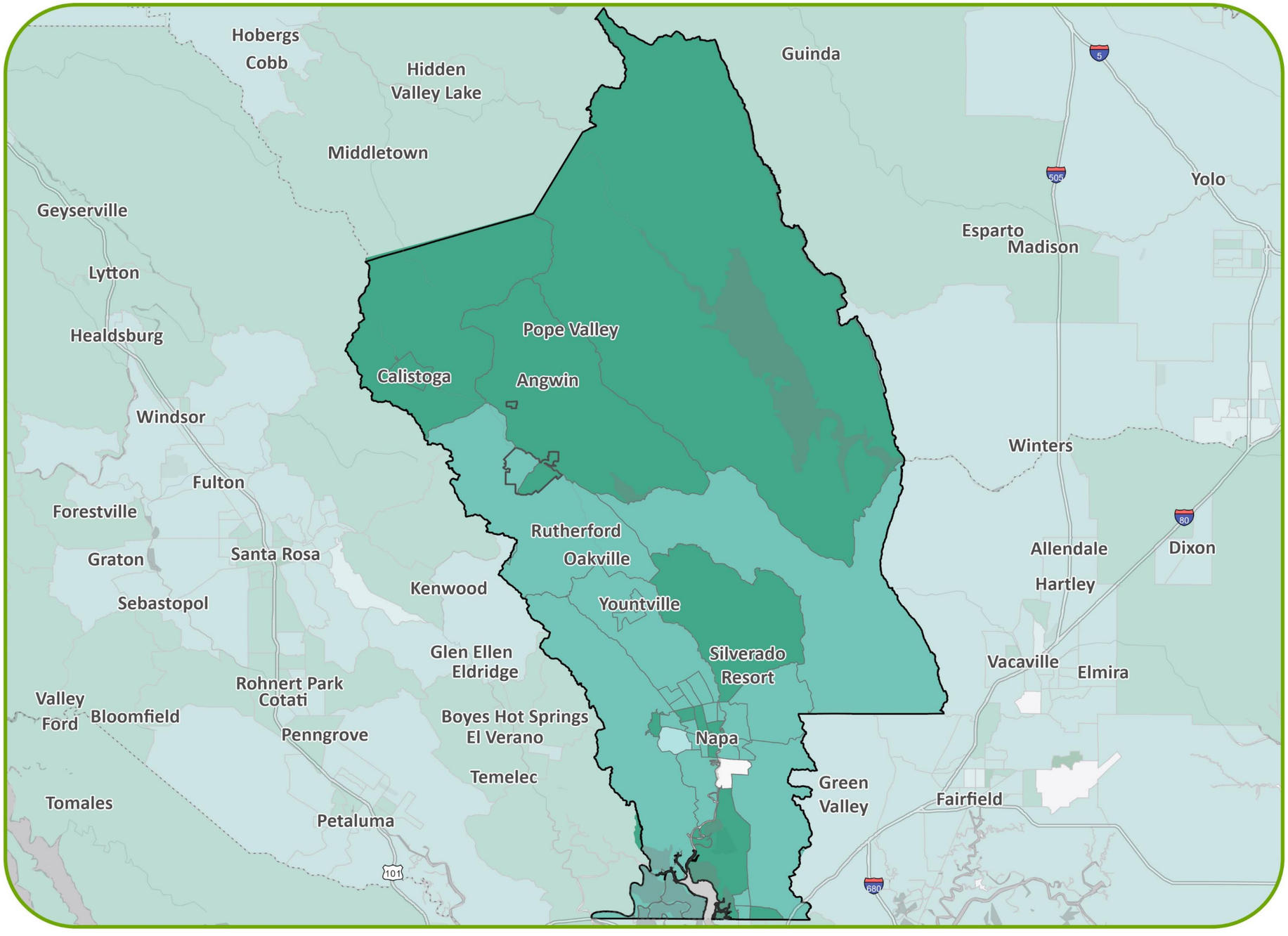


Figure 38: Overpayment By Homeowners (Napa County)

City Boundary
County Boundary
(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract
Percent of Owner Households with Mortgages whose Monthly Owner Costs are 30.0 Percent or More of Household Income
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

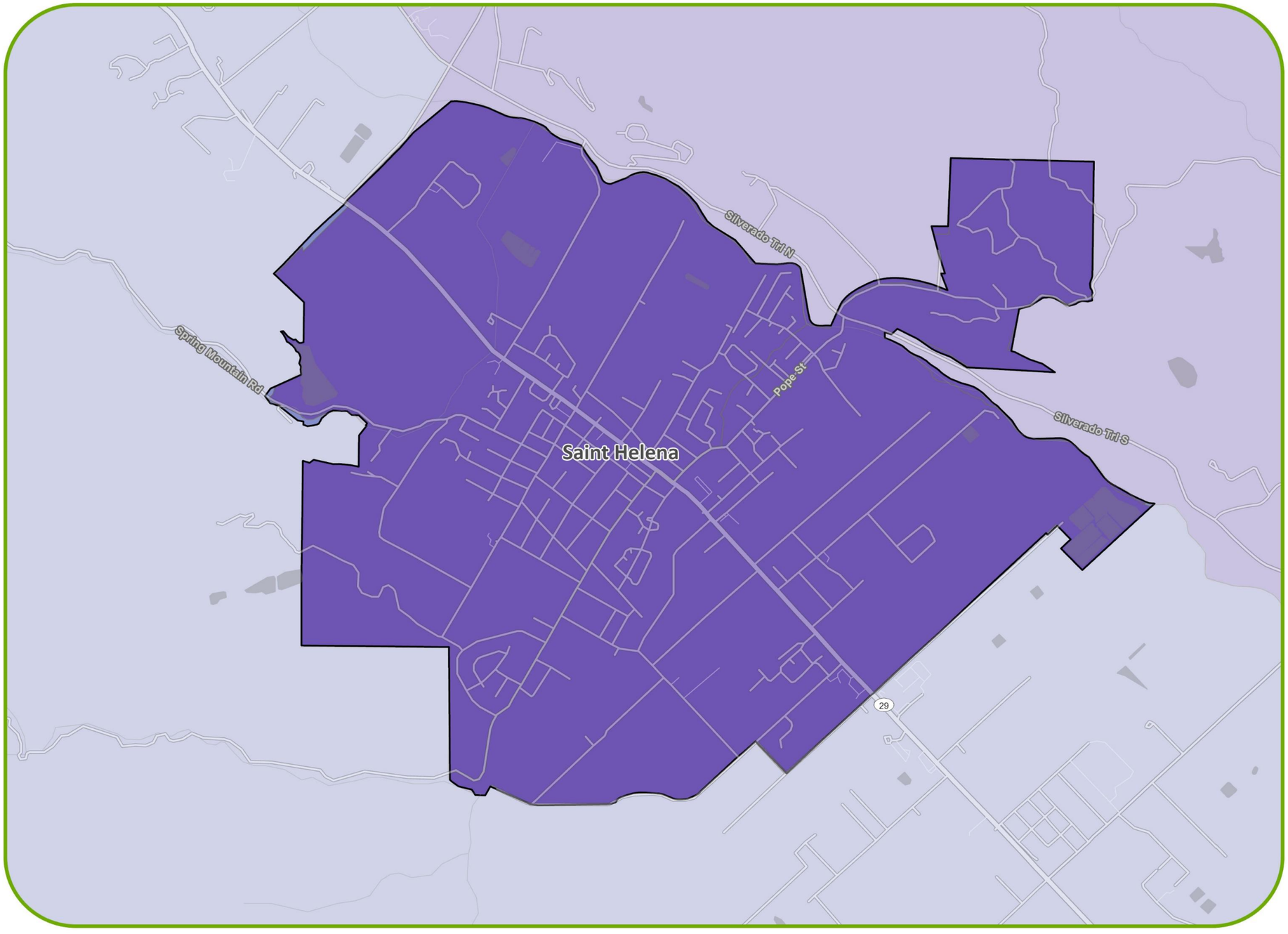


Figure 39: Overpayment By Renters (St. Helena)

City Boundary
(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract
Percent of Renter Households for whom Gross Rent (Contract Rent Plus Tenant-Paid Utilities) is 30.0 Percent or More of Household Income
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.

Table 7 Housing Cost Burden of Lower-Income Households (2014-2018)

Household by Type, Income, and Housing Problem	Renters	Percent	Owners	Percent	Total Households	
Extremely Low-Income (0-30 % AMI)	185		160		345	
With Cost Burden >30%	100	54.1%	105	65.6%	205	59.4%
With Cost Burden >50%	50	27.0%	90	56.3%	140	40.6%
Very Low-Income (0-30 % AMI)	240		105		345	%
With Cost Burden >30%	195	81.3%	70	66.7%	265	76.8%
With Cost Burden >50%	35	14.6%	40	38.1%	75	21.7%
Low-Income (51-80 % AMI)	145		160		305	%
With Cost Burden >30%	100	69.0%	85	53.1%	185	60.7%
With Cost Burden >50%	40	27.6%	60	37.5%	100	32.8%
Moderate & Above Income (>80% AMI)	500		1,105		1,605	%
With Cost Burden >30%	133	26.6%	205	18.6%	338	21.1%
With Cost Burden >50%	8	1.6%	60	5.4%	68	4.2%
Total	1,070	41.2%	1,530	58.8%	2,600	%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018

3.7.4 Substandard Housing

HUD considers housing units to be "standard units" if they are in compliance with local building codes. Substandard housing is housing that poses a risk to the health, safety, or wellbeing of its occupants or neighbors, includes housing that does not have operable indoor plumbing, electricity, or heat. Housing age can be an important indicator of housing condition in a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Typically, housing over 30 years old is more likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs. Some older housing units may have health risks such as lead paint and asbestos. Housing issues such as mold may elevate health conditions such as asthma.

3.7.5 Regional Trends

In Napa County approximately 73 percent of all housing units were built before 1990. These older units potentially require minor repairs and modernization improvements. Figure 41 shows the approximate break down by age of housing units.

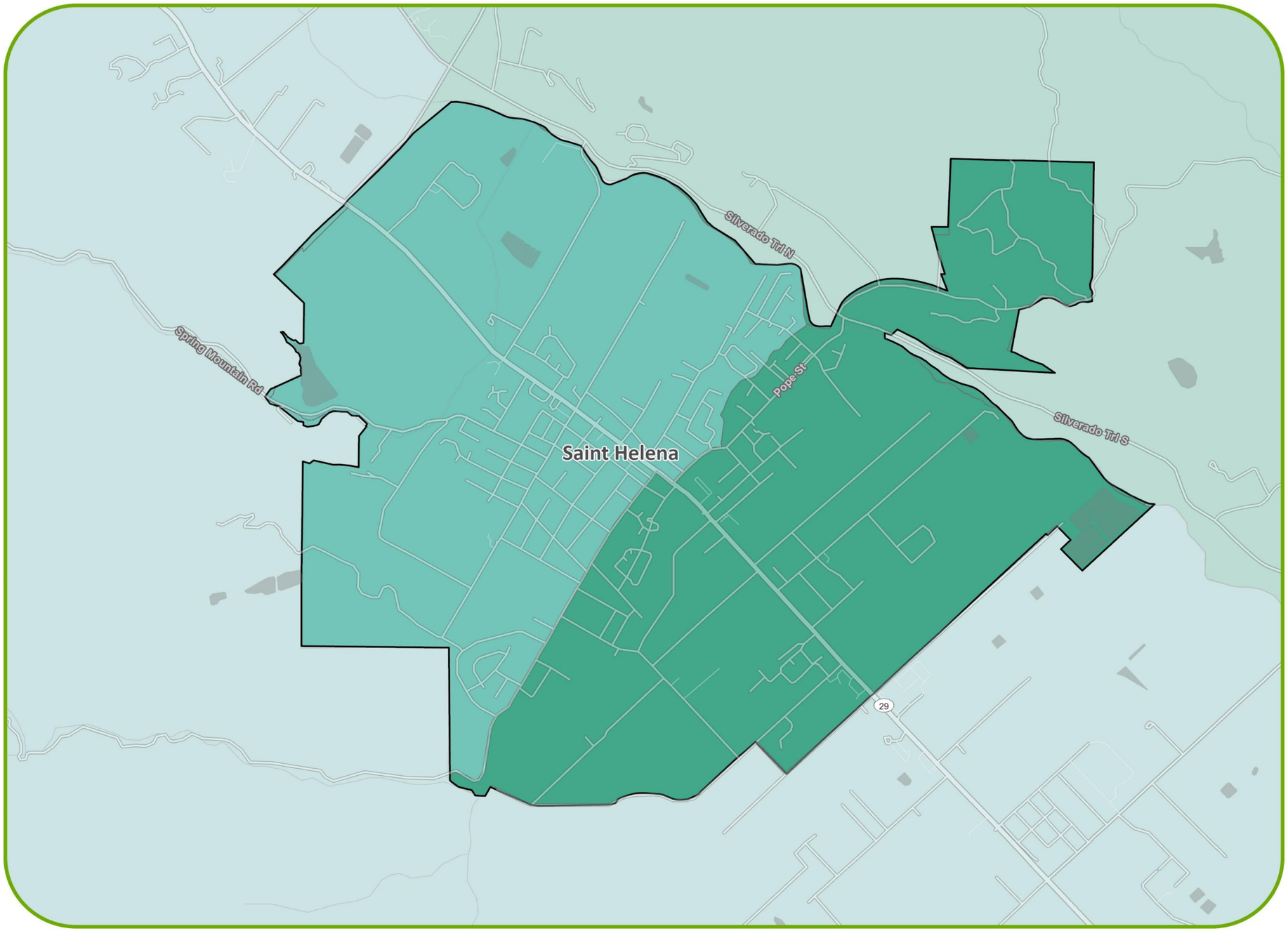


Figure 40: Overpayment By Homeowners (St. Helena)

City Boundary

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

Percent of Owner Households with Mortgages whose Monthly Owner Costs are 30.0 Percent or More of Household Income

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

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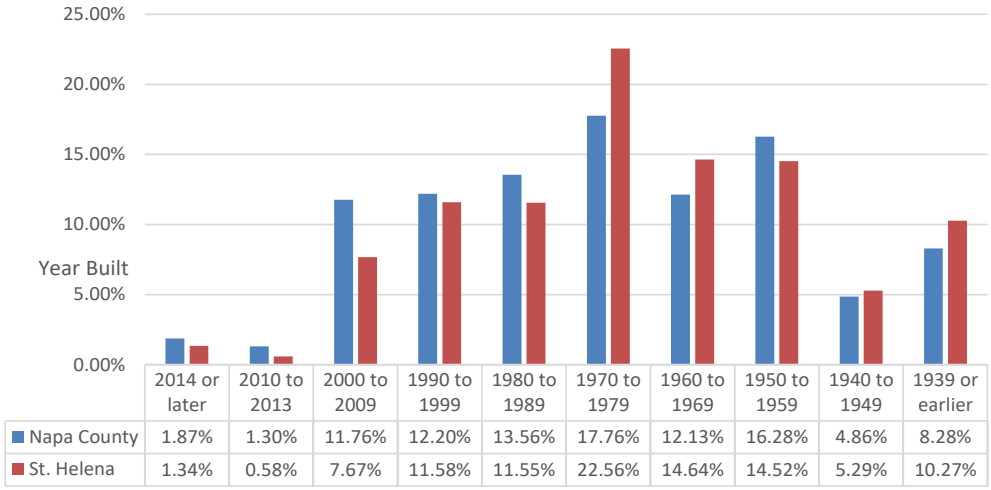
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Agenda Item #5.2.

Page 390 of 1246

Figure 41 Housing Stock Age (2015-2019)



Source: Bureau of the Census, American Community Survey, 2015-2019

The County of Napa has a total of 881 substandard housing units, approximately 2 percent of the total occupied units in the county. A housing unit is considered substandard if it lacks complete plumbing or kitchen facilities. Of the 881 substandard units, approximately 15 percent lacked complete plumbing facilities and 85 percent lacked complete kitchen facilities. Table 8 shows a breakdown of the number of substandard housing units in Napa County and St. Helena. In the past, lack of telephone service was also an indicator of housing conditions. Today, with the widespread availability of cell and internet phone services, many households have chosen not to install land line telephone services, and availability of telephone service is no longer considered an indicator of substandard housing conditions.

Table 8 Substandard Housing Units (2019)

Condition	Napa County		St. Helena	
Lacking complete plumbing facilities	128	0.26%	0	0.00%
Lacking complete kitchen facilities	753	1.55%	83	3.07%
Total	48705		2702	

Source: Bureau of the Census, American Community Survey, 2015-2019.

3.7.6 Local Trends

As shown above in Figure 41, approximately 79 percent of the city's housing stock was built prior to 1990, potentially requiring minor repairs and modernization improvements.

Table 8 shows 83 units, about 3 percent of the St. Helena's housing stock, are considered substandard. All identified substandard units lacked complete kitchen facilities.

3.7.7 Homelessness

"Homelessness," as defined by HUD, describes an individual, who is not imprisoned or otherwise detained, who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
  - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
  - An institution that provides a temporary residence for individuals intended to be institutionalized; or
  - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Throughout Napa Country, homelessness has become an increasingly important issue. Factors that contribute to the rise in homelessness include a lack of housing affordable available for low- and moderate-income households, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies, and lack of support for persons with extreme developmental, physical, and mental disabilities.

3.7.8 Regional Trends

Napa County's 2020 Point-In-Time Count indicated there were 464 persons experiencing homelessness in the county on any given night; mostly in the City of Napa. This is an increase from 322 persons in the 2018 Point-In-Time Count.

3.7.9 Local Trends

The number of homeless persons in St. Helena is unknown as the 2020 Point-In-Time Count does not include a breakdown of the homeless population by jurisdiction. Based on St. Helena's share of the countywide population, 3.9 percent, it is estimated the City's homeless population is approximately 18 persons.

3.7.10 Overcrowding

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen) and severe overcrowding refers to more than 1.5 persons per room. Large families generally have special housing needs due to lower per capita income, the need for affordable housing, or the need for larger units with three or more bedrooms, resulting in overcrowding. Some households may not be able to accommodate high-cost burdens for housing and accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding.

Household overcrowding is reflective of various living situations such as a housing unit that is inadequately sized to meet a household's needs, the necessity or desire to have extended family members reside in an existing household, or unrelated individuals or families share a single housing unit.

Not only is overcrowding a potential fair housing concern, but it can also potentially strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes. As a result, some landlords or apartment managers may be more hesitant to rent to larger households, thus making access to adequate housing even more difficult. According to local fair housing service providers and property managers, addressing the issue of large households is complex as there are no set of guidelines for determining the maximum capacity for a unit. Fair housing issues may arise from policies aimed to limit overcrowding that have a disparate impact on specific racial or ethnic groups with higher proportion of overcrowding.

3.7.11 Regional Trends

In Napa County, approximately 6 percent of occupied housing units are overcrowded. As shown in Figure 42, overcrowded housing is most prevalent in the cities of Napa and Calistoga. The City of Napa has the highest percentage of overcrowded units. Certain areas within the city have between 14 and 36 percent of households that are overcrowded. Rural areas experience less overcrowding, and some rural areas have no overcrowded or severely overcrowded units.

Table 9 shows the percentage of housing units that are overcrowded. Renter-occupied households had a larger proportion of overcrowded households in the county.

Table 9 Overcrowding by Tenure

Jurisdiction	Overcrowded (1+ occupants per room)			Severely Overcrowded (1.5+ occupants per room)		
	Renter	Owner	Total	Renter	Owner	Total
St. Helena	9.26%	1.57%	4.74%	1.44%	1.01%	1.18%
Napa County	11.92%	2.99%	6.18%	3.50%	0.64%	1.66%

Source: Table B25014 Tenure by Occupants Per Room 2015-2019 ACS. Bureau of the Census, American Community Survey, 2015-2019.

3.7.12 Local Trends

Based on 2015-2019 ACS estimates, approximately five percent of households in St. Helena are overcrowded, compared to 6 percent for the county as a whole. As shown in Table 9,a higher proportion of renter households are overcrowded than owned households in St. Helena. Figure 43 shows the percent of overcrowded households throughout the city, no concentrated areas overcrowding of households are shown. ACS estimates indicate overcrowding is a more common housing issue for Hispanic/Latino households than White households where approximately 20 percent Hispanic/Latino households in St. Helena are overcrowded compared to three percent of White households.

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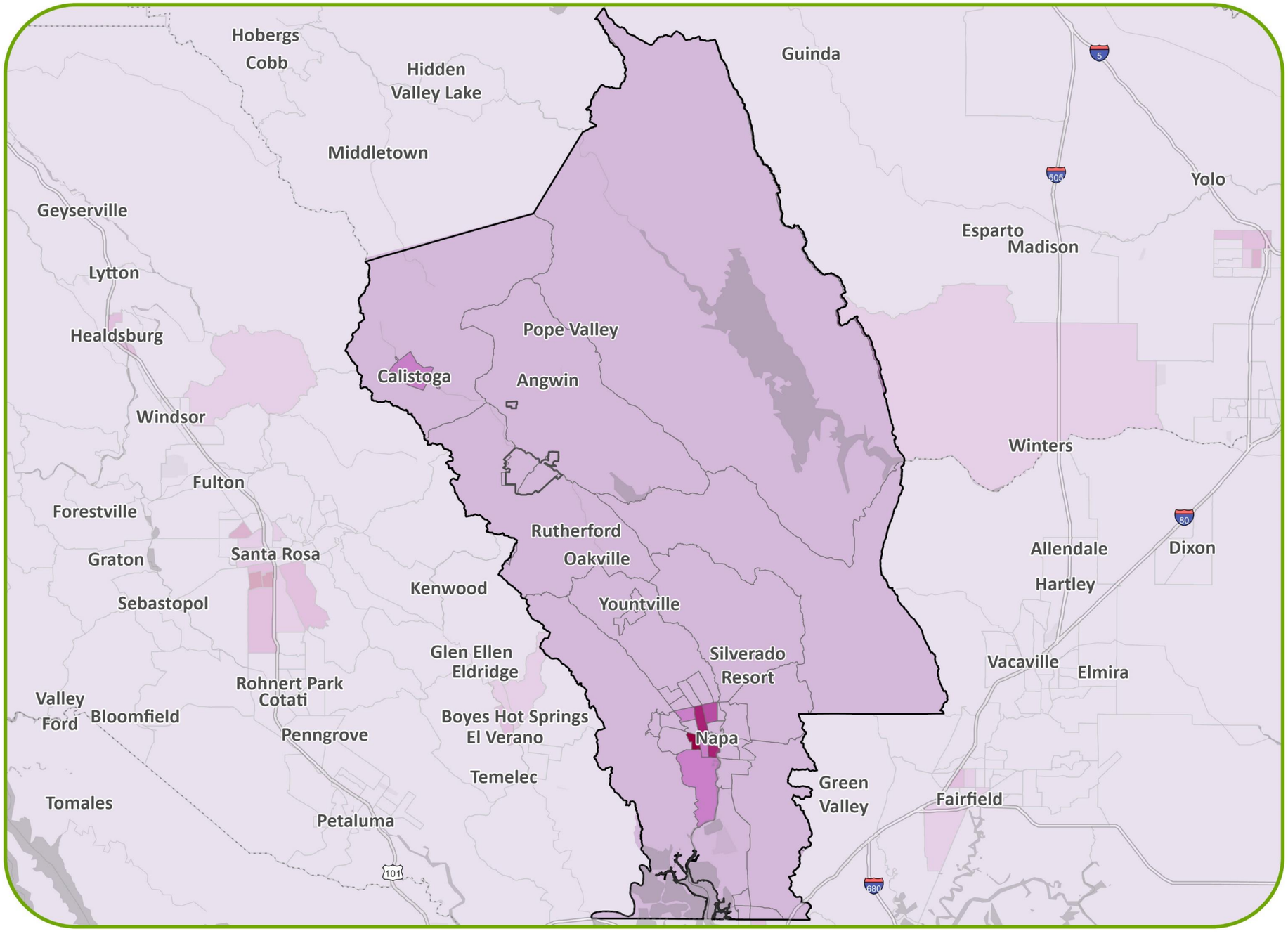


Figure 42: Overcrowded Households (Napa County)

City Boundary
County Boundary
(R) Overcrowded Households (CHHS) - Tract
Percent of Overcrowded Households
≤ 8.2% (Statewide Average)
8.3% - 12%
12.01% - 15%
15.01% - 20%
> 20%

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

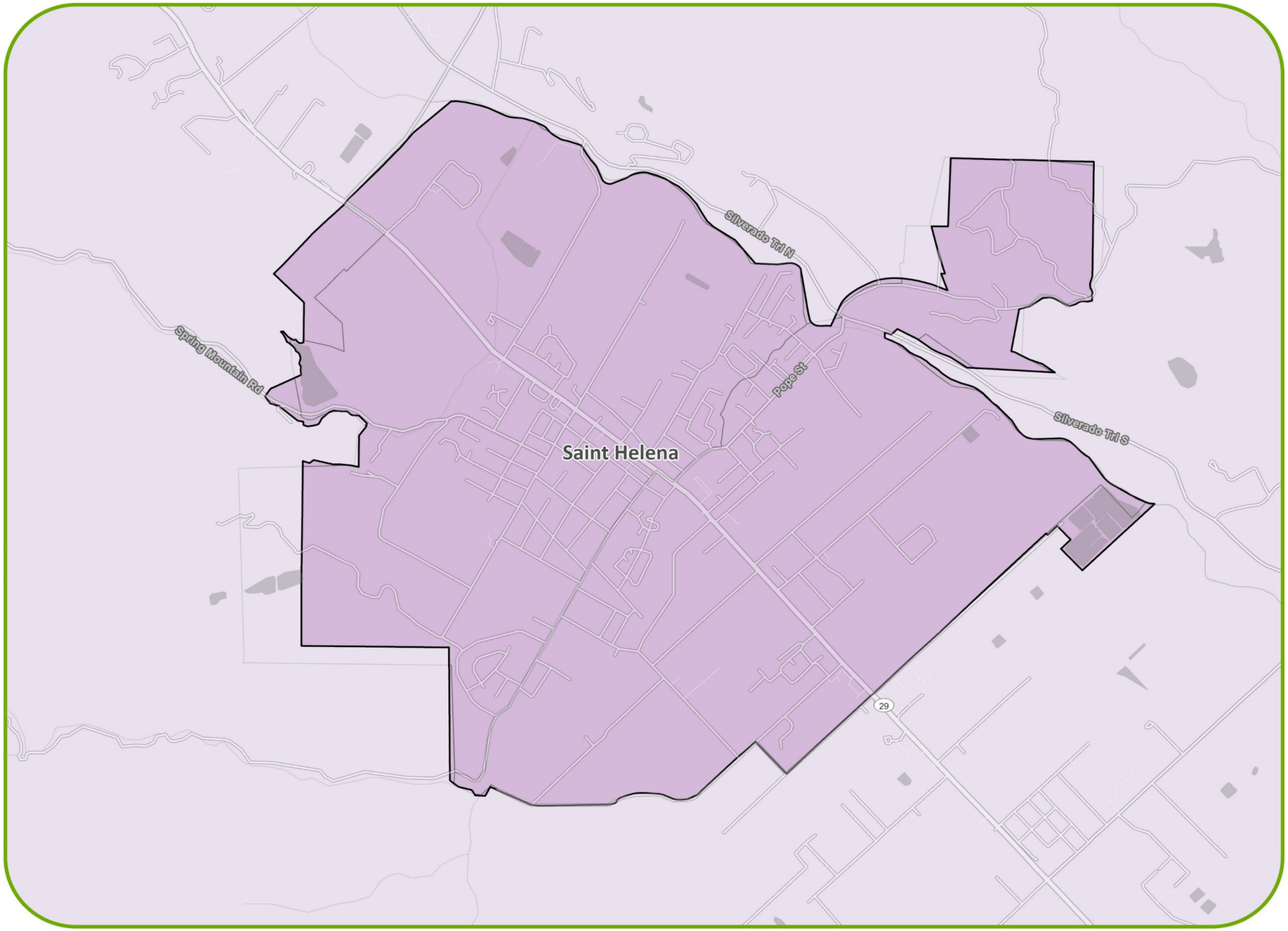


Figure 43: Overcrowded Households (St. Helena)

City Boundary
(R) Overcrowded Households (CHHS) - Tract
Percent of Overcrowded Households
- ≤ 8.2% (Statewide Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%
- > 20%

3.7.13 Displacement

Displacement, as defined by HCD, is used to describe any involuntary household move caused by landlord action or market changes. Shifts in neighborhood composition are often framed and perpetuated by established patterns of racial inequity and segregation. Movement of people, public policies, and investments, such as capital improvements and planned transit stops, and flows of private capital can lead to displacement. Displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, and insufficient market-rate housing production. Decades of disinvestment in low-income communities, coupled with investor speculation, can result in a rent gap or a disparity between current rental income of the land, and potentially achievable rental income if the property is converted to its most profitable use. These processes can disproportionally impact people of color, as well as lower income households, persons with disabilities, large households, and persons at-risk or experiencing homelessness.[81]

3.7.14 Regional Trends

The Urban Displacement Project (UDP) is an initiative out of the University of California, Berkeley that conducts data-driven research to better understand gentrification and displacement in order to generate more equitable and inclusive cities. UDP provides data to identify "sensitive communities," communities that are vulnerable to displacement caused by housing costs or with market-based displacement pressures within or near the community. As shown in Figure 44 below, portions of the cities of Napa and Calistoga are identified as sensitive communities by UDP. These communities are also more racially/ethnically diverse and have lower household median income compared to other areas of the county.

3.7.15 Local Trends

UDP did not identify any areas within St. Helena that are considered vulnerable to displacement, as shown in Figure 45. However, research from the University of California Berkeley indicates that 42.0 percent of households in St. Helena live in neighborhoods susceptible to or experiencing displacement.

[81] *HCD. 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf*

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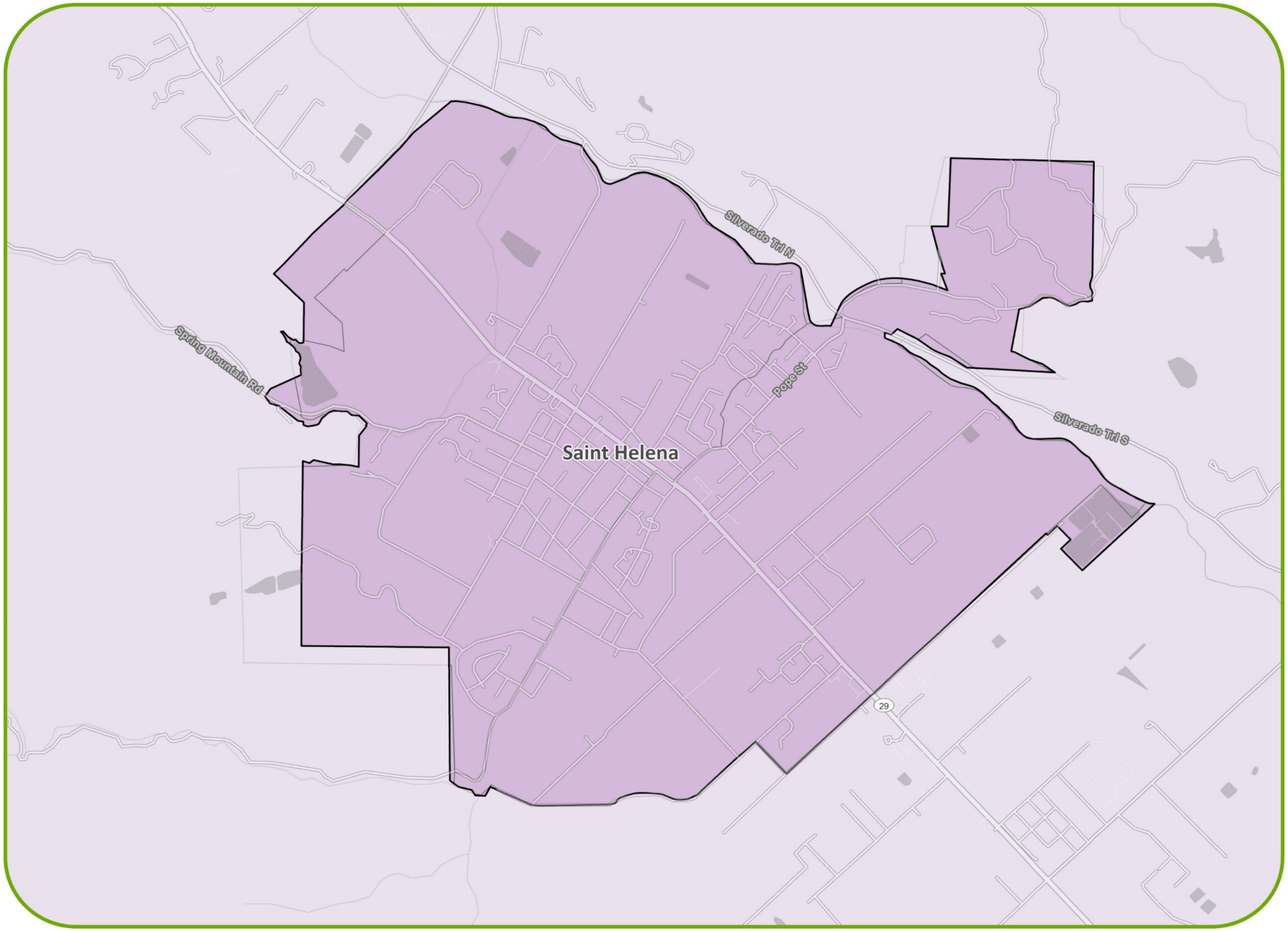


Figure 44: Sensitive Communities (Napa County)

City Boundary

(R) Overcrowded Households (CHHS) - Tract

Percent of Overcrowded Households

- ≤ 8.2% (Statewide Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%
- > 20%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles

N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

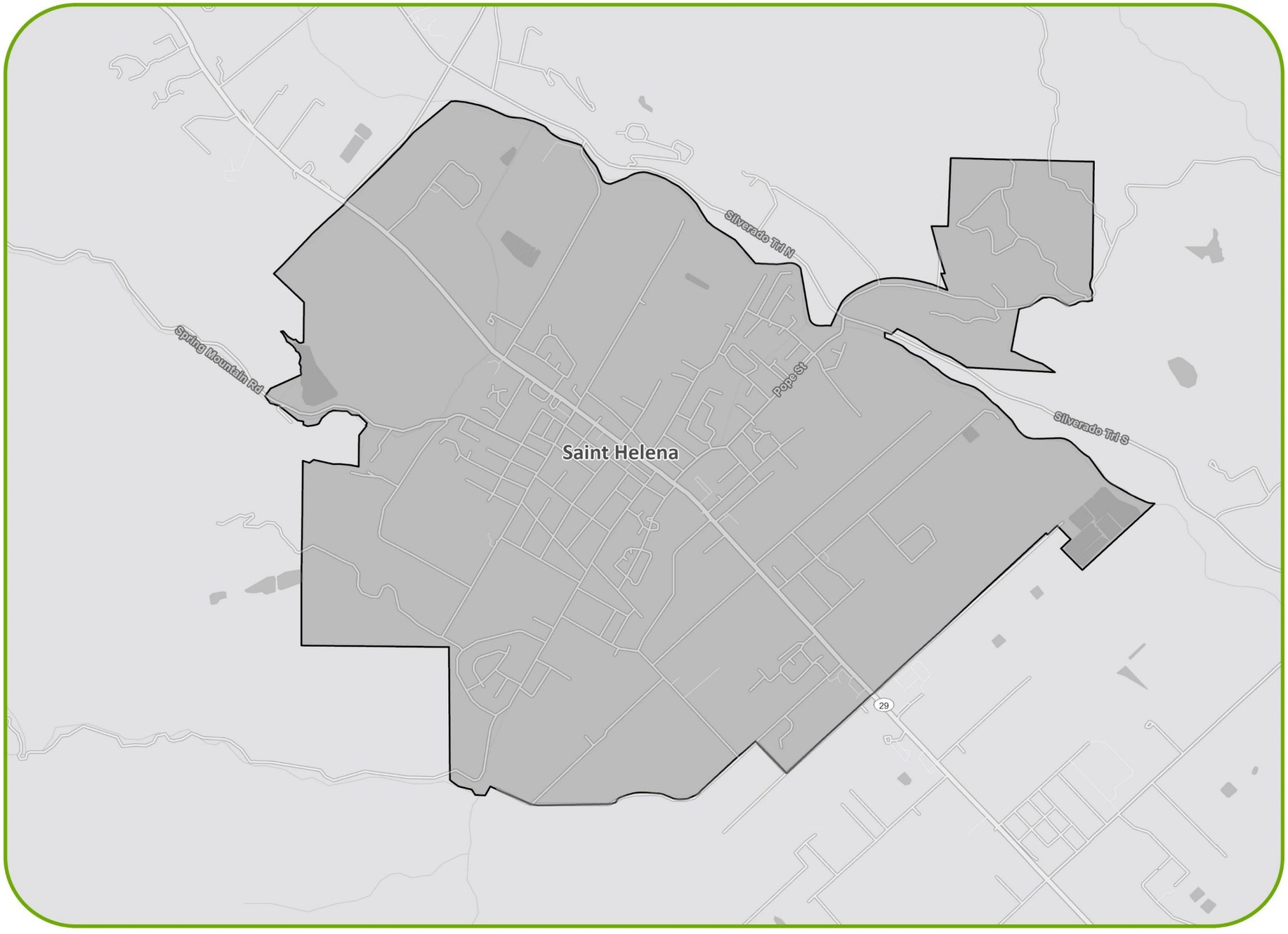


Figure 45: Sensitive Communities (St. Helena)

City Boundary
(A) Sensitive Communities (UCB, Urban Displacement Project)
Vulnerable
Other

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

4. Local Area of Knowledge

The AFFH analysis identified the eastern portion of St. Helena as generally experiencing more fair housing issues than other areas of the city. Fair housing issues in this area include higher levels of minority populations, low and moderate median income, overpayment of housing, higher median rent, and lower economic and environmental outcomes. The predominant population in this area of the city is White, however it has the highest non-White population of all areas within the city. Additionally, this area has a higher proportion of persons living with a disability compared to other areas. Overall, the eastern portion of the city is a moderate resource area, the same as the rest of the city. Some factors that could play into the trends seen in the data could be the location of existing retirement and older adult living facilities. The population living within these communities are, many time, fixed income and more often single-headed households. In addition, most of the city's high density land use and housing is located in this eastern portion of the city, which tends to be the housing type most affordable to lower income residents and single-parent households. As part of the Housing Element, the City is committing to improving the number of affordable units city-wide. In addition, with the recently adopted General Plan, the city envisions the redevelopment of Main Street within the eastern portion of the city with new, mixed-use development to increase economic opportunities and investments in this area.

4.1 Local Actions and Policy Efforts

In 2018, the City funded the 2018 St. Helena Housing Update Report, a housing analysis study that identified contributing factors to housing challenges in St. Helena. The report identified that residents believe new housing development primarily occurs east of Highway 29, however according to the report the majority of new construction was located west of Highway 29. In addition, the report also identified community opposition as a challenge to housing development in the city, leading to delays and increased project costs. Community members often desire to maintain the rural character of the city and are very concerned with how new development will impact surrounding neighborhoods.[82]

In October of 2020, the City Council adopted the Resolution 2020-105: Affirming that Discrimination and Systemic Racism Constitute A Public Health Crisis Causing Disparities in Mental Wellbeing, Language Access, Housing, Economic Development, Health, and Criminal Justice Experience, and Reaffirming Its Commitment to Advancing Justice, Equity, Diversity, and Inclusion in the City. This resolution commits the City to erasing barriers to opportunities to minority populations, including housing. The Staff Report to City Council for Resolution 2020-105 recommends actions to address racial equity and social justice in the community, including providing Spanish translation for City Council and Planning Commission meetings, provide all City communication in Spanish and reviewing adopted by other cities that promote inclusivity and access to affordable housing.

[82] 2018. St. Helena Housing and Community Report. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3395/staff_report-white_paper.pdf

The City also prepared a Diversity, Equity, and Inclusion Strategy to outline the City's efforts towards diversity, equity and inclusion, and social justice. The strategy includes actions such as creating a Diversity, Equity and Inclusion Committee to discuss topics, including housing and racial justice, and offering live Spanish interpretation for regular and special City Council and Planning Commission meetings. The City continues to provide Spanish interpretation for City Council and Planning Commission meetings.

4.2 Stakeholder Input

The City held three housing workshops to receive feedback from the community on housing issues and the Housing Element Update (on September 16, 2021, January 20, 2022, and March 16, 2022). During these workshops, participants frequently brought up concerns regarding the lack of affordable housing for lower income households and the "missing middle" as well as the need to support affordable home ownership. AFFH related concerns included the high cost of housing, transportation accessibility, ADU trends (specifically that ADUs tend to be utilized as vacation rentals and not housing).

4.2.1 Other Relevant Factors

Other factors to fair housing issues in St. Helena that have not been previously discussed in this analysis include lack of sufficient housing for farmworkers, availability of affordable units in a range of sizes, access to transportation, access to home ownership. These contributing factors limit the accumulation of wealth and access to housing resources in historically marginalized communities.

4.2.2 Farmworker Housing

An estimated between 6,000 and 9,000 farmworkers are employed Napa County. Sufficient affordable housing options are lacking for farmworkers who are often lower income and have special housing needs, such as seasonal housing. The number of farmworkers employed in St. Helena is unknown, however the city's central location with regard to vineyards and wineries throughout the county would imply a number of farmworkers are employed in proximity to the city.

4.2.3 Access to Transportation

St. Helena's public transportation system is operated by Vine Transit which operates one bus route (Route 10) in the city. Route 10 has four stops in the city, however all four stops are along the main road, State Route 29. Areas of the city located further north or south are more than 0.25 miles from a bus stop. This bus route connects the City of Napa and the City of Calistoga where connections to destinations further north or south can be made. Residents who live or work in St. Helena have limited options for traveling via public transit, potentially limiting their housing options.

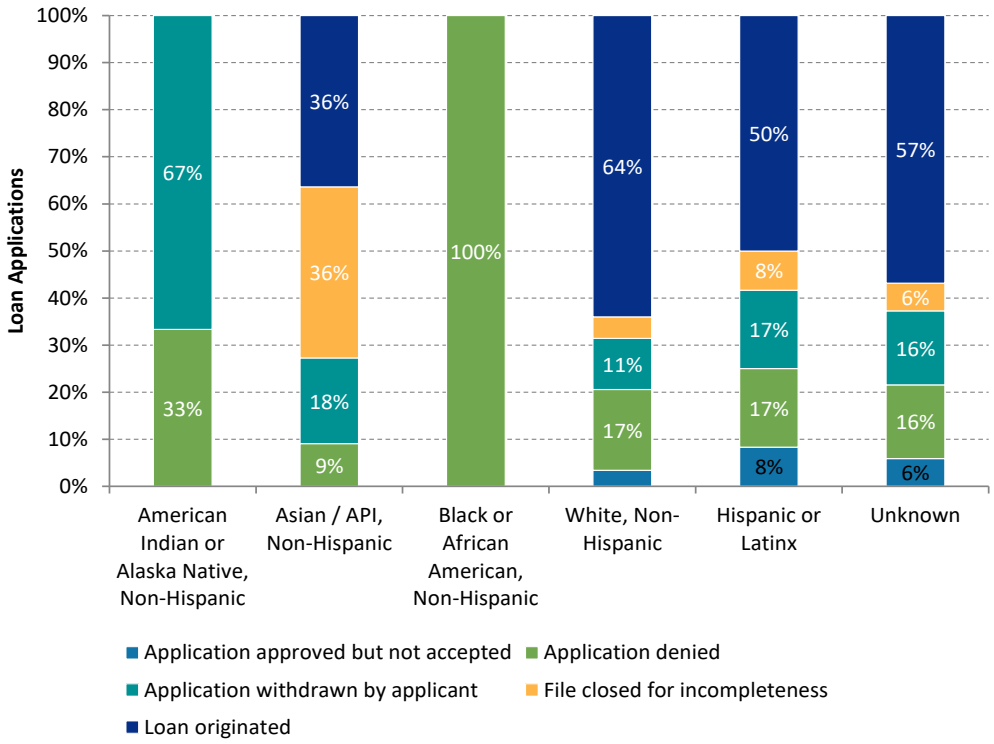
4.2.4 Access to Home Ownership

Increasing housing costs has produced a barrier to home ownership for St. Helena residents. As of December 2020, Zillow reported typical home values in St. Helena were estimated at $1,665,790, much

higher than the typical home value in Napa County, which is estimated at $768,410. Typical home values reflect the value of homes in the 35th to 65th percentile range. Home values have been consistently on the rise since 2000 (with the exception of the recession). This trend has made it more difficult for residents, especially lower income residents, to afford homes. Affordable housing projects in the city generally consist of rental units, which does not provide opportunities for lower income residents to own homes.

Mortgage application filing and acceptance data from 2018-2019 indicates there are racial/ethnic disparities among homeownership opportunities for residents in Napa County. As shown in Figure 46, 64 percent of White, Non-Hispanic applicants and 50 percent of Hispanic/Latinx had their loan originated, compared to 36 percent of Asian/ API applicants, 0 percent of Black/African American, and 0 percent of American Indian/Alaska Native applicants.

Figure 46 Mortgage Applications and Acceptance by Race



Source: Federal Financial Institutions Examination Council's (FFIEC) Home Mortgage Disclosure Act loan/application register (LAR) files

4.2.5 Opposition to New Development

According to the 2018 St. Helena Housing Update Report, city residents are "deeply concerned with maintaining the rural character of town" and therefore residents generally oppose housing projects that are perceived to changing neighborhood character. Many previous and ongoing multi-family housing projects

have been met with comments and concern from community members regarding environmental impacts, such as increases in water demand and increases in traffic as well as impacts to existing neighborhoods and community character.

4.2.6 Location of New Housing

Some residents of the city feel the city is segregated between east and west of Main Street, where the west side of the city consists of a greater percentage of White, affluent residents while the east side of the city has a greater percentage of non-White and low-income residents. In addition, residents have stated that the multi-family housing in the city is located in the eastern area. According to the 2018 St. Helena Housing Update Report, the majority of new construction over the last 10 years has been west of Highway 29.[83] The Magnolia Oaks housing development consists of 44 multi-family housing units, 10 of which are affordable to low-income residents. While this project is located just west of Highway 29, other recently multi-family projects have been constructed on the east along McCorkle Avenue. The City is in the process of adopting a new Zoning Ordinance to be consistent with the 2040 General Plan, which would permit duplexes and triplexes within the MR District (see Program H-N). This would create additional housing choices and affordability levels in the MR Districts on the western side of the city. In addition, Programs H-BB, H-EE, and H-XXwould implement placemaking strategies to outreach and work with the more diverse and older populations living in the east due to the historic development patterns.

5. Sites Inventory Analysis

5.1 Opportunity Areas

HCD and TCAC opportunity maps identify areas throughout the state whose characteristics support positive economic (low poverty, high employment, high median household income), educational (reading and math proficiency, high school graduation rates, low student poverty rates), and environmental outcomes (low exposure to pollution). A census tract with a designation of high resource would indicate there are strong educational and economic opportunities, meaning opportunity for current and future residents.

According to the 2022 TCAC Opportunity Map, the entire city is considered an area of moderate resource. However, the eastern portion of the city is has a higher percentage of non-White residents, lower household median income., higher percentage of cost burden among renters and owners, and less positive economic and environmental outcomes compared to the rest of the city. These demographic And socio-economic patterns influenced the locations of potential lower income sites in the city.

[83] Erica Skylar. 2018. St. Helena Housing Update Report. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3395/staff_report-white_paper.pdf

5.2 Improved Conditions

According to the 2022 TCAC Opportunity Map, the entire city is considered an area of moderate resource. Demographic and socio-economic spatial patterns show that census blocks with low- and moderate-income households, greater Hispanic/Latino populations, and higher rates of housing problems are located throughout the eastern half of the city. Sites that accommodate housing unit densities appropriate for lower-income units are scattered around the city. Sites that can accommodate most of the lower income units are located in the western and southern part of the city, which has a higher household median income and more positive economic and environmental outcomes. Approximately 38 percent of the total proposed units and 36 percent of the proposed lower-income units planned for in the sites inventory (Appendix B) are located in the eastern part of the city, which has a higher percentage of low- and moderate-income populations and non-White residents. .

Figure 47 shows the site inventory in relation to the TCAC Opportunity Map. Sites proposed within the eastern area of the city, are diverse with a mix of lower income and non-lower income sites. Lower income sites spread across the city. Site 7 (821 Pope Street) and Site 8 (882 and 886 College Avenue) have 50% lower income units and 50% moderate income units. The rest of the proposed lower income sites are 100% lower income units.

5.2.1 Exacerbated Conditions

The northern and eastern parts of the city contain block groups considered moderate resource with a higher concentration of Hispanic/Latino population, higher percent of renter occupied units, higher percentage of overpayment by residents, less positive economic outcomes, and higher pollution burden compared to the moderate and high resource areas of the city. According to California Housing Partnership data, all federal and State subsidized housing within St. Helena is in moderate resource areas in the northern and eastern portions of the city. The Sites Inventory does not exacerbate conditions in vulnerable areas of the city by identifying sites that can accommodate lower income units throughout the city. Additionally, one underutilized site was identified that could accommodate above moderate units in the eastern part of the city, which has a higher percentage of non-White residents and cost burden and lower economic and environmental outcomes.

5.2.2 Racially/Ethnically Concentrated Areas of Poverty and Affluence

There are no racially/ethnically concentrated areas of poverty or affluence identified in St. Helena. However, eastern areas of the city have a larger population of Hispanic/Latino residents as well as LMI populations compared to other areas of the city. In contrast, western areas of the city have higher concentrations of White residents, higher median incomes, and lower concentration of LMI populations. Sites feasible for lower income housing were identified in these affluent areas.

5.2.3 Access to Opportunity

The city is categorized into 2 census tracts, both of which are considered moderate resource. Housing units in the sites inventory are not disproportionately concentrated in different resource areas, and the sites identified in the eastern areas are scattered on vacant and underutilized parcels to facilitate the development of lower- and above moderate-income units.

5.2.4 Disproportionate Housing Needs

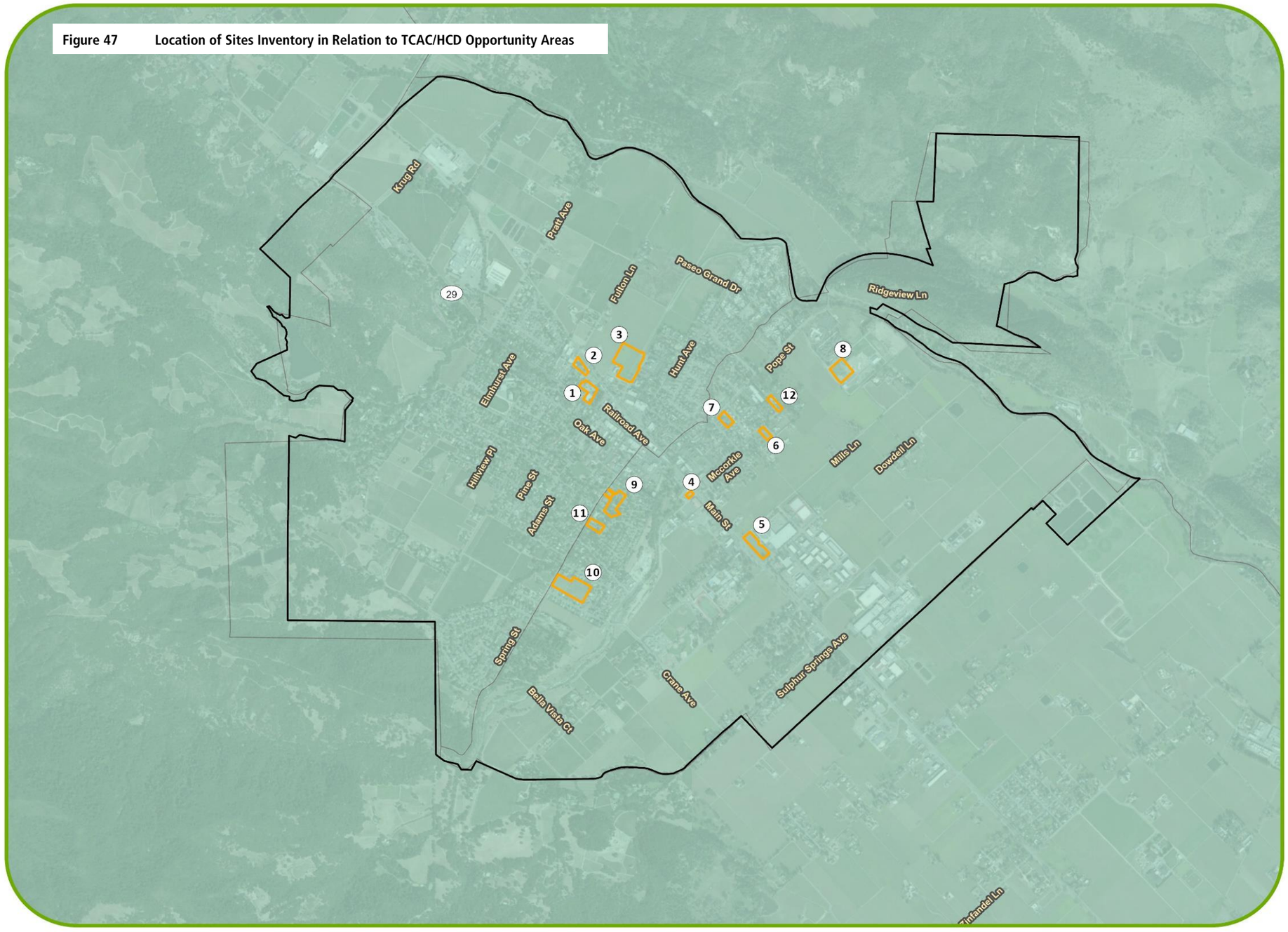
The fair housing assessment found a need for affordable housing for people with disabilities and adequate low-income households. The City incentivizes the development of extremely low-, very low-, low-, and moderate-income housing by reducing development fees and relaxing development standards to incentivize housing development. The City may also assist in acquiring and assembling property, subsidizing on-site and off-site improvements, and assisting in relocation activities as well as clearing and demolition.

5.2.5 Subsidized Housing

In 2019, approximately 1,105 households received Housing Choice Vouchers in the County of Napa, with 10 households receiving rental assistance and 6 households on the wait list in St. Helena.[84] The AFFH Data Viewer does not have data on Housing Choice Vouchers for St. Helena.

[84] *City of Napa Housing Authority's Annual Report Housing Services Agreement, 2019, https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3395/2018-2019_housing_services_annual_report.pdf*

Figure 47 Location of Sites Inventory in Relation to TCAC/HCD Opportunity Areas



City Boundary
Selected Sites
TCAC Opportunity Areas (2022)
Highest Resource
High Resource
Moderate Resource
Low Resource
High Segregation & Poverty
Missing/Insufficient Data

1 - 1480 Main Street
2 - 1572 Railroad Avenue
3 - Adams Street
4 - 905 Main Street
5 - Main Street (between Mills & Dowdell)
6 - 709 McCorkle Avenue
7 - 821 Pope Street
8 - 882 and 886 College Avenue
9 - 1447 and 1515 Spring Street
10 - Spring Street (between Hudson & Valley View)
11 - 1637 Spring Street
12 - 620 McCorkle Avenue

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

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Agenda Item #5.2.

Page 408 of 1246

6. Contributing Factors

This assessment of fair housing issues identifies factors that contribute to fair housing issues in the City of St. Helena, as shown in Table 10.

Table 10 Factors that Contribute to Fair Housing Issues

Identified Fair Housing Issue	Contributing Factor	Meaningful Action
Fair housing enforcement and outreach	· Lack of fair housing requirements and information provided to residents · Outreach and communication of services are limited to English · Limited fair housing testing and enforcement	· Participate in FHNV meetings, at least once annually, to coordinate regional responses to housing discrimination issues (Program H-XX)
Lack of affordable housing and displacement of residents	· Increasing rent and house/property costs · Dominance of single family housing · Land use and zoning laws · Availability of affordable units in a range of housing types	· Diversify and expand the housing stock to accommodate the varied housing needs of different groups (Programs H-E, H-H, H-I, H-J, H-W, H-LL) · Pursue down payment and mortgage assistance resources through the Housing Trust Fund or other resources (such as CalHome) for local funding to assist lower and moderate-income residents (Program H-GG) · Development of affordable housing on City-owned sites (Program H-V) · Provide by right approvals for multi-family housing projects that meet objective design and development standards (Program H-V) · At least once annually, provide an information on accessory dwelling units (ADUs) in the city, and target outreach to residents in the high resource

		southwest of Main Street and northeast of Pratt Street (Program H-Q)
Concentration of lower income and minority households in the southeastern areas of the city	· Land use and zoning laws · Location of existing affordable housing	· Prioritize affordable housing in high resource areas southwest of Main Street and northeast of Pratt Street (Program H-V) · Encourage construction and renting of ADUs in high resource areas to increase supply of variety of housing types in the city (Programs H-I, H-R) · Prioritize CIP in the eastern part of the city (Program H-WW) · Revise inclusionary housing ordinance for more lower income units, realistic in-lieu fees, workforce housing, and more on-site housing requirements (Program H-F) · Invest in public infrastructure projects in low and moderate resource areas that improve the quality of life for residents (Program H-WW)
Limited resources for persons with disabilities	· High cost of transportation for persons with disabilities · Lack of ADA compliant sidewalks	· Reduce ridership costs for VineGo paratransit system (Program H-WW) · Work with the County of Napa to carry out the ADA self-Evaluation and transition Plan to remove barriers for persons with disabilities to facilities and programs in Napa County (Program H-WW)

Appendix B: Comments on the Public Review Draft 2023-2031 Housing Element Update

The City received multiple comment letters on the Public Review Draft 2023-2031 Housing Element Update. Comments on the Public Review Draft were received between June 29, 2022, and July 30, 2022. Key changes in response to public input include revisions to various programs and the addition of a new site in the sites inventory.

Response to Comments

In response to these comments, the City has made a number of revisions to the Public Review Draft Housing Element, including:

- 1: Policy Document – Program H-Y: Corrected spelling error and added Voorhees Circle (now program H-Z).
- 1: Policy Document – Policy HE 2.5: Revised language for clarity.
- 1: Policy Document – Program H-C: Urban Limit Line: Deleted program.
- 1: Policy Document – Program H-J: Updated funding sources to include State and Federal programs and grants (now program H-I).
- 1: Policy Document – Program H-M: Zoning to Facilitate Higher Density Housing: Revised for clarity (now program H-N).
- 1: Policy Document – Program H-R: Affordability Requirements for ADU Incentives: Updated text to specify that a regulatory agreement is required (now program H-S).
- 5. Housing Conditions – Key Findings: Added source information for the data presented in the key finding related to Cost Burden
- 5. Housing Conditions – Physical Housing Conditions: Estimated the number of homes in need of rehabilitation.
- 6. Housing Market Conditions – Affordable Home Purchase Prices: Corrected broken references to Table 15.
- 6. Housing Market Conditions – For-Sale Housing: Revised note on Table 15 to clarify that 2021 data was used.

- 11. Housing Resources – Pending and Approved Projects: Revised Table 36 to identify the existing unit at 963 Pope Street as deed restricted.
- 11. Housing Resources – Remaining RHNA: Revised Table 37 to fix incorrect income categorization for 963 Pope Street.
- 11: Housing Resources – Residential Sites Inventory: Added 620 McCorkle (APN 009-502-003) to the available sites inventory.

- 11. Housing Resources – Pending and Approved Projects: Revised Table 36 to identify the existing unit at 963 Pope Street as deed restricted.
- 11. Housing Resources – Remaining RHNA: Revised Table 37 to fix incorrect income categorization for 963 Pope Street.
- 11: Housing Resources – Residential Sites Inventory: Added 620 McCorkle (APN 009-502-003) to the available sites inventory.

July 26, 2022

TO: Members of the City Council and Planning Commission, City of St. Helena

FROM: Jennifer La Liberte, Executive Director

SUBJECT: Housing Element Update, 2023-2031, Public Review Draft

The Board of Directors of Our Town St Helena and I appreciate the opportunity to comment on the draft Housing Element Update (HEU).

General Comments

Pg 1-4 Potential Funding Sources – There does not appear to be consistency among the potential funding sources for the objectives. Some programs list specific potential sources (though the lists should be expanded) and some list only staff time. It appears this could be related to how current programs are funded. Federal, state, county, local, and private funding sources would seem appropriate for each objective that requires development and construction funding. Also, if detailed funding sources are to be included, then US Department of Agriculture Rural Development should be added.

Pg. 1-6 Throughout the document (beginning on page 1-6), much of the cited data is outdated and does not accurately reflect today's market conditions. For example, the HEU states "typical contract rent for an apartment in St. Helena was $1,470 in 2019," and to avoid being cost burdened, a renter would need to earn $59,160. According to the Napa County 2021 Affordable Housing Needs Report (May 2021) produced by the California Housing Partnership, the average asking monthly rent in Napa County is $1,948 and renters need to earn $77,916 to avoid being cost burdened. Since St. Helena tends to be at the top of the market for Napa County, it's safe to assume (and observe) that those figures are even higher. Marcus & Millchap publishes a quarterly Bay Area multi-family market report that identifies mean rents by county by unit type which would be more accurate even if not specific to St Helena. We know that a typical two-bedroom market rate unit in good condition is renting for $2,100-$2,650 plus utilities, and three-bedrooms in very good condition are at approximately $3,000 per month.

Pg.1-11 How were the specific quantified objectives derived under each of the programs and how do they relate to each other? There appears to be significant overlap in

these objectives. Example: farmworker housing and very low-income housing could be the same housing; senior housing could be incorporated into a low-income project. The Quantified Objectives Summary Table on 1-40 page provides the totals but not the logic in how the quantities were broken out.

Pg. 1-17 "The City will explore possible incentives for building attached market rate housing units for rent and for sale" which is great, but it ought not take five years to explore incentives. And what action comes after exploration? Similarly, why will it take four years to study potential modifications to the Zoning Code to facilitate higher density housing, etc., when the City is already updating the Zoning Code and the HE and should be fairly versed in what changes are needed? Is it possible to make incremental changes? For example, an immediate step the City could take is to remove the conditional use permit requirement in multi-family zones to streamline the process for developers.

Page 1-25 Change Murietta to Marietta. Note: Some Voorhees Circle homes that have not changed hands are also at-risk for conversion.

Pp. 2-23 Beginning on page 2-23, Joe is Joe McGrath, Jordan is Jordan Bentley, Mary Stevenson is Mary Stephenson, John is John Sales, Jennifer Le Liberte is Jennifer La Liberte, and Steve is Steve Goldfarb.

Page 2-57 Employment – what did the unemployment rate increase to? Table 3, under 2010 for Napa County, the comma is in the wrong place.

Page 2-82 Vacant units -- It would be useful to state how many people could be housed in these units which comprise 17.4 percent of the housing stock. If the rental vacancy rate is 3.1 percent and ownership vacancy rate is 5.3 percent, what constitutes the delta (17.4 minus 3.1 minus 5.3)?

Page 2-83 Cost burden – for the last paragraph, what is the time period this data represents?

Page 2-84 How does the fact that an overwhelming portion of our existing housing stock is 40 to 80 years old correlate with the City's preservation goals?

Page 2-88 Table 14 – how many of the permitted units from 2015-2019 have been built?

Page 2-96 Home values – how is "typical home value" defined? Zillow is the cited source, which is providing listing prices, not value. Based on current listings in St. Helena, $1.6 million is at the lower end of the range. Local realtors could provide updated

MLS data which would be timelier and more accurate than Zillow. Also, within this section it is not clear whether existing deed-restricted units are included in totals of rent/homeownership units and monthly cost. It could be that these income-qualified units are affecting the total values. Could this be made more explicit?

Page 2-98 Affordable home purchases – some zeroes are at the beginning of the first sentence and middle of the second sentence that don't make sense.

Page 2-99 Table 15 -- The Area Median Income figures are for 2021. HUD has published new figures for 2022, so the footnote to the table should be adjusted accordingly.

Page 2-103 Table 16 – Christine Apartments, 723 Hunt Ave., four units, should be included as a very low and low income; OTSH purchased in June 2021 and recorded 55-year deed restrictions. Also, Grayson Apartments were funded privately through the inclusionary requirements met by 632 McCorkle and references to tax credits, AHP, etc. should be removed. This is an important point because the housing crisis here will not be solved exclusively through non-profits.

Page 2-154 Table 36 – 963 Pope Street, under "Project Description", the existing house is deed restricted and should be noted.

Page 2-155 Table 37 – if the 4 pending or approved units is referring to 963 Pope St, those should be moved to "lower" income.

<u>Policies</u>

HE 2.5 "Allow duplexes in all low-density residential zones" – please clarify whether this allowance is by right and not with a conditional use permit.

HE 4.8 "Give preference to projects providing workforce housing affordable to up to 140 percent of the AMI" – there doesn't appear to be an implementation program associated with this policy. What preference would be given, and would it be at the expense of another affordability level?

<u>Implementation Programs</u>

H-A, H-NN "Concentration of sites for affordable housing" – OTSH supports the City's efforts to ensure affordable housing sites are identified geographically throughout the city. But we caution that land is scarce, and large sites rarely become available that are suitable for multi-unit housing, and, most that do, tend to be located east of Main Street. We support incentivizing affordable housing wherever it can get

built, and don't support the City prioritizing Affordable Housing Trust Fund dollars for affordable projects in the western portion of the city at the expense of projects in the eastern portion.

H-C OTSH believes we should be planning for a more sustainable and less car-dependent future. We should be exploring opportunities to increase infill density and expand height limits and reduce parking requirements. Up and in should be the focus. The block of land from south of White Sulphur Spring Creek to Grayson and west of Highway 29 and east of Crane vineyard is one of the most poorly utilized sections of the City, and we believe a housing task force could explore how to unlock the potential here. Expanding the Urban Limit Line should be the last option as it runs a great risk of negatively impacting what makes this such a great and desirable place to live with vibrant wine and tourism industries.

H-D Water and sewer access should be prioritized for both affordable and missing middle housing. Also, please define "missing middle" in terms of Area Median Income. The water neutrality requirement should be eliminated for any attached affordable and missing middle housing. The City could consider requiring other trade-offs such as no-irrigation landscaping or rain capture systems.

H-J "ADU Workforce Housing Incentive Program" -- broaden the potential funding sources to include grants, state and federal programs. Also, consider working with the County Assessor to allow a property tax reduction on the larger property in exchange for 30-year a deed restriction on an ADU, with proper monitoring to ensure compliance.

H-M OTSH believe the City should immediately remove the Conditional Use Permit requirement on MDR Zoning. At a minimum, it should be removed for any parcel identified in the HE as a Housing Opportunity Site. Discretionary review is the toehold for opposition to these projects and makes developers wary of taking the significant financial risk that is required for this type of development. Also, consider allowing deed restrictions for missing middle projects (as defined by the City) and in exchange grant fee waivers and eliminate the housing impact fee requirement.

H-P We should not incentivize ADUs beyond existing state mandates unless they have a deed restriction and rental occupancy requirements in exchange. While this may be implied it isn't clearly stated.

H-R, H-DD	"Affordability requirements for ADU incentives; reduced fees for affordable housing" – these should include a reference to the mechanism that will restrict affordability (i.e., affordable housing regulatory agreement).
H-S	"Illegal housing units" – these types of policies or programs can be double edged as they often end up displacing households that cannot afford to live in legal units. Consider a companion program that sees to support households displaced by this program.
H-U	Under Objectives – "Support the development of 3 multi-unit housing projects….support the development of five infill projects…." What does "support" mean? As written it implies a maximum the City will "support" during the planning period.
H-??	Under Goal 3, Conservation of Existing Housing – consider adding an implementation program: "The City will work to obtain CDBG or other available funds to create an 'Affordable Housing Conservation Fund' so units can be acquired quickly when they hit the market and preserved at affordable levels."
H-Z	"Vacation Rentals" – the City should consider prohibiting vacation rentals in certain zoning districts if it hasn't already.
H-FF	"Affordable Homeownership" – the City should work with the County's Proximity Housing Program to provide down payment assistance to St. Helena first-time home buyers. If the County is amenable to working with the City to create a funding set-aside for St. Helena, the City could then market the program or work with others to do so.
H-II	"Housing Coordinator" – this is an immediate need, and a specified time frame is encouraged rather than "ongoing". It would be preferable to do this as a City of St Helena position, but a shared position is better than none. OTSH would prefer the City consider a Housing / Economic Development FTE rather than a lower level, part-time Housing Coordinator. Also, meeting with partner jurisdictions twice during the 13-year planning cycle does not appear to be sufficient.

Proposed Sites

Site maps	It would be helpful to add a north arrow to the aerials.

Page 2-162 The last sentence should read, "However, the future property owner intends to develop 36 to 50 units."

Page 2-170 Table 50, Site 5 – change 50 to 36-50 (if possible).

Housing Opportunity Sites

Adams Street What is the rationale for the size and placement of the Opportunity Site on the Adams Street property?

709 McCorkle This site was recently purchased and is intended to function as an estate compound. It has a low to zero probability of being developed for affordable housing.

741 McCorkle This house was recently renovated with significant capital improvements and is unlikely to be further developed in the next HE cycle.

1637 Spring This site has recently been purchased for the intent of turning it into employee housing.

Proposed site We encourage the City to add 620 McCorkle Avenue (APN 009-502-003-000) as a "key housing site". This 0.76-acre site is zoned MDR and is currently on the market. Including it as a key housing site would eliminate the requirement for a conditional use permit and be consistent with the goal to remove barriers to development of multi-unit housing.

Conclusion

OTSH commends the City for its work on this document. Realizing that the HEU is a mandated document that needs to follow strict guidelines, we hope the City will also create an implementation plan that identifies measures, cost analysis, staff and funding resources, and time frames for meeting the goals contained herein.

Aaron Hecock

From: LAURA KEIR <lkeir@me.com>
Sent: Tuesday, July 19, 2022 11:09 AM
To: Aaron Hecock
Subject: [External] Land designation

Hi
It appears numerous parcels sent to the state to meet our quota fir homes are not currently available for sale? Are they going to be for sale? And we are not aware? Or, emanate domain enforcement would be necessary?
I firmly disagree with the high to med density development of Valley View Hudson vineyard property being developed as traffic on the road is already more than a residential area should have to handle between cut threw traffic to avoid Hwy 29 to the school traffic it's impossible to safely get out of your driveway or even ride a bike!
Spring Street is narrow and I notice in addition three sites are designated as possible development.
The government/ Bay Area need to either agree to continue our exempt status. Recognize us as a primary agricultural area or the Napa Vally will be destroyed!

Laura
Sent from my iPhone

City of St Helena, City Hall
Received

JUL 13 2022

1480 Main St.
St Helena, CA 94574

Housing Element for Public Comment
Aaron Hecock, Senior Planner, City of St. Helena
ahecock@cityofsthelena.org

July 10, 2022

Dear Mr. Hecock,

As concerned St. Helena residents, we have read the Housing Element Update and plan to attend the public forum.

We support the city's efforts to identify appropriate sites for potential development to provide additional housing that is badly needed. Yet after reading about proposed rezoning and adding more density, we remain vigilant in pointing out situations where multi-unit projects would negatively impact neighborhoods.

We have shared with several City officials the situation we face after the recent purchase of the parcels at 1521 and 1541 Elmhurst. The owner, Jennifer Mozzetti, and her friend John Bowman, a self-described developer from Napa, have disrupted this peaceful neighborhood with their alleged plans to develop the parcel at 1541 Elmhurst into a multi-unit site with the "cooperation of the City." They initially claimed, as a result of their purchase of the two parcels, they "owned" the Elmhurst Alley from the property at 1521 extending to the end of the alley.

The city, through correspondence from Eric Janzen on 5/17/22 and several other emails, assured us that the Elmhurst Alley was listed by the County Assessors as a public right of way and is not owned by Ms. Mozzetti.

Elmhurst Alley is a single lane, dead-end alley that extends off busy Spring Mountain Road. It provides access to the vehicles of 5 single family homes in addition to the mail truck, delivery trucks and home health care vehicles that service those homes. The tightness of this alley already poses safety questions for Emergency and Fire Department vehicles.

Any development of the property at 1541 Elmhurst from its current single-family residence to a multi-unit would be unwise and unsafe expanding the number of alley users. (Garbage day finds the street with as many as 15 garbage cans as it is!) Certainly, the goal of adding multi-unit housing in St Helena is a laudable one, but to drop a new multi-unit project in an already dense neighborhood with limited access from a single-lane, blind alley, would be ill-conceived.

Our specific questions are these we hope you can answer:

1.The Housing Element mentions an inventory of possible sites, not yet public, that might be used to develop more housing.
Is the parcel at 1541 Elmhurst currently on this site list or being considered?

2. Can individuals, seeking to develop multi-unit housing on their own properties apply to be included on this site list?

If the answer is "yes" to either question, we kindly request a site visit, in person, by a member of the Planning Commission, so that the impact of adding more housing and residents on Elmhurst Alley will be obvious.

Sincerely yours,

Dayna Van Kleeck
1800 Spring Mountain Court

Henry Kistler, M.D.
1781 Spring Mountain Road

Susan Taylor Kistler
1781 Spring Mountain Road

Brenda Hill
1777 Spring Mountain Road

Jim Lampkin
1777 Spring Mountain Road

Terence Ford
1806 Spring Mountain Court

Kathryn Ford
1806 Spring Mountain Court

Polina De-Levi
1809 Spring Mountain Court

Vladymer De-Levi
1809 Spring Mountain Court

Brenda Hill
1777 Spring Mountain Road

Jim Lampkin
1777 Spring Mountain Road

Terence Ford
1806 Spring Mountain Court

Kathryn Ford
1806 Spring Mountain Court

Polina De-Levi
1809 Spring Mountain Court

Vladymer De-Levi
1809 Spring Mountain Court

Aaron Hecock

From: Nancy Dervin <nancydervin@hotmail.com>
Sent: Friday, July 1, 2022 3:13 PM
To: housingelements@hcd.ca.gov
Cc: office@mintierharnish.com; CityCouncil; Aaron Hecock
Subject: Re: [External] Public Review Draft Housing Element Available Now!

Dear HCD,

I am concerned about the City of St. Helena putting forth a Housing Element Draft that contains at least one property that the City has repeatedly been told is absolutely not available which is 601 Pope Street. There are other properties on the Draft that are also potentially not available but this one site is positively not available.

We have a huge housing shortage problem, like most communities. Knowingly including unavailable sites is unethical as well as contrary to the purpose of identifying housing opportunity sites.

What should be or can be done about this?

Sincerely,
Nancy Dervin
St. Helena, CA

From: St. Helena Housing Element <jim@mintierharnish.ccsend.com> on behalf of St. Helena Housing Element <office@mintierharnish.com>
Sent: Thursday, June 30, 2022 10:31 AM
To: nancydervin@hotmail.com <nancydervin@hotmail.com>
Subject: Public Review Draft Housing Element Available Now!



CITY OF ST. HELENA

Aaron Hecock

From: Mary Wilson <boecoup@gmail.com>
Sent: Wednesday, July 13, 2022 12:54 PM
To: Aaron Hecock
Subject: [External] Housing sites

I wanted to comment on the list of potential sites for housing that was in the St Helena Star. I've taken the time to look at each of the addresses mentioned. With the exception of one, I found all of them viable locations. My one exception is the vineyard location on Spring St.
One of the things that makes St Helena unique are the vineyards still scattered within the city. They are a part of our heritage, displaying the agriculture that has made this valley the world class jewel that it is. Please allow this one to remain as it is.

Respectfully, Mary Wilson

Sent from my iPad

Mary Wilson
1426 Kearney St.
St. Helena, Ca. 94574

707-529-4406

Aaron Hecock

From: Joe McGrath <joe.mcgrath65@gmail.com>
Sent: Thursday, July 14, 2022 12:12 PM
To: Aaron Hecock
Cc: Mary Stephenson; Maya DeRosa; Eric Hall; Lester Hardy; Jennifer La Liberte; Jordan Bentley; Joe Mcgrath
Subject: [External] Re: [External] A Potential New Opportunity Site

Aaron:

Thanks.
Speaking as a private citizen and neighboring property owner (and concurring with Mary as an OTSH Board member), I would also advocate that this lot [620 McCorkle - APN 009-502-003-000] be added to **this** HE cycle as a "Housing Opportunity Site".

In light of the recent multi-family developments on that street I would recommend however that it remain MDR, otherwise it may cause too much opposition with residents on the south side of McCorkle.
The goal would be to eliminate conditional use requirements which become, as you know, major entanglements in entitlement.

However, as MDR it should be explicitly listed under **17.40.020 Permitted Uses (N):**

N. Multiple-family dwellings, apartments, and dwelling groups at a density up to the maximum allowed by the medium density residential district shall be allowed as a permitted use on the following MR zoned parcels, which are identified as "Key Housing Sites" in Table 42 of the city's 2015-2023 housing element, and are identified as follows by street address and assessor's parcel number (APN): 567 Pope St. APN 009-070-002; 591 McCorkle Ave. APN 009-070-003; 1817 Spring St. APN 009-322-009; Sulphur Springs Ave. APN 009-362-015; Spring St. APN 009-441-023 and 009-552-002; 576 Pope St. APN 009-552-003; 1105 Pope St. APN 009-090-003. (Ord. 17-2 § 6 (part); Ord. 16-8 § 1; Ord. 15-2 § 7 (part): Ord. 12-2 § 6: Ord. 07-5 § 2 (part): Ord. 05-4 § 1 (part): Ord. 03-4 § 11: prior code § 27.51)

Please confirm that the above constitutes "public comment".

Thx,

Joe

Aaron Hecock

From: Joe McGrath <joe.mcgrath65@gmail.com>
Sent: Monday, July 18, 2022 4:41 PM
To: Aaron Hecock; Maya DeRosa
Subject: [External] HE Draft Input

Aaron/Maya:

Here are some additional comments/inputs re: Housing Element. Please do not take them as criticism of your hard work. The Housing Element can be a valuable tool to accomplish our municipal housing objectives if we shape it correctly.

Thanks,

Joe

General Comments:

* Current planning meetings should be held in person with a zoom option. It should no longer be acceptable that public meetings are held entirely by Zoom. It also should not be acceptable that participants to Zoom meetings have no idea how many other participants are present, and, if participants "opt-in" to identify themselves, are identified.

* The document and the process are too long, too bureaucratic, and not specific enough with respect to immediate and effective actions and policy changes that will alter the climate in any meaningful way to have a real near-term impact on affordable or missing middle housing.

* The document itself is outdated with may reference to data as far back as 2019 representing "current" data. We lived in a far different world than in 2019.

* A major flaw in the Housing Element process for Above Moderate or Market Rate units. Our State Legislators did not comprehend second home or vacation communities.
So meeting the HE RHNA objective for Above Moderate by enabling, say, the Hunter Project is nonsensical if say 50% of the SFHs ultimately become vacation homes.
Having these types of development consume constrained water, sewer and other valuable resources can impinge on more critical housing needs.

Specific Section / Page Comments:

Page 1-11:

H-C We should be planning for a more sustainable and less car-dependent future. We should be exploring opportunities to increase infill density and explore expanding height limits, and reduce parking requirements. Up and In should be the focus. The block of land from south of White Sulphur Spring Creek to Grayson and West of Highway 29 and east of Crane vineyard is one of the most poorly utilized sections of the City. We should unleash a task force to see if we can unlock

potential here. Expanding the Urban Limit Line should be our last option, and runs great risk of negatively impacting what makes this such a great and desirable place to live with a vibrant wine industry and tourism economy.

Page 1-12:

H-D. Water and sewer access should be prioritized for both affordable and missing middle. Also please define "missing middle" in terms of AMI %. 200%? Water Neutrality Requirement should also be eliminated for any attached affordable and missing middle. Mandate no-irrigation landscaping instead. All new buildings in CA are highly water efficient by California Building Code. It is better that we have new stock than old stock re: environmental sustainability (similar to newer car fleet vs. older regarding emissions).

Page 1-17:

H-M. It should not take 4 more years following 3 years working on the Housing Element to understand what Zoning Ordinances need to be changed to enable housing.

1) Start with removing the Conditional Use Permit requirement in some manner on MDR Zoning. At minimum, it should be reduced for any parcel identified in Housing Element as Housing Opportunity Site (not just Key Housing Opportunity Site") . It is imperative to reduce or eliminate "discretionary" review. Discretionary review is the toehold for opposition on these projects. It is also a toehold for CEQA opposition.
2) Define "Missing Middle" in terms of AMI. 200%?
3) Tradeoff off 2:1 (or some such ratio) of affordability requirements on private developers for below moderate units for moderate to missing middle (200%) cutoff units. Ie a developer can meet "affordable" designation if he/she builds (2) deed-restricted moderate to missing middle (80-200%AMI?) units for every (1) required < moderate unit (<80% AMI unit).
4) Eliminate Water Neutrality requirements for above. This is just one more hurdle.
5) Eliminate Housing Impact Fees for above. By very nature these projects are having a POSITIVE housing impact.
6) Reduce overall permit fee structure for above. (on page 2-142 it calculates 12.3% of multi-family costs on Permits & Fees. This is right after it the HE states that governmental constraints are not a factor?)

Pg 1-15:
H-J. What can we do to entice existing ADUs into a deed-restricted affordable? How about a tradeoff on property tax relief on that unit for 30-yr deed-restriction and rental occupancy rate compliance??

Pg 1-19:
H-P. We should not further incent ADUS beyond existing state mandates unless they have deed-restriction and rental occupancy requirements in exchange.

Pg 1-29:
H-II. What are the accountabilities of the Housing Coordinator? Why would we not do this under existing Departments?

Pg 1-34:
H-UU. We should be considering "no-irrigation" landscaping (at least after plants take hold).
We should eliminate the Water Neutrality Requirement on any deed-restricted affordable < 200% AMI. This is a cumbersome and complex and expensive requirement to comply with. New attached buildings under CBC are highly water efficient and perform well below 65 GPD per capita. Nix the irrigated landscaping as a tradeoff.

Pg 2-38:

HE1.B. This document indicates that because units have been built in last cycle that Growth management System was not an obstacle. This is untrue. 632 McCorkle was "lucky" in that we straddled two years and literally consumed (8) of the (9) available allocation. Had this been a 10 unit project, it is not clear what the City would have done. Had there

been another similar project, it is unclear what the city would have done. Uncertainty is the enemy of Investment and the friend of Risk.

Pg 2-103

Table 16 - Grayson Apartment 2 units funding source were **not** Tax Credits, nor AHP, nor RHCP, nor City funded. These two units were **funded privately** through inclusionary requirements on 632 McCorkle. This is an important point, because we will not solve the housing crisis here exclusively through non-profits.

Pg 2-125:

Saying that Building Codes and Zoning Ordinances are not a "governmental constraint" to development is an entirely untrue statement and somewhat offensive coming from a government agency. While I would not argue that enhancements in the California Building Code are in most cases warranted, they have most definitely affected housing costs and housing production and have contributed to the shortage of affordable housing stock. Enhancements to CBC in ADA, Seismic, Fire, and Environmental requirements have played a significant role in the increase in housing costs. This must be acknowledged. As for Fire Code, nearly all of the costs in the building code are for suppression systems to extinguish a fire that starts inside the building. Most homes in CA are destroyed by fire from outside the building.. The CBC however is very clear and the requirements do not have broad interpretation, so while costly to comply with, is not a great impediment.

Zoning Ordinances however and discretionary reviews are something entirely different. Developers do not like uncertainty. If a Zoning Ordinance can be interpreted differently by different people - that is problematic. And if the outcome of a Design Review Meeting may be different based on the makeup of a Commission that is problematic. Developers do not like uncertainty. This is why discretionary reviews are highly problematic. To bring a complete application to Design Review Submission - let's say 8-12 units - could easily require an investment of $250K. Surveys, Civil Plans, Arch Plans, Elec Plans, Plumbing Plans, Mechanical Plans, etc. This all with the possibility of project Denial.

Lastly. CEQA is a major governmental constraint and should be acknowledged as such. CEQA should have no role in infill projects within ULL unless special circumstances warrant.

2-132:

We should articulate what Design Review is "not". For projects that are entitled, Design Review has no function in determining whether a project can be built or not to its entitlement. It would be much preferable to establish objective design guidelines that should be followed for multi-family rather than subject applications to a highly subjective process.

2-138:
Parking requirements for 2 Bedrooms within the ULL should be reduced to 1.5 spaces for <200% AMI.

Housing Opportunity Sites Input

For the sites listed, the probability that any given site gets developed in the next HE cycle range between 0% and 95% (Phelps Site). Most sites identified have a low probability (< 10%?) chance of being developed.

709 McCorkle: This site has recently been purchased and is intended to function as an estate compound.

741 McCorkle: This house has been recently renovated with significant capital improvements, and is unlikely to be further developed in this HE cycle.

1637 Spring Street: This site has recently been purchased for the intent of turning it into employee housing. My understanding is that the current plan is to convert 1 BRs into 2 BRs through garage conversion.

620 McCorkle: Per prior inputs, this site should be added to the Housing Opportunity Site and Key Housing Opportunity Site list.

Saint Helena Housing Coalition, Inc.

PO Box 988
Saint Helena, CA 94574

July 13, 2022

Mr. Aaron Hecock, AICP Senior Planner
City of Saint Helena
1572 Railroad Avenue
Saint Helena, Ca 94574

RE: 2023-2031 Housing Element Draft
VIA: Email

Dear Mr. Hecock:

First of all ,we would like to thank you for the this very through and professional work product. It is obvious that much research and attention to detail has been taken.

A question. Under the Water Section it is stated that "although the maximum amount of (Bell Canyon) water that is available to the City is 992 acre-feet". Why?

In Section 11. Housing Resources -Future Housing Needs we note the following:

> The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units by income category.(Emphasis added).

Based upon our work in attempting to find suitable land for new "affordable" Essential worker housing our experience, in part, differs from the report's conclusions:

Regarding the City owned Adams Street parcel considerable thought should be given to identifying the Eastern most portion of the parcel, not the Western end for "affordable" housing. SHHC submitted as preliminary site plan so indicating. Thus, leaving the West end for a potential city hall location or other civic functions. To us, it does not make sense to place any type of affordable" housing at the West end.

Site 4: 905 Main Street. When SHHC made inquiries, we were informed that the owner expressed that this for-sale price of this parcel would exceed $1,000,000. Given the suggested density of five units that would make the land cost per unit $200,000. For most "affordable" housing the land cost should be nearer to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible.

Site 7: 81 Pope Street. Zillow estimates that the current price for this property is approximately $2,000,000. Again, that would work out to a land cost of $100,000 per unit of the projected 20 "affordable Units (to say nothing of the cost of demolishing the existing structure). . For most "affordable" housing the land cost should be near to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible.

Site 9: 1447 and 1515 Spring Street. The Zillow estimated sales price for each of the existing residences at $1.6mm to $1.75mm, totally $3.35mm in value. For the estimated 24 units that works out to a land cost of $139,583.00 per unit. For most "affordable" housing the land cost should be near to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible.

Site 10: Spring Street between Hudson Avenue & Valley View. From my notes during the public comment portion, I believe it was Joe McGrath who said that this property had recently been sold and lease-back on a long-term basis. Based upon that it would appear this parcel is not currently available.

Site 11: 601 Pope Street. This property owner declined SHHC's to acquire this parcel under a long-term lease. We offered $200,000 per year for a sixty-five-year lease and their response was "oh, we just like the way it looks".

Site 12: 1637 Spring Street. As recently as this spring this property owner expressed No interest, and the direct quote was "let them try and develop it."

Therefore, Mr. Hecock, unless that City is prepared to use Eminent Domain as in Kelo v. New London, it appears that the identified sites does not fulfill the "must" requirement of available sites to satisfy Saint Helena's 2023-2031 RHNA requirements.

Respectfully submitted:

Rick Crebs

Rick Crebs, CEO
rick@sthelenahc.org
707-580-0418

Saint Helena Housing Coalition, Inc.

PO Box 988
Saint Helena, CA 94574

July 25, 2022
Mr. Aaron Hecock, AICP Senior Planner
City of Saint Helena
1572 Railroad Avenue
Saint Helena, Ca 94574

RE: 2023-2031 Housing Element Draft
VIA: Email

Dear Mr. Hecock:

Again, we would like to thank you for leading this sixth Housing Element 2023-2031 document incredibly rich document full of quite important and relevant data.

However, we have some considerable concerns over facts stated and conclusions reach:

Issue #1:
In this report you state "The Housing Element ***must*** also identify ***adequate*** residential sites ***available*** for a variety of housing types for all income levels; provide assistance in developing ***adequate*** housing to meet the needs of low- and moderate-income households; address governmental constraints on the maintenance, improvement, and development of housing; conserve and improve the condition of the existing stock of affordable housing; and promote housing opportunities for all persons". (Aaron Hecock-Report to the City Council & Planning Commission Meeting -21 July 2022, page 4) (Emphasis added).

Response #1A:
Not being lawyers we referred to recognized authorities on the words contained in the above Issue #1.

Merriam-Webster Dictionary:
Ensure – "We define **ensure** as "to make sure, certain, or safe" and one sense of insure, "to make ***certain*** especially by taking necessary measures and precautions," is quite similar. But insure has the additional meaning "to provide or obtain insurance on or for," which is not shared by **ensure."**

> **Certain** – Ascertained; precise; identified; definitive; clearly known; unambiguous; or in law, capable of being identified or made known, without liability or to mistake or ambiguity, from data already given."

Realistic- means "based upon what is real rather than on what is wanted or hoped for"

> **Real –** means "having objective independent existence; not artificial, fraudulent, or illusory; being precisely what the name means; occurring or existing in actuality"

Black's Legal Dictionary:
Adequate means "Sufficient; proportionate; equally sufficient; equal to what is required; suitable to the case or occasion; satisfactory"
Availability Means "This phrase, among mercantile men, is a term well understood to be anything which can readily be converted into money; but it is not necessarily or primarily money."

Ready means **"**Prepared for what one is about to do or experience; equipped or supplied with what is needed for some act or event; *prepared for immediate movement or action"*(Emphasis added)

Demonstrate means "to prove indubitably"

Indubitable Proof "Evidence of which is not only found creditable but is of such weight and directness as to make out the facts alleged beyond a doubt."

Must "This word, like the word 'shall' is primarily of mandatory effect."

Based upon the above definitions SHHC is perplexed as to how the Housing Element can, in good conscience, or on any legal basis include 601 Pope Street or 1837 Spring Street as both owners have stated that they are not interested.

I just spoke to the owner who has been a dear friend of our families for 37 years and she stated ,"No one contacted me and further had no interest in allowing their back acreage to be developed into 'affordable' housing."?

Response #1B:
During the public comment section of the July 21m, 2022 2023-31 Zoom Housing Element, Rick Crebs, from SHHC, raised the issue of financial feasibility of Sites #4, 905 Main Street is stating "When SHHC made inquiries, we were informed that the owner expressed that this for-sale price of this parcel would exceed $1,000,000. Given the suggested density of five units that would make the land cost per unit $200,000. For most "affordable" housing the land cost should be nearer to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible".

Similar financial analysis was also offered on Site #7 821 Pope Street, (land costs of $100,000 per unit); Site #9 1447 & 1515 Spring Street, (land costs of $139,583 per unit).

Based upon that information provided during the Housing element Zoom meeting of Thursday, July 21, 2022, a question was directed by a city council member to the city's staff relative to the property valuations statements raised by Rick Crebs of SHHC on valuations attributed to Zillow. The response was questioned of the authenticity of the Zillow valuations. This seems odd in that the Housing Element report refers to Zillow eight (8) times as the authority on real estate valuations.

It was further stated that grants or low interest loans would off set the high land costs.

Please allow SHHC to provide a current financial analysis as present in SHHC's Offer to Develop 88 Units (using 2.3 acres at the East end of the Adams Street city owned parcel).

Use of Grants: Adams Street as an example:

Total Construction Costs $43,116,112 or average of $489,956 per unit (Leased, not sold land)

Funding necessary to complete this project: (Projected)

City/County	$2,000,000	(4.4%)
Other Grants	$32,337,084	(75.0%)*
Mortgage or Bond	$ 7,054,364	(16.40%)
Total	**$43,116,112 100% (rounded)**	

*The largest grants that SHHC has been able to discover are from the California Department of Housing Affordable Housing Sustainable Communities (AHSC) grants which currently has a maximum grant amount of

$35mm, so the Adams Street project comes close to it. This information is supplied to illustrate the extreme difficulty present in realistically financing the Saint Helena community to provide the "Must" in the RHNA requirement.

Issue #2:

In this report you state "The issue of owner consent to being included on the housing opportunity sites list has come up on several occasions. Being listed as a housing opportunity site in no way terminates or otherwise affects existing uses on-site. Furthermore, there are currently no legislative or other means to compel a private property owner in this process, meaning we cannot force or otherwise require that they build housing. That said, owner consent is not a requirement for inclusion in the housing opportunity sites inventory (Government Code 65583.2). The inventory is to show that there are suitable sites to meet the City's RHNA and the programs are there to help housing developers to make that happen. Designating sites as suitable for housing falls within the City's authority to regulate land uses. If the Housing Element were to designate an already developed site."

Response to #2:
Mr. Hecock, it is true that California government Code does not include language requiring "owners Consent". but, by the same logic, it does not exclude requiring the "owners' consent." This, it would seem that your comment is non-responsive. Further, Code 65583.2 refers to Government code 65583 which, in part, states "(3) An inventory of land suitable and available for residential development, including vacant sites and sites having ***realistic*** and ***demonstrated*** potential for development during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing. (Emphasis added).

Further, in referring to the word definitions provided above, that the proposed Saint Helena Housing 2023-2031 Document on a factually basis fails to meet with any degree of accuracy of the meanings of the authenticated meaning of the words; **Adequate**, **Available**, **Demonstratable**, **Ensure**, and **Must.**

In closing, such vagueness in the prior Housing Element Reports may have been tolerated in the past. However, our town is critically deficient in sufficient "affordable" housing for all AMI's. The fact that so many are required to commute to work in the Upper Valley each day clearly contributes to unnecessary Green Housing Gas (GHG) emissions to say nothing of the cost to commute which further contributes multiple well vetted studies that conclude that the majority of those renting are cost burdened. Many in the 50-60% of household income!

Lastly, the lack of a strategy to affirmatively address Saint Helena's housing crisis is to deny, or turn its back, on its pledge to work towards a policy of Diversity, Equity, and Inclusion.

Our town can no longer rely upon the old "Three Card Monty Trick" in addressing the statutory issues the Housing Element requires.

SHHC's First Suggestion:
The city should consider removing Sites 4 (905 Mains Street, Ste 7 (821 Pope Street, Ste 9 1447 & b1515 Springs Street as being financially unrealistic due to associated land costs and instead revise the Adams Street parcel from 30 unit of Lower Income to the recommendations in the following graph:

Table 50 Summary of Housing Units (Extracted)

	Lower Income	Moderate Income	Above Moderate Income	Total

Pending Projects	0	**4**	**88**	**92**
ADU Trends	0	0	72	72
Recommended Changes		**Site Inventory**		
Site 3 (Adams Street)	**-22**	**9**	**76**	**63**
Site 4 (905 Mains Street)	**0**	**0**	**-5**	**-5**
Site 7 (821 Pope Street	**-10**	**-10**	0	**-20**
Site 9 (1447 & 1515 Spring Street)	**-24**	0	**-24**	**-48**
Totals	**-56**	**-1**	**47**	**-10**
Remaining Sites (Consolidated)		**Site Inventory**		
Sites 1, 2, 5, 6, 8, 10, 11,12	152	87	244	483
Color Code -Purple-Doubtful				
Red - Subtractions				
Green -Additions				

The results reached is close to a net neutral on units for each category of AMI housing. And the inclusion of 88 units plus 50 for the OTSG/Phelps's project equates to a realistic 54% of Saint Helena's 2023-31 RHNA required allocation.

SHHC's Second Suggestion:

While draconian, the only true solution SHHC sees to the significant challenges in achieving the forthcoming coming 2023-31 RHNA Site locations allocations is for the city to firmly state that it will undertake, if necessary, Eminent Domain proceeding as in the Kelvo v. New London U.S. Supreme Court Decision.

In closing, it is time to discard the Housing Element word games from the past and boldly put forth only those Opportunity Sites that are ***certain*** and ***available***.

Respectfully submitted:

Rick Crebs

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Ccs: Anil Comelo, City Manager
Maya DeRosa, Director of Planning
Geoff Ellsworth, Mayor
Paul Dohring, Esq. Vice Mayor
Lester hardy, Esq., City Council Member
Eric Hall, City Council Member
Anna Chouteau, City Council Member



City of St. Helena 2023 General Plan Update

Addendum

prepared by

City of St. Helena
Maya DeRosa, Community Development Director
Department of Planning
1088 College Avenue
St. Helena, California 94574

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

April 2023

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Environmental Scientists | Planners | Engineers
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Table of Contents

Acronyms and Abbreviations iii

Executive Summary 1

1 Introduction 3
- 1.1 Project Title 3
- 1.2 Lead Agency Name and Address 3
- 1.3 Contact Person and Phone Number 3
- 1.4 Project Location 3
- 1.5 Project Description 6
- 1.6 Environmental Review 7
- 1.7 Discretionary Action 7
- 1.8 Prior Environmental Document(s) 8
- 1.9 Location of Prior Environmental Document(s) 8

2 Project Context 9
- 2.1 St. Helena General Plan 9
  - 2.1.1 Housing Element 10
  - 2.1.2 Public Health, Safety, and Noise Element 14
  - 2.1.3 2040 General Plan EIR 15

3 Overview of CEQA Guidelines Section 15164 17

4 Environmental Effects & Determination 19
- 4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR 19
- 4.2 Determination 19

5 Addendum Methodology 21
- 5.1 2040 General Plan Consistency 21
- 5.2 Accommodation of the RHNA 21
- 5.3 Consistency with Horizon Year 2040 Projections 22
- 5.4 Preliminary Environmental Considerations 23

6 Addendum Evaluation 25
- 6.1 Aesthetics 25
- 6.2 Agricultural Resources 29
- 6.3 Air Quality 33
- 6.4 Biological Resources 39
- 6.5 Cultural, Historic, and Tribal Cultural Resources 43
- 6.6 Energy, Greenhouse Gases, and Climate Change 47
- 6.7 Geology, Soils, and Seismicity 51
- 6.8 Hazards and Hazardous Materials 55
- 6.9 Hydrology and Water Quality 59
- 6.10 Land Use, Population, and Housing 65
- 6.11 Noise 69
- 6.12 Public Services and Recreation 73
- 6.13 Transportation and Traffic 77

6.14 Utilities and Service Systems 81
7 Summary of Findings 85
8 References 86
Bibliography 86

Tables

Table 1 City of St. Helena Regional Housing Needs Allocation....12
Table 2 Summary of Areas of Potential Impact under the 2040 General Plan Update EIR....15
Table 3 Housing Unit Yield per Site Category 22

Figures

Figure 1 Regional Location....4
Figure 2 Project Area 5
Figure 3 Housing Element Sites Inventory Locations – Vacant and Underutilized (Nonvacant) Sites....13

Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADU	Accessory dwelling unit
BAAQMD	Bay Area Air Quality Management District
BMP	Best management practices
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
DPM	Diesel Particulate Matter
EIR	Environmental impact report
GHG	Greenhouse Gas
HRA	Health risk assessment
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas & Electric
PM	Particulate matter
ROG	Reactive organic gas
SB	Senate Bill
SHMC	Saint Helena Municipal Code
VMT	Vehicle Miles Traveled
VOC	Volatile organic compounds

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Executive Summary

The proposed project consists of a comprehensive update to the Housing Element of the City of St. Helena General Plan. State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The project would update the City of St. Helena Housing Element as part of the 6th cycle of updates. For St. Helena, the planning period runs from January 31, 2023 through January 31, 2031. The Housing Element update identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under state law (California Government Code Section 65583). It analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The proposed project also includes revisions to the Public Health, Safety, and Noise Elements to be consistent with California law regulating evacuation routes and climate change vulnerability.

The Housing Element update establishes objectives, policies, and programs to assist the City of St. Helena in achieving state-mandated housing goals. The City's implementation of these policies and programs includes amendments to the Public Health, Safety, and Noise Element of the General Plan and the rezoning of several sites in the inventory of potential sites for meeting the city's Regional Housing Needs Allocation (RHNA) obligation. No formal land use changes or physical development is proposed at this time and future changes would require environmental evaluation as potential impacts are location-specific and cannot be assessed in a meaningful way until a project site and development proposal are identified.

Pursuant to Government Code section 65583(c)(1), these actions will be accomplished within three years of the City of St Helena's adoption of the Housing Element update. As required by Government Code Section 65583(c)(8), the Housing Element update provides a timeline for processing each of the amendments to the General Plan, Zoning Ordinance and other land use documents which implement the Housing Element update.

In considering the potential environmental impacts of the Housing Element update, the City determined that the Final Environmental Impact Report (EIR) certified for the 2040 General Plan update (2040 General Plan update Final EIR, State Clearinghouse Number 2010042001) is of continuing informational value. The City also determined that the potential environmental impacts (both direct and indirect impacts) of the Housing Element update are within the scope of the previously certified Final EIR and that none of the conditions requiring subsequent or supplemental environmental review under California Environmental Quality Act (CEQA) Guidelines Section 15162 exist. Based on the information and analysis provided below, the City determined that only minor or technical changes to the previously certified Final EIR are necessary and that that preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

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1 Introduction

This document is an Environmental Impact Report Addendum that analyzes the City of St. Helena's (City's) proposed Housing Element update and Public Health, Safety, and Noise Element update Project (hereafter also referred to as the "General Plan update," "proposed project," or "project").

1.1 Project Title

City of St. Helena General Plan Update

1.2 Lead Agency Name and Address

City of St. Helena
Department of Planning
1088 College Avenue
St. Helena, California 94574

1.3 Contact Person and Phone Number

Maya DeRosa, Community Development Director
(707) 967-2783 x 530

1.4 Project Location

The Housing Element update planning boundaries (Plan Area) coincide with the St. Helena city limits. The area encompasses approximately 5 square miles of land in the western portion of Napa County. The city is located northwest of the City of Yountville and southeast of the City of Calistoga, surrounded by unincorporated areas of the County. State Route 29 and 121 provide regional access to the city from the north and south. Figure 1 shows the regional location of the Plan Area, and Figure 2 shows the Plan Area's boundaries in its immediate location. In addition, the project identifies 11 vacant and underutilized sites within the city that can accommodate new housing or rezone. The vacant and underutilized sites to be studied for housing opportunities are shown broadly in Figure 3 and correspond to the list provided in the Housing Resources chapter of the needs assessment of the Housing Element update. Not all parcels have street addresses at this time. With most of the City developed and preservation of open space a priority, all draft vacant and opportunity sites are on currently underdeveloped, underutilized, or vacant lots.

Figure 1 Regional Location

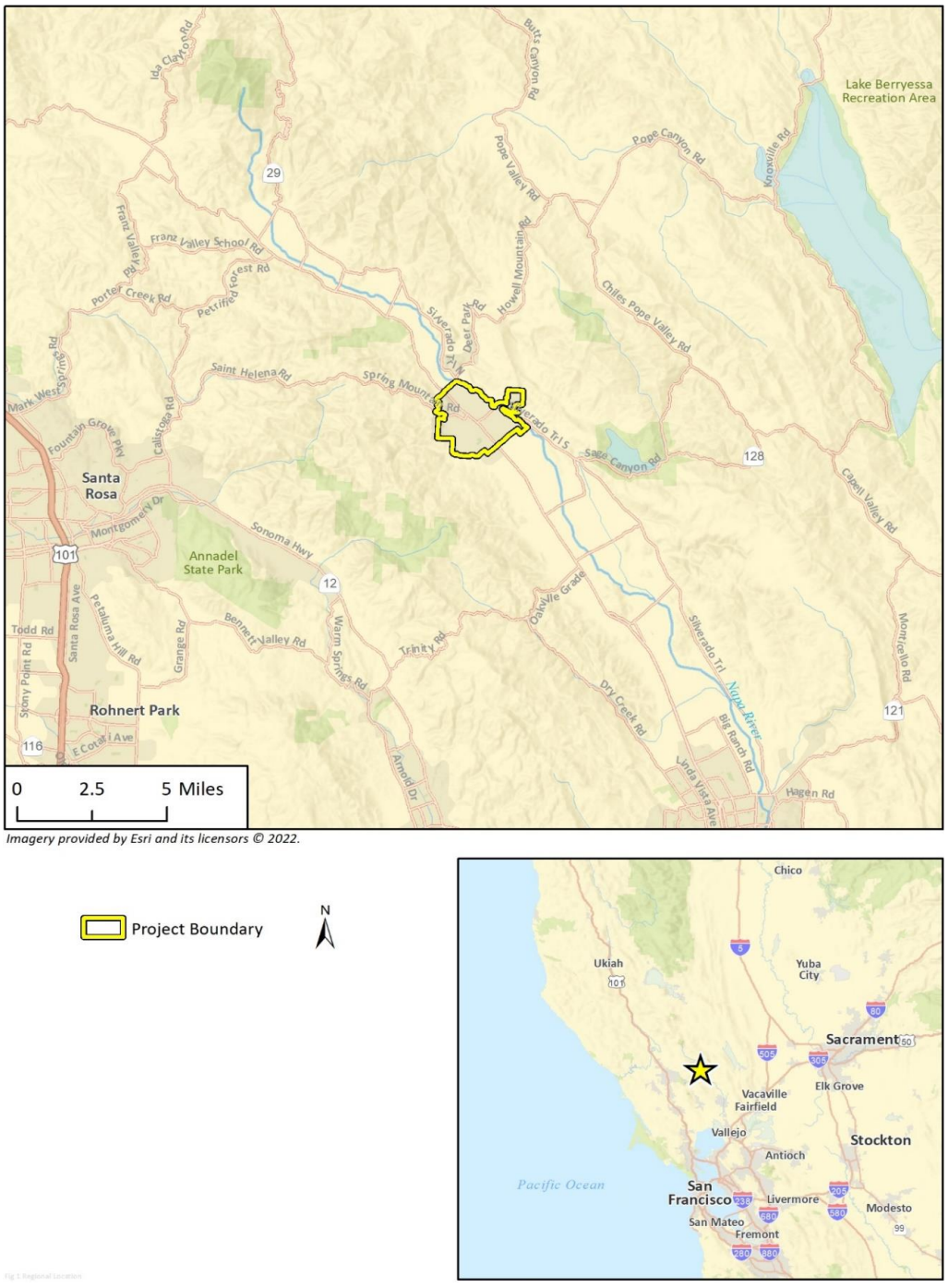
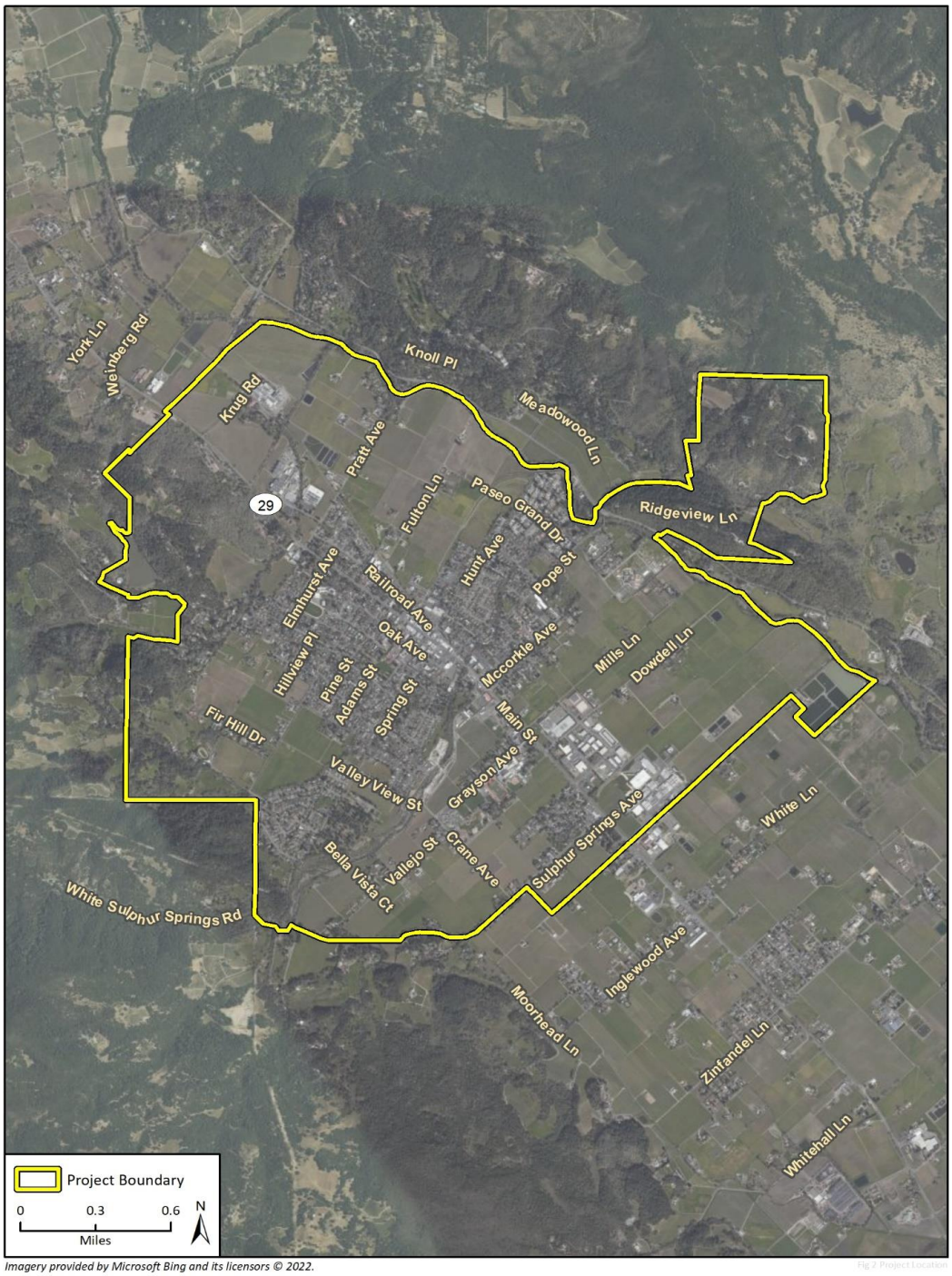


Figure 2 Project Area



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1.5 Project Description

The project consists of a comprehensive update to the Housing Element of the St. Helena General Plan and update to the existing Public Health, Safety, and Noise Element of the General Plan. These elements are a part of the St. Helena General Plan, which is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over approximately 20 years (i.e., 2040). The General Plan was subject to a comprehensive update as well; it underwent extensive environmental review in the form of an EIR, which was certified in 2019. The EIR for the St. Helena 2040 General Plan includes discussion of alternatives and growth inducing impacts (direct and indirect impacts) associated with urban development in the city.

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element update identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under state law (California Government Code Section 65583). It analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The project would update the City of St. Helena Housing Element as part of the 6th cycle of updates. For St. Helena, the planning period runs from January 31, 2023 through January 31, 2031.

Additionally, the Housing Element update would bring it into compliance with state legislation passed since the adoption of the 2040 General Plan and 2015-2023 Housing Element. There are multiple main components of the Housing Element update that mirror those of the previous Housing Elements, but that have been updated to reflect current conditions, including:

- An **introduction** to review the requirements of the Housing Element, public participation process, and data sources
- A profile and analysis of the city's demographics, housing characteristics, and existing and future **housing needs**
- An analysis of **constraints** on housing production and maintenance, including market, governmental, and environmental limitations to meeting the City's identified needs
- A review of **resources available** and results of a housing sites inventory analysis conducted to demonstrate the City of St. Helena's ability to satisfy its share of the region's future housing need
- A review of the City's **housing programs** and evaluation of accomplishments under the 2013-2021 Housing Element
- A **Housing Plan** to address the city's identified housing needs, which identifies the City's housing goals, policies, and implementing programs
- An identification of the **goals, policies, and programs** and the city's quantified objectives for the 2023-2031 planning period, by income group, based on growth estimates, past and anticipated development, and income data

The Housing Element update establishes objectives, policies, and programs to assist the City in achieving state-mandated housing goals. The city's implementation of these policies and programs includes future amendments to other elements of the General Plan and the rezoning of several sites in the inventory of potential sites for meeting the city's RHNA obligation. Pursuant to Government

Code section 65583(c)(1), these actions will be accomplished within three years of the City of St. Helena's adoption of the Housing Element update. As required by Government Code Section 65583(c)(8), the Housing Element update provides a timeline for processing each of the amendments to the General Plan, Zoning Ordinance and other land use documents which implement the Housing Element update.

1.6 Environmental Review

In April 2019, the City of St. Helena certified the St. Helena 2040 General Plan update and Final EIR (City of St. Helena General Plan 2040, State Clearinghouse Number 2010042001) for an update to General Plan, including the Land Use Element. The certified Final EIR discussed the potential environmental impacts (both direct and indirect impacts) associated with future development allowed under the General Plan update and included a thorough analysis of the estimated build out of the City through the horizon year 2040. The EIR estimated new development for residential, commercial, office, industrial, hospital and hotel uses throughout the city and sphere of influence and evaluated the potential environmental impacts associated with an estimated total buildout of 400 new dwelling units. The EIR found that, with implementation of the policies and programs contained in the General Plan and recommended mitigation measures, all impacts (direct and indirect) associated with future development under the General Plan update would be less than significant, except impacts on agricultural resources, air quality, energy, greenhouse gas emissions, and climate change, and transportation and traffic which would be significant and unavoidable.

In considering the potential environmental impacts of the Housing Element update, the City determined that the EIR certified for the 2040 General Plan update is of continuing informational value. The City also determined that the potential environmental impacts (both direct and indirect impacts) of the Housing Element update are within the scope of the previously certified EIR and that none of the conditions requiring subsequent or supplemental environmental review under CEQA Guidelines Section 15162 exists. Based on the information and analysis provided below, the City determined that only minor or technical changes to the previously certified EIR are necessary and that that preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate. Like the 2040 General Plan update, the Housing Element update does not include any development proposal or approval and future development of any specific housing site would be subject to additional environmental review pursuant to CEQA Guidelines Section 15168(c).

1.7 Discretionary Action

Implementation of the Housing Element would require the following discretionary actions by the City of St. Helena City Council:

- Approval of an Addendum to the General Plan EIR
- Adoption of the updated Housing Element and Public Health, Safety, and Noise Element

In addition to the above-mentioned actions, future amendments to the St. Helena Municipal Code (SHMC) consistent with the implementing programs of the updated Housing Element would also be adopted by the City Council.

The California Department of Housing and Community Development reviews the proposed Housing Element in accordance with California law. No other review by outside public agencies is required.

1.8 Prior Environmental Document(s)

The City of St. Helena General Plan 2040 Final EIR, State Clearinghouse Number 2010042001.

1.9 Location of Prior Environmental Document(s)

The location and custodian of the City of St. Helena General Plan 2040 EIR is the City of St. Helena Planning Department, 1088 College Avenue St. Helena, CA 94574. A copy of the EIR also is available online at the City of St. Helena website: https://www.cityofsthelena.org/planning/page/2040-general-plan-update

2 Project Context

The project consists of a comprehensive update to the Housing Element of the St. Helena General Plan and update to the existing Public Health, Safety, and Noise Element of the General Plan (collectively referred to as "project"). These elements are a part of the St. Helena General Plan, which is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over approximately 20 years (i.e., 2040).

2.1 St. Helena General Plan

California law requires that each city and county in California adopt "a comprehensive, long-term general plan," the purpose of which is to plan for important community issues such as new growth, housing needs, and environmental protection. Furthermore, the General Plan is used to project future demand for services such as sewer, water, roadways, parks, and emergency services. A General Plan is only successful when it reflects the priorities and values of the community and is a key tool for influencing quality of life.

City of St. Helena decision-makers (e.g., City Council and Planning Commission), rely on the General Plan as the basis for making decisions on matters such as land use and the provision of public facilities (e.g., roads, parks, fire stations). It is also a policy document that guides decisions related to protecting, enhancing, and providing those things that the community values most, such as open space, habitat conservation, economic development, and protecting the character of the community.

California law requires that every general plan, at a minimum, address certain subject categories (called "elements"), which include land use, circulation, housing, conservation of natural resources, open space, noise, safety, and environmental justice. A general plan may also address other subjects that are of importance to the community's future, such as sustainability, community design, and public art. St. Helena's adopted General Plan includes the following elements which address all state-mandated elements with additional policies and actions to address Environmental Justice issues:

- Land Use and Growth Management
- Economic Sustainability
- Public Facilities and services
- Circulation
- Historic Resources
- Open Space and Conservation
- Public Health, Safety, and Noise
- Climate Change
- Housing
- Parks and Recreation
- Arts, Culture, and Entertainment

2.1.1 Housing Element

2.1.1.1 Purpose of the Housing Element

The Housing Element of the General Plan is designed to provide the City of St. Helena with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both state and local governments, Government Code Section 65580 states that "the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order."

Pursuant to the state law, the Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs
2. To provide a strategy that establishes housing goals, policies, and programs

The Housing Element is one of the eight General Plan elements the state mandates in Government Code Section 65302. The Housing Element serves as an integrated part of the General Plan but is updated more frequently to ensure its relevancy and accuracy. The City of St. Helena's current Housing Element, adopted in 2015, identifies strategies and programs that focus on:

1. Conserving and improving existing affordable housing
2. Maximizing housing opportunities throughout the community
3. Assisting in the provision of affordable housing
4. Removing governmental and other constraints to housing investment
5. Promoting fair and equal housing opportunities

The residential character of St. Helena is largely determined by the variety, location, and maintenance of its housing. The Housing Element is an official response to the need to provide housing for all economic segments of the population, establishing goals, policies, and programs that will guide the City of St. Helena decision making and set forth an action plan to implement these housing programs through an established planning period.

2.1.1.2 Updates to the Housing Element

State law requires that housing elements be updated every eight years (California Government Code Section 65588). The Housing Element must identify residential sites adequate to accommodate a variety of housing types for all income levels and to meet the needs of special population groups as defined under state law (California Government Code Section 65583). The Housing Element analyzes market and governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons.

The previous Housing Element covered an eight-year planning period (January 31, 2015 through January 31, 2023), Government Code Section 65588(e).

The City of St. Helena Housing Element is now being revised as part of the 6th cycle of updates, the period of which runs from January 31, 2023 through January 31, 2031. Therefore, this update is referred to as the "Housing Element update."

The 2023-2031 Housing Element would bring the Element into compliance with California law enacted since the City's adoption of the 2015-2023 Housing Element and with the current Association of Bay Area Governments' (ABAG's) RHNA. The 2023-2031 Housing Element includes the following components, as required by California law:

- An assessment of the City's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- An analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability.
- Identification of the City's quantified objectives for the 2023-2031 RHNA and inventory of sites determined to be suitable for housing.
- Opportunities for Conservation in Residential Development: California law requires cities to identify opportunities for energy conservation in residential development.
- Review of the 2015-2023 Housing Element to identify progress and evaluate the effectiveness of previous policies and programs.
- A Housing Plan to address the City's identified housing needs, including housing goals, policies, and programs to facilitate the 2023 Housing Element update (6th Cycle).

2.1.1.3 Changes in California Law

The following items represent substantive changes to California law since the City's last Housing Element was adopted and certified in 2015. The Housing Element update incorporated and addressed all pertinent housing law changes.

- Affordable Housing Streamlined Approval Process: Senate Bill (SB) 35 (2017)
- Additional Housing Element Sites Analysis Requirements: Assembly Bill (AB) 879 (2017) and AB 1397 (2017)
- Affirmatively Furthering Fair Housing: AB 686 (2017)
- No-Net-Loss Zoning: SB 166 (2017)
- Safety Element to Address Adaptation and Resiliency: SB 1035 (2018)
- By Right Transitional and Permanent Supportive Housing: AB 2162 (2018) and B 101 (2019)
- Accessory Dwelling Units: AB 2299 (2016), SB 1069 (2016), AB 494 (2017), SB 229 (2017), AB 68 (2019), AB 881 (2019), AB 587 (2019), SB 13 (2019), and AB 671 (2019)
- Density Bonus: AB 1763 (2019)
- Housing Crisis Act of 2019: SB 330
- Surplus Land Act Amendments: AB 1486 and AB 1255 (2019)
- Housing Impact Fee Data: AB 1483 (2019)
- Emergency and Transitional Housing Act of 2019: AB 139 (2019)
- Standardization of Sites Inventory Analysis and Reporting: SB 6 (2019)

2.1.1.4 Regional Housing Needs Assessment and Required Buffer

The Housing Element must address the City's fair share of the regional housing need (as determined by ABAG) and specific California statutory requirements. It must also reflect the vision and priorities of the local community. As of December 2021, ABAG determined a final RHNA Allocation of 256 units for the City of which 162 must be affordable to lower-income households, as shown in Table 1.

Table 1 City of St. Helena Regional Housing Needs Allocation

	Income Category (Percent of Napa County Area Median Income)				
	Very Low (<50%)	Low (50-80%)	Moderate (80-120%)	Above Moderate (>120%)	Total Housing Units
RHNA Housing units	104	59	26	67	256
RHNA + 20% Buffer	121	71	31	79	302

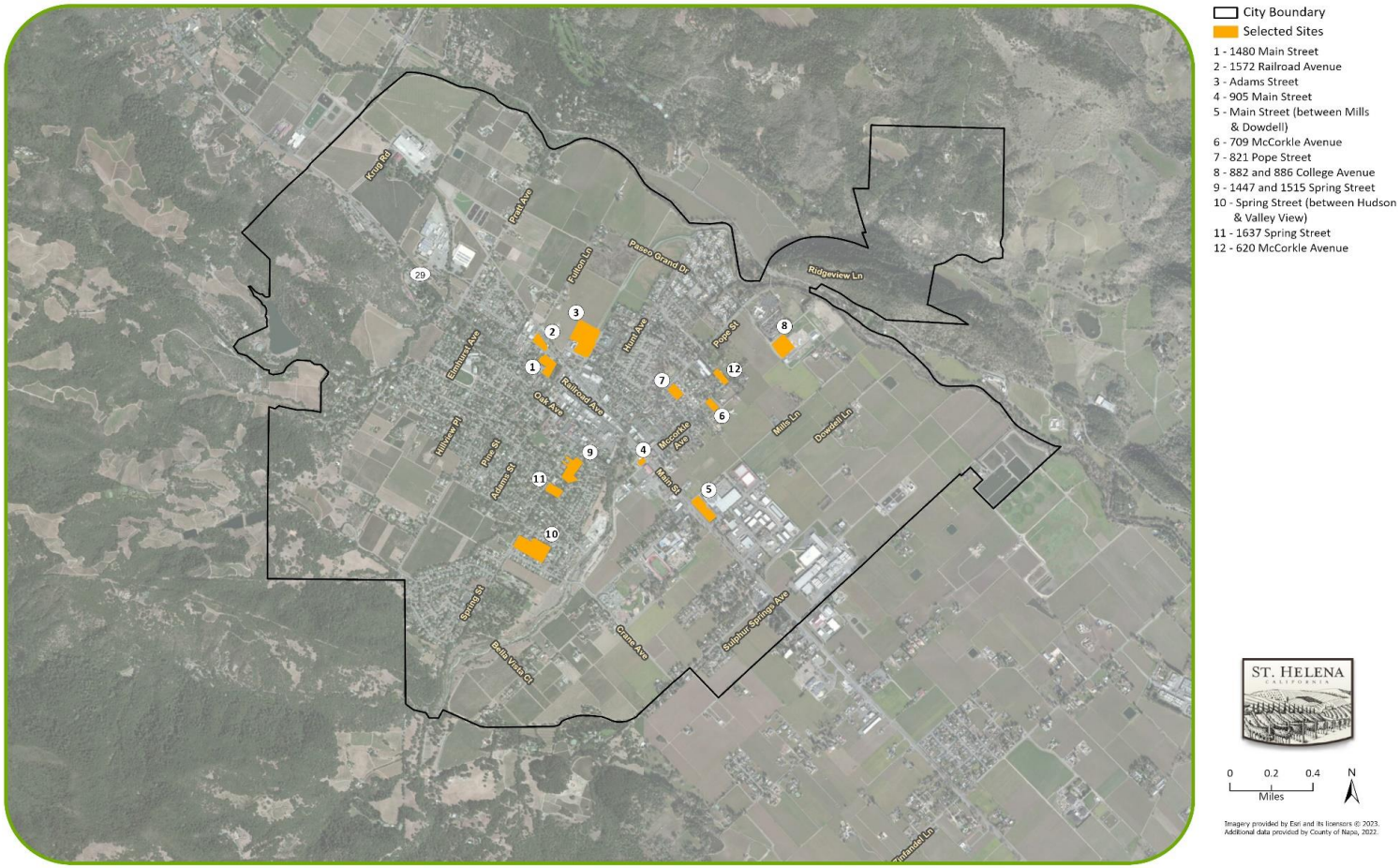
California law requires local jurisdictions to identify enough future housing sites inventory to not only cover the jurisdiction's 6th Cycle RHNA, but to also provide for an additional buffer capacity above the RHNA. The buffer capacity is required to accommodate realistic production rates of affordable housing units. Additionally, the buffer can allow for instances when a smaller residential project must be considered for a given property or when existing units are demolished. The "No Net Loss" Law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period. With this required buffer, the number of housing units identified in the Housing Element is 307.

To meet the objectives of the RHNA and provide sufficient capacity for housing development, the Housing Element identifies sites for residential development. The Housing Element update identifies some sites for land use changes either to be consistent with the existing Land Use Element or to permit or increase residential uses on the sites. However, neither the Housing Element nor the City itself develops housing. Moreover, as described in further detail in Section 5, *Addendum Methodology*, below, the Housing Element update, in and of itself, does not itself implement land use changes, but puts forth goals and policies that support housing efforts. As described in the Housing Element update, the City's RHNA can be accommodated in the following categories:

- Vacant or underutilized sites, where new residential units can be developed under current General Plan regulations;
- Sites to be rezoned to permit residential uses or permit them at a high density
- Planned or pending projects where no rezoning is required; and
- Current accessory dwelling units, also known as "granny flats"

Figure 3 shows the locations of the vacant and underutilized sites identified in sites inventory in the Housing Element update. All sites in the housing sites inventory are within the City's limits.

Figure 3 Housing Element Sites Inventory Locations – Vacant and Underutilized (Nonvacant) Sites



2.1.1.5 Zoning and General Plan Amendments

The project would involve an amendment to the City's Zoning Ordinance to rezone existing land use designations to Mixed-Use, Medium Density Residential, and High Density Residential. Some existing sites are designated as land uses other than a residential land use category and would be rezoned to mixed-use or residential land use categories. Select sites would be upzoned from existing residential land use categories to more dense residential land use categories. Most of these sites are located in the central areas of the City to reflect the intensity of existing nearby higher density parcels. Future development of those sites would require separate CEQA review and compliance with local development standards.

Due to the proposed zoning modifications on particular Draft Housing Element vacant and underutilized sites, a General Plan Amendment would be required to change the land use designations on those sites to be consistent with the zoning.

2.1.2 Public Health, Safety, and Noise Element

The Safety element is one of the eight General Plan elements the state mandates in Government Code Section 65302. The project includes revisions to the Public Health, Safety, and Noise Element which identifies forces of nature and events resulting from human action that have the potential to cause harm to life and property in the City. The goal of a Safety Element is to reduce the potential short and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards. Identifying the source of such threats allows decision-makers to take preemptory action to minimize the damage, particularly as it relates to new development. The Public Health, Safety, and Noise Element also addresses noise, fire and police protection, hazardous materials, solid waste, and public utility systems. A climate change vulnerability assessment identifying potential impacts from climate change on vulnerable populations and natural and built assets in St. Helena was also conducted for the Public Health, Safety, and Noise Element update.

California law requires specific changes to a safety element when the municipality undergoes an update to the Housing Element. The Public Health, Safety, and Noise Element update includes revisions to be consistent with California law through the following actions:

- Identify and propose policies for residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation routes.
- Update information relating to flood and fire hazards and city assets at risk due to climate change vulnerability.
- Propose and strengthen policies related to risk reduction, emergency preparedness and evacuation, and community and facility resilience infrastructure and strategies.
- Propose additional policies to address climate change hazards, including extreme heat days, extended drought, increased precipitation, and worsening air quality such as investing in backup power sources, funding for weatherization of homes, and providing cooling centers.

2.1.2.1 Changes in State Law

The following represent bills passed by the California State Legislature and approved by the Governor that require substantive changes to a Safety Element when a municipality undergoes an update. The Safety and Community Services Element update has incorporated and addressed all pertinent safety element law changes.

- Residential Emergency Evacuation Routes: SB 99 (2019)
- Evacuation Routes: AB 747 (2019)
- General Plans: SB 1035 (2018)
- Climate Change Adaptation: SB 379 (2015)
- Integration of Local Hazard mitigation Plan: AB 2140 (2006)
- Seismic and Geologic Hazards: SB 926 (2004)
- Flood Mapping: AB 162 (2007)

2.1.3 2040 General Plan EIR

The 2040 General Plan update EIR addressed the potential environmental effects (direct and indirect) of the planned buildout of St. Helena through the year 2040 and concluded that implementation of the General Plan would result in levels of environmental impacts as detailed in Table 2.

Table 2 Summary of Areas of Potential Impact under the 2040 General Plan Update EIR

Issue Area	Highest Level of Impact	Mitigation Proposed in the General Plan EIR
Aesthetics	Less than significant	None
Agricultural Resources	Significant and Unavoidable	None
Air Quality	Significant and Unavoidable	Mitigation Measures AQ-1, AQ-2, AQ-3, AQ-4, AQ-5, and AQ-6
Biological Resources	Less than significant	None
Cultural, Historic, and Tribal Cultural Resources	Less than significant	None
Energy, Greenhouse Gases, and Climate Change	Significant and Unavoidable	Mitigation Measure GHG-1
Geology, Soils, and Seismicity	Less than significant	None
Hazards and Hazardous Materials	Less than significant	None
Hydrology and Water Quality	Less than significant	HYDRO-1
Land Use, Population, and Housing	Less than significant	None
Noise	Significant and Unavoidable	Mitigation Measure NO-1
Public Services and Recreation	Less than significant	None
Transportation and Traffic	Significant and Unavoidable	Mitigation Measures TR-1, TR-2, TR-3, TR-4, TR-5, and TR-6
Utilities and Service Systems	Less than significant	None

The General Plan has an approximate year 2040 horizon, but actual buildout of all planned land uses may occur earlier or later, as long-range demographic and economic trends are difficult to accurately predict. The designation within the proposed General Plan of a site for a certain use does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development will depend on property owner initiative and market conditions.

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3 Overview of CEQA Guidelines Section 15164

Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when changes are proposed to a project that has a previously certified EIR. When considering the need for additional environmental review, the fundamental determination a lead agency must make is whether the previously certified EIR retains some informational value or whether changes in the project or circumstances have rendered it wholly irrelevant. If the previously certified EIR has continuing informational value, the lead agency then must determine whether the proposed changes in the Project requires additional environmental review under Public Resources Code Section 21166 and CEQA Guidelines Section 15162.

CEQA Guidelines Section 15164 provides that a lead agency will prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. CEQA Guidelines section 15162(a) states that no Subsequent or Supplemental EIR may be prepared for a project with a certified EIR unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
   A. The project will have one or more significant effects not discussed in the previous EIR.
   B. Significant effects previously examined will be substantially more severe than shown in the previous EIR.
   C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
   D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR, that an addendum to the existing EIR would be appropriate, and no new environmental document, such as a new EIR, would be required. The addendum need not be circulated for public review but can be included in or attached to the

final EIR, and the decision-making body shall consider the addendum with the final EIR prior to deciding on the project.

The City of St. Helena prepared this Addendum, pursuant to CEQA Guidelines Sections 15162 and 15164, to evaluate whether the project's environmental impacts are covered by and within the scope of the General Plan Final EIR). The following Addendum details any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that may cause one or more significant effects to environmental resources.

The responses herein substantiate and support the City of St. Helena's determination that the potential environmental impacts of the Housing Element update and Public Health, Safety, and Noise Element update policies and programs are within the scope of the General Plan EIR, do not require subsequent or supplemental environmental review under CEQA Guidelines Section 15162 and, in conjunction with the EIR, preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

4 Environmental Effects & Determination

4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in Project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

■ None

□ Aesthetics	□ Agricultural Resources	□ Air Quality
□ Biological Resources	□ Cultural, Historic, and Tribal Cultural Resources	□ Energy, Greenhouse Gases, and Climate Change
□ Geology, Soils, and Seismicity	□ Hazards & Hazardous Materials	□ Hydrology and Water Quality
□ Land Use, Population, and Housing	□ Noise	□ Public Services and Recreation
□ Transportation and Traffic	□ Utilities and Service Systems	

4.2 Determination

Based on this analysis, the 2040 General Plan EIR has continuing informational value and:

□ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the preparation of an Addendum to the previously certified EIR (City of St. Helena, 2040 General Plan Environmental Impact Report (2040 General Plan EIR State Clearinghouse Number 2010042001, dated October 2018) is adequate and appropriate.

Signature	April 24, 2023 Date
Maya DeRosa Printed Name	Community Development Director Title

5 Addendum Methodology

5.1 2040 General Plan Consistency

To promote a uniform and compatible vision for the development of the community, California law requires the General Plan be internally consistent in its goals and policies. The Housing Element and the Public Health, Safety, and Noise Element are components of the General Plan, and thus, the Housing Element update and Public Health, Safety, and Noise Element update must be consistent with the vision of the General Plan and supported by goals and policies of the other General Plan elements. General Plan elements and policies that affect housing are summarized below:

The **Land Use and Growth Management Element** directs the location, amount, and type of residential development in St. Helena. It presents the desirable pattern for the ultimate development of the city and reflects the community's evolution and changing demographics over the General Plan horizon. The Land Use Plan details the location and the density of development allowed throughout the city.

The **Community Design Element** guides the form, character, and appearance of the community to preserve the city's history and character in future commercial, industrial, and residential development.

The **Circulation Element** defines a safe, efficient, and adequate circulation system in St. Helena that responds to all circulation needs. Circulation means the actual physical circulation system consisting of freeways, streets, bicycle routes, sidewalks, and trails, as well as modes of transportation, including cars, buses, trucks, trains, bicycles, ridesharing, and walking.

The **Open Space and Conservation Element** and **Parks and Recreation Element** establish goals and polices to protect sensitive resources from development impacts; maintain and improve appropriate access to open space; and ensure park and recreation opportunities are sufficient to meet the needs of future residents.

The **Economic Sustainability Element** establishes goals and policies to guide city efforts to maintain an economically viable community, including providing a range of housing and employment opportunities that meet the needs of residents and workers alike, that attract families and businesses to create demand for planned land uses, and that establish and fund public service levels to preserve St. Helena's quality of life.

The **Climate Change Element** directs the City's response to and plans for climate change by addressing energy and water conservation, renewable energy production, transportation, sustainable business development, and reduction of climate change impacts in the city.

5.2 Accommodation of the RHNA

The City's RHNA for the current planning period is 256 units, which includes 162 very low and low-income housing units, 26 moderate income housing units, and 68 above moderate housing units. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units. As shown in Table 3, the City anticipates the development of 72 accessory dwelling units (ADUs) during the eight-year planning period and 93 units would be accommodated from planned and approved (pipeline)

projects, which can count towards the RHNA. A total of 307 units were identified on vacant and nonvacant sites under the existing General Plan land uses, as well as on sites requiring rezoning under Program H-A.

Although the housing sites inventory has been identified for future planning purposes as part of the Housing Element update, the adoption of the Housing Element itself does not change the current zoning or General Plan designations of the properties. California Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the start of the Housing Element planning period to rezone sites, including adoption of minimum density and development standards. Therefore, the City's rezoning program, which is identified as Program H-A of the Housing Element update, would be a separate project and evaluated in accordance with CEQA at the time of its review. Prior to the approval of any changes in land use, the City would evaluate the potential environmental impacts from the rezoning or change in land use.

Table 3 Housing Unit Yield per Site Category

Site Category/Approach	Very Low/Low	Moderate	Above Moderate	Total
RHNA plus buffer	**192**	**31**	**79**	**302**
Vacant or underutilized parcels	203	69	35	307
Planned or Pending Projects, no rezone	4	1	88	93
Accessory Dwelling Units	0	0	72	72
Total	**207**	**70**	**195**	**472**
RHNA Surplus	***(15)***	***(39)***	***(116)***	***(171)***

As shown in Table 3, existing vacant or underutilized residentially zoned properties, planned, and pending projects that require no zone change, and accessory dwelling units would yield four very low and low income housing units under current conditions. Therefore, the City of St. Helena needs to account for the additional 188 very low and low income housing units through a combination of the remaining approaches. The 188 very low and low income housing units fall within the projected horizon year buildout and housing unit assumptions addressed in the General Plan and General Plan EIR.

5.3 Consistency with Horizon Year 2040 Projections

The General Plan EIR reports that in 2018 there were 2,735 existing housing units in St. Helena and predicts that by horizon year 2040, St. Helena will have 3,067 units (Chapter 2, Project Description), assuming an addition of 332 new housing units citywide between 2018 and horizon year 2040. As discussed above, the City of St. Helena's RHNA for the current planning period is 256 units. In addition, the Housing Element includes a required buffer which plans for a total of approximately 302 units during the planning period. Including the pending and approved projects, ADU trends, and vacant and nonvacant sites, the Site Inventory would accommodate approximately 472 units as shown in Table 3 which would exceed the 332 units by an additional 140 units. Therefore, additional environmental analysis would be required prior to the implementation of the rezoning program identified as Program H-A in the Housing Element.

5.4 Preliminary Environmental Considerations

The Housing Element update, in and of itself, does not propose specific development projects, but rather puts forth goals, policies, and programs that support housing efforts in St. Helena. Each future housing development project and housing program adopted in the Housing Element would be subject to separate review to determine potential impacts on the environment related to each project as potential impacts are location-specific and cannot be assessed in a meaningful way until a project site and development proposal are identified. When a specific development proposal is considered for approval, that project would be subject to adopted development guidelines and standards and be required to incorporate applicable mitigation measures and alternatives developed in the 2040 General Plan EIR certified in 2019 (in accordance with CEQA Guidelines Section 15168(c)(3)). If a subsequent activity (in this case a specific development proposal) would have effects not identified in the program EIR (the 2040 General Plan EIR and this Addendum), the lead agency must prepare additional CEQA documentation.

Similarly, the goals, policies and programs in the updated Public Health, Safety, and Noise Element, in and of themselves, do not propose specific projects that result in a physical change to the environment. Should a project associated with implementation of the Public Health, Safety, and Noise Element have the potential to result in a physical change in the environment, it would be subject to separate review under CEQA.

This Addendum Evaluation, therefore, includes the analysis of the changes and potential impacts related to the adoption of Housing Element and Public Health, Safety, and Noise Element updates. No physical development or changes in land use are addressed or evaluated. The City would analyze any future development or changes in land use separate from the adoption of the Housing Element. This Addendum Evaluation is intended to demonstrate the project's consistency with the existing St. Helena 2040 General Plan update Final EIR to satisfy the requirements of CEQA. In particular, and pursuant to Public Resources Code Section 21083.3, this Addendum Evaluation assesses whether the updated Housing Element and Public Health, Safety, and Noise Element, as a policy and programs document, includes impacts not addressed or analyzed as significant effects in the St. Helena 2040 General Plan update Final EIR.

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6 Addendum Evaluation

6.1 Aesthetics

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the General Plan update:							
a. Have a substantial adverse effect on a scenic vista?	Less than Significant	None	No	No	No	Yes	Yes
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant	None	No	No	No	Yes	Yes
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Less Than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Aesthetics Findings

The 2040 General Plan EIR determined that impacts to aesthetic resources would be less than significant for scenic vistas, scenic highways, visual quality, and light and glare (Section 3.1, *Aesthetics*). It further stated that individual development projects would be subject to project-specific development and planning review, including adherence to goals and policies in the Land Use and Growth Management Element and Community Design Element related to urban design and visual quality. As such, all projects proposed under General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning aesthetic resources such as those that address architectural design, lighting, landscaping, building setbacks, and visual compatibility.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the time a Housing Element is adopted to rezone sites, including adoption of minimum density and development standards. The City would evaluate any proposed land use changes for potential environmental impacts prior to approval of the proposed land use change. Furthermore, future development proposals could be subject to further environmental analysis, pursuant to CEQA Guidelines Section 15168(c) and as required by state law, to evaluate potential impacts specific to that proposal.

Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to scenic vistas, scenic resources, or visual character, and would not create new sources of substantial light or glare which adversely affects views. The sites are located on vacant as well as non-vacant properties such as those with existing buildings or vineyards. However similar to the analysis within the 2040 General Plan EIR, any individual development projects consistent with the Housing Element would be subject to project-specific development and planning review, including adherence to goals and policies in the Land Use and Growth Management Element and Community Design Element related to urban design and visual quality. As such, all projects proposed under the Housing Element implementation would be required to conform to zoning, design standards, and other regulations concerning aesthetic resources such as those that address architectural design, lighting, landscaping, building setbacks, and visual compatibility.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. None of the implementation items would cause impacts to scenic vistas or resources or directly develop new structures which would impact views and create substantial glare. Any potential updates to structures to mitigate potential risks to wildfire or other climate safety hazards would be subject to project-specific development and planning review, including adherence to goals and policies in the Land Use and Growth Management Element and Community Design Element related to urban

design and visual quality. Therefore the Public Health, Safety, and Noise Element update would not result in significant adverse impacts related to aesthetics.

Conclusion

Based on the analysis above, the project would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR and no additional environmental assessment of aesthetics is required.

6.2 Agricultural Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Significant and Unavoidable	None	No	No	No	Yes	Yes
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	Less than Significant	None	No	No	No	Yes	Yes
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Agricultural Resources Findings

The 2040 General Plan EIR determined that there would be significant and unavoidable impacts to agricultural resources (Section 3.2, Agricultural Resources). The EIR found that implementation of the 2040 General Plan could result in the loss of up to 118 acres of land identified as Important Farmland, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The 2040 General Plan EIR found the loss of farmland is not directly mitigable, without preventing development altogether. No feasible mitigation measures were identified for agricultural land conversion that would fulfill the objectives of and implement the 2040 General Plan update. Therefore, and implementation of the plan would result in significant and unavoidable impacts to Important Farmlands.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the time a Housing Element is adopted to rezone sites, including adoption of minimum density and development standards. .

The General Plan goals and policies support continued farming and restrict uses that would interfere with farming and open space uses in certain areas. Most of the sites identified within the Housing Element update are located on sites with existing development and on sites zoned for residential or commercial uses. The Housing Element update includes one site identified for housing which is located on prime farmland. However, the site has a land use designation of Public and Quasi-Public and housing development would not result in any more severe impacts to agricultural resources than were a public facility developed on the site as currently shown in the General Plan. In addition, the 2040 General Plan EIR determined that there would be significant and unavoidable impacts to farmland (Section 3.2, Agricultural Resources). Therefore, the Housing Element update would not result in new or more severe impacts than those identified in the General Plan EIR. .

There would also be no new impacts to Williamson Act contracts, as none of the identified sites in the sites inventory are under Williamson Act contract.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. These updates would not convert existing farmland or forested land and would not impact any land under Williamson Act contract. Therefore, the Public Health, Safety, and Noise Element update would have no impact related to agricultural resources.

Conclusion

The Housing Element Update does not propose the development on housing on any areas of the City not already analyzed for development in the 2040 General Plan EIR. The Public Health, Safety, and Noise Element update would update information and goals, policies, and objectives to be consistent with the State legislation and would not change growth assumptions or buildout assessed

in the 2040 General Plan EIR. Therefore, the project would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR and no additional environmental assessment of agricultural resources is required.

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6.3 Air Quality

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant	None	No	No	No	Yes	Yes
b. Violate air quality standards or contribute substantially to an existing or projected air quality violation?	Significant and Unavoidable	AQ-1, AQ-2, and AQ-3	No	No	No	Yes	Yes
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	AQ-1, AQ-2, and AQ-3	No	No	No	Yes	Yes
d. Expose sensitive receptors to substantial pollutant concentrations?	Less than significant with Mitigation	AQ-4, AQ-5, and AQ-6	No	No	No	Yes	Yes
e. Create objectionable odors affecting a substantial number of people?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Air Quality Findings

As discussed under in Section 3.3, *Air Quality,* of the 2040 General Plan EIR, impacts related to consistency with applicable air quality plans would be less than significant. The 2040 General Plan would support the goals of Bay Area Air Quality Management District's (BAAQMD's) 2017 Clean Air Plan, include all applicable control measures, and would not conflict with its implementation.

The 2040 General Plan EIR concluded that impacts related to criteria pollutants would be significant and unavoidable. Construction emissions associated with a potential level of annual development that is consistent the General Plan's 2040 growth projections could result in reactive organic gas (ROG), NO_x, CO, and particulate matter (PM) emissions construction activity that exceeds BAAQMD-recommended CEQA significance thresholds. All other potential construction emissions would be below BAAQMD-recommended CEQA significance thresholds. In addition, maximum daily operational emissions associated with potential 2040 growth under the General Plan would result in ROG and PM_{10} emissions that could exceed BAAQMD-recommended CEQA significance thresholds. All other potential operational emissions would be below BAAQMD-recommended CEQA significance thresholds. To reduce impacts related to air quality emissions of criteria air pollutants, the 2040 General Plan EIR required implementation of Mitigation Measures AQ-1, AQ-2, and AQ-3 which would reduce ROGs from architectural coating, and PM from construction, as well require all development with the potential to create point-source air quality impacts to receive BAAQMD review prior to approval. In addition, any development under the 2040 General Plan would be required to comply with all applicable air quality plans, California Air Resources Board (CARB) and BAAQMD regulations, Title 24 energy efficiency standards, and policies within the 2040 General Plan aimed at reducing air pollution emissions. However, because the detail of future projects under the General Plan cannot be known, the 2040 General Plan EIR concluded impacts would be significant and unavoidable.

Mitigation Measure AQ-1: Require construction projects in the City of St. Helena to implement best management practices (BMPs) to reduce fugitive dust emissions. BMPs may include:

- Watering all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) three times per day using recycled water.
- Covering all haul trucks transporting soil, sand, or other loose material.
- Removing all visible mud or dirt track-out onto adjacent public roads using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- Limiting all vehicle speeds on unpaved roads to 15 mph.
- Completing all roadways, driveways, and sidewalks to be paved as soon as possible. Laying building pads soon as possible after grading unless seeding or soil binders are used.
- Minimizing idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- Maintaining and properly tuning all construction equipment in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper working condition prior to operation. • Staging construction equipment as far as possible from existing sensitive receptors (away from the southeast property line and surrounding residences).

- Posting a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
- Where warranted, the project sponsors shall incorporate the following language into construction specifications if significant risk is anticipated based on design level construction schedule, duration and concurrent construction activities:
- Powering portable equipment by electricity if available or if electricity is not available, using propane or natural gas if feasible. Diesel engines shall only be used if electricity is not available and it is not feasible to use propane or natural gas.
- Ensuring that all mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days continuously or 20 hours cumulative meets, at a minimum, U.S. EPA particulate matter emissions standards for Tier 2 engines or equivalent and be equipped with diesel particulate matter filters that meet CARB-certified Level 2 or 3 Diesel Particulate Filters. Alternatively-fueled equipment (i.e., non-diesel) would meet this requirement.

Mitigation Measure AQ-2: Require that applicants proposing development of projects within the City of St. Helena require contractors, as a condition of contract, to reduce construction-related fugitive ROG emissions by ensuring that low-volatile organic compounds (VOC) coatings that have a VOC content of 10 grams/liter (g/L) or less be used during construction. All project applicants shall submit evidence of the use of low-VOC coatings to BAAQMD prior to the start of construction.

Mitigation Measure AQ-3: Require all development applications with the potential to create point-source air quality impacts be referred to the Bay Area Air Quality Management District (BAAQMD) for review and comment to ensure compliance with BAAQMD requirements prior to approval of the project.

Mitigation Measure AQ-4: Require development projects to meet CARB setback recommendations from air contaminant sources for sensitive uses, or conduct specific air quality and health risk impact analyses and identify project specific mitigation measures.

Mitigation Measure AQ-5: To protect sensitive receptors require discretionary projects in proximity to Highway 29, Silverado Trail and the Rail Corridor to include an analysis of mobile source toxic air contaminant health risks. The analysis, if necessary, shall identify feasible mitigation measures to reduce health risks to acceptable levels.

Mitigation Measure AQ-6: All applicants proposing development of projects within 1,000 feet of existing sensitive receptors, as defined by BAAQMD, shall prepare a site-specific construction health risk assessment (HRA) taking into account both project-level and cumulative health risks (including existing toxic air contaminant sources). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project level and cumulative thresholds (as appropriate), then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project-level and/or cumulative thresholds (as appropriate), additional feasible on- and offsite mitigation shall be analyzed by the applicant to help reduce risks to the greatest extent practicable.

The 2040 General Plan EIR determined that impacts to sensitive receptors regarding pollutant concentrations by the General Plan would be less than significant. Although implementation of the General Plan could result in new sensitive residential receptors and new non-residential land uses that would potentially be emissions sources, permitted stationary sources in St. Helena are primarily located in commercial or semi-rural areas while most of the sensitive receptors, such as schools, residences, and retirement homes, are located in the downtown area of the city. In addition, individual development projects would be evaluated through the BAAQMD permit process and the CEQA process to identify and mitigate any significant exposures. Implementation of Mitigation Measures AQ-1 through AQ-6 would reduce potential impacts to sensitive receptors to less than significant.

Buildout under the General Plan would not cause or significantly contribute to CO concentrations that exceed State or federal ambient air quality standards for CO. Regulatory mechanisms, including asbestos National Emission Standards for Hazardous Air Pollutants regulations for demolition and renovation outlined in BAAQMD Regulation XI, Rule 11-2, would ensure impacts from asbestos containing materials present during demolition of existing structures would be less than significant. Heath risks associated with receptor exposure to Diesel Particulate Matter (DPM) would be less than significant because the use of off-road heavy-duty diesel equipment would be temporary and would combine with the highly dispersive properties of DPM, additional reductions in exhaust emissions would occur in the future, and construction-related activities would be short-term, incremental through time, and would occur at scattered locations throughout the city such that an individual receptor location would not be exposed to DPM exposure for a prolonged period of time. However, without specific details on the locations of building footprints or their construction schedules, a quantitative evaluation of potential health risk impacts is not possible. Mitigation Measures AQ-1, AQ-4, AQ-5, and AQ-6 would mitigate air quality impacts from construction to reduce health related impacts.

The 2040 General Plan EIR determined impacts related to objectionable odors affecting a substantial number of people would be less than significant.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the time a Housing Element is adopted to rezone sites, including adoption of minimum density and development standards.

While potential air quality-related impacts of future projects cannot be assessed in a meaningful way until the project site and development design is known, including the number of units, potential number of residents, and potential vehicle miles traveled, operational impacts would be addressed by provisions in the General Plan, the Green Building Code, and other regulations and standards that govern air quality in St. Helena. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers would be subject to BAAQMD rules and protocols Further General Plan goals

and policies support reduction of air quality impacts. Mitigation measures identified in the General Plan EIR will be implemented to help reduce impacts to the greatest extent possible. These measures would remain in practice with implementation of the Housing Element update.

Consistent with buildout under the 2040 General Plan, implementation of the proposed Housing Element update could contribute to impacts related to criteria pollutants. Annual development under the Housing Element update could increase construction emissions from indirect land use changes. Potential impacts caused by more development would be reduced through implementation of Mitigation Measures AQ-1 through AQ-6 identified in the General Plan EIR. However, impacts would remain significant and unavoidable even with implementation of mitigation, the same as impacts identified in the General Plan EIR. Implementation of the proposed Housing Element update could impact sensitive receptors. However, the Housing Element update does not proposed new land use changes which would place new sensitive receptors in areas with emission sources.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update would not directly result in development or activities that would generate air pollutants, cause an increase in VMT, or generate objectionable odors. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would not allow for more housing units or increase projected growth forecasts in the city. In addition, the updates would be subject to all applicable air quality plans, CARB and BAAQMD regulations, Title 24 energy efficiency standards, and policies within the 2040 General Plan aimed at reducing air pollution emissions. Therefore, the Public Health, Safety, and Noise Element update would have less than significant impacts related to air quality.

Conclusion

Based on the above, the Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

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6.4 Biological Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the Housing Element update:							
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant	None	No	No	No	Yes	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
c. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant	None	No	No	No	Yes	Yes
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than significant	None	No	No	No	Yes	Yes
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant	None	No	No	No	Yes	Yes
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	No Impact	None	No	No	No	Yes	Yes

2040 General Plan EIR Biological Resources Findings

The 2040 General Plan EIR determined that impacts to biological resources would be less than significant for effects to listed species or their habitats, loss of significant populations of sensitive species, protected wetlands, wildlife migration or movement corridors, local policies or ordinances protecting biological resources, or conflicts with conservation plans and habitat management plans and habitat groups identified therein (Chapter 3.4 Biological Resources). Individual development projects would be subject to project-specific development and planning review. As such, all projects proposed under General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning the protection of biological resources, including listed species, habitats, and all planning resources designed to protect and conserve these resources. Furthermore, future development would be required to comply with State and federal law and policies within the Open Space Element of the General Plan that protect biological resources. The General Plan is consistent with the SHMC and Open Space and Conservation Element policies and standards for tree preservations. The General Plan does not include any policies that would interfere with the Pacific Gas & Electric (PG&E) Habitat Conservation Plan for PG&E facilities, rights-of way, buffer lands, owned lands and easements, access routes and mitigation areas.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan that identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031).

Most sites identified in the sites inventory are located in previously developed areas with limited potential for disruption to undeveloped habitat areas, including sites that have previously been developed or infill sites in well developed areas. The sites inventory also includes vacant sites, although these sites have been previously disturbed and are in proximity to developed areas. Consistent with the 2040 General Plan EIR, the project would not adversely affect biological resources, including special-status species, riparian habitats or wetlands, or migratory species and wildlife corridors, to a greater extent than buildout under the General Plan, and impacts would remain less than significant. Build out under the Housing Element update would be subject to all applicable requirements of the SHMC and Open Space and Conservation Element policies as well as the PG&E Habitat Conservation Plan for PG&E facilities, rights-of way, buffer lands, owned lands and easements, access routes and mitigation areas.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. Policies contained within the update include vegetation management and maintenance and debris removal in stream channels that are designed to mitigate wildfire, erosion, and flood risk. These policies also stipulate that such activities must use best practices to protect wildlife and habitat. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review, including zoning, design standards, and other regulations concerning the protection of biological

resources, including listed species, habitats, and all planning resources designed to protect and conserve these resources. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts related to biological resources.

Conclusion

The Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.5 Cultural, Historic, and Tribal Cultural Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed? Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the Housing Element update:							
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA § 15064.5?	Less than significant	None	No	No	No	Yes	Yes
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA § 15064.5?	Less than significant	None	No	No	No	Yes	Yes
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant	None	No	No	No	Yes	Yes
d. Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native Tribe and that is: ▪ Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or ▪ A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Cultural Resources Findings

As discussed under Impact CUL-1 in Section 3.4, *Cultural, Historic, and Tribal Cultural Resources,* of the 2040 General Plan EIR, impacts related to historic, cultural, and tribal cultural resources would be less than significant. Future development under the General Plan could result in demolition, deconstruction, relocation, or alteration of historic resources. The SHMC establishes procedures for archaeological surveys and mitigation measures for archaeological and paleontological resources and protections for significant architectural or historical buildings. Policies within the Historic Resources Element would further mitigate potential impacts on historic districts and buildings. Implementation of the 2040 General Plan would be less than significant with implementation of existing regulations and the proposed policies and implementation actions within the Historic Resources Element.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program 1.1 to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031).

Consistent with buildout under the 2040 General Plan, implementation of the proposed Housing Element update, including associated construction activities would result in less than significant impacts to historic, cultural, and tribal cultural resources within the Plan Area. Buildout under the Housing Element update would adhere to State and local development guidelines that govern historical, cultural, and tribal cultural resources, including AB 52 and SB 18 and policies in the City's Historic Resources Element. Native American tribes requesting consultation will be notified of projects when project-specific environmental review begins, according to AB 52 and SB 18 (if applicable), and tribal representative requests will be included into project approval, including notification, monitoring, and consultations in accord with federal and state requirements. Any evidence of cultural resources that might be unearthed in the process of construction would be required to comply with SHMC which establishes mitigation measures for archaeological resources. Compliance with existing regulations would ensure impacts related to archaeological resources and human remains would remain less than significant, the same as impacts identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and comply with relevant policies and standards within the General Plan Historic Resources Element and the SHMC previously adopted to protect archaeological and paleontological resources and significant architectural or historical buildings. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts related to cultural resources.

Conclusion

The 2040 Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.6 Energy, Greenhouse Gases, and Climate Change

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and Unavoidable	GHG-1	No	No	No	Yes	Yes
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Significant and Unavoidable	GHG-1	No	No	No	Yes	Yes
c. Cause wasteful, inefficient, and unnecessary consumption of energy during project construction, operation, and/or maintenance?	Less than Significant	None	No	No	No	Yes	Yes
d. Conflict with the CBC Energy Efficiency Standards, the CARB passenger vehicle GHG emission reduction targets for 2020 and 2035, or any other applicable energy conservation regulations?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Energy, Greenhous Gas Emissions, and Climate Change Findings

The 2040 General Plan EIR determined impacts related to greenhouse gas (GHG) emissions would be significant and unavoidable, Section 3.6, *Energy, Greenhouse Gas Emissions, and Climate Change*. Buildout under the 2040 General Plan would result in a substantial increase in GHG emissions from baseline conditions by 2040 and would not make substantial progress towards meeting the State's 2050 goal of 80 percent reduction from 1990 levels pursuant to Executive Order S-03-05. The primary source of GHG emissions under the General Plan would be from the transportation sector and the second largest source of emissions would be from the commercial/industrial sector. To reduce impacts related to greenhouse gas emissions, the 2040 General Plan EIR required Mitigation Measure GHG-1. However, even with implementation of the mitigation measure and policies within the 2040 General Plan aimed at reducing GHG emissions, the 2040 General Plan EIR concluded that impacts would remain significant and unavoidable.

> **Mitigation Measure GHG-1**: The City of St. Helena shall adopt and begin to implement a Climate Action Plan within a goal of 18 months, but no later than 36 months, of adopting the Proposed Plan update to address the GHG reduction goals of Executive Order B-30-15 and Executive Order S- 03-05 for GHG sectors that the City has direct or indirect jurisdictional control over. The Climate Action Plan shall include a community inventory of GHG emission sources, and quantifiable GHG emissions reduction targets for 2030 and 2050, and an interim target for the General Plan buildout year 2040, that are consistent with the statewide GHG reduction targets. The City shall monitor progress toward its GHG emissions reduction goals and prepare reports every five years detailing that progress.

In addition, the 2040 General Plan EIR concluded that impacts related to consistency with applicable plans, policies, and regulation regarding GHG reductions would be significant and unavoidable. Under buildout of the 2040 General Plan, per capita emissions would exceed the significance threshold of 2.3 metric tons of carbon dioxide equivalent per service population in 2040, which would conflict with CARB's 2017 Scoping Plan, AB32, and Executive Order S-03-05, and BAAQMD's CEQA Guidelines. Mitigation Measure GHG-1 would help reduce GHG emissions, however further action at the State and federal level would be necessary to achieve State reduction targets. At the time, there were no post-2030 State or federal measures that would assist the city in achieving the efficiency target in 2040, even with implementation of Mitigation Measure GHG-1. Therefore, the General Plan could potentially conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs, meaning impacts would remain significant and unavoidable.

The 2040 General Plan EIR concluded that impacts related to energy resources would be less than significant for energy consumption and consistency with state or local plans for renewable energy or energy efficiency. The General Plan EIR determined that implementation of the General Plan would decrease net energy consumption and per service population energy consumption due to delivery of energy through Marin Clean Energy which has higher goals for renewable energy than PG&E and through an increase in fuel efficiency for vehicles. Furthermore, policies within the General Plan aim to reduce energy consumption of natural gas, electricity, and gasoline and diesel fuels by fostering an increase in energy efficiency and renewable energy, encouraging bicycle and pedestrian transit, and decreasing use of cars. All future development under the Proposed Plan would be required to comply with the latest California Building Code (CBC) requirements, including CBC Energy Efficiency

Standards, as well as all federal, State, and local rules and regulations pertaining to energy consumption and conservation.

By decreasing demand for energy- and fuel-related energy resources both overall and on a per service population basis and complying with applicable federal, State, and local regulations, impacts to energy consumption and consistency with state or local plans for renewable energy or energy efficiency would be less than significant.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031).

Implementation of the Housing Element update could increase the demand for electricity and natural gas. However, new development would be required to comply with statewide mandatory energy requirements outlined in CALGreen, which could decrease energy consumption in new and retrofitted structures. In addition, consistent with the General Plan, the Housing Element supports higher density that would reduce vehicle miles traveled (VMT) and fuel consumption compared to existing lower-density development. Therefore, energy consumption would not be wasteful, inefficient, or unnecessary, and the Housing Element update would not conflict with nor obstruct a State or local plan for increasing renewable energy or energy efficiency. Impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

Consistent with buildout under the 2040 General Plan, implementation of the proposed Housing Element update could increase the frequency and/or severity of GHG emissions or otherwise conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gases. Annual development under the Housing Element update could exceed the GHG significance threshold applied in the 2040 General Plan EIR and conflict with the 2017 Climate Change Scoping Plan. Potential impacts caused by development allowed under the Housing Element would be reduced through implementation of Mitigation Measure GHG-1, identified in the General Plan EIR. However, impacts would remain significant and unavoidable even with implementation of mitigation, the same as impacts identified in the General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update would not increase built out or population increases in the city and would not directly result in development or activities that would increase demand for energy or increase VMT. Policies within the update encourage use of renewable back-up power sources and storage that would support the City's a more reliable and less wasteful source of energy for use during emergencies. In addition, any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk from climate safety hazards would be subject to project-specific development and planning review and comply with the CBC Energy Efficiency Standards, policies within the General Plan aimed at reducing energy consumption of natural gas, electricity, and gasoline and

diesel fuels, and all federal, State, and local rules and regulations pertaining to energy consumption and conservation. Therefore, the Public Health, Safety, and Noise Element update would have less than significant impacts related to GHG emissions, energy or climate change.

Conclusion

Based on the above, the Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.7 Geology, Soils, and Seismicity

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the Housing Element update:							
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			No	No	No	Yes	Yes
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or based on other substantial evidence of a known fault?	Less than significant	None	No	No	No	Yes	Yes
2. Strong seismic ground shaking?	Less than significant	None	No	No	No	Yes	Yes
3. Seismic-related ground failure, including liquefaction?	Less than significant	None	No	No	No	Yes	Yes
4. Landslides?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Result in substantial soil erosion or topsoil loss?	Less than significant	None	No	No	No	Yes	Yes
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than significant	None	No	No	No	Yes	Yes
d. Be located on expansive soil, as defined in Section 1803.5.3, Expansive Soil, of the California Building Standards Code (2013), creating substantial risks to life or property?	Less than significant	None	No	No	No	Yes	Yes
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Geology, Soils, and Seismicity Findings

The 2040 General Plan EIR determined that impacts to geology, soils, and seismicity would be less than significant for adverse effects related to rupture of a known fault, strong ground shaking, seismic-related ground failure, or landslides; soil erosion; landslide, lateral spreading, subsidence, liquefaction, or collapse; locating development on expansive soils; and installing septic tanks and alternative waste water disposal systems in expansive soils, Section 3.7, *Soils, Geology, and Seismicity*. It further stated that individual development projects would be subject to project-specific development and planning review, including adherence to standards for geology, soils, and seismicity impacts. Implementation of the 2040 General Plan would be less than significant in regard to impacts to geology, soils, and seismicity.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the 2040 General Plan, buildout under the Housing Element update could result in impacts related to geologic hazards, including seismic activity, faults, liquefaction, landslides, erosion, and unstable soils. However, new development would be required to comply with local and state codes and requirements related to geologic hazards, including the CBC, the National Pollutant Discharge Elimination System (NPDES) program, and applicable General Plan policies. Compliance with these requirements would ensure impacts would remain less than significant. In addition, consistent with buildout allowed under the General Plan, new development under the Housing Element update would connect to the existing sewer system and not include septic tanks or other alternative wastewater disposal systems. Therefore, impacts related to geology and soils would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions that would mitigate potential impacts related to geology and soils by requiring soils and geology reports for new development, prohibiting development on instable slopes, and limiting development in hillside areas with potential for slope failure. None of the implementation items would directly result new structures that would be exposed to seismic activity, faults, liquefaction, landslides, erosion, or unstable soils or involve septic tanks. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and any impacts would be mitigated through compliance with all applicable General Plan policies, the CBC, the NPDES program, and all other applicable local and state codes and requirements. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts.

Conclusion

The Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.8 Hazards and Hazardous Materials

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant	None	No	No	No	Yes	Yes
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant	None	No	No	No	Yes	Yes
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant	None	No	No	No	Yes	Yes
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant	None	No	No	No	Yes	Yes
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Less than significant	None	No	No	No	Yes	Yes
g. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, public use airport, or private airstrip, would the project result in a safety hazard for people residing or working in the Planning Area?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Hazards and Hazardous

The 2040 General Plan EIR determined that impacts for hazards and hazardous materials would be less than significant for transport, use, and disposal of hazardous materials; upset and accident conditions involving the release of hazardous materials into the environment; emissions or handling of hazardous materials within one-quarter mile of a school; location of development projects on hazardous materials sites such that the new use would create a hazard to the public or the environment; interference with an adopted emergency response or evacuation plan; and risk from wildland fire in lands adjacent to urbanized or residential areas, Section 3.8, *Hazards and Hazardous Materials*. It further stated that the Plan Area. The 2040 General Plan EIR described that individual development projects would be subject to project-specific development and planning review, including adherence to state, regional, and local regulations and standards related to hazards. There are no airport land use compatibility plans within the planning area or public airports, public use airports, or private airstrips within two miles of affecting any portion of the General Plan planning area.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the 2040 General Plan, construction and operation of the development allowed under the Housing Element update would be subject to existing regulations related to use, storage, handling, and disposal of hazardous materials. Applicable regulations would include those set forth by the California Department of Toxic Substances Control, State Water Resources Control Board, Regional Water Quality Control Board, California Highway Patrol and California Department of Transportation, and BAAQMD. Compliance with these existing regulations would ensure impacts related hazardous materials would remain less than significant, consistent with the 2040 General Plan EIR. The proposed Housing Element update would not include circulation changes and is not located within the planning boundaries of any airports. Therefore, impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions to enhance emergency response and evacuation procedures through testing of response exercises and maintaining the City's emergency response plan. In addition, policies and implementation actions address risk associated with the use, transport, and disposal of hazardous materials and wildfire prevention and response. The update is would not directly result in development that would have the potential to impact hazards or hazardous materials. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and would be required to comply with relevant

policies within the General Plan California, as well as applicable standards from the Department of Toxic Substances Control, State Water Resources Control Board, Regional Water Quality Control Board, California Highway Patrol and California Department of Transportation, and BAAQMD. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.9 Hydrology and Water Quality

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Violate any water quality standards or waste discharge requirements?	Less than significant	None	No	No	No	Yes	Yes
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less than significant	None	No	No	No	Yes	Yes
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Less than Significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
d. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than significant	None	No	No	No	Yes	Yes
e. Otherwise substantially degrade water quality?	Less than significant	None	No	No	No	Yes	Yes
f. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Less than significant with Mitigation	HYDRO-1	No	No	No	Yes	Yes
g. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Less than significant	None	No	No	No	Yes	Yes
h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
i. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Hydrology and Water Quality Findings

The 2040 General Plan EIR determined that impacts to hydrology and water quality would be less than significant for water quality standards and waste discharge requirements, depletion of ground water, drainage, runoff, erosion, and siltation. It further stated that new development under the General Plan would primarily result in redevelopment of previously developed sites with residential, commercial, and public uses, which would have a limited effect on local drainage or runoff characteristics. The 2040 General Plan EIR also concluded that on-going compliance with the NPDES requirements, including required implementation of BMPs to treat storm water runoff and protect water quality, the Bay Area Stormwater Management Agencies Association's Manual design guidance for stormwater treatment, Title 16 of the SHMC, and General Plan policies would reduce potential impacts related to water quality, runoff, and flooding. Buildout of the General Plan would generate a small increase in impervious surfaces, although the planning area is already largely developed. However, it would not be anticipated that new development would contribute to a significant impact on water quality, groundwater recharge, or runoff.

The 2040 General Plan EIR determined that impacts related to placement of housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map would be less than significant with mitigation. Implementation of the General Plan could result in development on sites partially or fully within the 100-year flood zone or construction of new housing within flood hazard zones. Policies within the General Plan and compliance with the SHMC regulate development in flood hazard areas, consistent with standards from the Federal Emergency Management Agency. To further reduce impacts related to development within flood zones, the 2040 General Plan EIR required Mitigation Measure HYDRO-1, which would reduce impacts to a less than significant level.

> **Mitigation Measure HYDRO-1:** Any proposed development or redevelopment on land designated as regulatory floodway on current Federal Emergency Management Agency maps shall, prior to issuance of a construction permit, obtain and submit to the City a Letter of Map Revision from the Federal Emergency Management Agency, demonstrating that a hydrologic and hydraulic analysis showed that grading modifications were performed such that the proposed development would no longer be within the floodway. These modifications shall be completed without raising the base flood level or impacting other properties.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Development allowed under the Housing Element update would be subject to existing regulations, including NPDES requirements, required BMPs, San Francisco Bay Area Stormwater Management Agencies Association 's Manual design guidance for stormwater treatment, Title 16 of the SHMC, and General Plan policies related to water quality, runoff, and erosion, siltation, and flooding control. Compliance with these existing regulations would ensure

impacts related to water quality, drainage, erosion, siltation, runoff, and flooding would remain less than significant, the same as impacts identified in the 2040 General Plan EIR.

Consistent with buildout under the General Plan, implementation of the proposed Housing Element update, including associated construction activities could result in impacts to groundwater supply. Individual projects allowed under the Housing Element update would be subject to Mitigation Measure HYDRO-1 identified in the General Plan EIR and project-level environmental review, which would identify potential impacts and reduce impacts to a less than significant level, the same as under the General Plan.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions that reduce risk of floods and impacts related to flood hazards. None of the policies or implementation actions would impact hydrology or water quality or directly result in development that would alter existing drainage patterns, contribute to runoff, degrade water quality, impact groundwater supply and recharge, or expose people or structures to flood hazards. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and would be required to comply with NPDES requirements, including required implementation of BMPs to treat storm water runoff and protect water quality, the Bay Area Stormwater Management Agencies Association's Manual design guidance for stormwater treatment, Title 16 of the SHMC, and applicable General Plan policies. Therefore, the Public Health, Safety, and Noise Element update would not have an adverse impact and hydrology and water quality.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

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6.10 Land Use, Population, and Housing

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Physically divide an established community?	No Impact	None	No	No	No	Yes	Yes
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact	None	No	No	No	Yes	Yes
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	No Impact	None	No	No	No	Yes	Yes
d. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
e. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Land Use Planning, Housing, and Population Findings

The 2040 General Plan EIR determined that impacts to land use and planning would be less than significant as they pertain to dividing established communities, conflicts with applicable land use plans, habitat conservation plan or natural community conservation plan, and displacing substantial numbers of existing housing or people, Section 3.10 *Land Use, Population, and Housing*. The 2040 General Plan EIR further found that General Plan implementation would not physically divide an established community and would beneficially increase connectivity throughout the city. The 2040 General Plan EIR further stated that individual development projects under the General Plan would be subject to project-specific development and planning review, which would ensure adherence to standards for land use planning, housing, and population.

Addendum Analysis

The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies a range of sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites may differ from those identified in the General Plan EIR. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031Consistent with development under the General Plan, the Housing Element update would not involve circulation changes to the Plan Area, and individual development projects would occur within private and City-owned property in already developed areas. In addition, projects under the Housing Element update would be subject to General Plan policies related to increased connectivity for pedestrians, bicycles, and drivers in the City. Therefore, development under the Housing Element update would not physically divide a community, and impacts would remain less than significant. Moreover, consistent with the General Plan, development under the Housing Element update would be subject to existing zoning and development regulations in the SHMC and policies in the General Plan. Compliance with these regulations and policies and required development and planning review would ensure individual projects would not conflict with applicable land use policies, plans, and regulations. Therefore, impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. None of the policies or implementation actions would result in new structures that would physically divide a community or change existing land uses. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would not displace people or housing or result in population growth. would not result in significant adverse impacts related to land use, population, and housing.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

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6.11 Noise

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the General Plan update:							
a. Expose persons to or generate noise levels in excess of standards established in the proposed General Plan Noise Element, or applicable standards of other agencies?	Less than significant	None	No	No	No	Yes	Yes
b. Expose persons to or generate excessive groundborne vibration or groundborne noise levels?	Less than significant with mitigation	NO-1	No	No	No	Yes	Yes
c. Result in a substantial permanent increase in ambient noise levels in the vicinity of the Planning Area above levels existing without the project?	Significant and unavoidable	None	No	No	No	Yes	Yes
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the Planning Area to excessive noise levels?	No Impact	None	No	No	No	Yes	Yes
f. For a project within the vicinity of a private airstrip, expose people residing or working in the Planning Area to excessive noise levels?	No Impact	None	No	No	No	Yes	Yes

2040 General Plan EIR Noise Findings

As discussed under in Section 3.11, *Noise*, of the 2040 General Plan EIR, impacts related to construction, traffic, railway, and stationary noise sources would be less than significant. Policies within the Public Health, Safety, and Noise Element address construction operation noise, noise compatibility along the rail line, traffic noise impacts, and stationary noise sources. Impacts from to traffic-related vibration and rail vibration was determined to be less than significant with mitigation.

The 2040 General Plan EIR concluded that impacts related to vibration during construction would be less than significant with mitigation. Impacts related to traffic vibration and rail vibration were less than significant. Construction of new development under the 2040 General Plan could result in use of heavy duty equipment that could produce vibration that may be felt by adjacent uses. Construction equipment operating within 25 feet of sensitive land uses could generate distinctly perceptible vibration, non-pile driving construction activities occurring within 25 feet of sensitive uses could result in significant vibration impacts. In addition, pile driving occurring within approximately 175 feet or 300 feet of sensitive uses for vibratory/sonic pile drivers and impact pile drivers, respectively, could also result in significant vibration impacts. As the specific future projects to be developed under the General Plan are not known at this time, and as the level of construction activity that would occur at various locations for future projects is also not known, it is possible the future construction activities could result in significant vibration impacts in portions of the Planning Area near historic structures and sensitive receptors such as schools and residences. To reduce construction related vibration impacts, the General Plan EIR required Mitigation Measure NO-1 which would reduce impacts to less than significant.

> **Mitigation Measure NO-1:** Where vibration impacts have the potential to cause structural damage or distinctly perceptible human response (reference Tables 3.11-12 to 3.11-14, or more recent sources), require a vibration study, prepared by a qualified vibration consultant. The study should include a site-specific engineering assessment of potential vibration impacts to structures and sensitive receptors from construction activities and specify a mitigation plan to minimize the impacts using all reasonable and feasible means available. The mitigation plan should include a procedure for establishing threshold and limiting vibration values for potentially affected structures, based on an assessment of each structure's ability to withstand the loads and displacements due to construction vibrations and a commitment to develop a vibration monitoring plan during the engineering phase and to implement a compliance monitoring program during construction.

The 2040 General Plan EIR reported there would be no noise impacts related to exposure of people residing or working in the Planning Area to excessive noise levels related to use of a public airport or private airstrip since the Planning Area is not in proximity to either a public airport or private airstrip. The nearest public airport to St. Helena is Angwin-Parrett Field located 4 miles northeast of the Planning Area and the nearest private airstrip is the Pope Valley Airport located 7 miles northeast of the Planning Area.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element,

change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the General Plan, construction of individual projects under the proposed Housing Element update could increase the frequency and/or severity of noise levels within the city. Individual projects allowed under the Housing Element update would be subject to Mitigation Measure NO-1, which would reduce construction vibration impacts to a less than significant level. Operation of individual projects under the proposed Housing Element update could increase the frequency and/or severity of traffic-related noise levels within the city but they would be less than significant. Individual projects allowed under the Housing Element update would be subject to policies identified in the Public Health, Safety, and Noise Element and standards within the SHMC related to noise. Compliance with these requirements would ensure impacts related to increases in noise levels from construction, traffic, rail, and stationary sources would remain less than significant. Consistent with development allowed under the General Plan, the proposed project would not be located within the vicinity of a private air strip or an airport land use plan and would not expose people residing or working in the area to excessive airport-related noise levels. Therefore, impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions aimed at minimizing noise, including noise generated by construction and traffic. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and would be required to comply with noise standards within the SHMC and General Plan. Therefore, the Public Health, Safety, and Noise Element update would have no impact related to noise.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.12 Public Services and Recreation

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Implementation of the Proposed Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, or other public facilities?	Less than significant	None	No	No	No	Yes	Yes
b. Implementation of the Proposed Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Implementation of the Proposed Plan would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Public Services and Recreation Findings

As discussed in Section 3.12, *Public Services*, of the 2040 General Plan EIR, buildout under the 2040 General Plan would not result in significant impacts to local fire and police agencies or other public facilities within the City of St. Helena. Projected new development under the 2040 General Plan could result in population and employment increase but would not result in substantial increase demand for fire services, police services, schools, parks, recreation, and library facilities. The increase in service population would not require construction of new or expansion of existing facilities for fire service, police service, schools, parks or other public facilities. Policies within the General Plan monitor the need for additional public facilities, pursue sites for future facilities, require Fire Department and Police department review of individual development projects, and implement public safety impact fees. In addition, potential new or expanded public service facilities would be subject to additional CEQA review. Therefore, impacts were found to be less than significant.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the General Plan and analyzed in the 2040 General Plan EIR, buildout under the Housing Element update could increase the demand for fire, police, schools, parks, and library services within the city but is not anticipated to generate a need for the construction of new facilities or expansion of existing ones. Most sites are urban infill sites where development already exists and public services are already being provided. New development would be required to pay safety impact fees and subject to review by the Fire Department and Police Department. Additionally, General Plan policies governing public services would remain in effect for the Housing Element update and future development projects. Compliance with General Plan goals and policies regarding public services and recreation would ensure that new housing would not result in a substantial demand to public services. These goals and policies would continue to apply to projects implemented under the Housing Element update. Therefore, potential impacts to public services associated with implementation of the updated Housing Element are within the scope of impacts analyzed in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update would not result in development that would increase demand for public services or governmental or recreational facilities. The update includes policies and implementation actions that would ensure adequate provisions of public services, including fire and police protection, and protect of City facilities from potential natural and made-made hazards which would improve response times and safety. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would increase service ratios, response times, and other performance objectives for public services and facilities. Potential development

would be subject to project-specific development and planning review and comply with General Plan goals and policies regarding public services and recreation. Therefore, the Public Health, Safety, and Noise Element update would have no impact related to public services or recreation.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.13 Transportation and Traffic

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	Significant and unavoidable	None	No	No	No	Yes	Yes
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Not discussed	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Less than significant	None	No	No	No	Yes	Yes
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant	None	No	No	No	Yes	Yes
e. Result in inadequate emergency access?							
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?							

2040 General Plan EIR Transportation Findings

The 2040 General Plan EIR concluded that impacts related to transportation would be significant and unavoidable regarding consistency with policies and regulations related to roadway, transit, pedestrian, and bicycle facilities, Section 3.13, *Transportation.* The 2040 General Plan EIR determined 7 out of 27 analyzed intersections would have significant impacts. Policies and actions within the General Plan aim to reduce single occupancy vehicle trips, improve circulation throughout the city, and promote options for alternate forms of transportation. To reduce impacts to intersections, the 2040 General Plan EIR required Mitigation Measures TR-1, TR-2, TR-3, TR-4, TR-5, and TR-6. However, even with implementation of the mitigation measures, the 2040 General Plan EIR concluded that impacts would remain significant and unavoidable. Main Street is a State highway (State Route 29), therefore mitigation measures along Main Street are subject to Caltrans approval and cannot be guaranteed by the City. In addition, improvements to accommodate future traffic volumes may not be implemented due to lack of funds. Therefore, because the City cannot guarantee that needed improvements would be implemented, impacts to intersection traffic operations are significant and unavoidable.

The 2040 General Plan EIR determined that other transportation impacts would be less than significant, including potential to conflict with applicable congestion management programs, change in air traffic patterns, increase in hazards due to a design feature or incompatible uses, emergency access, and potential to conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031), including urban infill sites and sites with existing development.

Pursuant to CEQA Guidelines Section 5064.3, subdivision(b), a project's transportation impact is now based on VMT instead of an level of service analysis as conducted under the 2040 General Plan EIR. Under the updated State requirements, VMT are derived based on location and the amount and distance of vehicle travel attributable to a project, including induced automobile travel. Significance criteria used to determine VMT impact include questions as to whether the project would cause substantial additional VMT, or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (e.g., by adding new mixed flow travel lanes) or by adding new roadways to the network.

The Housing Element update would facilitate development of 307 units to meet the City of St. Helena's RHNA for the current planning period. The proposed housing sites in the Housing Element update would concentrate housing development in the City, which would reduce overall VMT. Furthermore, the policies within the General Plan encourage the use of transit, bicycling and pedestrian routes and work to reduce VMT. Buildout under the Housing Element update would be subject to comply with these policies. Therefore, potential transportation impacts associated with

implementation of the updated Housing Element are within the scope of impacts analyzed in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update includes policies and implementation actions to alleviate evacuation constraints for residential developments with less than two emergency evacuation routes and would strengthen emergency preparedness and evacuation procedures. None of the policies or implementation actions would impact congestion management programs, change air traffic patterns, increase hazards due to a design feature or incompatible use, impair emergency access, or conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and comply with applicable policies in the General Plan aimed at reducing VMT and transportation impacts. Therefore, the Public Health, Safety, and Noise Element update would have no adverse impacts related to transportation.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.14 Utilities and Service Systems

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the General Plan update:							
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less Than Significant	None	No	No	No	Yes	Yes
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant with Mitigation	UTS-1	No	No	No	Yes	Yes
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than significant	None	No	No	No	Yes	Yes
d. Have insufficient water supplies available to serve the project from existing entitlements and resources such that new or expanded entitlements needed?	Less than Significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	None	No	No	No	Yes	Yes
f. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than Significant	None	No	No	No	Yes	Yes
g. Not comply with federal, State, and local statutes and regulations related to solid waste?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Utilities and Service Systems Findings

The 2040 General Plan EIR concluded that impacts related to wastewater, water supply, and solid waste would be less than significant provided that proposed projects would comply with federal, State, and local statutes and regulations and the policies and actions within the General Plan addressing wastewater capacity, stormwater runoff, water conservation, waste management, recycling, and composting. The City plans to increase the wastewater treatment plant permitted capacity from 0.5 million gallons per day to 0.65 million gallons per day by 2030, which would have sufficient capacity to accommodate buildout under the General Plan. Any new stormwater facilities would comply with all applicable environmental regulations, including project-level environmental review and NPDES permits regulations. The City's Water Neutral Policy for Development would ensure future water demand does not exceed current demand by requiring any new water demand be offset by water conservation retrofits or in-lieu payments for the City to conduct retrofits. Buildout under the General Plan would not require exceed the capacity of the Clover Flat Landfill which has significant remaining capacity. Therefore, the General Plan EIR determined there would be no significant impacts to the city's utilities or service systems.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, evaluated previously for potential environmental impacts in the General Plan EIR that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. Many of these sites have existing connections to utility and service systems as they are infill sites or already developed. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). . All future development accommodated under the Housing Element update would be required to adhere to the General Plan, adopted master plans, and other regulatory requirements concerning water, wastewater, storm drains, solid waste, and other infrastructure; water supply; and wastewater treatment systems.

Consistent with buildout under the General Plan, implementation of the proposed Housing Element update could increase population such that new or expanded wastewater facilities would be required to provide utilities and service systems to new development. In addition, future development for new or expanded facilities would be subject to further environmental analysis, pursuant to CEQA Guidelines section 15168(c) and as required by state law, to evaluate potential impacts.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update includes policies and implementation actions that aim to enhance and protect the City's utilities and service system, such as improving efficiency of stormwater drainage systems and ensuring adequate water supply. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would work to address these goals and would be subject to project-specific development and planning review and comply with applicable policies in the General Plan, NPDES permits regulations, and the City's Water Neutral Policy for

Development. Therefore, the Public Health, Safety, and Noise Element update would have no adverse impacts related to utilities and service systems.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

7 Summary of Findings

The Housing Element update is part of the City's General Plan, and like other elements within the General Plan, includes goals and policies that the City should meet when it comes to the planning of housing. The Housing Element is unique from the other elements within the General Plan in that it is required to be periodically updated to align with the State's allocation of the RHNA. Also, the Housing Element includes Housing Programs that are required to be implemented within the planning period established for the Housing Element. These programs are usually implemented over time as a separate project after the Housing Element is adopted. The Housing Element update does not involve site-specific projects but does include identified sites that could undergo land use changes through Program H-A to facilitate development of RHNA housing units during the 6th cycle. The sites inventory (provided in the Housing Resources chapter of the Housing Element update) yields housing units that exceed the number needed to meet the RHNA requirements, as demonstrated in Table 3.

The General Plan Program EIR is accompanied the City's 2040 General Plan update. Future development and zoning changes associated with the Housing Element's Housing Programs will be subject to applicable development standards and reviews established by City ordinances.

The Public Health, Safety, and Noise Element update does not involve site-specific projects but proposes policies and implementation actions that are aimed at enhancing emergency response and evacuation procedures and minimizing impacts to people and structures from natural and man-made disasters. Any potential updates to structures or development of climate resilient infrastructure would be designed to mitigate potential impacts associated with climate safety hazards. Potential updates and development would not generate population growth or additional VMT or result in an increase in demand for services or facilities.

This analysis demonstrates that adoption of the Housing Element and Public Health, Safety, and Noise Element update would not result in impacts beyond those addressed or analyzed in the General Plan EIR, nor does the General Plan update present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the General Plan update and no additional environmental assessment is required.

This analysis was performed pursuant to CEQA Guidelines Sections 15162 and 15164 and is intended to determine if additional environmental review is required or if the changes proposed by the project are within the scope of the previously certified 2040 General Plan EIR. This analysis determined that the 2040 General Plan EIR is of continuing informational value, the proposed changes in the General Plan update are within the scope of that previously certified EIR, and none of the conditions requiring the preparation of subsequent or supplemental environmental review under CEQA Guidelines section 15162 exists. Therefore, the City of St. Helena, as lead agency, has determined that this Addendum to the EIR is sufficient to meet the requirements of CEQA and no additional environmental review is required. Pursuant to CEQA Guidelines section 15164, this Addendum does not need to be circulated for public review and can be included in or attached to the final EIR. The decision-making body shall consider the Addendum with the Final EIR prior to deciding upon the Project.

8 References

Bibliography

St. Helena, City of. 2018. *St. Helena General Plan Update 2040 Draft Environmental Impact Report SCH#2010042001.* St. Helena, CA. October, 2018.

St. Helena, City of. 2019. *General Plan Update 2040.* St. Helena, CA. April, 2019.

List of Preparers

Rincon, Consultants, Inc. prepared this Addendum under contract to the City of St. Helena. Persons involved in data gathering analysis, project management, and quality control are listed below.

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December 6, 2022

Maya DeRosa, Planning & Building Director
Planning Department
City of St. Helena
1572 Railroad Avenue
St. Helena, CA 94574

Dear Maya DeRosa:

RE: City of St. Helena's 6th Cycle (2023-2031) Draft Housing Element

Thank you for submitting the City of St. Helena's (City) draft housing element received for review on October 5, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Holland & Knight, Generation Housing, and Nancy Dervin pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (January 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c). Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City fails to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly

available and considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jamillah Williams, of our staff, at Jamillah.Williams@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

Enclosure

APPENDIX
CITY OF ST. HELENA

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at https://www.hcd.ca.gov/hcd-memos. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at https://www.hcd.ca.gov/building-blocks and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

As part of the evaluation of programs in the past cycle, the element must provide an explanation 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).

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Enforcement: While the element includes analysis of fair housing complaints, it must describe the City's compliance with existing fair housing laws and regulations. For additional information, please see pages 28-30 on HCD's Affirmatively Furthering Fair Housing (AFFH) Guidance Memo at https://www.hcd.ca.gov/community-development/affh/index.shtml.

   Concentration of Fair Housing Issues: The assessment of fair housing (AFH) demonstrated that there is a concentration of several fair housing issues within the east and southeast quadrant of the City. For example, this area has the highest concentrations of lower-income households, highest percentage of single-headed households, greatest percentage living below the poverty line, high exposure to environmental burdens, and is considered the only low-resourced area in the City. As a result, the analysis should address trends, past and current policy efforts, and their effectiveness, neighborhood investment or disinvestment, local data and knowledge, and other relevant factors, particularly relative to equitable quality of life, resources, and strategies to address any inequities in quality of life.

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

   Housing Costs (For Sale and Rental Prices): While the element includes estimated rents and for sale housing costs for residents, it utilizes American Community Survey (ACS) data. The element should supplement census data with other sources (e.g., local knowledge) to better reflect current market conditions.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

   Progress towards Regional Housing Needs Allocation (RHNA): The element is crediting 87 above moderate-income units from the Hunter Subdivision Project towards the RHNA. However, HCD has received public comment indicating that the Hunter Subdivision project has been pending since 2010 and there are concerns about the City's ability to process and approve this project during the planning period. The element should provide an analysis demonstrating the likelihood of these units being built during the planning period.

   Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. In addition, the element could analyze the extent that existing uses may impede additional residential development. The element included a site-by-site description along with some general information about the characteristics for each site. While the element included an analysis of some sites existing uses, it did not provide an analysis for all sites. For example, Sites 1, 2, 3, 11, and 13 included information on the existing use but provided no analysis on the likelihood for redevelopment. For example, Site 1 and 2 stated that development will occur upon the removal of the existing uses and structures. However, the element did not include any information on the likelihood that this will occur during the planning period. Additionally, Site 6 includes two parcels with separate owners and states that one of the owners is interested in developing pursuant to Senate Bill 9, however provides no description or analysis about the likelihood that the second parcel will redevelop. Sites 7 and 9 do not include any analysis of the existing uses or information about the likelihood for redevelopment. Lastly, Sites 5, 6, 10, and 12 analysis is entirely dependent on property owner interest. The element should either provide additional information on these sites such as the nature of meetings with property owners, the likelihood that the owner will redevelop during the planning period or additional information that indicates the likelihood for redevelopment.

   To facilitate a complete analysis, the element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the City and relate those trends to the

sites identified. The element could also consider indicators such as age and condition of the existing structure expressed developer interest, low improvement to land value ratio, and other factors. Based on a complete analysis, the element may need to add or modify programs to further encourage and incentivize redevelopment of sites.

Lastly, HCD received a number of comments concerning sites identified in the inventory that have a low likelihood of redevelopment due to existing buildings in commercial districts and on privately-owned property. As noted above, the element should provide additional analysis and information demonstrating the likelihood of redevelopment on these sites.

Realistic Capacity: The element is generally assuming 75-80 percent of maximum allowable densities on most sites. However, while the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element mentions realistic capacity assumptions were taken into account for sites selection but should demonstrate what specific criteria, trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.

The element also assumes that Site 5 will be developed for 50 lower-income units. However, this site allows a maximum allowable density of 26 units per acre and the site size is 1.8 acres equating to a total capacity of 46 units. While the site may have owner interest to develop beyond the maximum allowable densities, the element must either revise the capacity assumptions within the allowable densities or include a program to increase the sites allowable density.

The element also should analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses. This analysis should consider the likelihood of nonresidential development, performance standards, and development trends supporting residential development. For additional information, see the Building Blocks at https://www.hcd.ca.gov/analysis-of-sites-and-zoning.

Publicly-Owned Sites: The element must include additional discussion on each of the City-owned sites identified to accommodate the RHNA. Specifically, the analysis should provide support for residential capacity assumptions, existing uses and any known conditions that preclude development in the planning period and the potential schedule for development. If zoning does not currently allow residential uses at appropriate densities, then the element must include programs to rezone sites pursuant to Government Code section 65583.2, subdivisions (h) and (i). In addition, the housing element must include a description of whether there are any plans to sell 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.

Replacement Housing Requirements: If the sites inventory identifies sites with existing residential uses, it must include a program to provide for replacement. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program has the same requirements as set forth in Gov. Code section. 65915, subdivision (c)(3).

Infrastructure Availability: The element included a capacity analysis for water, sewer and dry utilities. The analysis noted that there are some deficiencies in the current infrastructure system and additional upgrades will be needed to meet current demand such was the water distribution system, wastewater collection system, and storm drainage system. The element must include a program committing to actions and a timeline to make sufficient infrastructure available to accommodate the RHNA. Additionally, while the element included an analysis of infrastructure capacity, the element must specifically indicate if total infrastructure capacity (existing and planned) is available to accommodate the RHNA.

Environmental Constraints: The element describes a few environmental conditions within the City and indicates that the City certified a FEIR with the 2040 General Plan Update that described environmental constraints and mitigation measures. However, the element must specifically describe any known environmental constraints or any other conditions that preclude development on identified sites within the planning period.

Sites Inventory Electronic Form: Please note, pursuant to Government Code section 65583.3, subdivision (b), the City 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/community-development/housing-element/index.shtml for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Zoning for a Variety of Housing Types:

- *Emergency Shelters* – The element states that emergency shelters are required to provide sufficient parking for employees and one space per two beds pursuant to AB 139 (Statutes of 2019). However, pursuant to Government Code section 65583, subdivision a)(4)(A), parking for emergency shelters should only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones. The element should discuss compliance with this requirement or include a program, if necessary. Additionally, the element should describe any siting or spacing requirements imposed on emergency shelters. Lastly, the element must include an analysis of the suitability and capacity of the zone(s) identified to accommodate emergency shelters. Specifically, the analysis should demonstrate whether the I and SC zone have sufficient capacity to accommodate the identified housing need for emergency shelters. For example, identifying the number of parcels, typical parcels sizes, whether the sites are nonvacant, and the potential capacity for adaptive reuse. Lastly, in analyzing the

suitability of these zones, the element should address proximity to transportation and services and any conditions inappropriate for human habitability.

- *Transitional and Supportive Housing* - While the element indicates that the City permits supportive housing by-right in all residential zones, the element must specifically demonstrate compliance with AB 2162 (Statutes of 2018). Specifically, supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs, if necessary.

- *Accessory Dwelling Unit (ADU)* – The element notes that ADUs are allowed in most residential zones. However, ADUs must be permitted in all zones that allow for residential uses including the AP Zone, mixed-use and commercial zones. The element should analyze consistency with this requirement and include a program, if appropriate. Additionally, after a cursory review of the City's ordinance, HCD discovered several areas which were not consistent with State ADU Law. This includes, but is not limited to, the definition of a cooking facility, definition of an efficiency kitchen, allowing both an ADU and JADU for conversions on a lot with an existing or proposed single-family dwelling, separate conveyance of an ADU or JADU, and restricting bedroom count. The element must include a program to update the City's ADU ordinance in compliance with state law.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

   Land-Use Controls: 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), as follows:

   - *Zoning* – The element must include an analysis of all residential zones, especially those identified to accommodate a variety of housing types and the regional housing needs allocation (RHNA) i.e., mixed-use, central business, overlay zones, etc., As part of the analysis, the element should identify all applicable land use controls including development standards, allowable densities, zoning, and any other relevant requirements. The analysis should evaluate these requirements for impacts on achieving maximum densities, cost, feasibility and supply (number of units) of housing. Lastly, the element should identify and analyze any minimum unit size requirements.

   - *Parking* – The element notes that mobile home units are required to provide two spaces per mobile home unit in addition to centralized parking and multifamily housing is required to provide 1.5 – 2 parking spaces per unit. The element should

analyze these requirements and their impacts on cost, supply, housing choice and affordability and include programs to address identified constraints.

Local Processing and Permit Procedures: The element briefly discusses the required permits for a typical single family, subdivision, and multifamily project. This is not a complete analysis and does not address the requirements. The element must describe and analyze the City's permit processing and approval procedures by zone and housing type (e.g., multifamily rental housing, mobilehomes, housing for agricultural employees, supportive housing. The analysis should consider processing and approval procedures and time for typical single-family and multifamily developments, including type of permit, level of review, approval findings and any discretionary approval procedures. The analysis must evaluate the processing and permit procedures' impacts as potential constraints on approval certainty, feasibility, and housing supply and affordability. For additional information and sample analysis, see the *Building Blocks* at https://www.hcd.ca.gov/processing-permitting-procedures.

Additionally, the element indicates that multifamily requires a conditional use permit (CUP) and design review, however the element also states that multifamily is allowed by right and subject only to "routine approvals" and design review. The element must clearly detail the approval process for multifamily housing by zone. For your information, subjecting multifamily housing to an exception process such as a CUP in zones where multifamily housing is already allowed is generally considered a constraint. As noted above, the element must clarify what type of discretionary process and identify and evaluate any approval findings or decision-making criteria for this requirement. The analysis should address impacts on housing cost, supply, timing and approval certainty. Based on a complete analysis, the element should include programs to address or remove the identified constraints.

Design Review: The element's analysis of the design review process states that every development including an individual single-family home and multifamily housing must go through design review and approvals from planning commission which can take an average of three months processing time. In addition, the various approval criteria include subjective language related to the compatibility of design with the neighborhood and surrounding areas, compatibility with historical character, and designs that promote harmonious transitions. Design review processes that have little to no guidance or clarity and requiring findings related to character are generally considered a constraint. The element must analyze this process and the approval criteria for potential constraints on approval certainty, feasibility, supply and affordability. Based on a complete analysis, the element may need to include or modify a program to address and remove or mitigate any identified constraints.

Local Ordinances: While the element included a discussion of the City's inclusionary requirement, it must specifically identify and analyze any other locally adopted ordinances such as short-term rental ordinances that directly impact the cost and supply of residential development.

On/Off-Site Improvements: While the element indicates on and off-site improvements are listed in St. Helena's municipal code, it must specifically identify subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width) and analyze their impact as potential constraints on housing supply and cost. For additional information and a sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml.

Fees: The element includes a hypothetical example of fees for single family and a multifamily project that focuses on detailing impact fees for each project type. However, a complete analysis should identify all fees and costs including permit processing and planning fees, development fees, exactions, and any other applicable fees and analyze as potential constraints on housing supply and affordability. For more information, please visit: https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/fees-and-exactions.

Building Codes and Enforcement: While the element states that the City has authority to deem any structure unsafe, it should specifically discuss the City's code enforcement process (e.g., whether code enforcement activities are compliant-based or proactive).

Constraints on Housing for Persons with Disabilities:

- *Reasonable Accommodation* – The element identifies approval findings for granting a reasonable accommodation including finding related to impacts on surrounding uses – essentially a CUP finding. However, reasonable accommodation should be a unique exception process from a CUP, especially given its importance in addressing barriers to housing for persons with disabilities. The element should include a program to amend the Reasonable Accommodation Ordinance and remove constraints, namely the "potential impact on surrounding uses" approval finding. Additionally, the element should also indicate whether the City charges any fees to applicants filing reasonable accommodation requests.

- *Other Requirements* – The element must also include an analysis of zoning, development standards, building codes, and process and permit procedures as potential constraints on housing for persons with disabilities. Specifically, the analysis must describe any zoning code definitions of family and any spacing or concentration requirements for housing for persons with disabilities.

- *Residential Care Facilities of Seven or More* – The element states that these uses are permitted with a CUP in high-density residential zones. For your information, excluding these uses from residential zones and/or subjecting the uses to a CUP is generally considered a constraint and programs should be modified as appropriate with specific commitment to allow the use in residential zones with objectivity and certainty.

- *Residential Care Facilities of Six or Fewer* – The element indicates that group homes of six or fewer are excluded from some residential zones. For your

information, these uses must be allowed in any area zoned for residential use. The element should include or modify a program to address this requirement committing to allowing these uses in any zone that permits residential uses.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including… …the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)*

   Permit Times: The element must include an analysis of the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially hinder the construction of a locality's share of the regional housing need.

6. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

   Special Needs Households: While the element includes data and a general discussion of housing challenges faced by special needs households, it still must provide an analysis of the existing needs and resources for each special needs group including extremely low-income households, persons with disabilities including developmental disabilities, female headed households, and farmworkers. For example, the element should discuss the existing resources to meet housing needs (availability of shelter beds, number of large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element... (Gov. Code, § 65583, subd. (c).)*

   To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:

   - *Ongoing Programs*: Numerous programs continue to indicate an "ongoing" implementation status. While this may be appropriate for some programs, programs

with quantified objectives or specific implementation actions must include completion or initiation dates resulting in beneficial impacts within the planning period. This includes but is not limited to Programs H-U, H-X, H-KK and H-P.

- *Timelines*: The element includes two programs with timelines for implementation towards the end of the planning period (Programs H-S and H-I). Given the importance of these programs and to achieve beneficial impact throughout the planning period, the element should revise these programs to be implemented earlier in the planning period.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding B3, 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 City 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:

   Shortfall of Sites (Program H-A): The element notes that several sites do not currently permit residential uses or have appropriate densities and will need to be rezoned to accommodate the RHNA. While the element included Program H-A to rezone sites, the program should identify acreage, allowable densities, and anticipated units to be rezoned and must specifically commit to meet all requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). For example, the program must commit to permit owner-occupied and rental multifamily uses by-right for developments in which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a CUP, planned unit development permit, or other discretionary review or approval.

   Replacement Housing Requirements: The housing element must include a program to provide replacement housing. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c)(3).

   Sites Identified in Multiple Planning Periods: While the element includes Program H-A to maintain an inventory to comply with Government code section 65583.2 (c), this program must commit to zone and allow for the following:

- sites must meet the density requirements for housing for lower income households, and
- allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower income households (Gov. Code, § 65583.2, subd. (c).).

Nonvacant Sites Reliance to Accommodate RHNA: As the element relies upon nonvacant sites to accommodate the regional housing need for lower-income households, it should include a program(s) to promote residential development of those sites. The program could commit to provide financial assistance, regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites. Examples of incentives include identifying and targeting specific financial resources and reducing appropriate development standards. For additional information, see the Building Blocks at https://www.hcd.ca.gov/identify-adequate-sites.

Publicly-Owned Sites: The element identified publicly-owned sites to accommodate a portion of the RHNA. The element should include a program with numerical objectives that ensures compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of publicly- owned sites. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance.

Senate Bill 9 Implementation: The element relies on the implementation and usage of Senate Bill 9 to accommodate a portion of the RHNA, promote a variety of housing types and choices, and implement affirmatively furthering fair housing requirements. While the element included program H-T to support lot splits, the element must include specific actions to implement and incentive the usage of SB 9. This includes but is not limited to establishing a compliant ordinance, development standards, incentives, and marketing and outreach to developers and property owners.

Program H-C – Water Sewer Priority: For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) While the element commits to granting priority water and sewer to developments with units affordable to lower income households, local governments are also required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a program, policy, or commitment to deliver the adopted housing element to water and sewer providers and include a cover memo describing the City's housing element, including the City's housing needs and regional housing need. For additional information and sample cover memo, see the Building Blocks at https://www.hcd.ca.gov/priority-for-water-and-sewer.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, the element should be revised as follows:

Program H-B (Growth Management System): The element notes that the City implemented a growth management system which likely violates SB 330 (Housing Crisis Act, 2019, Gov. Code, § 66300). The element included a program to remove the growth management system, however included the timeline has "ongoing." The element should include a specific implementation timeline for when this system will be removed and implementation should happen earlier in the planning period (e.g., one year).

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding B1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City may need to revise or add programs. Additionally, while the element did include programs to address fair housing issues and contributing factors, several programs will need to be revised with increased metrics, geographic targeting for place-based strategies, and implementation steps to facilitate meaningful change. Additionally, while the element included some programs for place-based strategies, these programs must include geographic targeting for the Southeast quadrant of the City, include actions that improve one's quality of life related to housing, transportation, safety, education, recreation, infrastructure, etc., and quantified metrics that target beneficial impacts for people, households and neighborhoods (e.g., number of people or households assisted, number of housing units built, number of parks or infrastructure projects completed). HCD will follow-up under a separate cover with additional information.

D. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the element described various efforts to achieve public participation in the preparation of the housing element update, it should also describe how comments were considered and incorporated into the element.

City of St. Helena 2023-2031 Housing Element Update
Responses to HCD's 90-day Comment Letter

Section	HCD Comment	Revision
A	As part of the evaluation of programs in the past cycle, the element must provide an explanation 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).	We have added the required evaluation under the new heading "Effectiveness in Meeting the Needs of Special Needs Populations" to page 2-39 of the track changed version.
B	Enforcement: While the element includes analysis of fair housing complaints, it must describe the City's compliance with existing fair housing laws and regulations.	We have added a paragraph under the heading Local Resources on page A-12.
B	Concentration of Fair Housing Issues: The assessment of fair housing (AFH) demonstrated that there is a concentration of several fair housing issues within the east and southeast quadrant of the City. For example, this area has the highest concentrations of lower-income households, highest percentage of single-headed households, greatest percentage living below the poverty line, high exposure to environmental burdens, and is considered the only low-resourced area in the City. As a result, the analysis should address trends, past and current policy efforts, and their effectiveness, neighborhood investment or disinvestment, local data and knowledge, and other relevant factors, particularly relative to equitable quality of life, resources, and strategies to address any inequities in quality of life.	We have expanded the analysis under the heading 4. Local Area of Knowledge on page A-101 of the track change version. We have also expanded the analysis under heading "5. Sites Inventory Analysis," on pages A-103 to A-105 of the track changed version.
B	2. Housing Costs (For Sale and Rental Prices): While the element includes estimated rents and for sale housing costs for residents, it utilizes American Community Survey (ACS) data. The element should supplement census data with other sources (e.g., local knowledge) to better reflect current market conditions.	We have expanded the analysis of for sale housing under the new heading "Current Market Rate For-Sale Housing" on page 2-101 of the track changed version; and "Current Market Rate Rental Housing" on page 2-107 of the track-changed version.
B	Progress towards Regional Housing Needs Allocation (RHNA): The element is crediting 87 above moderate-income units from the Hunter Subdivision Project towards the RHNA. However, HCD has received public comment indicating that the Hunter Subdivision project has been pending since 2010 and there are concerns about the City's ability to process and approve this project during the planning period. The element should provide an analysis demonstrating the likelihood of these units being built during the planning period.	We have clarified the analysis under the heading Pending or Approved/Entitled Projects on pages 2-194 and 2-195 of the track change version.
B	Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of	We have added an analysis of nonvacant sites under the new

	nonvacant sites. In addition, the element could analyze the extent that existing uses may impede additional residential development. The element included a site-by-site description along with some general information about the characteristics for each site. While the element included an analysis of some sites existing uses, it did not provide an analysis for all sites. For example, Sites 1, 2, 3, 11, and 13 included information on the existing use but provided no analysis on the likelihood for redevelopment. For example, Site 1 and 2 stated that development will occur upon the removal of the existing uses and structures. However, the element did not include any information on the likelihood that this will occur during the planning period. Additionally, Site 6 includes two parcels with separate owners and states that one of the owners is interested in developing pursuant to Senate Bill 9, however provides no description or analysis about the likelihood that the second parcel will redevelop. Sites 7 and 9 do not include any analysis of the existing uses or information about the likelihood for redevelopment. Lastly, Sites 5, 6, 10, and 12 analysis is entirely dependent on property owner interest. The element should either provide additional information on these sites such as the nature of meetings with property owners, the likelihood that the owner will redevelop during the planning period or additional information that indicates the likelihood for redevelopment. To facilitate a complete analysis, the element can summarize past experiences converting existing uses to higher density residential development, include current market demand for the existing use, provide analysis of existing leases or contracts that would perpetuate the existing use or prevent additional residential development and include current information on development trends and market conditions in the City and relate those trends to the sites identified. The element could also consider indicators such as age and condition of the existing structure expressed developer interest, low improvement to land value ratio, and other factors. Based on a complete analysis, the element may need to add or modify programs to further encourage and incentivize redevelopment of sites. Lastly, HCD received a number of comments concerning sites identified in the inventory that have a low likelihood of redevelopment due to existing buildings in commercial districts and on privately-owned property. As noted above, the element should provide additional analysis and	heading "Suitability of Nonvacant Sites" beginning on page 2-201 of the track change version. The nonvacant site analysis was included in Site 7, 9, 10, and 12 Sites 1-3 are City-owned sites and the existing uses would not impede redevelopment as the City has authority over its uses. Added timeline for City goals for these sites on page 2-196 and in Program H-L. Removed one parcel on Site 6 to only include parcel with owner interest (page 2-205) and removed Site 11 based on public comment (page 2-213) Clarified on Site 5 that there is on-going discussions and plans being prepared for affordable housing (page 2-204)

	information demonstrating the likelihood of redevelopment on these sites.	
B	Realistic Capacity: The element is generally assuming 75-80 percent of maximum allowable densities on most sites. However, while the element provides assumptions of buildout for sites included in the inventory, it must also provide support for these assumptions. For example, the element mentions realistic capacity assumptions were taken into account for sites selection but should demonstrate what specific criteria, trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also assumes that Site 5 will be developed for 50 lower-income units. However, this site allows a maximum allowable density of 26 units per acre and the site size is 1.8 acres equating to a total capacity of 46 units. While the site may have owner interest to develop beyond the maximum allowable densities, the element must either revise the capacity assumptions within the allowable densities or include a program to increase the sites allowable density. The element also should analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses. This analysis should consider the likelihood of nonresidential development, performance standards, and development trends supporting residential development.	We have expanded the analysis under sites 4-12 beginning on page 2-203 of the track change version. We have adjusted the capacity assumptions for Site 5 to 46 units.
B	Publicly-Owned Sites: The element must include additional discussion on each of the City-owned sites identified to accommodate the RHNA. Specifically, the analysis should provide support for residential capacity assumptions, existing uses and any known conditions that preclude development in the planning period and the potential schedule for development. If zoning does not currently allow residential uses at appropriate densities, then the element must include programs to rezone sites pursuant to Government Code section 65583.2, subdivisions (h) and (i). In addition, the housing element must include a description of whether there are any plans to sell the property during the planning period and how the jurisdiction will comply with the Surplus Land Act	We have expanded their analysis under the heading City-Owned Sites on page 2-196 of the track change version, as well as in the Site 1 summary on page 2-197. New Program H-L has been added to address City' Owned Sites. – Rezone requirements have been added.

	Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.	
B	Replacement Housing Requirements: If the sites inventory identifies sites with existing residential uses, it must include a program to provide for replacement. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program has the same requirements as set forth in Gov. Code section. 65915, subdivision (c)(3).	The sites inventory does not assume demolition or replacement of any units that meet the State criteria, including any parcel that: • currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and • was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or • subject to any other form of rent or price control through a public entity's valid exercise of its police power, or • occupied by low or very low-income households
B	Infrastructure Availability: The element included a capacity analysis for water, sewer and dry utilities. The analysis noted that there are some deficiencies in the current infrastructure system and additional upgrades will be needed to meet current demand such was the water distribution system, wastewater collection system, and storm drainage system. The element must include a program committing to actions and a timeline to make sufficient infrastructure available to accommodate the RHNA. Additionally, while the element included an analysis of infrastructure capacity, the element must specifically indicate if total infrastructure capacity (existing and planned) is available to accommodate the RHNA.	We have expanded the analysis under the heading Available of Infrastructure and Services on page 2-221 of the track change version.
B	Environmental Constraints: The element describes a few environmental conditions within the City and indicates that the City certified a FEIR with the 2040 General Plan Update that described environmental constraints and mitigation measures. However, the element must specifically describe any known environmental constraints or any other conditions that preclude development on identified sites within the planning period.	We have expanded the analysis under the heading Environmental Constraints, beginning on page 2-223 of the track change version.
B	Sites Inventory Electronic Form: Please note, pursuant to	We will provide an updated sites

	Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory.	inventory form at the time of submission.
B	Emergency Shelters – The element states that emergency shelters are required to provide sufficient parking for employees and one space per two beds pursuant to AB 139 (Statutes of 2019). However, pursuant to Government Code section 65583, subdivision a)(4)(A), parking for emergency shelters should only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones. The element should discuss compliance with this requirement or include a program, if necessary. Additionally, the element should describe any siting or spacing requirements imposed on emergency shelters. Lastly, the element must include an analysis of the suitability and capacity of the zone(s) identified to accommodate emergency shelters. Specifically, the analysis should demonstrate whether the I and SC zone have sufficient capacity to accommodate the identified housing need for emergency shelters. For example, identifying the number of parcels, typical parcels sizes, whether the sites are nonvacant, and the potential capacity for adaptive reuse. Lastly, in analyzing the suitability of these zones, the element should address proximity to transportation and services and any conditions inappropriate for human habitability.	We have added an action for compliance with AB 139 in the municipal code update program (HE-F). We have added the required capacity analysis to pages 2-127 and 2-182 of the track changed version.
B	Transitional and Supportive Housing - While the element indicates that the City permits supportive housing by-right in all residential zones, the element must specifically demonstrate compliance with AB 2162 (Statutes of 2018). Specifically, supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs, if necessary.	As required, the City allows transitional and supportive housing in all residential, commercial, and mixed use districts, subject only to the requirements of residential uses. We have updated pages 2-10, 2-13, 2-129, and 2-190 of the track changed version.
B	Accessory Dwelling Unit (ADU) – The element notes that ADUs are allowed in most residential zones. However, ADUs must be permitted in all zones that allow for residential uses including the AP Zone, mixed-use and commercial zones. The element should analyze consistency with this requirement and include a program, if appropriate. Additionally, after a cursory review of the City's ordinance, HCD discovered several areas which were not consistent with State ADU Law. This includes, but is not limited to, the definition of a cooking facility,	We have revised the analysis on page 2-10, 2-192, and 2-193 to reflect the needed revisions to the code, as identified here. We have added the necessary actions to the municipal code update program (HE-F).

	definition of an efficiency kitchen, allowing both an ADU and JADU for conversions on a lot with an existing or proposed single-family dwelling, separate conveyance of an ADU or JADU, and restricting bedroom count. The element must include a program to update the City's ADU ordinance in compliance with state law.	
B	Zoning – The element must include an analysis of all residential zones, especially those identified to accommodate a variety of housing types and the regional housing needs allocation (RHNA) i.e., mixed-use, central business, overlay zones, etc., As part of the analysis, the element should identify all applicable land use controls including development standards, allowable densities, zoning, and any other relevant requirements. The analysis should evaluate these requirements for impacts on achieving maximum densities, cost, feasibility and supply (number of units) of housing. Lastly, the element should identify and analyze any minimum unit size requirements.	We have expanded our analysis within the governmental constraints section to include analysis of density and development standards in the CB, SC, and BPO zones, the HP, MHP, PD, RR, and SP overlay zones, the new Mixed-Use zone (currently part of the Draft Zoning Code Update, October 2022). We have also expanded our analysis to include discussion of minimum unit size requirements, which are only regulated for commercial parcels. Please see the heading "Zoning Code" in the "Governmental Constraints" section beginning on page 2-136 of the track changed version.
B	Parking – The element notes that mobile home units are required to provide two spaces per mobile home unit in addition to centralized parking and multifamily housing is required to provide 1.5 – 2 parking spaces per unit. The element should analyze these requirements and their impacts on cost, supply, housing choice and affordability and include programs to address identified constraints.	We have expanded our analysis of parking requirements on pages 2-152 through 2-154 of the track changed version. We could not provide a direct cost analysis, but have provided a comparison to neighboring jurisdictions and an evaluation of how these requirements would impact a site in the inventory.
B	Local Processing and Permit Procedures: The element briefly discusses the required permits for a typical single family, subdivision, and multifamily project. This is not a complete analysis and does not address the requirements. The element must describe and analyze the City's permit processing and approval procedures by zone and housing type (e.g., multifamily rental housing, mobilehomes, housing for agricultural employees, supportive housing. The analysis should consider processing and approval procedures and time for typical single-family and multifamily developments, including	We have completely overhauled the Governmental Constraints section to respond to these comments. Please see the new headings "Processing and Permit Procedures," "Procedures for Selected Housing Types," and beginning on page 2-160 of the track changed version.

	type of permit, level of review, approval findings and any discretionary approval procedures. The analysis must evaluate the processing and permit procedures' impacts as potential constraints on approval certainty, feasibility, and housing supply and affordability.	
B	Design Review: The element's analysis of the design review process states that every development including an individual single-family home and multifamily housing must go through design review and approvals from planning commission which can take an average of three months processing time. In addition, the various approval criteria include subjective language related to the compatibility of design with the neighborhood and surrounding areas, compatibility with historical character, and designs that promote harmonious transitions. Design review processes that have little to no guidance or clarity and requiring findings related to character are generally considered a constraint. The element must analyze this process and the approval criteria for potential constraints on approval certainty, feasibility, supply and affordability. Based on a complete analysis, the element may need to include or modify a program to address and remove or mitigate any identified constraints.	We have revised the document under the heading "Design Review" beginning on page 2-163 of the track changed version. We have updated program H-F to include actions related to codifying objective design standards, as well as a by-right ministerial review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330.
B	Local Ordinances: While the element included a discussion of the City's inclusionary requirement, it must specifically identify and analyze any other locally adopted ordinances such as short-term rental ordinances that directly impact the cost and supply of residential development.	We have revised the Governmental Constraints section to include analysis of additional locally adopted ordinances (17.132, 17.134, 17.138, 17.144, and 17.146) associated with residential development or commercial uses in residential zones. Please see the analysis under the heading "Locally Adopted Ordinances" beginning on page 2-174 of the track changed version.
B	On/Off-Site Improvements: While the element indicates on and off-site improvements are listed in St. Helena's municipal code, it must specifically identify subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width) and analyze their impact as potential constraints on housing supply and cost.	We have expanded our analyses. Please see the changes to the On/Offsite Improvement Standards section beginning on page 2-148 of the track changed version.
B	Fees: The element includes a hypothetical example of fees for single family and a multifamily project that focuses on detailing impact fees for each project type. However, a complete analysis should identify all fees and	We have updated our analysis accordingly. Please see the revised information under the heading "Fees and Exactions"

	costs including permit processing and planning fees, development fees, exactions, and any other applicable fees and analyze as potential constraints on housing supply and affordability.	beginning on page 2-156.
B	Building Codes and Enforcement: While the element states that the City has authority to deem any structure unsafe, it should specifically discuss the City's code enforcement process (e.g., whether code enforcement activities are compliant-based or proactive).	We have updated our analysis accordingly. Please see the revised information under the heading "Building Codes and Enforcement" beginning on page 2-147 of the track-changed version.
B	Reasonable Accommodation – The element identifies approval findings for granting a reasonable accommodation including finding related to impacts on surrounding uses – essentially a CUP finding. However, reasonable accommodation should be a unique exception process from a CUP, especially given its importance in addressing barriers to housing for persons with disabilities. The element should include a program to amend the Reasonable Accommodation Ordinance and remove constraints, namely the "potential impact on surrounding uses" approval finding. Additionally, the element should also indicate whether the City charges any fees to applicants filing reasonable accommodation requests.	We have revised the analysis accordingly. Please see information under the heading "Reasonable Accommodation" beginning on page 2-170 of the track changed version. We have also added an action to the Municipal Code Update program (H-F) committing the City to update Chapter 173.200 (Reasonable Accommodation) to remove discretionary finding requirements that constrain development, including finding #5, which considers impacts to surrounding properties or uses.
B	Other Requirements – The element must also include an analysis of zoning, development standards, building codes, and process and permit procedures as potential constraints on housing for persons with disabilities. Specifically, the analysis must describe any zoning code definitions of family and any spacing or concentration requirements for housing for persons with disabilities.	We have expanded our analysis of constraints to housing for persons with disabilities to include subsections for "Zoning and Land Use," "Permits and Processing," "Building Codes," and "Definition of family," beginning on page 2-170 of the track changed version.
B	Residential Care Facilities of Seven or More – The element states that these uses are permitted with a CUP in high-density residential zones. For your information, excluding these uses from residential zones and/or subjecting the uses to a CUP is generally considered a constraint and programs should be modified as appropriate with specific commitment to allow the use in residential zones with objectivity and certainty.	We have revised the analysis of small and large residential care facilities in the chapter on "Zoning for a Variety of Housing Types," beginning on page 2-188. We have also made associated revisions in the section "Constraints to Housing for Persons with Disabilities" under the headings, "Zoning and Land

		Use" and "Permits and Processing" beginning on page 2-170 of the track changed version. We have updated the Municipal Code Update program (H-F) to commit the City to "allow residential care homes facilities of six or fewer in zones allowing single-family uses, subject only to the requirements of single-family uses, in compliance with State law (HSC § 1568.0831); and facilities with seven or more beds in zones allowing multifamily uses, subject only to the requirements multifamily uses."
B	Residential Care Facilities of Six or Fewer – The element indicates that group homes of six or fewer are excluded from some residential zones. For your information, these uses must be allowed in any area zoned for residential use. The element should include or modify a program to address this requirement committing to allowing these uses in any zone that permits residential uses.	We have revised the analysis of small and large residential care facilities in the chapter on "Zoning for a Variety of Housing Types," beginning on page 2-188. We have updated the Municipal Code Update program (H-F) to commit the City to "allow residential care homes facilities of six or fewer in zones allowing single-family uses, subject only to the requirements of single-family uses, in compliance with State law (HSC § 1568.0831); and facilities with seven or more beds in zones allowing multifamily uses, subject only to the requirements multifamily uses." We have also made associated revisions in the section "Constraints to Housing for Persons with Disabilities" under the headings, "Zoning and Land Use" and "Permits and Processing" beginning on page 2-170 of the track changed version.
B	Permit Times: The element must include an analysis of the length of time between receiving approval for a housing development and submittal of an application for	We have updated the section "Processing and Permit Procedures" with an analysis of

	building permits that potentially hinder the construction of a locality's share of the regional housing need.	the length of time between receiving approval for a housing development and submittal of an application for building permits. Please see the subheading "Actual Project Times" beginning on page 2-162 of the track changed version.
B	Special Needs Households: While the element includes data and a general discussion of housing challenges faced by special needs households, it still must provide an analysis of the existing needs and resources for each special needs group including extremely low-income households, persons with disabilities including developmental disabilities, female headed households, and farmworkers. For example, the element should discuss the existing resources to meet housing needs (availability of shelter beds, number of large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.	We have updated Chapter 7: Special Housing Needs extensively, including a new subsection on Extremely Low-Income Households. We have added analyses of existing resources as well as gaps in resources and actions items to all subsections. Please Chapter 7: Special Housing Needs, beginning on page 2-109 of the track changed version.
C	Ongoing Programs: Numerous programs continue to indicate an "ongoing" implementation status. While this may be appropriate for some programs, programs with quantified objectives or specific implementation actions must include completion or initiation dates resulting in beneficial impacts within the planning period. This includes but is not limited to Programs H-U, H-X, H-KK and H-P.	We have updated the timeframe of all programs previously marked "ongoing."
C	Timelines: The element includes two programs with timelines for implementation towards the end of the planning period (Programs H-S and H-I). Given the importance of these programs and to achieve beneficial impact throughout the planning period, the element should revise these programs to be implemented earlier in the planning period.	We have updated these programs to be implemented earlier in the planning period.
C	Shortfall of Sites (Program H-A): The element notes that several sites do not currently permit residential uses or have appropriate densities and will need to be rezoned to accommodate the RHNA. While the element included Program H-A to rezone sites, the program should identify acreage, allowable densities, and anticipated units to be rezoned and must specifically commit to meet all requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). For example, the program must commit to permit owner-occupied and rental multifamily uses by-right for developments in	I've updated the Program H-A with program text provided by HCD in the Sites Inventory Guidelines.

	which 20 percent or more of the units are affordable to lower-income households. By-right means local government review must not require a CUP, planned unit development permit, or other discretionary review or approval.	
C	Replacement Housing Requirements: The housing element must include a program to provide replacement housing. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c)(3).	The sites inventory does not include any sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and: • Were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or • Subject to any other form of rent or price control through a public entity's valid exercise of its police power, or • Occupied by low or very low-income households
C	Sites Identified in Multiple Planning Periods: While the element includes Program H-A to maintain an inventory to comply with Government code section 65583.2 (c), this program must commit to zone and allow for the following: • sites must meet the density requirements for housing for lower income households, and • allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower income households (Gov. Code, § 65583.2, subd. (c).).	We have updated Program H-A to commit to these requirements.
C	Nonvacant Sites Reliance to Accommodate RHNA: As the element relies upon nonvacant sites to accommodate the regional housing need for lower-income households, it should include a program(s) to promote residential development of those sites. The program could commit to provide financial assistance, regulatory concessions, or incentives to encourage and facilitate new, or more intense, residential development on the sites. Examples of incentives include identifying and targeting specific financial resources and reducing appropriate development standards.	We have added a new program, which appears as H-K, related non-vacant sites. The program commits to adopting incentives to encourage new or more intense development on non-vacant lower-income sites.

City of St. Helena 2023-2031 Housing Element Update
Responses to HCD's 90-day Comment Letter

C	Publicly-Owned Sites: The element identified publicly-owned sites to accommodate a portion of the RHNA. The element should include a program with numerical objectives that ensures compliance with the Surplus Land Act, provides incentives and actions along with a schedule to facilitate development of publicly- owned sites. Actions should include outreach with developers, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance.	We have added a new program, which appears as H-L, related to publicly owned sites. The program commits to engaging local affordable housing developers, conducting studies of the sites, and implementing an action, all by 2025. Rezone requirements have also been included in the program, based on HCD's previous comment.
C	Senate Bill 9 Implementation: The element relies on the implementation and usage of Senate Bill 9 to accommodate a portion of the RHNA, promote a variety of housing types and choices, and implement affirmatively furthering fair housing requirements. While the element included program H-T to support lot splits, the element must include specific actions to implement and incentive the usage of SB 9. This includes but is not limited to establishing a compliant ordinance, development standards, incentives, and marketing and outreach to developers and property owners.	We have updated program H-U (formerly H-S) to include incentives and outreach related to SB 9 development generally. Program H-V (formerly H-U) includes an additional layer by further incentivizing affordable multi-unit developments in high resource areas specifically. We have committed the City to adoption these additional incentives by 2026 (as part of the current zoning code update)
C	Program H-C – Water Sewer Priority: For your information, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) While the element commits to granting priority water and sewer to developments with units affordable to lower income households, local governments are also required to immediately deliver the housing element to water and sewer service providers. HCD recommends including a program, policy, or commitment to deliver the adopted housing element to water and sewer providers and include a cover memo describing the City's housing element, including the City's housing needs and regional housing need.	We have updated Program H-C accordingly.
C	Program H-B (Growth Management System): The element notes that the City implemented a growth management system which likely violates SB 330 (Housing Crisis Act, 2019, Gov. Code, § 66300). The element included a program to remove the growth management system, however included the timeline has "ongoing." The element should include a specific implementation timeline for when this system will be removed and	We have updated Program H-B to commit the City to implement these changes immediately and to update the revised zoning code prior to the sunset of SB 330 in 2025.

	implementation should happen earlier in the planning period (e.g., one year).	
D	While the element described various efforts to achieve public participation in the preparation of the housing element update, it should also describe how comments were considered and incorporated into the element.	We have expanded our analysis, to include this info under Workshop #1, each of the Focus Group Meetings, and the Joint Study Sessions. For other events and efforts, this information is already included in the Draft. Please note that Workshops #2 and #3 include information related to the city response to each commentor. Additionally, each subheading *under Other Outreach Activities* identifies how input was incorporated. Finally, in Appendix B, the City has outlined the changes that were made to the Housing Element based on the public comments on the Public Review Draft (which are also included in the Appendix), including changes to programs, corrected data, and the addition of a new site (620 McCorkle).

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY GAVIN NEWSOM, *Governor*

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April 7, 2023

Maya DeRosa, Planning & Building Director
Planning Department
City of St. Helena
1572 Railroad Avenue
St. Helena, CA 94574

Dear Maya DeRosa:

RE: City of St. Helena's 6th Cycle (2023-2031) Revised Draft Housing Element

Thank you for submitting the City of St. Helena's (City) revised draft housing element that was received for review on February 7, 2023. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. HCD considered comments from Holland and Knight; David Kellogg and Generation Housing; pursuant to Government Code section 65585, subdivision (c).

The revised draft element addresses many statutory requirements described in HCD's December 6, 2022 review; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. During the housing element revision process, the City must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (January 31, 2023), then any rezoning to make prior identified sites available or accommodate the regional housing needs allocation (RHNA) (Program H-A) shall be completed no later than one year from the statutory deadline pursuant to Government Code sections 65583, subdivision (c) and 65583.2, subdivision (c).

Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i). Please be aware, if the City fails to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until these rezones are completed.

Please be aware Chapter 654, Statues 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.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: https://www.opr.ca.gov/planning/general-plan/guidelines.html.

We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Jamillah Williams, of our staff, at Jamillah.Williams@hcd.ca.gov.

Sincerely,

Paul McDougall
Senior Program Manager

APPENDIX
CITY OF ST. HELENA

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at https://www.hcd.ca.gov/planning-and-community-development/hcd-memos. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks),* available at https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks and includes the Government Code addressing State Housing Element Law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2…shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

   Enforcement: While the element discussed compliance with existing fair housing laws, it must also address any past or current findings, lawsuits, enforcement actions, settlements or judgements related to fair housing or civil rights. For additional information, please see HCD's prior review and pages 28-30 on HCD's Affirmatively Furthering Fair Housing (AFFH) Guidance Memo at https://www.hcd.ca.gov/community-development/affh/index.shtml.

   Concentration of Fair Housing Issues: The element was revised to briefly indicate that the east side of the City's fair housing conditions are attributed to types of uses and zoning. However, to better formulate appropriate policies and programs, the element must still analyze trends, past and current policy efforts, and their effectiveness, neighborhood investment or disinvestment, local data and knowledge, and other relevant factors, particularly relative to equitable quality of life, resources, and strategies to address any inequities in quality of life. Please see HCD's prior review for more information.

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress towards the Regional Housing Needs Allocation (RHNA): The element is crediting 87 units from the Hunter Subdivision Project towards the RHNA. HCD's prior review found that the City must analyze the likelihood that this project will be built and units will be available during the planning period. Additionally, the prior review found that HCD has received public comments regarding the City's ability to process and approve this project in a timely manner. Further, this analysis is particularly important given that the project has been pending since the 4th cycle planning period and the project will help the City provide housing and build a portion of their RHNA. The element was revised to state that the project will receive "planning approvals in the near future" and the next planning commission hearing is in February. This does not address HCD's prior review. The element should clearly indicate timelines and remaining steps to fully entitle this project and demonstrate the likelihood these units will become available during the planning period. Lastly, the revised element is now crediting these units towards the City's above moderate-income RHNA. However, HCD received public comments from the applicant indicating that 20 percent of the project will be affordable via deed restrictions in line with the City's inclusionary requirements. The element could be revised to credit a portion of these units towards the City's lower-income RHNA. Based on the outcomes of a complete analysis, the element should include a program to monitor the progress of the project and take alternative action if the project is not entitled and permit are not issued in a timely manner.

Realistic Capacity: The element was revised to state that sites are assumed to develop at an average of 80 percent of maximum allowable densities and noted three projects that have developed between 50-100 percent of maximum allowable densities. First, while the element states that most sites were assumed to develop at 80 percent of maximum allowable densities, Sites 2, 4 and 5 have higher build out assumptions (e.g., 85-100 percent). The element should either adjust calculations in the inventory based on the analysis or provide a specific analysis supporting the higher assumptions. Second, the analysis indicates that realistic capacity was based on past trends and notes three projects. However, the element should include all recent residential or multifamily projects to analyze all development activity by zone, size, allowable density, built density and affordability.

The element was revised to indicate that sites in the mixed-use zone do allow 100 percent commercial and that the City will implement Program H-P to incentivize residential development. However, to account for the likelihood of 100 percent nonresidential development, the analysis should discuss recent trends for development in the pertinent zone, including how often 100 percent nonresidential uses occur, then, adjust residential capacity assumptions and add or modify programs, if appropriate.

Nonvacant Sites: The element was revised with additional site characteristics, including owner interest and referenced past projects that redeveloped to residential development with similar existing uses. However, in addition to property owner interest and development trends, the analysis should consider additional factors that are indicative of redevelopment potential. For example, several sites seem to have low underutilization e.g., existing densities vs. allowable densities, floor area ratio (FAR), low lot coverage,

etc., The element could quantify this factor for applicable sites and include additional local or regional examples supporting the trend that underutilized sites will redevelop at the densities and uses identified in the inventory.

Lot Consolidation: The revised element now indicates that Sites 8 and 9 are made up of several parcels. The element should include an analysis evaluating whether these sites will need be consolidated to develop at the densities that were identified in the inventory. Based on a complete analysis, the element may need to add or modify programs with a commitment to facilitate and incentivize lot consolidation.

City-Owned Sites: HCD's prior review found that the element must include an analysis supporting residential capacity assumptions, existing uses and any known conditions that would preclude development. The element was not revised to address this finding. The element did reference that the City conducted feasibility studies for these sites. Where appropriate, the analysis should incorporate more information regarding the outcomes of these feasibility studies to support the likelihood of development on these sites. Please see HCD's prior review for additional information.

Sites Inventory Electronic Form: Please note, pursuant to Government Code section 65583.3, subdivision (b), the City 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/community-development/housing-element/index.shtml for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Infrastructure: The element was revised to state that adequate infrastructure is available contingent upon the implementation of infrastructure improvements identified in the City's Integrated Utility master plan. However, the element must still include a program committing to actions and a timeline to make sufficient infrastructure and implement the necessary improvements to accommodate the RHNA. Please see HCD's prior review for additional information.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures.. (Gov. Code, § 65583, subd. (a)(5).)*

   Land Use Controls: While the element was revised to include a list of all development standards by zone, it must evaluate lot coverage requirements and heights for impacts on achieving maximum densities, cost, feasibility and supply (number of units) of housing.

Parking: The element was revised with an analysis evaluating the 1.5 parking space requirement for smaller bedroom types (i.e., studio and one-bedrooms). While the analysis found that these requirements are not a constraint on development due to the lack of available public transportation, requiring 1.5 parking spaces for a studio apartment is generally considered a constraint and can impact a project's cost, supply (number of units), feasibility and ability to achieve maximum densities. The element should be revised with a program committing to reducing parking requirements.

Local Permit and Processing Procedures: HCD's prior review found that multifamily housing is subject to a conditional use permit (CUP) and it is considered a constraint. Additionally, HCD's certification of the 5th cycle housing element on May 29, 2015 explicitly stated that for the City to remain in compliance, it must complete Program HE1.D which committed to eliminating use permit requirements for multifamily projects in the medium density residential district. Further, HCD's records indicate that the City utilized state funding to remove or lessen discretionary review for multifamily housing (SB2 Planning Grants) and removing the use permit requirements for multifamily housing in certain zones (LEAP Planning Grants).

However, the element provides conflicting information. For example, the element's review and revise section indicates that the City removed the CUP requirement for multifamily housing. Additionally, page 2-162 indicates that a CUP is a required permit, while page 2-160 notes that multifamily is only subject to design review. The element must reconcile this information and clearly indicate if multifamily housing is subject to CUP requirements and whether this constraint has been removed. If this constraint has not been fully addressed, the element must include a program committing to removing this constraint early in the planning period (e.g., one year).

Additionally, 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.

Fees and Exactions: While the element now includes a listing of fees for a typical single family and multifamily development, the element should specifically evaluate impact fees e.g., parks and public safety for impacts on housing cost, supply, and feasibility.

Constraints on Housing For Persons with Disabilities: While the element now includes Program H-F committing to allowing group homes for seven or more persons similarly to multifamily uses, it must also commit to 1) allowing group homes of seven or more in all zones allowing residential uses and 2) permit these uses with objectivity and certainty similar to other residential uses of the same form.

B. Housing Programs

1. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (*Gov. Code, § *65583, subd. (c)(1).)*

   As noted in Finding A2, 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 City 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:

   Replacement Housing Requirements: The housing element must include a program to provide replacement housing. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c)(3).

   City-Owned Sites: While the element includes Program H-L (City-Owned Sites), the Program should be revised based on the outcomes of a complete analysis as noted in Finding A2. In addition, the Program should include steps and milestones beyond a request for proposal, including complying with the Surplus Land Act, facilitating all necessary entitlements, assisting with funding, issuing permits and alternative actions to identify other sites within a specified time if development does not proceed as anticipated. Finally, the program should include numeric objectives, including affordability, consistent with the assumptions in the sites inventory.

   Permanent Supportive Housing: The element now includes Program H-F (Municipal Code Updates) to incorporate objective design standards for ministerial design review of multifamily uses. However, the Program should clarify permanent supportive housing pursuant to Government Code section 65651 will also be permitted without discretionary action.

2. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable*

accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)

As noted in Finding A3 the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

3. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

   As noted in Finding A1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City will need to add or revise 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.

   Additionally, as found in HCD's prior review, programs still should be revised with increased metrics and significant and meaningful actions (beyond the RHNA) to promote housing mobility (more choices and affordability across geographies) and new housing choices and affordability in higher opportunity and relatively higher income areas (e.g., missing middle housing types). Further, as found in HCD's prior review, the element still must include significant and meaningful place-based strategies for community revitalization with actions targeting the southeast quadrant of the City to improve quality of life related to housing, transportation, safety, education, recreation, infrastructure, etc., and quantified metrics that target beneficial impacts for people, households and neighborhoods (e.g., number of people or households assisted, number of housing units built, number of parks or infrastructure projects completed). HCD will follow-up under a separate cover with additional information.

City of St. Helena 2023-2031 Housing Element Update
Responses to HCD's 60-day Comment Letter
Please note: All page numbers reference the track change version of the Housing Element

Comment Section	Comment	Revision
A-1	Enforcement: While the element discussed compliance with existing fair housing laws, it must also address any past or current findings, lawsuits, enforcement actions, settlements or judgements related to fair housing or civil rights. For additional information, please see HCD's prior review and pages 28-30 on HCD's Affirmatively Furthering Fair Housing (AFFH) Guidance Memo at https://www.hcd.ca.gov/community-development/affh/index.shtml.	We have added information on a previous settlement between the City and Esvin Calderon in 2021 [page A-13] and claim filed in the city in 2016 [page A-13] both based on fair housing concerns.
A-1	Concentration of Fair Housing Issues: The element was revised to briefly indicate that the east side of the City's fair housing conditions are attributed to types of uses and zoning. However, to better formulate appropriate policies and programs, the element must still analyze trends, past and current policy efforts, and their effectiveness, neighborhood investment or disinvestment, local data and knowledge, and other relevant factors, particularly relative to equitable quality of life, resources, and strategies to address any inequities in quality of life. Please see HCD's prior review for more information.	We have added information on City efforts to address fair housing concerns, including the 2018 St. Helena Housing Update Report [page A-100] and Diversity, Equity, and Inclusion Strategy [page A-101]., as well as additional information under headings 4.2.5 and 4.2.6 on page A-103.
A-2	Progress towards the Regional Housing Needs Allocation (RHNA): The element is crediting 87 units from the Hunter Subdivision Project towards the RHNA. HCD's prior review found that the City must analyze the likelihood that this project will be built and units will be available during the planning period. Additionally, the prior review found that HCD has received public comments regarding the City's ability to process and approve this project in a timely manner. Further, this analysis is particularly important given that the project has been pending since the 4th cycle planning period and the project will help the City provide housing and build a portion of their RHNA. The element	We have included additional information on progress and timelines for the Hunter Subdivision Project [page 2-197]. We have also added an objective to Program H-A, which commits the City to supporting the timely completion of the Hunter Subdivision Project and alternative actions.

	was revised to state that the project will receive "planning approvals in the near future" and the next planning commission hearing is in February. This does not address HCD's prior review. The element should clearly indicate timelines and remaining steps to fully entitle this project and demonstrate the likelihood these units will become available during the planning period. Lastly, the revised element is now crediting these units towards the City's above moderate-income RHNA. However, HCD received public comments from the applicant indicating that 20 percent of the project will be affordable via deed restrictions in line with the City's inclusionary requirements. The element could be revised to credit a portion of these units towards the City's lower-income RHNA. Based on the outcomes of a complete analysis, the element should include a program to monitor the progress of the project and take alternative action if the project is not entitled and permit are not issued in a timely manner.	
A-2	Realistic Capacity: The element was revised to state that sites are assumed to develop at an average of 80 percent of maximum allowable densities and noted three projects that have developed between 50-100 percent of maximum allowable densities. First, while the element states that most sites were assumed to develop at 80 percent of maximum allowable densities, Sites 2, 4 and 5 have higher build out assumptions (e.g., 85-100 percent). The element should either adjust calculations in the inventory based on the analysis or provide a specific analysis supporting the higher assumptions. Second, the analysis indicates that realistic capacity was based on past trends and notes three projects. However, the element should include all recent residential	We have added the following information: Site 2 [page 2-201]: Added details regarding the 2015 site feasibility and capacity analysis which found the site can accommodate the proposed number of housing units on the site. Site 4 [page 2-207]: Revised to propose a total of four housing units on the site, equaling 80 percent of the maximum allowed density. Site 5 [page 2-209]: Added details regarding non-profit ownership's plans to develop an affordable housing development on the site that is equal to greater than 100 percent of the maximum allowed density of the site, including referencing the allowed density bonus for a 100 percent affordable housing project and the feasibility analysis conducted by the non-profit.

	or multifamily projects to analyze all development activity by zone, size, allowable density, built density and affordability. The element was revised to indicate that sites in the mixed-use zone do allow 100 percent commercial and that the City will implement Program H-P to incentivize residential development. However, to account for the likelihood of 100 percent nonresidential development, the analysis should discuss recent trends for development in the pertinent zone, including how often 100 percent nonresidential uses occur, then, adjust residential capacity assumptions and add or modify programs, if appropriate.	
A-2	Nonvacant Sites: The element was revised with additional site characteristics, including owner interest and referenced past projects that redeveloped to residential development with similar existing uses. However, in addition to property owner interest and development trends, the analysis should consider additional factors that are indicative of redevelopment potential. For example, several sites seem to have low underutilization e.g., existing densities vs. allowable densities, floor area ratio (FAR), low lot coverage, etc., The element could quantify this factor for applicable sites and include additional local or regional examples supporting the trend that underutilized sites will redevelop at the densities and uses identified in the inventory.	We have added additional regional examples of redevelopment of nonvacant sites for current projects in the cities of Calistoga and Napa [page 2-205]. We have also, added additional statements of other underutilized factors for each of the non-vacant sites [page 2-211 to 2-223]
A-2	Lot Consolidation: The revised element now indicates that Sites 8 and 9 are made up of several parcels. The element should include an analysis evaluating whether these sites will need be consolidated to develop at the densities that were identified in the inventory. Based on a complete analysis, the element may need to add or modify programs	We have added a statement clarifying that the parcels making up Site 8 and Site 9 are under single ownership and development would not be dependent upon lot consolidation [pages 2-215 and 2-217]. We have added program H-ZZ as follows: **H-ZZ Lot Consolidation** To expand opportunities for additional

	with a commitment to facilitate and incentivize lot consolidation.	affordable housing, the City will encourage the consolidation of small parcels to accommodate larger-scale and higher density developments that are compatible with existing neighborhoods. The sites inventory includes five parcels equating to 39 lower- and 39 moderate-income RHNA units. These sites were identified based on common ownership and contiguous lots. While all five parcels are within moderate resource areas, two of these parcels (site 9) are located on the western portion of the city, an area with fewer fair housing issues, and adjacent to Spring Street in proximity to high-quality transit opportunities. While these parcels will be processed by-right pursuant to Gov. Code section 65583(c)), the City will also implement other efforts to facilitate and encourage lot consolidation. **Objectives:** Post the sites on the City's website by October 2023 and provide list to interested developers when requested, and review annually for accuracy Develop and implement incentives for lot consolidation by January 2024 such as fee waivers, reduced development fees, expedited permit processing, greater density bonus incentives, and modifications to parking, height, or setback standards Facilitate lot consolidation for high density residential developments by providing appropriate assistance to developers to encourage negotiations between property owners Encourage the development of 39 lower- and 39 moderate income units during the planning period. To increase housing mobility and opportunities in areas where fair housing issues are less concentrated, encourage the development of 15 lower- and 15 moderate-income units on the western portion of the City
A-2	City-Owned Sites: HCD's prior review found that the element must include an analysis supporting residential capacity assumptions, existing uses and any known conditions that would preclude development. The element	We have added details of the 2015 site feasibility and capacity analysis which evaluated site capacity for all three of the proposed City-owned sites. We have also Incorporated information for each of the three sites on total housing unit capacity, lot

	was not revised to address this finding. The element did reference that the City conducted feasibility studies for these sites. Where appropriate, the analysis should incorporate more information regarding the outcomes of these feasibility studies to support the likelihood of development on these sites. Please see HCD's prior review for additional information.	coverage, parking, environmental sensitives on site, and service connection obstacles from the 2015 analysis [pages 2-199 to 2-204].
A-2	Sites Inventory Electronic Form: Please note, pursuant to Government Code section 65583.3, subdivision (b), the City 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/community-development/housing-element/index.shtml for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.	Noted
A-2	Infrastructure: The element was revised to state that adequate infrastructure is available contingent upon the implementation of infrastructure improvements identified in the City's Integrated Utility master plan. However, the element must still include a program committing to actions and a timeline to make sufficient infrastructure and implement the necessary improvements to accommodate the RHNA. Please see HCD's prior review for additional information.	We have clarified that the RHNA allocation is within buildout of the Master Plan and that all improvements would not impede housing construction and would be constructed on the adopted CIP schedule. [2-227 to 2-230]
A-3	Land Use Controls: While the element was revised to include a list of all development standards by zone, it must evaluate lot coverage requirements and heights for impacts on achieving maximum densities,	We have revised our analysis to include an analysis of height and lot coverage [beginning on page 2-137 just before the development standards table], as well as new program actions in Program H-N.

	cost, feasibility and supply (number of units) of housing.	**New Text, page 2-137 to 2-138** Development standards related to maximum lot coverage and height pose potential constraints to multifamily affordable housing development. Currently the City allows 45 percent lot coverage and a maximum height of 30 feet in the MR and HR zones. Due to the potential to constraint affordable housing development, the City has included actions in Program H-N: Zoning to Facilitate Higher Density Housing that commit the City to increasing lot coverage to 55 percent and maximum height to 42' (three stories) in the HR zone and on multifamily sites in the MR zone. Please note that the MR zone is a single-family zone, but the zoning code has been updated to allow multifamily uses on housing opportunity sites identified in the 5th Cycle Housing Element Update. Additionally, the program commits the City to allowing minor modifications to these standards that can be approved by the Community Development Director without a public hearing. Minor modifications should include up to 10 percent modification to maximum lot coverage and up to five percent (or two feet, whichever is greater) modification in maximum height. **New Actions: Program H-N: Zoning to Facilitate Higher Density Housing** The City shall revise maximum lot coverage to 55 percent and maximum height to 42 feet in the HR zone and on multifamily sites in the MR zone. The City shall revise the zoning code to allow minor modifications of up to 10 percent increase in lot coverage standards and 5 percent (or two feet, whichever is greater) in maximum height. Minor modifications shall be approved by the Community Development Director without a public hearing.
A-3	Parking: The element was revised with an analysis evaluating the 1.5 parking space requirement for smaller bedroom types (i.e., studio and one-bedrooms). While the analysis found that these requirements are not a constraint on development due to the lack of available public transportation,	We have revised our analysis to identify parking for multifamily developments with small unit sizes as a constraint. The revisions are shown in track changes below. We have also included a new program action related to parking standards in Program H-N. **Revised text, page 2-153, above Table 35** The City of St. Helena's parking standards do

	requiring 1.5 parking spaces for a studio apartment is generally considered a constraint and can impact a project's cost, supply (number of units), feasibility and ability to achieve maximum densities. The element should be revised with a program committing to reducing parking requirements.	not impose undue constraints to development of multifamily uses with two or more bedrooms. As shown in **Error! Reference source not found.**~~Table 35~~, when compared to other nearby jurisdictions, St. Helena's housing requirements are not only less restrictive, but much less complex. ~~Additionally, the City is currently reevaluating its parking requirements for residential uses as part of the ongoing Comprehensive Zoning Code Update.~~ However, parking standards for multifamily uses with three or more studio or one-bedroom units require 1.5 parking spaces per unit. This requirement is a constraint to development of smaller unit multifamily uses. Program H-N commits the City to limiting parking requirements for these uses to one space per unit. **Program H-N: Zoning to Facilitate Higher Density Housing [new action]** The City shall reduce parking requirements for multifamily uses with three or more units to require one parking space for studio or one-bedroom units.
A-3	**Local Permit and Processing Procedures:** HCD's prior review found that multifamily housing is subject to a conditional use permit (CUP) and it is considered a constraint. Additionally, HCD's certification of the 5th cycle housing element on May 29, 2015, explicitly stated that for the City to remain in compliance, it must complete Program HE1.D which committed to eliminating use permit requirements for multifamily projects in the medium density residential district. Further, HCD's records indicate that the City utilized state funding to remove or lessen discretionary review for multifamily housing (SB2 Planning Grants) and removing the use permit requirements for multifamily housing in certain zones (LEAP Planning Grants). However, the element provides conflicting information. For example, the element's review and revise section indicates that the City removed	We have revised our analysis to summarize allowed uses in the MR zone, and to clear up confusion related to implementation of the 5th cycle program discussed (see below). We have also included a new program action committing the City to allowing duplexes and triplexes, as well as density ranges from 5.1 to 16 du/ac in the MR zone without a CUP. We have added information that the City is in the process of adopting a new Zoning Ordinance (hearings in Fall 2023) to be consistent with the 2040 General Plan, which would permit duplexes and triplexes within the MR District (see Program H-N). This would create additional housing choices and affordability levels in the MR Districts on the western side of the city. In addition, several programs, including H-BB, H-EE, and H-XX would implement place-based strategies to engage and work with the more diverse and older populations in the eastern portion of the city due to the historic development patterns. **New text page 2-166 to 2-167:** Currently (2023) the MR zone does not allow for multifamily uses without a conditional use

	the CUP requirement for multifamily housing. Additionally, page 2-162 indicates that a CUP is a required permit, while page 2-160 notes that multifamily is only subject to design review. The element must reconcile this information and clearly indicate if multifamily housing is subject to CUP requirements and whether this constraint has been removed. If this constraint has not been fully addressed, the element must include a program committing to removing this constraint early in the planning period (e.g., one year). Additionally, 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.	permit (CUP), with the exception of 5th Cycle Housing Element opportunity sites. Although the MR zone is primarily a single-family zone, the requirement for a CUP in this zone constrains the development of smaller multifamily uses. Program H-N commits the City to allowing duplexes and triplexes and a density range of 5.1 to 16 dwelling units per acre in the MR zone without a CUP. Please note: the City implemented 5th Cycle Housing Element program HE1.D which committed the City to eliminating use permit requirement for multifamily projects on Housing Opportunity sites (Key Housing Sites) in the medium density residential zone. Section 17.40.020 was amended to permit the following: *N. Multiple-family dwellings, apartments, and dwelling groups at a density up to the maximum allowed by the medium density residential district shall be allowed as a permitted use on the following MR zoned parcels, which are identified as "Key Housing Sites" in Table 42 of the city's 2015-2023 housing element, and are identified as follows by street address and assessor's parcel number (APN): 567 Pope St. APN 009-070-002; 591 McCorkle Ave. APN 009-070-003; 1817 Spring St. APN 009-322-009; Sulphur Springs Ave. APN 009-362-015; Spring St. APN 009-441-023 and 009-552-002; 576 Pope St. APN 009-552-003; 1105 Pope St. APN 009-090-003. (Ord. 17-2 § 6 (part); Ord. 16-8 § 1; Ord. 15-2 § 7 (part): Ord. 12-2 § 6: Ord. 07-5 § 2 (part): Ord. 05-4 § 1 (part): Ord. 03-4 § 11: prior code § 27.51)* Further, The City has received SB 2 and LEAP grants from the State of California to assist with encouraging and streamlining affordable housing development in the city. The City has applied these funds to the Comprehensive Zoning Code Update currently underway. The Draft Update works to overcome constraints and encourage development by incorporating objective design standards for residential development and removing CUP requirements for duplexes and triplexes and densities of 5.1 to 16 du/ac in the MR zone, among other efforts.

City of St. Helena 2023-2031 Housing Element Update
Responses to HCD's 60-day Comment Letter
Please note: All page numbers reference the track change version of the Housing Element

		Revised text, page 2-41, Evaluation of 5th Cycle program HE1.D: In an effort to implement this Goal, the City has removed the Use Permit requirement for multi-family housing in the High Density Residential (HR) ~~land use designation~~zone and all of the Housing Opportunity Sites (Key Housing Sites, see Section 17.40.020(N)) located within the Medium Density Residential (MR) zone~~other designations~~ and has established a streamlined approval process consistent with SB35 and SB330. Further, as mentioned above, affordable housing units are not subject to the GMS Ordinance limitations. **Program H-N: Zoning to Facilitate Higher Density Housing [new action]** The City shall revise Section 17.40.020 to allow duplexes and triplexes and densities of 5.1 to 16 dwelling units per acres in the MR zone without a conditional use permit. We have also added program H-AAA to address compliance with the Permit Streamlining Act as follows: **H-AAA Permit Streamlining Act** The City shall amend the Municipal Code to specify who is responsible for making CEQA determinations and within the timeframes of PRC 21080.1 and PRC 21080.2; and determination of when the PSA is triggered per Government Code 65950(a)(5) the Permit Streamlining Act (PSA). **Objective:** Amend the municipal code for compliance with State law within 18 months of adoption of the Housing Element **Timeframe:** Within 18 months of adoption of the 2023-2031 Housing Element
A-3	Fees and Exactions: While the element now includes a listing of fees for a typical single family and multifamily development, the element should specifically evaluate impact fees e.g., parks and public safety for impacts on housing cost, supply, and feasibility.	We have revised the summary of fees and exactions to include the following analysis immediately following Table 36 on page 2-159. **New Text, page 2-159** City impact fees are included in Table 36 above. Among these, the costliest fee is the Parks fee of $7.16 per square foot. These funds are used

City of St. Helena 2023-2031 Housing Element Update
Responses to HCD's 60-day Comment Letter
Please note: All page numbers reference the track change version of the Housing Element

		to develop and maintain City parks, a critical resource in the community. The City's wastewater impact fee ($0.45 per square foot), drainage system fee ($0.73 per square foot) and public safety fee ($1.04 per square foot) are particularly low. Further, the City's civic facilities and transportation fees are both under $2 per square foot. Importantly, City impact fees for multifamily listed in Table 36 are based on an eight-unit development, as explained previously, and have a lower per unit cost than City impact fees shown for a typical single-family use. These impact fees are based on the City's actual costs and are reevaluated and revised each year. The City's impact fees do not impose undue impacts to housing cost, supply, and feasibility, and are not a constraint to the development of housing.
A-3	Constraints on Housing For Persons with Disabilities: While the element now includes Program H-F committing to allowing group homes for seven or more persons similarly to multifamily uses, it must also commit to 1) allowing group homes of seven or more in all zones allowing residential uses and 2) permit these uses with objectivity and certainty similar to other residential uses of the same form.	We have revised the relevant action in Program H-F to include this specific language. Revisions are shown in track changes below. **Revised Action, Program H-F**<br ~~Define and a~~Allow for residential care ~~homes~~ facilities of six or fewer in zones allowing single-family uses, subject only to the requirements of single-family uses, in compliance with State law (HSC § 1568.0831); ~~California Government Code Section 65583~~and permit facilities with seven or more beds in ~~zones allowing~~all ~~multifamily~~residential ~~uses~~zones ~~,~~ with objectivity and certainty similar to other residential uses of the same form~~subject only to the requirements multifamily uses~~.
B-1	**Replacement Housing Requirements:** The housing element must include a program to provide replacement housing. Absent a replacement housing program, these sites are not adequate sites to accommodate lower-income households. The replacement housing program must adhere to the same requirements as set forth in Government Code section 65915, subdivision (c)(3).	We have added a new program, H-YY, as follows: **Replacement Unit Program** The City will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions: • currently has residential uses or within the past five years has had residential uses that have been vacated or

		demolished, and • was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or • subject to any other form of rent or price control through a public entity's valid exercise of its police power, or • occupied by low or very low-income households **Objectives:** In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development. **Implements policies:** HE3.1 HE6.1 **Who is responsible:** Planning Department **Funding:** General Fund **Timeframe:** Implement: immediately Adopt policy: by January 31, 2024
B-1	**City-Owned Sites:** While the element includes Program H-L (City-Owned Sites), the Program should be revised based on the outcomes of a complete analysis as noted in Finding A2. In addition, the Program should include steps and milestones beyond a request for proposal, including complying with the Surplus Land Act, facilitating all necessary entitlements, assisting with funding, issuing permits and alternative actions to identify other sites within a specified time if development does not proceed as anticipated. Finally, the program should include numeric objectives, including affordability, consistent with the assumptions in the sites inventory.	We have revised program H-L as follows: **H-L City- ~~O~~owned Sites** The City will maintain compliance with the Surplus Land Act throughout the 2023-2031 Housing Element planning period. The City will assess the appropriateness of and consider implementing the following: outreach opportunities with housing developers, requests for proposals, development incentives, fee waivers, priority processing, and financial assistance (when available) to facilitate and incentivize developers to develop housing units on City-owned sites. The City plans to make 3 properties available through the Surplus Land Act process over the next two years for a potential development of 57 lower-income units. The City shall conduct

		studies of City owned sites included in the sites inventor to determine the most efficient use for housing. These include sites 1, 2, and 3. Through this process, the City shall engage local affordable housing developers to determine site constraints and potential policies to ~~meaningful~~meaningfully incentivize affordable housing development on these sites. The City shall proceed with the findings for housing development by ~~2025~~2026. The City anticipates two-and-a-half years to enter into an Exclusive Negotiation Agreement (Fall 2026), and one-and-a-half additional years for land use entitlements and development agreements (Spring 2028). City owned sites included in the inventory (sites 1-3) shall be rezoned incompliance with Govt. Code Section 65583.2(h) and (i) within three years of the adoption deadline (by January 31, 2026. **Objectives:** Engage local affordable housing developers immediately Study city owned sites to determine the most efficient use for affordable housing development within the first year following adoption By 2026, implement an action plan to sell, or release an RFP to develop, City owned land for affordable housing development based on the findings of the conducted studies. Through the action plan, establish and implement a variety of incentives to facilitation housing development. Maintain compliance with the Surplus Land Act throughout the 2023-2031 Housing Element Planning Period Make properties available through the Surplus Land Act process Target Exclusive Negotiating Agreement by Fall 2026 Target land use entitlements issuance by Spring 2028 Encourage the development of 57 lower-income units in the northeast quadrant of the city near transit opportunities, and where fair housing issues are less concentrated and

City of St. Helena 2023-2031 Housing Element Update
Responses to HCD's 60-day Comment Letter
Please note: All page numbers reference the track change version of the Housing Element

		walkability and environmental scores are more positive
B-1	Permanent Supportive Housing: The element now includes Program H-F (Municipal Code Updates) to incorporate objective design standards for ministerial design review of multifamily uses. However, the Program should clarify permanent supportive housing pursuant to Government Code section 65651 will also be permitted without discretionary action.	We have included a new program action in Program H-F with this language, as shown below. **New Action, Program H-F** Allow permanent and supportive housing pursuant to Government Code section 65661 without discretionary action.
B-2	As noted in Finding A3 the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.	See response to A3 above.
B-3	As noted in Finding A1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the City will need to add or revise 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. Additionally, as found in HCD's prior review, programs still should be revised with increased metrics and significant and meaningful actions (beyond the RHNA) to promote housing mobility (more choices and affordability across geographies) and new housing choices and affordability in higher opportunity and relatively higher income areas (e.g., missing middle housing types). Further, as found in HCD's prior review, the element still must include significant and meaningful place-based strategies for community revitalization with actions targeting	To respond the HCD's AFFH evaluation of the Housing Element implementation programs, we have added actions, place-based strategies, and/or metrics and milestones to the following programs: H-XX: Fair Housing Provider H-E: Streamline Special Needs Housing H-H: Workforce and Farmworker Housing H-I: ADU Workforce Housing Incentive Program H-W: Missing Middle Housing H-LL: Special Needs Housing Opportunities H-GG: Affordable Homeownership H-V: Multi-unit Development in High Resource Areas H-Q: Direct Assistance for ADU Development H-R: Place-based ADU Strategy H-A: Sites Inventory H-K: Nonvacant Sites H-JJ: Housing Coordinator H-BB: Special Housing Needs Rehabilitation H-AA: Vacation Rentals H-X: Condominium Conversions

	the southeast quadrant of the City to improve quality of life related to housing, transportation, safety, education, recreation, infrastructure, etc., and quantified metrics that target beneficial impacts for people, households and neighborhoods (e.g., number of people or households assisted, number of housing units built, number of parks or infrastructure projects completed). HCD will follow-up under a separate cover with additional information.	









City of St. Helena

2023-2031 Housing Element Update

Public Hearing Draft

April 2023

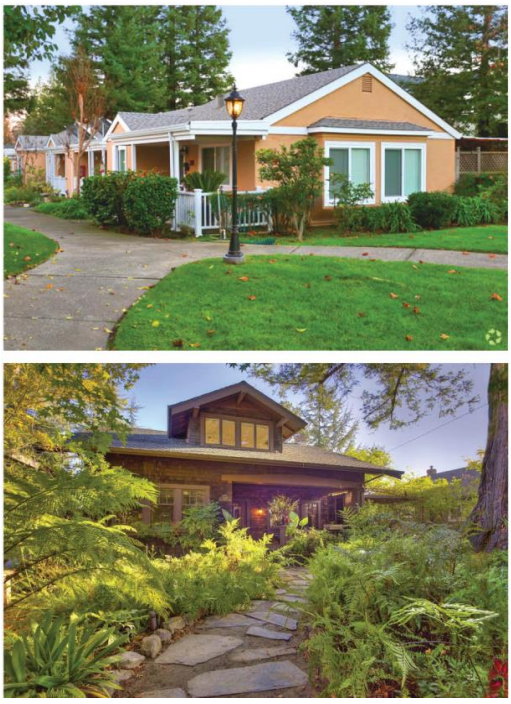




Table of Contents

Introduction iii

1. Policy Document

Policy Document Contents 1-1

Organization of the Policy Document 1-3

Key Findings and Recommendations 1-5

Goals, Policies, and Implementation Programs 1-9

Quantified Objectives 1-4943

2. Needs Assessment

Needs Assessment Contents 2-1

1. Introduction 2-7
2. Review of the Existing Housing Element 2-3535
3. Demographic and Economic Trends 2-5958
4. Population and Employment Projections 2-8180
5. Housing Conditions 2-8584
6. Housing Market Conditions 2-9897
7. Special Housing Needs 2-109108
8. Non-governmental and Governmental Constraints 2-131130
9. Opportunities for Energy Conservation 2-190169
10. Zoning for a Variety of Housing Types 2-192171
11. Housing Resources 2-198177

Appendix A: Affirmatively Further Fair Housing (AFFH)

AFFH Contents A-1

1. Introduction A-5
2. Summary of Fair Housing Issues A-9
3. Segregation and Integration Patterns and Trends A-14
4. Local Area of Knowledge A-10099
5. Sites Inventory Analysis A-103101
6. Contributing Factors A-110107

Appendix B: Comments on the Public Review Draft Housing Element B-1


Private Property
STONEBRIDGE
900-1078 COLLEGE AVENUE

Introduction

Purpose of the Element

Since 1969, California has required that all local governments (cities and counties) adequately plan to meet the housing needs of everyone in the community. California's local governments meet this requirement by adopting housing plans as part of their "general plan" (also required by the state). General plans serve as the local government's "blueprint" for how the city and/or county will grow and develop and include seven required elements: land use, transportation, conservation, noise, open space, safety, and housing. The law mandating that housing be included as an element of each jurisdiction's general plan is known as "housing-element law."

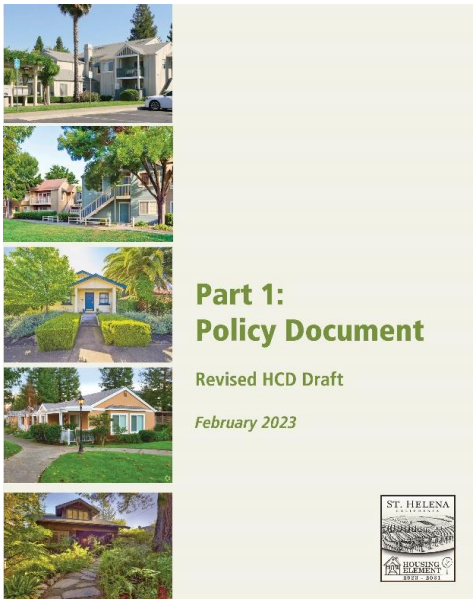
California's housing-element law acknowledges that, in order for the private market to adequately address the housing needs and demand of Californians, local governments must adopt plans and regulatory systems that provide opportunities for (and do not unduly constrain), housing development. As a result, housing policy in California rests largely upon the effective implementation of local general plans and, in particular, local housing elements.

Although the Housing Element is one of seven required elements of the general plan, it has several unique requirements that set it apart from the other six. State law (Government Code Section 65580 (et seq.)) specifies in detail the topics that the housing element must address and sets a schedule for required updates every eight years. The housing element is also the only element reviewed and certified by the State for compliance with State law. Every jurisdiction in the State of California is required to submit a Housing Element to the Department of Housing and Community Development (HCD) for review and certification.

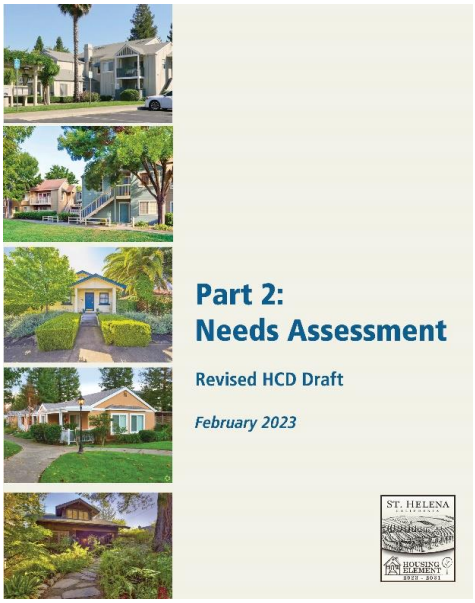
The 2023-2031 Housing Element establishes a comprehensive plan to address housing needs in St. Helena over the eight-year planning period between January 31, 2023 and January 31, 2031. The Housing Element sets the community goals and policies surrounding the development, rehabilitation, and preservation of housing units to meet the needs of St. Helena residents (present and future. St. Helena is a member of the Association of Bay Area Association of Governments and, therefore, is required submit an updated Housing Element to HCD by January 31, 2023.

Housing Element Update Components

The 2023-2031 Housing Element Update consists of two parts; the Housing Needs Assessment, and this Housing Element Policy Document.



1. The **Policy Document** states goals, policies, implementing program, and quantified objectives for the development, rehabilitation, and preservation of housing. The Policy Document is the action plan that reacts directly to the findings of the Housing Needs Assessment and input from the community. The City will implement the actions specified in the Policy Document throughout the planning period.



2. The **Needs Assessment** identifies and analyzes the existing and projected housing needs, provides a list of sites for housing development that are adequate to accommodate the City's regional housing needs allocation, documents constraints to housing production, and analyzes fair housing. In short, the Needs Assessment provides the context for the City's housing action plan.











Part 1: Policy Document

Public Hearing Draft

April 2023

ST. HELENA
CALIFORNIA
HOUSING ELEMENT
2023 - 2031


1426

Policy Document Contents

Organization of the Policy Document 1-3

Key Findings and Recommendations 1-5

Review of Existing Housing Element 1-5

Demographic and Economic Trends 1-5

Housing Conditions 1-5

Special Housing Needs 1-6

Non-governmental and Governmental Constraints 1-7

Sites Inventory and Zoning for a Variety of Housing Types 1-7

Affirmatively Furthering Fair Housing 1-8

Goals, Policies, and Implementation Programs 1-9

Goal 1 A Diversity of Housing to Meet Local Needs 1-9

Goal 2 High-Quality Neighborhoods with a Balance of Housing Types ..... 1-21~~19~~

Goal 3 Conservation of Existing Housing ..... 1-30~~26~~

Goal 4 Assistance to Support Affordable Housing ..... 1-34~~30~~

Goal 5 Resource Conservation ..... 1-41~~37~~

Goal 6 Affirmatively Furthering Fair Housing ..... 1-44~~40~~

Quantified Objectives ..... 1-49~~43~~

Quantified Objectives by Type ..... 1-49~~43~~

Quantified Objectives Summary Table ..... 1-50~~44~~







Organization of the Policy Document

The 2023-2031 Housing Element Policy Document includes six goals, supported by policies and implementation programs that aim to address identified housing needs during the planning period. The goals, policies, and programs of the Housing Element establish a policy framework to guide city decision-making to meet identified housing needs. The Policy Document is organized under the following goal titles:

1. A Diversity of Housing to Meet Local Needs
2. High-Quality Neighborhoods with a Balance of Housing
3. Conservation of Existing Housing
4. Assistance to Support Affordable Housing
5. Resource Conservation
6. Affirmatively Further Fair Housing

Goals

The housing goals are articulated as general "end condition statements," which describe a desired outcome or end state. The goals do not contain an action verb as they reflect a final statement of what the city hopes to achieve. Goals describe ideal future conditions for a topic and tend to be general and broad in nature. How the goal will be achieved is established via the applicable policies and programs.

Policies

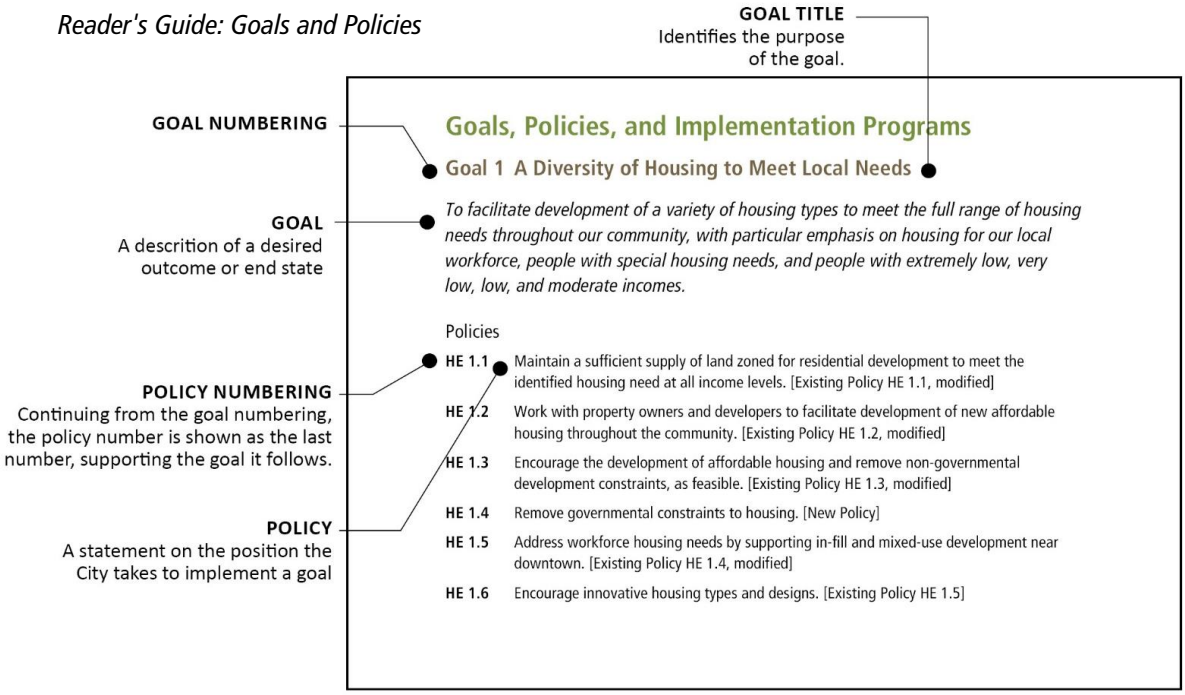
Policies are statements on the position the City takes to implement a goal. Policies contained in the Housing Element are important statements as they provide a clear and unambiguous statement that guides a specific course of action for decision-makers to achieve a desired goal. Future actions and development must be consistent with these policies.

Programs

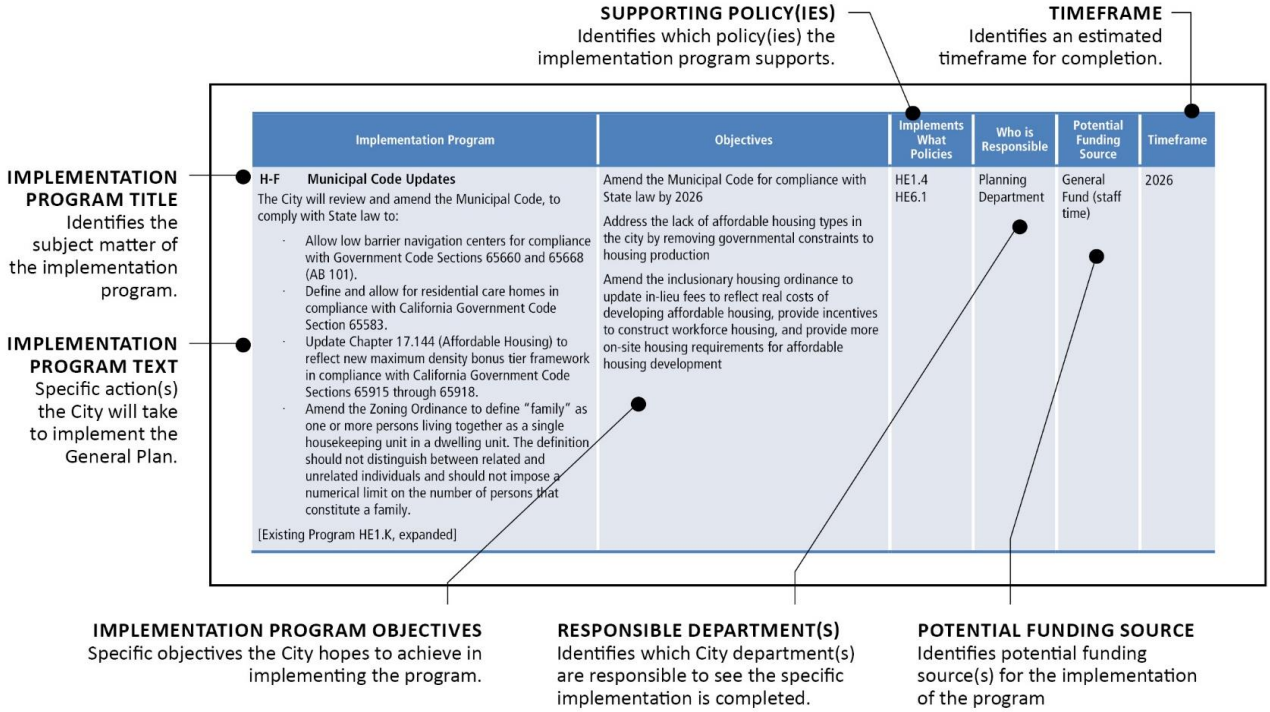
While many policies can be implemented as part of standard City operations, some policies require specific programs to assure their implementation. Housing programs define the specific actions the City will undertake to achieve the stated goals and policies.

For more information, please see the Policy Document Reader's Guide diagrams on the following page.

Reader's Guide: Goals and Policies



Reader's Guide: Implementation Programs



Key Findings and Recommendations

The following section summarizes the key findings in the Housing Needs Assessment and references the resulting programs.

Review of Existing Housing Element

Since the City of St. Helena adopted the Housing Element Update in 2014, the City successfully implemented a majority of the Housing Element implementation programs. Between 2014 and 2021, the City was successful in obtaining additional funding for affordable housing production, preserving existing affordable housing units, and promoting the expansion of multifamily and mixed use housing through the recent 2040 General Plan Update. The City also successfully implemented programs incentivizing and streamlining affordable housing development and revised development standards related to second units for state compliance. While the 2040 General Plan Update process required significant staff time and delayed implementation of some Municipal Code amendments, the City is currently (2022) undertaking a zoning code update that will address the remaining code amendments implementation measures during the 6th cycle. As the code update draws to its conclusion, the City will have more resources available to implement the remaining implementation actions, which have been continued and expanded in the 2023-2031 Housing Element.

Demographic and Economic Trends

Generally, the population of the Bay Area continues to increase because of natural growth and the strong economy drawing new residents to the region. The population of St. Helena increased by 2.1 percent from 2000 to 2020, which is lower than the growth rate of the Bay Area. In 2019, St. Helena's youth population under the age of 18 was 1,050 and senior population 65 and older was 1,636. These age groups represent 17.2 percent and 26.8 percent, respectively, of St. Helena's population. Program H-A commits the City to providing sufficient housing sites to meet the needs of the population and Programs H-H and H-I address workforce housing.

Housing Conditions

Number of Homes. The number of new homes built in the Bay Area has not kept pace with the demand, resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness. The number of homes in St. Helena increased, 4.4 percent from 2010 to 2020, which is above the growth rate for Napa County and below the growth rate of the region's housing stock during this time period. Program H-N, H-O work to facilitate higher density development, and H-P works to provide residential development opportunities in commercial areas through the implementation of mixed-use zoning.

Home Prices. A diversity of homes at all income levels creates opportunities for all St. Helena residents to live and thrive in the community.

- **Ownership.** The largest proportion of homes had a value in the range of $1 million-$1.5 million in 2019. Home prices increased by 118.2 percent from 2010 to 2020. Program H-GG works to increase affordable homeownership opportunities in St. Helena through the pursuit of mortgage credit certificates.

- **Rental Prices.** The typical contract rent for an apartment in St. Helena was $1,470 in 2019. Rental prices increased by 15.7 percent from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to make $59,160 per year. Programs H-DD, H-EE, H-FF, and H-HH work to assist the development of affordable housing. Program H-II includes a commitment to support the Housing Choice Voucher program and to support efforts to expending funding for the program.

Housing Type. It is important to have a variety of housing types to meet the needs of a community today and in the future. In 2020, 63.9 percent of homes in St. Helena were single family detached, 6.1 percent were single family attached, 6.2 percent were small multifamily (2-4 units), and 18.4 percent were medium or large multifamily (5+ units). Between 2010 and 2020, the number of single-family units increased more than multi-family units. Generally, in St. Helena, the share of the housing stock that is detached single family homes is above that of other jurisdictions in the region. Programs aimed at addressing the lack of affordable housing types include H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-P, and H-W.

Cost Burden. A household is considered "cost-burdened" if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered "severely cost-burdened." In St. Helena, 21.1 percent of households spend 30-50 percent of their income on housing, while 16.6 percent of households are severely cost burden and use the majority of their income for housing. Lower-income, Latinx, and large households are disproportionally impacted by housing cost burdens. Programs including H-E, H-H, H-M, H-DD, H-EE, and H-FF work to reduce the costs of production or create more affordable housing opportunities by streamlining development approvals, incentivizing affordable housing types, generating funds, and reducing fees.

Special Housing Needs

People with Disabilities. In St. Helena, people with disabilities make up around 12 percent of the total population. Children (under 18) make up around 38 percent of the developmentally disabled population, while adults make up around 62 percent. Most of the developmentally disabled population reside with their parent, family, or guardian.

Senior Households. Senior households represent a higher percentage of the total households in St. Helena, at about 39 percent of households in the city. There is a large income disparity between seniors who rent housing and seniors who own their home. Most seniors who rent make 0 to 30 percent of AMI, and sixty-eight percent of senior households in this income category have housing cost burdens. By contrast, most seniors who own make greater than 100 percent of AMI; thirteen percent of senior households in this category experience housing cost burdens.

Farmworkers. The number of permanent farm workers in Napa County has increase from 2,916 in 2002 to 4,290 in 2017, while the number of seasonal farm workers decreased from 7,855 to 5,734. In St. Helena, the migrant worker student population totaled 20 during the 2019-20 school year, an increase of two students since the 2016-17 school year.

Persons Experiencing Homelessness. According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. Countywide, many of the persons experiencing homelessness report chronic substance abuse or mental illness.

Programs H-E, H-H, H-I, H-BB, H-FF, H-KK, H-LL, H-NN, H-OO respond to the city's special housing need by streamlining development review, incentivizing development, or providing directly funding for construction or rehabilitation of housing for those with special needs.

Non-governmental and Governmental Constraints

The non-governmental constraints that restrict building in St. Helena include the price of land, cost of construction, flooding, conservation easements and long-term vineyard leases, and a lack of rental accessory dwelling units. The governmental controls analyzed in this section were land use controls, codes and enforcements, on-and off-site improvements, fees and exactions, processing and permit procedures, and regulations affecting housing for persons with disabilities. The land use controls including zoning and current General Plan land use designations do not constrain residential development; however, some changes are necessary to streamline the design review process. Additionally, water and sewer access are constrained, and the City must prioritize service for proposed development that includes housing for lower-income households (Program H-C). Additionally, St. Helena must also amend the Zoning Code to allow for low barrier navigation centers, consistent with State law. See Program H-F for more information.

Sites Inventory and Zoning for a Variety of Housing Types

Sites Inventory. In combination with the City's pending projects and ADU development trends, the sites inventory provides adequate sites to meet the City's RHNA allocation and buffer requirements. St. Helena received a RHNA of 256 total units distributed across very low-income (104 units), low-income (59 units), moderate-income (26 units), and above moderate-income (67 units) categories. A total of 83 lower income housing units can be accommodated on City-owned properties and 332 total housing units can be accommodated on vacant and non-vacant sites. Multiple property owners of vacant and non-vacant sites are supportive of and interested in housing development on their properties. See Program H-A for more information.

Zoning for a Variety of Housing Types. St. Helena's Zoning Code allows for a variety of housing types in the City including multiple-family units, transitional and supportive housing, single-room occupancy units, manufactured and mobile homes, and accessory dwelling units. However, to comply with Section 65915 through 65918 of the California Government Code, St. Helena should amend the Zoning Code to reflect the new

maximum density bonus provisions that were adopted by the State in 2020. Program H-F commits the City to updating the Zoning Code for compliance with State law.

Affirmatively Furthering Fair Housing

Concentrations of Lower- and Moderate-Income Earning Populations. In St. Helena, residents with low and moderate household incomes are concentrated in the eastern portion of the city. The Housing Element ensures available land to accommodate all income levels on sites located across the city. Efforts to combat this impediment are outlined in Programs H-A, H-B, H-N, H-O, H-R, H-S, H-U, H-V, H-W, and H-AA.

Insufficient Housing Stock for Farmworkers. Farmworker housing is a critical need in Napa County and St. Helena due to the presence of year-round agricultural production. The migratory and sometimes seasonal nature of farm work poses housing challenges for the community and are seen as an impediment for St. Helena. Efforts to combat this impediment are outlined in Programs H-E, H-H, H-I, and H-KK.

Lack of Affordable Housing Types. There is a lack of diversity in housing types that restricts development of affordable housing in St. Helena. Local land use and zoning regulations perpetuate this deficiency by limiting the form of housing that can be developed on a particular site. Much of the residentially zoned parcels within the city are zoned low and medium density residential and are not compatible with the construction of duplexes, triplexes, quadplexes and multifamily housing developments. The City is upzoning a number of parcels as a part of the Housing Element Update to allow higher density residential development. Efforts to further combat this impediment are outlined in Programs H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-N, H-P, H-R, H-S, H-V, H-W, H-AA, H-DD, H-EE, H-FF, H-GG, H-LL, and H-NN.

Goals, Policies, and Implementation Programs

Goal 1 A Diversity of Housing to Meet Local Needs

To facilitate development of a variety of housing types to meet the full range of housing needs throughout our community, with particular emphasis on housing for our local workforce, people with special housing needs, and people with extremely low, very low, low, and moderate incomes.

Policies

HE 1.1 Maintain a sufficient supply of land zoned for residential development to meet the identified housing need at all income levels. [Existing Policy HE 1.1, modified]

HE 1.2 Work with property owners and developers to facilitate development of new affordable housing throughout the community. [Existing Policy HE 1.2, modified]

HE 1.3 Encourage the development of affordable housing and remove non-governmental development constraints, as feasible. [Existing Policy HE 1.3, modified]

HE 1.4 Remove governmental constraints to housing. [New Policy]

HE 1.5 Address workforce housing needs by supporting in-fill and mixed-use development near downtown. [Existing Policy HE 1.4, modified]

HE 1.6 Encourage innovative housing types and designs. [Existing Policy HE 1.5]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-A Available Sites Inventory The City will prepare a sites inventory and suitability analysis that identifies suitable sites for housing development that allows targeted income housing developers to have a clear idea of what sites are suitable for meeting the Regional Housing Needs of the City. To accommodate the remaining lower-income RHNA of 156 units, the City of St. Helena will identify and rezone a minimum of 14 acres to the HDR zoning district, allowing exclusively residential uses and a minimum of 20 units per acre to a maximum of 28 units per acre by January 31, 2026. Rezoned sites will permit owner-occupied and rental multifamily uses by right pursuant to Government Code section 65583.2(h) and (i) for developments in which 20 percent or more of the units are affordable to lower income households and will be selected from sites 2, 3, 5, 8, and 10 in the parcel listing (Table 58). As reflected in *11: Housing Resources*, each site has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.~~Sites included in the inventory with a proposed zoning change shall be rezoned as proposed in 11: Housing Resources, incompliance with Govt. Code Section 65583.2(h) and (i). The City shall complete this rezoning effort within three years of the adoption deadline. The City will monitor progress toward program objectives and implement additional measures as necessary if the metrics are not being met.~~ The City will maintain an inventory of parcels meeting the requirements of Government Code Section 65583.2(c); that is, vacant sites identified in two or more consecutive	Identify housing sites suitable to accommodate: · Very low income: 104 units · Low income: 59 units · Moderate income 26 units · Above Moderate income: 67 units · Total: 256 units Provide sites that proactively work to overcome concentrations of lower- and moderate-income earning populations; with the goal of facilitating the development of 82 lower income units in the western portion of the city Provide sites appropriate for affordable housing types Commit to streamlining review of Hunter Subdivision project to completion with the goal of Building Permit applications in 2025. Evaluate timeline at the end of 2025 and if determined necessary, identify additional housing sites to meet the City's 6th Cycle RHNA requirements.	HE1.1	Planning Department	General Fund (staff time)	Within three years of the adoption deadline Publicly-available inventory: by 2024 **Hunter Subdivision** Building permits: 2025 Evaluate timeline by end of 2025

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
housing elements or nonvacant sites identified in a prior housing element, that are identified to accommodate housing for lower income households. This inventory shall be made available online. All previously used lower-income sites currently meet the lower-income density threshold (20 du/ac), however the City shall update the zoning code to allow by-right approval for housing developments that include 20 percent or more of its units affordable to lower income households (Gov. Code, § 65583.2, subd. (c).) on these sites. The City will consider AFFH in the identification of sites within the inventory and will work to provide sites that proactively work to overcome concentrations of lower- and moderate-income earning populations on the eastern portion of the city. [New Program]					
H-B Growth Management System The City will remove the Growth Management System (GMS) from the Zoning Code. Due to Senate Bill 330, the GMS cannot currently be enforced. The City shall remove the GMS from the zoning code through the current ~~c~~Comprehensive ~~z~~Zoning ~~c~~Code U~~u~~pdate currently underway. The GMS has been removed from the Draft Zoning Code, which is scheduled for adoption in summer/fall 2023. [Existing Program HE1.A, modified]	During the planning period, encourage the development of: · 4 very low-income units · 4 low-income units · 10 moderate-income units · 10 above moderate-income units Address the city's lack of affordable housing by removing governmental constraints	HE1.1 HE1.4	Planning Department	General Fund (staff time)	~~Ongoing~~ Implementation: immediate Revised Zoning Code: by 2025 (prior to sunset of SB 330)

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-C Water and Sewer Access The City will continue to give priority access to water and sewer infrastructure to projects that include affordable housing units. As required by State law, the City shall deliver the adopted housing element to water and sewer providers, including a cover memo describing the City's housing element, as well as the City's housing needs and regional housing need. [Existing Program HE1.C, modified]	~~During the planning period, encourage the development of:~~ ~~· 8 very low-income units~~ ~~· 8 low-income units~~ Establish specific procedures providing priority access to water and sewer infrastructure to developments with units affordable to lower-income households, as required by State law. ~~-~~ Provide water and sewer providers with the adopted housing element, including cover memo, as required by State law.	HE1.3 HE1.4	Planning and Public Works Departments	General Fund (staff time) Water and Sewer Enterprise Funds	~~Ongoing~~Establish procedure: by 2025 Provide providers with housing element: immediately upon adoption
H-D Road and Utility Improvement Coordination The City will continue to work with private property owners/developers to plan for road and utility improvements necessary to support housing on sites identified for lower-income housing, in the event these sites are developed. Funding for off-site improvements will be provided through development impact fees. The City shall annually evaluate funding levels and potential opportunities for use of the funds in line with this program. [Existing Program HE1.E]	During the planning period, encourage the development of: · 4 very low-income units · 4 low-income units · 4 units identified for seniors, farmworkers, or persons with disabilities	HE1.2 HE1.3	Planning Department	General Fund (staff time)	~~Ongoing~~Throughout the planning period, as needed Evaluate funding levels and opportunities: annually

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-E Streamline Special Needs Housing The City will apply streamlined ministerial review to housing developments that meet the needs of lower income households and special needs groups, such as seniors, people with disabilities, farmworkers, and homeless families and individuals. The City shall evaluate the streamlined review policy every two years to identify constraints on special needs housing production. The City shall provide priority processing to development applications that work to provide housing for residents with special housing needs. The City shall also support these applicants by providing technical support through the entitlement process and shall provide additional density bonuses and modifications to development standards (beyond State law) to special needs housing projects proposed on the western half of the city, where fair housing issues are less concentrated. [Existing Program HE1.F, modified]	During the planning period, encourage the development of: · 15 very low-income units · 8 low-income units · 6 units identified for seniors, farmworkers, or persons with disabilities Address the lack of affordable housing types in the city Address the lack of farmworker housing in the city Provide incentives that work to overcome concentrations of affordable housing on the eastern portion of the city.	HE1.4	Planning Department	General Fund (staff time)	Evaluate constraints: every two years~~Ongoing~~ Apply streamlined review: throughout planning period

H-F Municipal Code Updates The City will review and amend the Municipal Code, to comply with State law to: · Allow low barrier navigation centers for compliance with Government Code Sections 65660 and 65668 (AB 101). · ~~Define and a~~Allow for residential care ~~homes~~ facilities of six or fewer in zones allowing single-family uses, subject only to the requirements of single-family uses, in compliance with State law (HSC § 1568.0831); ~~California Government Code Section 65583~~and permit facilities with seven or more beds in ~~zones allowing~~all ~~multifamily~~residential ~~uses~~zones , ~~with objectivity~~ and certainty similar to other residential uses of the same form~~subject only to the requirements multifamily uses~~. · Update Chapter 17.144 (Affordable Housing) to reflect new maximum density bonus tier framework in compliance with California Government Code Sections 65915 through 65918. · Amend the Zoning Ordinance to define "family" as one or more persons living together as a single housekeeping unit in a dwelling unit. The definition should not distinguish between related and unrelated individuals and should not impose a numerical limit on the number of persons that constitute a family. · Update parking requirements related to emergency shelters for compliance with Government Code section 65583, subdivision (a)(4)(A) to require only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones.	Amend the Municipal Code for compliance with State law by ~~2026~~2025 Address the lack of affordable housing types in the city by removing governmental constraints to housing production Amend the inclusionary housing ordinance to update in-lieu fees to reflect real costs of developing affordable housing, provide incentives to construct workforce housing, and provide more on-site housing requirements for affordable housing development	HE1.4 HE6.1	Planning Department	General Fund (staff time)	By ~~2026~~2025

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
· Allow accessory dwelling units in all zones allowing residential uses, including the AP Zone, mixed-use and commercial zones. · Update Chapter 17.116.030 (Accessory Dwelling Units) for compliance with Government Code section 65852.2. · Update Chapter 173.200 (Reasonable Accommodation) to remove discretionary finding requirements that constrain development, including finding #5, which considers impacts to surrounding properties or uses. · Incorporate objective design standards for single-family, small lot, and multifamily developments that provide a ministerial design review process · Provide a by-right streamlined review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330. · Allow permanent and supportive housing pursuant to Government Code section 65661 without discretionary action. [Existing Program HE1.K, expanded]					

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-G Safety Element Update The City will, in accordance with SB 1035, update the General Plan Safety Element to include any new information on fire and flood hazards, as well as climate adaptation and resiliency strategies. In accordance with SB 99 and AB 747, the updated Safety Element will also include evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. [New Program]	Update the Safety Element by 2024	HE1.4	Planning Department	General Fund (staff time)	2024

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-H Workforce and Farmworker Housing The City will ~~explore~~identify~~,~~ and adopt, as appropriate, incentives for development to address the housing needs of "workforce" and farmworker households, with priority given to projects in lower-density higher income on the western half of the city.~~that overcome geographic concentrations of lower- and moderate-income earners~~. As part of this effort, the City will explore the feasibility of adding an above moderate-income workforce housing component to the Inclusionary Housing Ordinance requirements and amend the Ordinance as appropriate. [Existing Program HE1.H, modified]	~~Explore~~ Identify and adopt, as appropriate, development incentives such as higher density and height allowances, a streamlined design review process, and financial incentives, including fee reductions and waivers and contributions from the City's Housing Trust Fund, to encourage the development of workforce and farmworker housing, including additional incentives for those projects in low-density high-income areas Encourage the development of: · 10 units identified for workforce or farmworker housing during the planning period · 2 workforce housing developments in low-density high-income areas Address the lack of affordable housing types in the city Address the lack of farmworker housing in the city	HE1.4	Planning Department	General Fund (staff time)	~~Ongoing~~By 2025

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-I ADU Workforce Housing Incentive Program The City will implement a program to provide financial assistance for the development of accessory dwelling units in exchange for affordability restrictions that will provide workforce housing. Potential funding sources include, but are not limited to, Housing Trust Funds and Transient Occupancy Tax revenues. To encourage housing mobility and housing choice, the City shall provide marketing of the ADU Workforce Housing Program (and financial incentives) targeted at low-density areas of the city, with particular emphasis on the western half of the city where fair housing issues and existing affordable units are less concentrated. As part of this effort, the City shall hold up to two multi-lingual engagement events. [Existing Program HE1.I]	Establish an ADU Workforce Housing incentive program Market financial incentives to residents in LR and MR zones, particularly on the western portion of the City ~~E~~in combination with Programs H-Q and H-R, encourage the development of: · 80 accessory dwelling units, targeting 60 on the western portion of the city · 20 ADUs with affordability restrictions during the planning period, including ~~10~~ 15 within the western portion of the city~~, consistent with AFFH~~. · 15 ADUs near downtown Address the lack of affordable housing types in the city Address the lack of farmworker housing in the city	HE1.4	Planning Department	Housing Trust Funds Transient Occupancy Tax State and Federal workforce housing programs State and Federal grant funding	~~Ongoing~~ Establish program: by 2025~~8~~ Provide marketing and engagement events: 2025

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-J Non-traditional Housing Types The City will encourage development of co-housing, ecohousing, a 'green' manufactured home, and other forms of housing, and will ensure these housing types are considered in the city's streamlined approval process. The City will evaluate and update, as appropriate, current zoning practices to remove constraints to non-traditional housing types. The City will also amend the zoning code to provide objective standards for residential development that work for a variety of housing types, including non-traditional housing types. [Existing Program HE1.J, modified]	Evaluate current zoning practices to identify constraints to non-traditional housing types by 2025. Amend the zoning code to remove constraints and provide objective design standards by 2026. Encourage the development of: · 10 missing middle units on infill parcels or in areas within the western portion of the city, consistent with AFFH. · 4 non-traditional housing units during the planning period. Address the lack of affordable housing types in the city	HE1.5	Planning Department	General Fund (staff time)	~~Ongoing~~Encourage non-traditional housing types: ~~T~~throughout the planning period Evaluate zoning: by 2025 Amend zoning: by 2026
H-K Non-Vacant Sites The City shall adopt a policy(ies) to incentivize new or more intense development on sites included in the sites inventory as lower-income capacity, including sites 7, 9, and 11 (for sites 1 and 2, see Program H-L. Incentives may include, but are not limited to, reducing development standards, providing flexible parking standards, priority processing, or deferred fees. The City shall engage property owners within six months of adoption to discuss constraints and potential incentives.	Adopt policies that Incentivize the development of new or more intense uses on non-vacant sites identified as lower-income capacity to meet the RHNA. Encourage the construction of 42 new lower-income units on sites 7, 9, and 11, including 32 on the western portion of the city	HE 1.1 HE 1.2 HE 1.3	Planning Department	General Fund (staff time)	Engage property owners: within six months of adoption Adopt incentives: 2024

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-L City-~~O~~owned Sites The City will maintain compliance with the Surplus Land Act throughout the 2023-2031 Housing Element planning period. The City will assess the appropriateness of and consider implementing the following: outreach opportunities with housing developers, requests for proposals, development incentives, fee waivers, priority processing, and financial assistance (when available) to facilitate and incentivize developers to develop housing units on City-owned sites. The City plans to make 3 properties available through the Surplus Land Act process over the next two years for a potential development of 57 lower-income units. The City shall conduct studies of City owned sites included in the sites inventor to determine the most efficient use for housing. These include sites 1, 2, and 3. Through this process, the City shall engage local affordable housing developers to determine site constraints and potential policies to ~~meaningful~~meaningfully incentivize affordable housing development on these sites. The City shall proceed with the findings for housing development by 2026. The City anticipates two-and-a-half years to enter into an Exclusive Negotiation Agreement (Fall 2026), and one-and-a-half additional years for land use entitlements and development agreements (Spring 2028). City owned sites included in the inventory (sites 1-3) shall be rezoned incompliance with Govt. Code Section 65583.2(h) and (i) within three years of the adoption deadline (by January 31, 2026.	Engage local affordable housing developers immediately Study city owned sites to determine the most efficient use for affordable housing development within the first year following adoption By 2026, implement an action plan to sell, or release an RFP to develop, City owned land for affordable housing development based on the findings of the conducted studies. Through the action plan, establish and implement a variety of incentives to facilitation housing development. Maintain compliance with the Surplus Land Act throughout the 2023-2031 Housing Element Planning Period Make properties available through the Surplus Land Act process Target Exclusive Negotiating Agreement by Fall 2026 Target land use entitlements issuance by Spring 2028 Encourage the development of 57 lower-income units in the northeast quadrant of the city near transit opportunities, and where fair housing issues are less concentrated, and walkability and environmental scores are more positive	HE 1.1 HE 1.2 HE 1.3	Planning Department	General Fund (staff time)	Engage developers: immediately upon adoption Conduct studies: by July 2025 Implement action plan and incentives for City owned sites: by 2026 Rezone sites: by Jan. 31, 2026

Goal 2 High-Quality Neighborhoods with a Balance of Housing Types

To plan for a balance of housing types throughout the community. [Existing Goal, modified]

Policies

HE 2.1 Encourage higher density development. [Existing Policy HE 2.1, modified]

HE 2.2 Promote higher density development opportunities in low density, high resource areas. [New Policy]

HE 2.3 Promote mixed-use developments. [Existing Policy HE 2.3]

HE 2.4 Promote accessory dwelling unit (ADU) production. [Existing Policy HE 2.4, modified]

HE 2.5 Allow duplexes to the extent required by State law in all single-family residential zones consistent with SB 9. [New Policy]

HE 2.6 Promote the development of missing middle housing with an area median income target of 120 percent (moderate income). [New Policy]

HE 2.7 Promote a balance of housing types and unit sizes throughout the community. [Existing Policy HE 2.6, modified]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
~~H-K~~H-M**Incentives for Lower-Cost Housing Types** The City will continue to provide incentives for higher density housing and will explore possible incentives for building attached market rate housing units for rent and for sale. Incentives ~~to~~ may include, but are not restricted to, fast tracking development applications, deferred development fees, reduced parking and/or other city standards, and density bonuses. [Existing Program HE2.A]	Encourage the development of 20 lower income units during the planning period Study potential incentives for attached market rate units by 2027 Address the lack of affordable housing types in the city	HE2.1	Planning Department	General Fund (staff time)	~~Ongoing~~Throughout the planning period Attached market-rate housing study by 2027

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
~~H-L~~H-N **Zoning to Facilitate Higher Density Housing** The City will modify the Zoning Code to facilitate higher density housing, consistent with the 2040 General Plan Update and Housing Sites Analysis, and discourage the construction of oversize homes, particularly within the western portion of the city, consistent with AFFH. The City shall revise maximum lot coverage to 55 percent and maximum height to 42 feet in the HR zone and on key housing sites in the MR zone (see Section 17.40.020(N)). The City shall revise the zoning code to allow minor modifications of up to 10 percent increase in lot coverage standards and 5 percent (or two feet, whichever is greater) in maximum height. Minor modifications shall be approved by the Community Development Director without a public hearing. The City shall reduce parking requirements for multifamily uses with three or more units to require one parking space for studio or one-bedroom units. The City shall revise Section 17.40.020 to allow duplexes and triplexes and densities of 5.1 to 16 dwelling units per acres in the MR zone without a conditional use permit. [Existing Program HE2.B, modified]	Modify the development standards within the Zoning Ordinance to encourage higher density developments by 2026 Develop land use patterns that work to overcome geographic concentrations of lower-and moderate-income earning populations Address the lack of affordable housing types in the city	HE2.1 HE2.2	Planning Department	General Fund (staff time)	By 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
~~H-M~~H-O **Exemptions from Minimum Density** The City will amend zoning regulations to prohibit exemptions from minimum density requirements. [Existing Program HE2.C]	Prohibit exemptions from minimum density requirements Encourage development patterns that work to overcome geographic concentrations of lower-and moderate-income earning populations	HE2.1 HE2.2	Planning Department	General Fund (staff time)	By 2026
~~H-N~~H-P **Mixed-use Development Types** The City will amend the Zoning Code to create and implement the development criteria set for mixed use development within St Helena. [Existing Program HE2.G, modified]	Amend the Zoning Ordinance to create and implement the development criteria set for mixed use development by 2026 Encourage the development of 20 housing units in mixed-use projects during the planning period Explore and adopt, as appropriate, development incentives such as higher density and height allowances, a streamlined design review process, and financial incentives, including fee reductions and waivers and contributions from the City's Housing Trust Fund, to encourage employers to provide on-site employee housing Address the lack of affordable housing types in the city	HE2.3	Planning Department	General Fund (staff time)	By 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
~~H-Q~~H-Q **Direct Assistance for ADU Development** The City will continue to provide financial incentives, such as fee waivers and pre-approved plans, for ADU development. ~~.~~ The City will also explore additional options such as covering the cost of a feasibility consult or the license fee for pre-approved plans, or capping total fees. The City will work with Napa Sonoma ADU to provide public information regarding ADUs on the City website, including a guide for homeowners explaining the benefits and procedures for adding an ADU and links to resources, including the ADU Feasibility Calculator, Home Match Program, and Standard ADU Plans Program. [Existing Program HE2.J, modified]	Provide direct financial incentives to 10 ADU projects in the planning period Explore additional financial incentives by 2025 Provide informational materials and technical assistance regarding the development of ADUs to 30 households ~~primarily~~ in ~~high resource areas~~low-density western portions of the city within the planning period Address the lack of affordable housing types in the city	HE2.4	Planning Department	Housing Trust Fund General Fund (staff time)	~~Ongoing~~Explore additional incentives: by 2025 Provide informational materials: by 2025 Engage Napa Sonoma ADU: annually

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
~~H-P~~H-R **Place-based ADU Strategy** The City will target specific areas for ADU incentives and will create incentives to construct ADUs in the low- and medium-density areas near downtown as well as in ~~areas with lower concentrations of lower- and moderate-income earning households~~low-density higher-income areas of the city, particularly on the western portion of the city. Potential incentives include, but are not restricted to, fast tracking development applications, deferred development fees, and reduced parking and/or other city standards. [Existing Program HE2.K, modified]	Establish place-based ADU strategies and incentives by 2026 In combination with Program H-I and H-Q, ~~Encourage~~ the development of: · 80 accessory dwelling units, targeting 60 on the western portion of the city · 20 ADUs with affordability restrictions during the planning period, including 15 within the western portion of the city. · 15 ADUs near downtown ~~· 5 ADUs in high resource areas~~ Proactively work to overcome concentrations of lower- and moderate-income earning households Proactively work to relieve displacement pressures on multifamily zones	HE2.2 HE2.4	Planning Department	General Fund (staff time)	~~Ongoing~~ Establish program: by 2026
~~H-Q~~H-S **Affordability Requirements for ADU Incentives** The City will link financial incentives and development standard variances to affordability requirements for ADUs. Whenever the City assists in the development of an ADU through financial incentives or by granting a variance, the City will require that either the main house or the ADU is used as a rental unit affordable to lower- and moderate-income households for a minimum of five years through an affordable housing regulatory agreement with the City. [Existing Program HE2.M, modified]	Update the zoning ordinance to include affordability requirements for ADU projects receiving financial or regulatory incentives by 2026 Incentivize the development of: · 12 very low-income units · 14 low-income units · 6 moderate income units	HE2.4	Planning Department	Housing Trust Fund General Fund (staff time)	~~Ongoing~~By 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
~~H-R~~H-T **Illegal Housing Units** The City will continue to respond to complaints regarding illegal units. Additionally, the City will work with the property owners to help bring illegal units up to code and to abate the use of non-habitable buildings as living units. [Existing Program HE2.N]	Respond to complaints regarding illegal units Provide technical and financial support to assist five lower income units to be brought up to code within the planning period	HE2.4	Planning and Building Department	General Fund (staff time) Housing Trust Fund	~~Ongoing~~Throughout the planning period
~~H-S~~H-U **Place-based Density Increases** The City will revise the Zoning Code to allow urban lot splits, duplexes, and other two-unit projects in single-family residential zones in accordance with Senate Bill 9. The City will also ~~explore~~ adopt incentives, which may include fee reductions, deferrals, or waivers; flexible development standards; priority processing, or ~~to allow~~allowing triplexes on single-family lots if one unit ensures affordability to lower- or moderate-income renters by deed restriction. The City shall publicize informational materials outlining policies and incentives on the City website and through mailing lists and social media outlets. [New Program]	Adopt incentives for small multi-unit SB 9 projects in single-family zones by 2024 Publicize informational materials by 2024; update within 30-days of changes Revise the Zoning Code by 2026 Proactively work to overcome concentrations of lower- and moderate-income populations Proactively work to relieve displacement pressures in multifamily zones	HE2.2 HE2.5	Planning Department	General Fund (staff time)	~~Ongoing~~ Allow duplexes: by 2024~~6~~ ~~Explore~~ Adopt incentives: ~~2028~~by 2024
~~H-T~~H-V **Multi-unit Development in Low-density Higher-income ~~High Resource~~ Areas** The City will encourage the development of affordable housing on in-fill parcels and in ~~high-resource areas~~low-density areas in the western portion of the city, in line with the City's commitment to affirmatively further fair housing. As part of this effort, the City will explore and adopt,	Post an inventory of potential housing sites on the City's web site immediately following adoption of the Housing Element Explore revisions to development standards to encourage multi-unit infill development (as part of comprehensive zoning code update) by 2026	HE2.2, HE2.6	Planning Department City Council	General Fund (staff time)	~~Ongoing~~ Housing sites posted to website in 2023

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
revisions to development standard to encourage multi-unit developments within existing neighborhoods throughout the city. The City will also explore additional incentives to encourage affordable multi-unit projects in high resource areas, including, but not limited to priority permit processing, reduced or waived development fees, reduced parking and/or other city standards, and an additional density bonus. [Existing Program HE2.P, modified]	~~Support~~ Facilitate the development of three multi-unit ~~affordable~~ lower-income housing projects on City-owned properties in the planning period ~~Support~~ Facilitate the development of five lower- or moderate-income infill projects in the planning period Address disproportionate housing needs in infill areas, including overpayment, overcrowding, and displacement risk by increasing housing opportunities; ~~support~~ facilitate seven SB9 lot splits to increase housing opportunities in single family neighborhoods in the planning period, with a goal of facilitating development of five lower-income units on these properties Explore additional incentives for affordable multi-unit projects in ~~high resource areas~~low-density areas on the western portion of the city by 202~~68~~ Encourage the development of eight lower- and eight moderate income multi-family units in high resource areas or on infill parcels within the planning period Proactively work to overcome concentrations of lower- and moderate-income ~~populations~~households on the eastern portion of the city Address the lack of affordable housing types in the city				Standards update: 2026 Explore potential addition incentives: by 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timing
~~H-U~~H-W **Missing Middle Housing** The City will review and amend the zoning code and applicable development standards to encourage and promote a mix of dwelling types and sizes, specifically missing middle-density housing types (e.g., triplexes, courtyard buildings, townhomes, live/work) to create a diversity of housing types and densities and increase the availability of affordable housing to reduce displacement risk for residents overpaying for housing. Specifically, the City will add a new mixed use zone, consistent with the 2040 General Plan Update, and will evaluate and revise minimum lot sizes and parking ratios, particularly in high resource, low-density areas. [New Program]	Revise zoning standards to encourage missing middle housing by 2026 To enhance housing mobility and housing choice, encourage the development of a variety of missing middle housing types in infill projects; support the development of three missing middle housing developments between three and 20 units To enhance housing mobility, encourage the development of 15 lower- and 15 moderate-income units in low-density high-income ~~resource~~ areas	HE2.2 HE2.6 HE2.7	Planning Department	General Fund (staff time)	~~Ongoing~~Revise Zoning Code: by 2026

Goal 3 Conservation of Existing Housing

Improve and conserve existing housing, with particular attention to the rehabilitation and retention of existing affordable units. [Existing Goal]

Policies

HE 3.1 Protect the existing stock of affordable and market rate housing. [Existing Policy HE 3.1]

HE 3.2 Support the conservation of existing housing units for those with special housing needs, including seniors and others with special housing needs. [New Policy]

HE 3.3 Monitor housing conditions. [Existing Policy HE 3.2]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-V~~H-X **Condominium Conversion** The City will continue to restrict the conversion of rental units to condominiums. Current policy allows conversion to condominiums under certain circumstances when the vacancy rate is high. Because the presence of second homes within the community results in an inflated vacancy rate, the City will update the current policy to eliminate the linkage to vacancy rates. To work to reduce displacement pressures in lower-resourced areas, the revised policy will completely restrict all conversions in the eastern portion of the city. [Existing Program HE3.A]	Preserve existing affordable housing stock Update current policy to remove linkage to vacancy rates Completely restrict condominium conversion in the eastern portion of the City Address the lack of affordable housing types in the city	HE3.1	Planning Department	General Fund (staff time)	~~Ongoing~~ Update policy by 2026~~.~~
~~H-W~~H-Y**Affordable Housing Impact Fee** The City will continue to charge an affordable housing impact fee whenever housing units are converted to other uses. The City will exempt conversion projects that create affordable for-sale housing from this impact fee. Collected affordable housing impact fees will be used for the preservation and development of housing opportunities affordable to lower- and moderate-income households, and will give priority to projects in the eastern portion of the city where fair housing issues, and displacement risks exist in greater concentrations. [Existing Program HE3.B]	Evaluate the impact fee against the real cost of affordable housing development every two years~~.~~ Discourage the conversion of residential uses to nonresidential uses Address the lack of affordable housing types in the city by working to retain existing units or generating funding for future affordable units	HE3.1	Planning Department	General Fund (staff time)	~~Ongoing~~Throughout the planning period Evaluate impact fee: every two years

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-X~~H-Z **At-Risk Assisted Affordable Housing Units** Although there are no assisted affordable units currently at-risk of conversion to market rate in St. Helena, the City with the assistance of the Napa Housing Authority, shall continue to monitor assisted properties. If units are identified as at-risk of conversion, the City will work with the property owners and/or other parties to ensure that they are conserved as affordable housing. The City will also engage with owners of deed-restricted moderate--income for-sale units (Marietta Townhomes and Voorhees Circle) at-risk of conversion to market rate within the planning period. The City will work with owners to find solutions to extend affordability requirements. [Existing Program HE3.C, modified]	Unless consistent with the terms of an affordable housing agreement with the City of St. Helena, prohibit the conversion of assisted affordable units to market rate Retain all assisted affordable units during the planning period Immediately (by 2024) engage homeowners with expiring deed-restrictions	HE3.1	Planning Department	General Fund (staff time)	~~Ongoing~~Engage at-risk property owners: immediately, and twice annually thereafter
~~H-Y~~H-AA **Vacation Rentals** The City will continue to limit the conversion of market rate housing to vacation rentals and will abate the use of illegal vacation rentals, including time shares and fractional interests. To preserve existing affordable housing and reduce displacement pressures, the City shall adopt a policy restricting conversion of units occupied by lower- and moderate- income households in the southeast quadrant of the city to vacation rentals. [Existing Program HE3.D]	Maintain the current stock of market rate housing Restrict the conversion of housing units to vacation rentals occupied by lower- and moderate-income households in the southeast quadrant of the city where fair housing issues exist in greater concentrations Discourage the conversion of market rate housing units to vacation rentals, particularly in ~~high resource areas~~low-density higher-resourced areas~~, consistent with AFFH~~ Address the lack of affordable housing types in the city	HE3.1	Planning Department	General Fund (staff time)	~~Ongoing~~Throughout the planning period

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-Z~~H-BB **Special Housing Needs Rehabilitation Program** The City shall actively pursue federal and State funding sources, including CDBG, Affordable Housing and Sustainable Communities (AHSC), Permanent Local Housing Allocation (PLHA), CalHome funds, HOME, and other grant sources to establish a program to support the rehabilitation needs of seniors and others with special housing needs, particularly on the eastern portion of the city where affordable units are generally concentrated and displacement risks are increased. [Source: New Program]	Pursue funding to assist with rehabilitation costs for lower income households and seniors During the Planning Period, encourage the ~~conservation~~ rehabilitation/conservation of: · 20 units accessible to seniors · 10 units accessible to persons with a disability	HE3.2	Planning and Finance Departments	CDBG, AHSC, PLHA, CalHome, HOME	Annually and as notices of funding availability are released.
~~H-AA~~H-CC **Annual Progress Report** The City will continue to review housing needs, conditions, achievements and challenges as part of the City's regular General Plan review and Annual Housing Element Progress Report, as required by State law. [Existing Program HE3.E]	Submit the Annual Progress Report to the State Department of Housing and Community Development and the Governor's Office of Planning and Research by April 1st of each year Provide transparency on housing-related actions and programs	HE3.3 HE4.6	Planning Department	General Fund (staff time)	Annually

Goal 4 Assistance to Support Affordable Housing

To provide technical and financial resources to support development of affordable housing in our community, especially housing that meets the needs of our local workforce, people with special housing needs, and people with moderate, low, and very low incomes.

Policies

HE 4.1 Develop permanent local sources of funding to support affordable housing. [Existing Policy HE 4.1]

HE 4.2 Aggressively pursue and 'leverage' State and Federal housing funds. [Existing Policy HE 4.2]

HE 4.3 Address farmworker housing needs. [Existing Policy HE 4.3]

HE 4.4 Support housing that meets special needs, including senior citizens and persons with disabilities. [Existing Policy HE 4.4]

HE 4.5 Explore methods to increase Housing Trust Fund money. [Existing Policy HE 4.5]

HE 4.6 Provide transparency regarding information on housing-related actions, fees, and programs. [New Policy]

HE 4.7 Provide local preference in the procurement process when municipal funds may be used for housing. [New Policy]

HE 4.8 Give preference to projects providing workforce housing affordable to up to 140 percent of the AMI. [New Policy].

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-BB~~H-DD **Revenue Generation for Affordable Housing** The City will continue to generate revenues for affordable housing through the Affordable Housing Trust Fund and Transient Occupancy Tax and will continue to use the revenue to support the development or rehabilitation of affordable housing. [Existing Program HE4.B, modified]	Support the development or preservation of five extremely low or very low-income units Address the lack of affordable housing types in the city	HE4.1 HE4.5	Planning Department	General Fund (staff time) Housing Trust Fund Transient Occupancy Tax	~~Ongoing~~Throughout the planning period
~~H-CC~~H-EE **Reduced Fees for Affordable Housing** The City will continue to reduce, defer, or waive fees for affordable housing developments and will explore and adopt as appropriate higher incentives for affordable housing developments with units affordable to extremely low- and very low-income households. [Existing Program HE4.C, modified]	Reduce fees for 30 extremely-low or very low-income units Address the lack of affordable housing types in the city	HE4.1	Planning Department	General Fund Housing Trust Fund	~~Ongoing~~Evaluate and adopt, as appropriate, potential additional incentives: by 2026
~~H-DD~~H-FF **Extremely Low-Income Units** The City will continue to prioritize the use of the Affordable Housing Trust Fund in support of the development and preservation of regulated affordable units for extremely low-income households. The City will immediately engage with developers interested in creating or preserving housing for extremely low-income households to discuss available incentives and any financial or technical assistance the City can provide. [Existing Program HE4.D]	Support the development or preservation of six units for extremely low-income households Address the lack of affordable housing types in the city	HE4.1	Planning Department	Housing Trust Fund	~~Ongoing~~Engage prospective developers: immediately upon identification

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-EE~~H-GG **Affordable Homeownership** The City will continue to pursue mortgage revenue bonds and/or mortgage credit certificates to promote affordable homeownership opportunities for moderate- and lower-income households. The City shall evaluate these opportunities and engage with potential partnering jurisdictions or institutions annually. The City shall also engage with local mortgage brokers and real estate agents to identify existing programs providing downpayment loans or direct assistance to first-time homebuyers and shall make this information available on the city's website, as well as through up to two multi-lingual engagement events targeting the eastern portion of the city. [Existing Program HE4.E]	Research and identify potential funding sources in 2024 and annually thereafter with the goal of establishing a homeownership assistance program in 2026 Collect and publicize information on existing programs available to first-time and lower-income prospective homeowners through State, Federal, or non-profit agencies within 18 months of adoption of the Housing Element; hold up to two multi-lingual events on the eastern portion of the City by 2026 Assist three lower- or moderate-income households transition from rental housing to homeownership Address the lack of affordable housing types in the city	HE4.2	Planning and Finance Departments	General Fund (staff time)	~~Ongoing~~Annually Identify funding for City led program: in 2024 and annually thereafter Collect and publicize information on existing programs: within 18 months of adoption Targeted engagement events: by 2026
~~H-FF~~H-HH **Additional Funding** The City will continue to pursue additional funding for affordable housing and will explore new options for affordable housing funding. [Existing Program HE4.F, modified]	Explore new funding sources ~~bi-annually~~ every two years to support housing for lower- and moderate-income households, seniors, and residents with special housing needs Address the lack of affordable housing types in the city	HE4.1	Planning and Finance Departments	General Fund (staff time)	~~Ongoing~~ Explore new opportunities: ~~biannually~~Every two years

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-GG~~H-II **Section 8 Subsidies** The City will continue to partner with the City of Napa Housing Authority to provide rental assistance to low-, very low-, and extremely low-income households through Housing Choice Voucher (Section 8) rent subsidy certificates. [Existing Program HE4.G]	Support the City of Napa Housing Authority rental assistance efforts; engage the Housing Authority annually to explore ~~opportunities~~opportunities. Provide informational materials regarding Housing Choice Voucher subsidies on the City website by 2024 Address the lack of affordable housing types in the city	HE4.2	Planning Department	General Fund (staff time)	~~Ongoing~~Engage the Housing Authority: annually Informational materials: by 2024
~~H-HH~~H-JJ **Housing Coordinator** While the City currently contracts with the City of Napa for Housing Authority services, the City will explore the possibility of establishing a full-time, shared Housing Coordinator for the up-valley communities to: promote development of new affordable housing in low-density higher-resourced areas, assist lower-income households obtain housing in higher resourced areas, and preserve existing affordable units. The City shall ~~and~~ enter into a cost-sharing agreement, if feasible. The position would serve all of the up-valley communities, including Napa County. [Existing Program HE4.H]	Meet with potential partner jurisdictions a minimum of two times during the planning period to explore options Identify and procure funds to establish a shared Housing Coordinator for the up-valley communities to promote affordable development in low-density higher resourced areas, assist lower-income households obtain housing in higher-resourced areas, and preserve existing lower- and moderate-income units	HE4.2	City Manager Planning Department	General Fund (staff time) CDBG, AHSC, PLHA), CalHome, HOME, and other grant sources	~~Ongoing~~Engage potential partners: by 2026 Identify potential funding: by 2026

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-II~~H-KK **Farmworker Housing Needs** The City will contribute staff time and City resources, as appropriate, to countywide farmworker housing efforts that may occur during the Housing Element planning period. The City will reach out to affordable housing developers to support regional and City efforts to develop farmworker housing, including assisting with financing or applications, incentives and concessions, expedited review or other strategies to encourage the development of housing for farmworkers. [Existing Program HE4.I]	Support local and regional efforts to develop farmworker housing Assist in the development of one farmworker housing project during the planning period Address the lack of farmworker housing in the city	HE4.3	Planning Department	General Fund (staff time) Housing Trust Fund	Outreach to affordable housing developers by 2024 and ~~biannually~~ every two years thereafter
~~H-JJ~~H-LL **Special Needs Housing Opportunities** The City will encourage new developments to provide a portion of units to meet the special housing needs of seniors and persons with disabilities, including developmental disabilities, throughout the city. The City will provide information on available incentives on the City website and shall immediately engage individuals or agencies interested in special needs production to discuss opportunities and constraints specific to the parcel(s) being considered. [Existing Program HE4.J]	During the Planning Period, encourage the development of: · 10 units accessible to seniors · 5 units accessible to persons with disabilities Address the lack of affordable housing types ~~in~~ throughout the city	HE4.4	Planning Department	General Fund (staff time)	~~Ongoing~~Information to website: by 2025 Engage potential developers: immediately upon identification

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-KK~~H-MM **Housing Information Transparency** The City will, in accordance with AB 1483 (2019), obtain, maintain, update, and make publicly available information related to zoning ordinances, development standards, fees, exactions, affordability requirements, and fair housing laws from the Department of Housing and Community Development, State Fair Employment, and Housing Commission's enforcement program, as well as programs and funding sources for homeowners at risk of foreclosure, the State Historic Building Code, and information on energy conservation opportunities. The City will, as appropriate, share this information on the City website and/or in hard copy form at City offices. Any changes to such information shall be made public within 30 days of changes. The City will provide these items in Spanish, as funding and staff time allows. [New Program]	Create and share a digital information database in compliance with AB 1483 by 2024 Updated information is made publicly available within 30 days of changes Provide information in Spanish, as funding allows	HE4.6	Planning Department	General Fund (staff time)	~~Ongoing~~Data base: By 2024 and annually thereafter Update information: within 30-days of any changes
~~H-LL~~H-NN **Funding for New Special Housing Needs** The City shall actively pursue federal and State funding sources, including CDBG, Affordable Housing and Sustainable Communities (AHSC), Permanent Local Housing Allocation (PLHA), CalHome funds, HOME, and other grant sources to support the construction of housing for seniors and those with special housing needs. The City shall periodically review available housing programs to identify additional funding sources. [Source: New Program]	Pursue funding to assist with construction and rehabilitation needs of lower income households and seniors During the Planning Period, encourage the development of: · 20 units accessible to seniors · 10 units accessible to persons with disabilities	HE3.1 HE 4.1 HE4.2 HE4.4	Planning and Finance Departments	CDBG, AHSC, PLHA, CalHome, HOME	Annually and as notices of funding availability are release.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-MM~~H-OO **Unit Conversion for Extremely Low-Income Households** The City will continue to explore the potential of using Affordable Housing Trust Fund money to purchase existing housing for conversion to restricted affordable housing and will commit funding as appropriate. Priority for use of Affordable Housing Trust Fund monies will be given to the creation of housing affordable to extremely-low-income households, particularly within the western portion of the city, consistent with the commitment to overcome geographic income disparities. [Existing Program HE4.L]	Identify potential funding Engage with owners of local market rate multifamily units to discuss opportunities, if funding allows Assist in the conversion of two units from market rate to extremely low-income during the planning period Proactively work to overcome concentrations of lower- and moderate-income populations Address the lack of affordable housing types in the city	HE4.1	Planning Department	Housing Trust Fund General Fund (staff time)	~~Ongoing~~Identify potential funding: annually Engage owners: immediately as funding and potential properties are identified
~~H-NN~~H-PP **Surplus and Excess Public Land** The City will, in accordance with AB 1486 (2019) and AB 1255 (2019), annually identify and inventory a list of sites owned by the City that have been sold, leased, or otherwise disposed of in the prior year. This inventory shall be publicly available and be included in the Housing Element annual report presented to the City Council and submitted to HCD. [New Program]	Regularly maintain an inventory of publicly-owned surplus or excess land on the City website Annually release information regarding publicly-owned sites that have been sold, leased, or disposed of	HE4.6	Planning Department	General Fund (staff time)	~~Ongoing~~ 2023, with annual updates

Goal 5 Resource Conservation

To promote resource conservation by encouraging housing types and designs that use fewer resources (water, electricity, etc.) and therefore cost less to operate over time, supporting long-term housing affordability.

Policies

HE 5.1 Encourage alternative energy sources. [Existing Policy HE 5.1]

HE 5.2 Encourage energy and resource conservation. [Existing Policy HE 5.2]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-QQ~~H-QQ **Green Building Ordinance** The City shall update the Green Building Ordinance, as necessary, to meet or exceed periodic updates to the State's Green Building Standards Code (CalGreen). [Existing Program HE5.A, modified]	Ensure compliance with CalGreen throughout the planning period	HE5.1	Planning and Building Department	General Fund (staff time)	~~Ongoing~~Throughout the planning period, as necessary
~~H-PP~~H-RR **Alternative Energy Technologies** The City will continue to encourage the use of alternative energy technologies and will explore incentives for the use of solar energy in new and rehabilitated housing. Incentives to adopt as appropriate include, but are not restricted to, ensuring a streamlined review process for applications, allowing applications to be submitted via email and paid by phone, deferred fees, and reduced applicable city standards. [Existing Program HE5.B, modified]	Encourage alternative energy technologies in new and existing developments Explore additional incentives for solar installation	HE5.1	Planning and Building Department	General Fund (staff time)	~~Ongoing~~Explore and adopt incentives, as appropriate: by 2026
~~H-QQ~~H-SS **Alternative Energy Technology Information** The City will continue to provide public information on energy conservation and alternative energy technologies to residential developers, contractors, and property owners. [Existing Program HE5.C]	Provide information on the City website and at City Hall regarding energy conservation, alternative energy technology options, possible sources of financing, and any applicable information regarding necessary local permits	HE5.1	Planning and Building Department	General Fund (staff time)	~~Ongoing~~2023; updated annually thereafter

Implementation Program	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-RR~~H-TT **Cost-Effective Energy Conservation** The City will continue to require cost-effective energy conservation measures in all new and rehabilitated housing to promote long-term affordability for occupants. The City will adopt the State's new Energy Efficiency Standards as part of any update to the California Building Standards Code and ensure that all new housing units constructed in the City meet or exceed these standards. [Existing Program HE5.D]	Promote long-term affordability Adopt updated State energy efficiency and building code standards, as necessary, throughout the planning period	HE5.2	Planning and Building Department	General Fund (staff time)	~~Triennially~~ Every three years beginning in 2023
~~H-SS~~H-UU **Energy Conservation Measures** The City will continue to participate in AB-811 programs and will explore additional state and federal sources of funding to finance local energy conservation measures. Sources of state and federal funds include, but are not limited to, the California Energy Commission State Energy Program and Energy Efficiency and Conservation Block Grant Program, and the Low-Income Home Energy Assistance Program. [Existing Program HE5.E]	Identify and procure additional funding to support energy conservation measures Provide information on available assistance programs on the City website by 2024 Assist three households, through financial or technical assistance, with the implementation of energy conservation measures	HE5.2	Planning and Finance Departments	General Fund (staff time) State and Federal Grant Funds	~~Ongoing~~Throughout the planning period Explore funding: annually Provide information on assistance programs: by 2024
~~H-TT~~H-VV **Water Conservation** The City will continue to apply Municipal Code provisions pertaining to water resources, including requirements for water-efficient landscaping for new residential and commercial construction, as well as implementing the "Water Neutrality" policy for all new development. [Existing Program HE5.H]	Reduce water consumption Require water-efficient landscaping Implement the "Water Neutral" policy Implement the Water Efficient Landscape Ordinance (WELO)	HE5.2	Planning and Public Works Departments	General Fund (staff time)	~~Ongoing~~Throughout the planning period

Goal 6 Affirmatively Furthering Fair Housing

To assure that housing programs maximize opportunity and housing choice throughout the city and proactively work to overcome patterns of economic segregation and discrimination based upon age, sex, race, sexual orientation, religion, familial status, ethnic background, or disability. [Existing Goal, modified]

Policies

HE 6.1 Support equal housing opportunities for all residents of St. Helena. [Existing Policy HE 6.1]

HE 6.2 Support the fair housing services provider. [New Policy]

HE 6.3 Support regional efforts to affirmatively further fair housing. [New Policy]

HE 6.4 Ensure public investments are equitably distributed throughout the community. [New Policy]

HE 6.5 Consider affirmatively furthering fair housing goals in all housing related decisions. [New Policy]

Implementation Programs

Implementation programs for this goal have been included in a table beginning on the following page.

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
~~H-UU~~H-WW **Affirmatively Furthering Fair Housing** The City shall address disparities in housing needs and access to opportunity for all persons regardless race, color, religion, sex, national origin, familial status, disability gender, gender identify, gender expression, sexual orientation, marital status, ancestry, veteran or military status, source of income, and genetic information as protected categories by the California Fair Employment and Housing Act (Part 2.8 [commencing with Section 12900] of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. The City identified barriers to fair housing through the Affirmatively Furthering Fair Housing Assessment. Actions the City will take to address the identified barriers and foster an inclusive community, include: · Concentrations of Lower- and Moderate-income Earning Populations: H-A, H-B, H-N, H-O, H-R, H-U, H-V, H-W and H-OO. · Insufficient Housing Stock for Farmworkers: H-E, H-H, H-I, and H-KK. · Lack of Affordable Housing Types: H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-N, H-P, H-Q, H-V, H-X, H-AA, H-DD, H-EE, H-FF, H-GG, H-LL, H-NN, and H-OO. · Fair Housing Enforcement and Outreach: H-T, H-II, H-JJ, H-WW, and H-XX. · Limited Resources for Persons with Disabilities: H-BB, H-LL, and H-NN; as well as objectives D, F and G in this program.	A) Work to coordinate annual meetings with jurisdictions and fair housing providers in the county to assist with and participate in promoting fair housing opportunities through pursing potential funding opportunities and joint efforts aimed at educating the community about fair housing issues and resources B) Promote the availability of bi-lingual resources by ensuring that City-provided services and materials are available in Spanish and that information is included regarding the availability of interpretation or translation services C) ~~Encourage~~ Facilitate development of multifamily housing ~~in high resource areas~~on the western portion of the city by providing developers with information on incentives for affordable multifamily development and maintaining a list of available sites (for metrics, see Program H-V) D) Use local permitting and approval processes to ensure all new multifamily construction, as well as ADUs, meet the accessibility requirements of the federal and state fair housing acts; with the goal of facilitating the development of 30 units accessible to seniors and other residents with special housing needs E) Affirmatively recruit a diverse and multi-lingual staff, as positions become available	HE6.1 HE6.2 HE6.3 HE6.4 HE6.5	City Council City Manager Planning Department	General Fund (staff time)	~~Ongoing~~ A and H: annually C: engage with developers twice within the planning period D: by 2027 F and G: ~~biannually~~Every two years

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
· Place-based Strategies for Community Preservation and Revitalization and Displacement Protection: H-A, H-I, H-J, H-N, H-Q, H-R, H-U, H-V, H-W, and H-WW. The City has included additional objectives with this program. The City shall monitor progress toward these objectives annually in the Annual Progress Report and shall implement additional measures as necessary. [New Program]	F) Work with Napa Valley Transportation Authority to explore lowering ridership costs for the VineGo paratransit system G) Work with the County of Napa to carry out an ADA self-e~~E~~valuation and transition plan to remove barriers for persons with disabilities to facilities and programs in Napa County H) Prioritize capital improvement projects for public infrastructure improvements that facilitate affordable housing development ~~in low and moderate resource areas~~in the eastern portion of the city				
~~H-VV~~H-XX **Fair Housing Provider** The City will continue to utilize and support Fair Housing Napa Valley as the City's fair housing service provider, responsible for implementing fair housing programs, receiving complaints, and providing referrals to available resources when necessary. The City will work with the Fair Housing Napa Valley to provide educational materials to educate real estate professionals, property owners and tenants on their rights and responsibilities and the resources available to address fair housing issues. [Existing Program HE6.A, modified]	Provide direct funding to Fair Housing Napa Valley with of goal of providing up to $80,000 over the planning period~~and~~ S~~s~~upport fair housing investigations with a goal of assisting with five investigations of existing affordable developments for rent in the southeast quadrant of the city and fair housing issues are more concentrated and displacement risk is higher Provide multi-lingual informational materials to the public regarding tenant rights, fair housing issues, and resources on the City's ~~website~~website and hold one multi-lingual engagement event to present the information targeting residents in the eastern portion of the city Provide a link to Fair Housing Napa Valley on the City's website	HE6.2	City Manager Planning Department	General Fund	~~Ongoing~~Engage Fair Housing Napa Valley: annually Informational materials to City website: by 2024 Engagement event: 2025

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-YY Replacement Unit Program The City will adopt a policy and will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions: • currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and • was subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low-income, or • subject to any other form of rent or price control through a public entity's valid exercise of its police power, or • occupied by low or very low-income households	In order to mitigate the loss of affordable housing units, require new housing developments to replace all affordable housing units lost due to new development.	HE3.1 HE6.1	Planning Department	General Fund	Implement: immediately Adopt policy: by January 31, 2024

Implementation Programs	Objectives	Implements What Policies	Who is Responsible	Potential Funding Source	Timeframe
H-ZZ Lot Consolidation To expand opportunities for additional affordable housing, the City will encourage the consolidation of small parcels to accommodate larger-scale and higher density developments that are compatible with existing neighborhoods. The sites inventory includes five parcels equating to 39 lower- and 39 moderate-income RHNA units. These sites were identified based on common ownership and contiguous lots. While all five parcels are within moderate resource areas, two of these parcels (site 9) are located on the western portion of the city, an area with fewer fair housing issues, and adjacent to Spring Street in proximity to high-quality transit opportunities. While these parcels will be processed by-right pursuant to Gov. Code section 65583(c)), the City will also implement other efforts to facilitate and encourage lot consolidation.	Post the sites on the City's website by October 2023 and provide list to interested developers when requested, and review annually for accuracy Develop and implement incentives for lot consolidation by January 2024 such as fee waivers, reduced development fees, expedited permit processing, greater density bonus incentives, and modifications to parking, height, or setback standards Facilitate lot consolidation for high density residential developments by providing appropriate assistance to developers to encourage negotiations between property owners Encourage the development of 39 lower- and 39 moderate income units during the planning period. To increase housing mobility and opportunities in areas where fair housing issues are less concentrated, encourage the development of 15 lower- and 15 moderate-income units on the western portion of the City	HE 1.3 HE 4.6 HE6.1	Planning Department	General Fund Housing Trust Fund	Post sites to website: by Oct. 2023 Implement incentives: by 2024
H-AAA Permit Streamlining Act The City shall amend the Municipal Code to specify who is responsible for making CEQA determinations and within the timeframes of PRC 21080.1 and PRC 21080.2; and determination of when the PSA is triggered per Government Code 65950(a)(5) the Permit Streamlining Act (PSA).	Amend the municipal code for compliance with State law within 18 months of adoption of the Housing Element	HE 1.3 HE 4.6	Planning Department	General Fund (staff time)	Within 18 months of adoption of the 2023-2031 Housing Element

Quantified Objectives

Quantified Objectives by Type

One of the requirements of State law (California Government Code, Section 65583[b]) is that the Housing Element contains quantified objectives for the maintenance, preservation, improvement, and development of housing. State law recognizes that the total housing needs identified by a community may exceed available resources and the community's ability to satisfy this need. Under these circumstances, the quantified objectives need not be identical to the total housing needs, however, the quantified objectives shall establish the number of housing units by income category that can be realistically constructed, rehabilitated, and conserved. The City has established quantifiable objectives in implementation programs throughout the policy document. This section summarizes new construction, conservation, and special needs housing objectives for the 2023-2031 planning period.

New Construction Objectives

Extremely low-income	33 units	166 lower-income units	30~~2~~23 total units
Very low-income	73 units		
Low-income	60 units		
Moderate-income	4~~5~~45 units	13~~6~~67 moderate and above-moderate units	
Above moderate-income	92 units		

Rehabilitation and Conservation Objectives

- Conservation of all existing affordable housing units.
- Conserve 200 manufactured homes at manufactured home parks.
- Rehabilitation of 20 units for seniors and 10 units for persons with a disability

Assistance for Special Needs Households

- 35 units of senior housing
- 18 units for persons with a disability
- 12 units for farmworkers
- Assist in the conversion of two units from market rate to extremely low-income during the planning period.
- Assist three lower- or moderate-income households transition from rental housing to homeownership

Quantified Objectives Summary Table

The City will strive to exceed the following targets for affordable housing development in St. Helena.

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction	33	73	60	4~~5~~45	92	30~~2~~23
Rehabilitation	10	10	5	5	0	30
Conservation/Preservation	0	120	100	231	0	451

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Part 2: Needs Assessment

Public Hearing Draft

April 2023

ST. HELENA
CALIFORNIA
HOUSING ELEMENT
2023 - 2031



Needs Assessment Contents

1. Introduction 2-7

Housing Element Purpose 2-7

Authority 2-7

Status 2-7

Consistency with the General Plan 2-8

Changes to State Law 2-8

Public Participation 2-13

2. Review of the Existing Housing Element 2-3535

Housing Production During the 2015-2023 Planning Period 2-3535

Progress in Implementation 2-3636

3. Demographic and Economic Trends 2-5958

Key Findings 2-6059

Population Trends 2-6059

Household Trends 2-6160

Demographic Trends 2-6867

Extremely Low-Income Households 2-7473

Employment Trends 2-7473

4. Population and Employment Projections 2-8180

Key Findings 2-8180

Population 2-8180

Households 2-8281

5. Housing Conditions 2-8584

Key Findings 2-8584

Existing Housing Conditions 2-8685

6. Housing Market Conditions 2-9897

Key Findings 2-9897

For-Sale Housing 2-9897

Rental Housing 2-103101

7. Special Housing Needs ..... 2-109~~108~~

Key Findings ..... 2-109~~108~~

People with Disabilities ..... 2-110~~109~~

People Living with Developmental Disabilities ..... 2-111~~110~~

Seniors ..... 2-113~~112~~

Large Households ..... 2-117~~115~~

Female-Headed Households ..... 2-119~~118~~

Farmworkers ..... 2-122~~121~~

Extremely Low-Income Households ..... 2-124~~123~~

Persons Experiencing Homelessness ..... 2-125~~124~~

Non-English Speakers ..... 2-129~~128~~

8. Non-governmental and Governmental Constraints ..... 2-131~~130~~

Key Findings ..... 2-131~~130~~

Non-governmental Constraints ..... 2-132~~131~~

Governmental Constraints ..... 2-135~~134~~

9. Opportunities for Energy Conservation ..... 2-190~~169~~

10. Zoning for a Variety of Housing Types ..... 2-192~~171~~

Key Findings ..... 2-192~~171~~

Multiple-Family Rental Housing ..... 2-192~~171~~

Density Bonuses for Affordable Housing ..... 2-192~~171~~

Housing for Permanent and Seasonal Agricultural Employees ..... 2-193~~172~~

Zoning for Emergency Shelters, Transitional Housing, and Supportive Housing ..... 2-193~~172~~

Residential Care Facilities ..... 2-194~~173~~

Low Barrier Navigation Centers ..... 2-195~~174~~

Single Room Occupancy (SRO) ..... 2-195~~174~~

Factory Built Housing and Mobile Homes ..... 2-196~~175~~

Accessory Dwelling Units ..... 2-197~~175~~

11. Housing Resources ..... 2-198~~177~~

Future Housing Need ..... 2-198~~177~~

Residential Site Inventory ..... 2-200~~179~~

Availability of Infrastructure and Services ..... 2-229~~204~~

Environmental Constraints ..... 2-231~~206~~

References ..... 2-232~~207~~

Figures

Figure 1 Population Growth Trends, Indexed to 1990 ..... 2-61~~60~~

Figure 2 Housing Tenure ..... 2-63~~62~~

Figure 3 Housing Tenure by Race of Householder ..... 2-64~~63~~

Figure 4 Housing Tenure by Age ..... 2-65~~64~~

Figure 5 Housing Tenure by Housing Type ..... 2-66~~65~~

Figure 6 Households by Displacement Risk and Tenure ..... 2-67~~66~~

Figure 7 Population Growth Trends ..... 2-68~~67~~

Figure 8 Senior and Youth Population by Race ..... 2-69~~68~~

Figure 9 Population by Race, St. Helena, 2000-2019 ..... 2-70~~69~~

Figure 10 Households by Household Income Level ..... 2-71~~70~~

Figure 11 Household Income Level by Tenure ..... 2-72~~71~~

Figure 12 Poverty Status by Race ..... 2-73~~72~~

Figure 13 Jobs in St. Helena ..... 2-75~~74~~

Figure 14 Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence ..... 2-76~~75~~

Figure 15 Jobs-Worker Ratios, By Wage Group ..... 2-77~~76~~

Figure 16 Jobs-Household Ratio ..... 2-78~~77~~

Figure 17 Resident Employment by Industry ..... 2-79~~78~~

Figure 18 Unemployment Rate ..... 2-80~~79~~

Figure 19 Bay Area, Population Totals and Projections, 1990-2050, Plan Bay Area 2050. ..... 2-82~~81~~

Figure 20 Housing Type Trends ..... 2-87~~86~~

Figure 21 Housing Units by Year Structure Built ..... 2-88~~87~~

Figure 22 Occupancy Status ..... 2-89~~88~~

Figure 23 Vacant Units by Type ..... 2-90~~89~~

Figure 24 Overcrowding by Tenure and Severity ..... 2-91~~90~~

Figure 25 Overcrowding by Income Level and Severity ..... 2-92~~91~~

Figure 26 Overcrowding by Race ..... 2-93~~92~~

Figure 27 Cost Burden by Tenure ..... 2-9~~4~~93
Figure 28 Cost Burden by Income Level ..... 2-95~~94~~
Figure 29 Cost Burden by Race ..... 2-96~~95~~
Figure 30 Substandard Housing Issues, St. Helena, 2019 ..... 2-97~~96~~
Figure 31 Home Values of Owner-occupied Units ..... 2-99~~98~~
Figure 32 Zillow Home Value Index (ZHVI) ..... 2-99~~98~~
Figure 33 Contract Monthly Rents for Renter-occupied Units ..... 2-103~~102~~
Figure 34 Median Contract Monthly Rent ..... 2-104~~103~~
Figure 35 Map of Affordable Housing Units, St. Helena ..... 2-106~~105~~
Figure 36 Disability by Type ..... 2-110~~109~~
Figure 37 Senior Households by Income and Tenure ..... 2-114~~113~~
Figure 38 Cost-Burdened Senior Households by Income Level ..... 2-115~~114~~
Figure 39 Household Size by Tenure ..... 2-117~~116~~
Figure 40 Housing Units by Number of Bedrooms ..... 2-118~~117~~
Figure 41 Cost Burden by Household Size ..... 2-119~~118~~
Figure 42 Household Type ..... 2-120~~119~~
Figure 43 Female-Headed Households by Poverty Status ..... 2-121~~120~~
Figure 44 Farm Labor by County, Napa County ..... 2-123~~122~~
Figure 45 Racial Group Share of General and Homeless Populations, Napa County ..... 2-126~~125~~
Figure 46 Hispanic or Latinx Share of General and Homeless Populations, Napa County ..... 2-127~~126~~
Figure 47 Population with Limited English Proficiency ..... 2-130~~129~~
Figure 48 Discretionary Permit Process Flowchart ..... 2-162~~153~~
Figure 49 Residential Site Inventory Map ..... 2-227~~202~~

Tables

Table 1 Progress Toward the 5th Cycle RHNA ..... 2-35~~35~~
Table 2 Program Implementation Status pursuant to GC Section 65583 ..... 2-40~~40~~
Table 3 Population Growth Trends ..... 2-60~~59~~
Table 4 Household Trends ..... 2-62~~61~~
Table 5 Average Household Size, St. Helena and Napa County ..... 2-62~~61~~
Table 6 St. Helena Regional Housing Needs Allocation ..... 2-74~~73~~
Table 7 St. Helena, Population Totals and Projections, 2010-2040, Plan Bay Area 2040 ..... 2-81~~80~~

Table 8	Department of Finance Population Projections, Napa County, 2010-2050	2-8~~1~~80
Table 9	Plan Bay Area 2050 Population Projections, Bay Area, 2015-2050	2-8~~2~~81
Table 10	Table 2: St. Helena, Household Totals and Projections, 2010-2040, Plan Bay Area 2040	2-8~~3~~82
Table 11	Household Projections by Region, 2015-2050	2-8~~3~~82
Table 12	Job Totals and Projections, St. Helena and Napa County, 2010-2040	2-8~~3~~82
Table 13	Job Totals and Projections, North Napa County and the Bay Area, 2015-2050	2-8~~4~~83
Table 14	Housing Permitting from 2015-2019 St. Helena	2-8~~7~~86
Table 15	Affordable Home Purchase Prices by Income Level, Napa County	2-101~~100~~
Table 16	Residential Properties for Sale, January 2023	2-102~~101~~
Table 17	Affordable Rental Housing Units, St. Helena	2-106~~105~~
Table 18	Affordable For-Sale Housing Units, St. Helena	2-107~~106~~
Table 19	Residential Properties for Rent, January 2023	2-107~~106~~
Table 20	Assisted Affordable Housing Developments by Conversion Risk Status, St. Helena	2-108~~107~~
Table 21	People with Developmental Disabilities by Age, St. Helena	2-111~~110~~
Table 22	People with Developmental Disabilities by Residence	2-113~~111~~
Table 23	Households by Age	2-114~~112~~
Table 24	Senior Housing Units, St. Helena.	2-116~~115~~
Table 25	Migrant Worker Student Population	2-122~~121~~
Table 26	Farm Labor, Napa County	2-122~~121~~
Table 27	Homelessness by Household Type and Shelter Status, Napa County	2-125~~124~~
Table 28	Characteristics for the Population Experiencing Homelessness, Napa County	2-128~~127~~
Table 29	Students in Local Public Schools Experiencing Homelessness	2-128~~127~~
Table 30	Price of Vacant Land, March 2022	2-132~~131~~
Table 31	Zoning Districts that Permit Residential Uses	2-136~~135~~
Table 32	Density/Intensity Standards by Zoning District	2-138~~136~~
Table 33	Development Standards by Zone	2-139~~137~~
Table 34	Residential Street Width Requirements	2-149~~143~~
Table 35	Parking Requirements, St. Helena, Napa, Yountville	2-154~~147~~
Table 36	Planning and Development Fees	2-158~~150~~
Table 37	Construction Cost Summary, Cost Per Unit and Cost Per Square-Foot	2-159~~151~~
Table 38	Planning Application Fees – Surrounding Jurisdictions, Single-Family and Multiple-Family	2-161~~152~~

Table 39 Typical Processing Procedures by Project Type ..... 2-163~~154~~
Table 40 Timelines for Permit Procedures ..... 2-163~~154~~
Table 41 Timelines for Permit Procedures ..... 2-164~~155~~
Table 42 Housing Types Permitted by Base Zoning District ..... 2-168~~158~~
Table 43 Pending and Entitled Projects ..... 2-199~~178~~
Table 44 Progress Towards RHNA ..... 2-200~~178~~
Table 45 Site 1 Summary ..... 2-201~~180~~
Table 46 Site 2 Summary ..... 2-203~~182~~
Table 47 Site 3 Summary ..... 2-205~~183~~
Table 48 Site 4 Summary ..... 2-209~~186~~
Table 49 Site 5 Summary ..... 2-211~~187~~
Table 50 Site 6 Summary ..... 2-213~~188~~
Table 51 Site 7 Summary ..... 2-215~~190~~
Table 52 Site 8 Summary ..... 2-217~~192~~
Table 53 Site 9 Summary ..... 2-218~~193~~
Table 54 Site 10 Summary ..... 2-220~~195~~
Table 55 Site 11 Summary ..... 2-223~~198~~
Table 56 Site 12 Summary ..... 2-224~~199~~
Table 57 Summary of Housing Units ..... 2-226~~201~~
Table 58 Vacant and Nonvacant Sites ..... 2-228~~203~~

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1. Introduction

Since 1969, California Housing Element Law has required that local governments develop plans to accommodate and facilitate housing for current and future residents, at all income levels.

Housing Element Purpose

The purpose of the Housing Element is to establish a comprehensive plan to address housing needs in St. Helena over the eight-year planning period between January 31, 2023, through January 31, 2031. The Housing Element sets the policies surrounding the development, rehabilitation, and preservation of housing units that meet the needs of St. Helena residents.

The Housing Element consists of two parts, the Housing Needs Assessment and a Housing Element Policy Document. The Housing Needs Assessment identifies and analyzes the existing and projected housing needs for St. Helena and also identifies sites for housing development that are adequate to accommodate the City's regional housing needs allocation. The Housing Policy document will state goals, policies, quantified objectives, and implementation programs for the development, rehabilitation, and preservation of housing, based upon the findings of the Housing Needs Assessment and input received through public outreach. Then, throughout the eight-year planning period, St. Helena will implement a set of programs to meet the goals included in the Housing Element Policy Document.

Authority

Housing Elements are required by section 65302(c) of the California Government Code. Housing Elements are one of seven mandatory General Plan Elements. Specific requirements for Housing Elements are set forth beginning at section 65580 of the Government Code, with additional guidance provided by the State Department of Housing and Community Development (HCD). The combination of the Housing Needs Assessment and the Housing Element Policy Document will address all applicable requirements of state law.

Status

The St. Helena City Council adopted the prior Housing Element in 2015 for the planning period ranging from January 31, 2015 through January 31, 2023. Upon review of the adopted Housing Element, HCD sent the City of St. Helena a letter of compliance on May 29, 2015.[1] The 2023-2031 Housing Element Update will plan for St. Helena's housing needs through the 8-year planning period of January 31, 2023, through January 31, 2031. While the City's policies and programs guide housing development during the planning period, the City receives

[1] *California Department of Housing and Community Development. Housing Element Review Letters. http://www.hcd.ca.gov/hpd/hrc/plan/he/he_review_letters/. Accessed on March 11, 2014.*

credit for housing units that are built during the Regional Housing Need Assessment (RHNA) projection period, which is June 20, 2022, through December 31, 2030, a period of 8.5 years. [2]

Consistency with the General Plan

California Government Code Section 65300.5 requires that a general plan be internally consistent, meaning that no conflicts exist among the elements of the plan. Government Code section 65583(c) requires that a housing element describe how consistency has been achieved among the general plan elements. The most important aspect of consistency among general plan elements is that policies and implementation measures do not conflict but support one another to achieve the overall goals and vision of a general plan.

In preparing the 2023-2031 Housing Element, the City reviewed goals and policies in the various elements of the 2040 St. Helena General Plan. With the passage of SB 1035 in 2018, the City will need to update its Safety Element to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies. Program H-G ~~H-H~~ commits the city to updating the Safety Element. Additionally, the City has committed to remove the Growth Management System through Program H-B, and will need to update the Zoning Code for consistency. Consistency with the remaining components of the 2040 General Plan has been achieved through the adoption of complementary policies in each of the elements that support the goals and policies of the other elements.

Changes to State Law

The following items represent substantive changes to State housing law since the City's last Housing Element was adopted and certified. While this is not an exhaustive list, these items are state mandates that must be addressed in the Housing Element.

Affordable Housing Streamlined Approval Process: Senate Bill 35 (2017)

SB 35 requires a streamlined, ministerial review process, or objective design standards, for qualifying multifamily, urban infill projects in jurisdictions that have failed to approve housing projects sufficient to meet their State-mandated RHNA. Among other requirements, to qualify for streamlining under SB 35, a project must incorporate one of two threshold levels of affordable housing: (1) 10 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for above moderate-income housing or have failed to submit an annual progress report as required under state law; or (2) 50 percent of the project units in jurisdictions that have not approved housing projects sufficient to meet their RHNA for below moderate-income housing. Additionally, the Housing Element must describe the City's processing procedures related to SB 35.

The City is not subject to the requirements of SB 35 as it has successfully met its fair share of local housing needs for the fifth cycle, an accomplishment only shared with a small handful of ~~California local~~ jurisdictions

[2] *California Department of Housing and Community Development. Housing Element Update Schedule. https://www.hcd.ca.gov/community-development/housing-element/docs/6th-web-he-duedate.pdf. Accessed November 2021.*

statewide. The City has not adopted a ~~has adopted a~~ streamlined approval process for multi-family units ~~within the community~~ ~~to comply with~~related to SB 35 or SB 330, however, it has drafted a process to comply with the law which is being codified as a part of the ongoing Zoning Code Update~~, in compliance with SB 35/SB 330~~. The process incorporates ~~an~~ objective design ~~checklist~~ standards ~~and does not impose~~and ministerial review free of discretionary processes. Program H-F commits the City to amending the Zoning Code to provide a by-right streamlined review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330.~~to adopt the SB 330 streamlining process for objective design standards for residential developments~~.

Additional Housing Element Sites Analysis Requirements: Assembly Bill 879 (2017) and Assembly Bill 1397 (2017)

These bills require additional analysis and justification of the sites included in the sites inventory of the City Housing Element. The Housing Element may only count non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements if the sites are subject to a program that allows affordable housing by right. Additionally, the bills require additional analysis of non-vacant sites and additional analysis of infrastructure capacity, and by place size restrictions on all sites. The Housing Element sites inventory has been prepared in compliance with AB 879 and AB 1397.

Affirmatively Furthering Fair Housing: Assembly Bill 686 (2017)

AB 686 requires the City to administer its housing programs and activities in a manner to affirmatively further fair housing and not take any action that is inconsistent with this obligation. The City must take actions to overcome patterns of segregation, address disparities in housing needs and access to opportunity, and foster inclusive communities. The Housing Element must include an assessment of fair housing practices, an examination of the relationship of available sites to areas of high opportunity, and actions to affirmatively further fair housing. This Housing Element includes Program H-WW addressing fair housing and AFFH directly, and objectives to affirmatively further fair housing in programs throughout the Element. Appendix A: Affirmatively Furthering Fair Housing includes an analysis of fair housing in St, Helena.

No-Net-Loss Zoning: Senate Bill 166 (2017)

SB 166 amended the No-Net-Loss rule to require that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate the unmet RHNA. When a site identified in the Housing Element as available to accommodate the lower-income portion of the RHNA is actually developed for a higher income group, the City must either (1) identify, and rezone if necessary, an adequate substitute site or (2) demonstrate that the land inventory already contains an adequate substitute site. This Housing Element has been prepared in accordance with the No-Net-Loss rule and identifies sites that can accommodate 241 units in addition to the City's RHNA requirement of 256. Chapter 11 includes a detailed discussion of the sites inventory process.

Safety Element to Address Adaptation and Resiliency: Senate Bill 1035 (2018)

SB 1035 requires the General Plan Safety Element to be reviewed and revised to include any new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies with each revision of the housing element. Program H-G of this Housing Element commits the City to updating the Safety Element within three years of certifying this Housing Element.

By Right Transitional and Permanent Supportive Housing: Assembly Bill 2162 (2018) and Assembly Bill 101 (2019)

AB 2162 requires the City to change its zoning to provide a "by right" process and expedited review for supportive housing. The bill prohibits the City from applying a conditional use permit or other discretionary review to the approval of 100 percent affordable developments that include a percentage of supportive housing units, either 25 percent or 12 units, whichever is greater. The change in the law applies to sites in zones where multifamily and mixed uses are permitted, including in nonresidential zones permitting multifamily use. The City currently permits transitional and supportive housing within all residential, commercial, and mixed-use zones, subject only to the same conditions as residential uses, in compliance with State law. ~~zones~~.

Additionally, AB 101 requires that a Low Barrier Navigation Center development be a use allowed by right in mixed-use zones and nonresidential zones permitting multifamily uses if it meets specified requirements. The City does not currently comply with this requirement. Program H-F commits the City to update the zoning code to allow low barrier navigation centers by right in areas zoned for mixed use as well as nonresidential zones permitting multifamily uses.

Accessory Dwelling Units: Assembly Bill 2299 (2016), Senate Bill 1069 (2016), Assembly Bill 494 (2017), Senate Bill 229 (2017), Assembly Bill 68 (2019), Assembly Bill 881 (2019), Assembly Bill 587 (2019), Senate Bill 13 (2019), and Assembly Bill 671 (2019)

In recent years, multiple bills have added requirements for local governments related to Accessory Dwelling Unit (ADU) regulation. The 2016 and 2017 updates to State law included changes pertaining to the allowed size of ADUs, permitting ADUs by right in at least some areas of a jurisdiction, and parking requirements related to ADUs. More recent bills reduce the time to review and approve ADU applications to 60 days and remove lot size and replacement parking space requirements. AB 68 allows an ADU and a junior ADU to be built on a single-family lot, if certain conditions are met. The State has also removed owner-occupancy requirements for ADUs, created a tiered fee structure that charges ADUs based on their size and location, and prohibits fees on units of less than 750 square feet. In addition, AB 671 requires the Housing Element to include plans to incentivize and encourage affordable ADU rentals. In 2020, the City adopted updated ADU regulations which streamlined the review process for ADU construction and conversion~~, in compliance with the requirements of State law.~~

The St. Helena Zoning Code allows ADUs in all residential zoning districts, however, to achieve compliance with California Government Code Sections 65852.2 and 65852.22, the City must allow ADUs in all zones that allow for residential uses, including the AP Zone, and any mixed-use, and commercial zones. Additionally, ~~the~~ several

areas of Chapter 17.116.030 need to be revised for compliance with State law. This includes, but is not limited to, the definition of a cooking facility, definition of an efficiency kitchen, allowing both an ADU and JADU for conversions on a lot with an existing or proposed single-family dwelling, separate conveyance of an ADU or JADU, and restricting bedroom count.

The City is currently undertaking a comprehensive zoning code update that will address these compliance issues. Program H-F in this Housing Element commits the City to revising the code for compliance with State law by 2026.

Density Bonus: Assembly Bill 1763 (2019) and AB 2345 (2020)

AB 1763 amended California's density bonus law to authorize significant development incentives to encourage 100 percent affordable housing projects, allowing developments with 100 percent affordable housing units to receive an 80 percent density bonus from the otherwise maximum allowable density on the site. If the project is within half a mile of a major transit stop, a jurisdiction may not apply any density limit to the project. AB 2345 further amended California's density bonus law to allow residential projects with some on-site affordable housing to receive a density bonus of up to 50 percent. Specifically, a residential development is eligible for a 50 percent density bonus if 11 percent of the units are very low-income, 20 percent are low-income units, or 40 percent are moderate-income units. The affordable units must remain affordable for a minimum of 55 years. In addition to the density bonus, qualifying projects will receive four regulatory incentives or concessions, depending on how much of the development includes affordable units. Specifically:

- One incentive or concession for projects that include at least 10 percent of the total units for lower-income households, at least five percent for very low-income households, or at least 10 percent for persons and families of moderate-income in a common interest development.
- Two incentives or concessions for projects that include at least 17 percent of the total units for lower-income households, at least 10 percent for very low-income households, or at least 20 percent for persons and families of moderate-income in a common interest development.
- Three incentives or concessions for projects that include at least 24 percent of the total units for lower-income households, at least 15 percent for very low-income households, or at least 30 percent for persons and families of moderate-income in a common interest development.
- Four incentives or concessions for projects where one hundred percent of all units in the development, including total units and density bonus units, but exclusive of a manager's unit or units, are for lower income households, as defined by Section 50079.5 of the Health and Safety Code, except that up to 20 percent of the units in the development, including total units and density bonus units, may be for moderate-income households, as defined in Section 50053 of the Health and Safety Code. For these projects, if it is located within one-half mile of a major transit stop, the applicant also receives a height increase of up to three additional stories (33 feet).

The City of St. Helena currently establishes density bonus provisions for affordable housing in Chapter 17.144 (Affordable Housing). The provisions in that Chapter do not reflect the new maximum density bonus tier framework that was adopted by the State in 2020. Because of this, the City is not currently in compliance and has included Program H-F to commit the City to amend the Zoning Code for compliance with California Government Code Sections 65915 through 65918~~.~~. The City is currently undertaking a Zoning Code Update. The Draft Zoning Code includes density bonus provisions that comply with State law. The Zoning Code Update is currently scheduled for adoption in summer/fall 2023.

Housing Crisis Act of 2019: Senate Bill 330

SB 330 enacts changes to local development policies, permitting, and processes that will be in effect through January 1, 2025. SB 330 places new criteria on the application requirements and processing times for housing developments; prevents localities from decreasing the housing capacity of any site, such as through downzoning or increasing open space requirements, if such a decrease would preclude the jurisdiction from meeting its RHNA housing targets; prevents localities from establishing non-objective standards; and requires that any proposed demolition of housing units be accompanied by a project that would replace or exceed the total number of units demolished. Additionally, any demolished units that were occupied by lower-income households must be replaced with new units affordable to households with those same income levels. The Housing Element must describe the City's processing procedures related to SB 330. Please see Chapter 8: Nongovernmental and Governmental Constraints for more information.

The City has adopted an SB 330 process and checklist to streamline the design and approval of by-right multi-family units within the community, in compliance with SB 330.

Surplus Land Act Amendments: Assembly Bill 1486 and AB 1255 (2019)

AB 1486 refines the Surplus Land Act to provide clarity and further enforcement to increase the supply of affordable housing. The bill requires the City to include specific information relating to surplus lands in the Housing Element and Housing Element Annual Progress Reports, and to provide a list of sites owned by the county that have been sold, leased, or otherwise disposed of in the prior year. AB 1255 requires the City to create a central inventory of surplus and excess public land each year. The City is required to transmit the inventory to the Department of Housing and Community Development and to provide it to the public upon request. The City has committed to transmitting the required information to HCD each year with their annual report in Program H-CC.

Housing Information Transparency: Assembly Bill 1483 (2019)

AB 1483 requires the City to publicly share information about zoning ordinances, development standards, fees, exactions, surplus public lands, fair housing resources, and affordability requirements. The City is also required to update such information within 30 days of changes. The Housing Element will report on the City's compliance with these requirements. Program H-NN specifically commits the City to providing updated information on a range of housing issues through their website and at City offices.

Emergency and Transitional Housing Act of 2019: Assembly Bill 139 (2019)

AB 139 established new criteria for evaluating the needs of the homeless population. The analysis must assess the capacity to accommodate the most recent homeless point-in-time count by comparing that to the number of shelter beds available on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage of those in emergency shelters that move to permanent housing (see Chapter 7: subsection Persons Experiencing Homelessness). The bill also established new parking standards for emergency shelters. Lastly, the bill requires the Housing Element to include a review of the effectiveness of the housing element goals, policies, and related actions to meeting the jurisdiction's special housing needs (see Chapter 2: Review of Previous Element).

The City is in compliance with State laws related to emergency shelters, supportive housing, and transitional housing. The City currently permits transitional and supportive housing within all residential, commercial, and mixed-use zones, subject only to the same conditions as residential uses, in compliance with State ~~law.~~law. ~~Currently, the Zoning Code allows both supportive and transitional housing by-right in all residential zoning districts.~~ Additionally, emergency shelters are identified as a by-right use in the I and SC zoning districts.

Standardization of Sites Inventory Analysis and Reporting: Senate Bill 6 (2019)

SB 6 requires the City to electronically submit the sites inventory to HCD. The City will submit the final sites inventory to HCD with the adopted Housing Element. Program H-A commits the City to submitting an electronic copy of the inventory to HCD.

Evacuation Routes: Senate Bill 99 and AB 747 (2019)

Two recent bills, AB 747 and SB 99, require the General Plan Safety Element to be updated to identify evacuation routes and their capacity, safety, and viability under a range of emergency scenarios and to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The bill requires these updates to occur with the 2023-2031 Housing Element Update. Program H-G commits the City to updating to the Safety Element as necessary for compliance with SB 99 and AB 747 during the 6th Housing Element cycle.

Public Participation

Section 65583(c)(5) of the Government Code states that "The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort." Public participation played a critical role in the formulation and refinement of the County's housing goals and policies.

Housing issues affect the entire community – residents, employers, and the public and private sectors. The public participation requirement of housing element law presents an opportunity to engage constituents in a dialogue – defining problems and creating solutions. The inclusion of community stakeholders in the housing

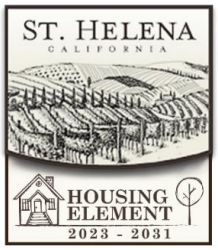
element public participation process helps ensure appropriate housing strategies are more efficiently and effectively evaluated, developed, and implemented. An inadequate public participation process may lead to community conflict or in worse case scenarios, anti- development initiatives, and NIMBYism. Successful public participation is important because a diverse cross section of the population can be engaged in defining the housing problem and in crafting community sensitive solutions. Another benefit of broad participation and true engagement of the public is that when it is time to adopt housing strategies and approve housing developments, a greater portion of the community has been involved and participated in the plan and more frequently will support its implementation. Meaningful participation creates stakeholders in the ultimate outcome of the process.

In response to the need for public participation, City planning staff worked with consultants to develop a robust community engagement program tailored to ensure the community and other stakeholders are engaged in the process and are given ample opportunities to provide input. The key objective of the community engagement program is to maximize opportunities for everyone interested in the Housing Element to participate. The engagement program includes branding, a project website, business cards, newsletters and eblasts, announcements on the City website and social medial, multiple workshops, a Housing Element Focus Group, and Planning Commission and City Council study sessions and hearings. This section summarizes our engagement program.

In an effort to Affirmatively Further Fair Housing (AFFH), the City reached out to a broad range of stakeholders, including not just housing developers and residents, but also to Spanish speakers and those working to address fair housing issues and the lack of affordable housing citywide. Throughout the Update, the Project team asked focus group members, workshop participants, the Planning Commission, and the City Council about fair housing issues in the community. The City has incorporated this feedback into Program H-WW~~H-VV~~: Affirmatively Further Fair Housing, as well as into a variety of programs throughout the Policy Document.

Branding

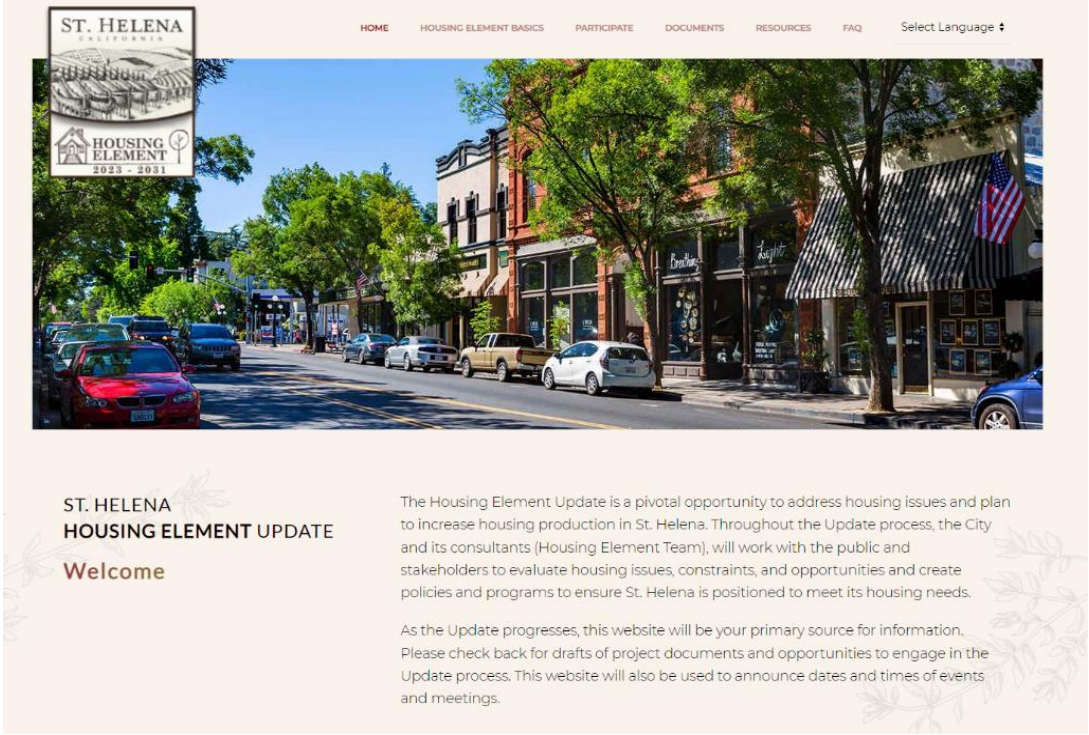
A branding package was prepared for the project. This included a project logo and style templates for all work products, maps, presentations, and publicity materials. The common branding helps to build recognition for the project and ensure that this effort is distinct in the minds of the community. The logo to the right will be used on all materials developed as part of the Housing Element Update.



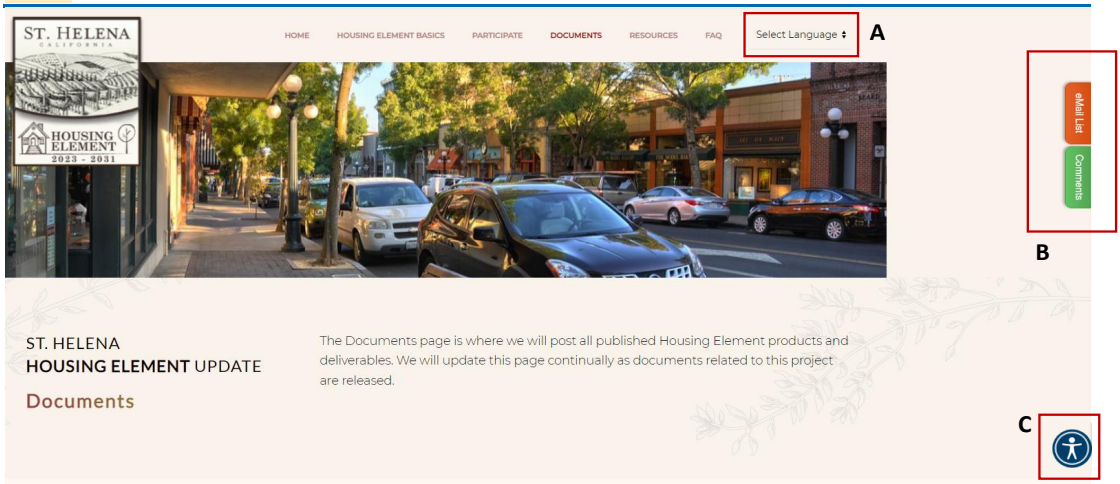
Housing Element Website

During the development and review of the Housing Element, the City created and maintained a website dedicated to the 2023-2031 Housing Element Update. This website provided easy access to information on the project, including the Housing Element information/Frequently Asked Questions, the project newsletters, and Zoom meeting info. Project documents were posted to the website and comments were encouraged through the provided "Comments" button on each page. A link on the website allowed residents to sign up for the email list. The website also featured a Google Translate menu allowed readers to translate the website into Spanish. Lastly, an accessibility widget was incorporated into the website allowing readers to adjust text size and spacing, contrast, and a number of other aspects of the website to suit the reader's needs.

https://sthelenahousing.com



https://sthelenahousing.com/documents



A: Google Translate Tool: This tool allows users to translate the entire website into Spanish.

B: Email and Contact Buttons: These buttons allow users to join the project email list or provide a comment to the project Team.

C: Accessibility Widget: This widget allows users to choose visibility options for greater accessibility

https://sthelenahousing.com/basics

The project website features a Housing Element 101 video, presented in English and Spanish.

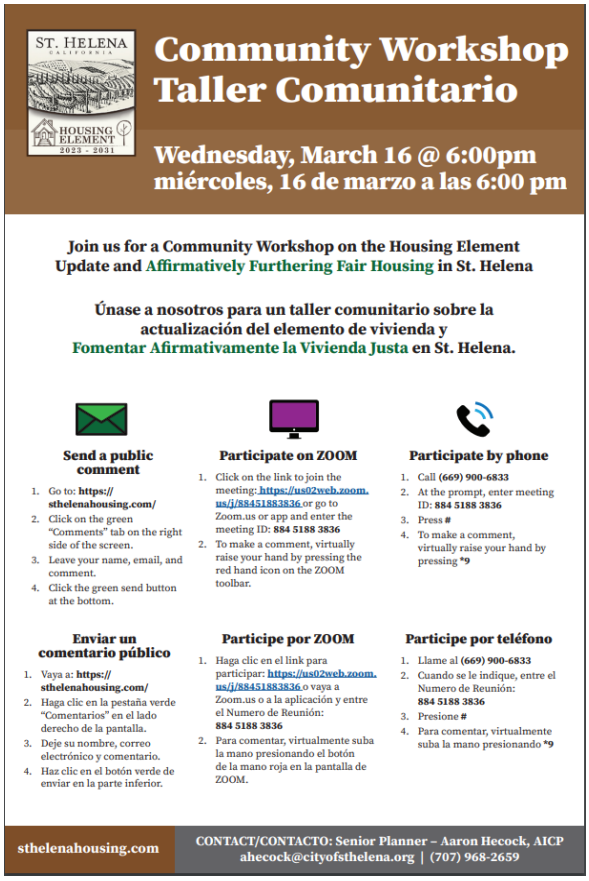
VIDEO: ST. HELENA HOUSING ELEMENT 101



English



Spanish



ST. HELENA CALIFORNIA
HOUSING ELEMENT 2023 - 2031

Community Workshop
Taller Comunitario

Wednesday, March 16 @ 6:00pm
miércoles, 16 de marzo a las 6:00 pm

Join us for a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing in St. Helena

Únase a nosotros para un taller comunitario sobre la actualización del elemento de vivienda y Fomentar Afirmativamente la Vivienda Justa en St. Helena.

Send a public comment
1. Go to: **https://sthelenahousing.com/**
2. Click on the green "Comments" tab on the right side of the screen.
3. Leave your name, email, and comment.
4. Click the green send button at the bottom.

Participate on ZOOM
1. Click on the link to join the meeting: **https://us02web.zoom.us/j/88451883836** or go to Zoom.us or app and enter the meeting ID: **884 5188 3836**
2. To make a comment, virtually raise your hand by pressing the red hand icon on the ZOOM toolbar.

Participate by phone
1. Call **(669) 900-6833**
2. At the prompt, enter meeting ID: **884 5188 3836**
3. Press **#**
4. To make a comment, virtually raise your hand by pressing ***9**

Enviar un comentario público
1. Vaya a: **https://sthelenahousing.com/**
2. Haga clic en la pestaña verde "Comentarios" en el lado derecho de la pantalla.
3. Deje su nombre, correo electrónico y comentario.
4. Haz clic en el botón verde de enviar en la parte inferior.

Participe por ZOOM
1. Haga clic en el link para participar: **https://us02web.zoom.us/j/88451883836** o vaya a Zoom.us o a la aplicación y entre el Numero de Reunión: **884 5188 3836**
2. Para comentar, virtualmente suba la mano presionando el botón de la mano roja en la pantalla de ZOOM.

Participe por teléfono
1. Llame al **(669) 900-6833**
2. Cuando se le indique, entre el Numero de Reunión: **884 5188 3836**
3. Presione **#**
4. Para comentar, virtualmente suba la mano presionando ***9**

sthelenahousing.com

CONTACT/CONTACTO: Senior Planner – Aaron Hecock, AICP
ahecock@cityofsthelena.org | (707) 968-2659

In addition to eblasts and Facebook posts, meetings were announced via the website. Flyers were posted for each event in English and Spanish.



MEETINGS

COMMUNITY WORKSHOPS −

Title	Date	Flyer	Presentation	Agenda	Other Materials	Video
Workshop #3	March 16, 2022 6 pm, via Zoom					
Workshop #2	Janaury 20, 2022 6 pm, via Zoom					
Workshop #1	September 16, 2021 6 pm, via Zoom					

FOCUS GROUPS +

PLANNING COMMISSION +

CITY COUNCIL +

For those unable to attend, event materials, presentations, and videos are posted to the Participate page.

Project Business Cards

To encourage the use of the project website, business cards were made up for the Project. The cards were provided to the City and can be handed out to those looking for additional information on the Housing Element Update. Each card lists the project website address and a QR Code that can direct users to that website.



Newsletters and Email Notifications (eBlasts)

During the Housing Element development, two newsletters will be developed and distributed. The newsletters will be designed to give the community a better understanding of the Update process and the draft Housing Element. Both newsletters will be published in both English and Spanish and made available from the project website.

Newsletter #1: Housing Element Update Overview

Newsletter #1 describes what a housing element is, how and why it is being updated, the project schedule, and how to get involved in the Update process. The newsletter also describes the other components of the project, including General Plan amendments, Safety Element update, and the environmental analysis. The newsletter will publicize upcoming community engagement opportunities and the project website.

Newsletter #2: HCD Review Draft Housing Element

Newsletter #2 will provide a summary of the key findings and changes in the HCD Review Draft Housing Element, particularly key changes to policies and programs, any proposed changes to land use designations (locations or density ranges), and what these changes mean for their community.

Email notifications (eblasts) are sent out to announce upcoming events and the release of project-related documents. Email addresses were compiled from those requesting notification from the City and from those signing up on the project website and at project events. As of May 2022, the Housing Element email list has 32 subscribers.

Images of Newsletter #1 and an eBlast are included on the following page.



ST. HELENA CALIFORNIA

HOUSING ELEMENT 2023 - 2031

NEWSLETTER #1: HOUSING ELEMENT OVERVIEW

St. Helena Housing Element Update!

We are excited to announce that in February 2021, the City of St. Helena kicked off the update to the City's Housing Element. The update is scheduled to take approximately two years, and throughout the process, we invite the public to be part of the planning process and provide input on how St. Helena should provide housing over the planning period (2023-2031).

What is a Housing Element?

Since 1969, every jurisdiction in California has been required to have a Housing Element as part of their General Plan. Unlike other mandatory General Plan elements, the Housing Element must be updated every eight years and is subject to review and approval by the California Department of Housing and Community Development (HCD). Major components of the Housing Element include a housing needs assessment, the identification of sites for housing at all income levels, a review of constraints to housing, and updated policies and programs to carry out the goals of the updated element.

The City's current 2014-2022 Housing Element was adopted in 2015 and was part of the 5th Cycle of housing element updates in the State. This update for the 2023-2031 Housing Element is part of the 6th Cycle of housing element updates. Between the 5th and 6th Cycles, the State has passed over a dozen of new housing laws, many of which aim to lower barriers to building affordable housing. These will all be addressed with this update.

Another major addition to the 6th Cycle Housing Element Update is the inclusion of an Affirmatively Furthering Fair Housing analysis. This analysis will examine housing practices in the city to identify any areas that may perpetuate housing inequities in the community. Once identified, the Housing Element will create policies and programs to help work towards more equitable housing practices.

Visit the Project Website to:

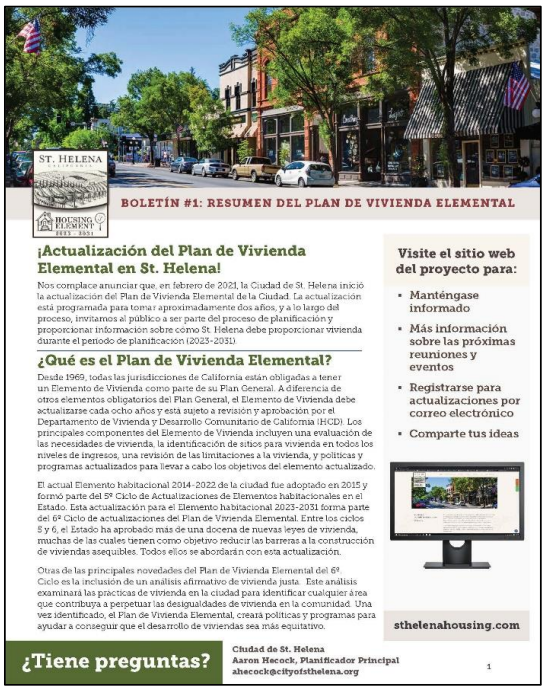
- Stay informed
- Find out about upcoming meetings and events
- Sign-up for email updates
- Share your ideas

sthelenahousing.com

Have questions?

City of St. Helena
Aaron Hecock, Senior Planner
ahecock@cityofsthelena.org

1



ST. HELENA CALIFORNIA

HOUSING ELEMENT 2023 - 2031

BOLETÍN #1: RESUMEN DEL PLAN DE VIVIENDA ELEMENTAL

¡Actualización del Plan de Vivienda Elemental en St. Helena!

Nos complace anunciar que, en febrero de 2021, la Ciudad de St. Helena inició la actualización del Plan de Vivienda Elemental de la Ciudad. La actualización está programada para tomar aproximadamente dos años, y a lo largo del proceso, invitamos al público a ser parte del proceso de planificación y proporcionar información sobre cómo St. Helena debe proporcionar vivienda durante el período de planificación (2023-2031).

¿Qué es el Plan de Vivienda Elemental?

Desde 1969, todas las jurisdicciones de California están obligadas a tener un Elemento de Vivienda como parte de su Plan General. A diferencia de otros elementos obligatorios del Plan General, el Elemento de Vivienda debe actualizarse cada ocho años y está sujeto a revisión y aprobación por el Departamento de Vivienda y Desarrollo Comunitario de California (HCD). Los principales componentes del Elemento de Vivienda incluyen una evaluación de las necesidades de vivienda, la identificación de sitios para vivienda en todos los niveles de ingresos, una revisión de las limitaciones a la vivienda, y políticas y programas actualizados para llevar a cabo los objetivos del elemento actualizado.

El actual Elemento habitacional 2014-2022 de la ciudad fue adoptado en 2015 y formó parte del 5º Ciclo de Actualizaciones de Elementos habitacionales en el Estado. Esta actualización para el Elemento habitacional 2023-2031 forma parte del 6º Ciclo de actualizaciones del Plan de Vivienda Elemental. Entre los ciclos 5 y 6, el Estado ha aprobado más de una docena de nuevas leyes de vivienda, muchas de las cuales tienen como objetivo reducir las barreras a la construcción de viviendas asequibles. Todos ellos se abordarán con esta actualización.

Otras de las principales novedades del Plan de Vivienda Elemental del 6º Ciclo es la inclusión de un análisis afirmativo de vivienda justa. Este análisis examinará las prácticas de vivienda en la ciudad para identificar cualquier área que contribuya a perpetuar las desigualdades de vivienda en la comunidad. Una vez identificado, el Plan de Vivienda Elemental, creará políticas y programas para ayudar a conseguir que el desarrollo de viviendas sea más equitativo.

Visite el sitio web del proyecto para:

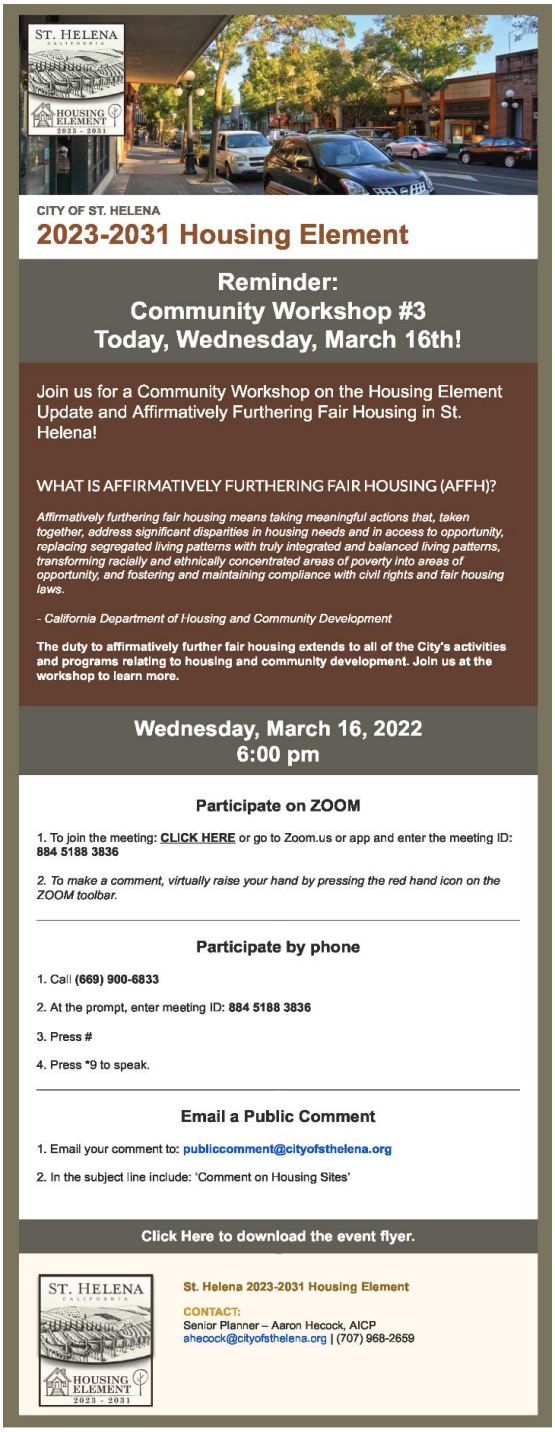
- Manténgase informado
- Más información sobre las próximas reuniones y eventos
- Registrarse para actualizaciones por correo electrónico
- Comparte tus ideas

sthelenahousing.com

¿Tiene preguntas?

Ciudad de St. Helena
Aaron Hecock, Planificador Principal
ahecock@cityofsthelena.org

1



ST. HELENA CALIFORNIA

HOUSING ELEMENT 2023 - 2031

CITY OF ST. HELENA

2023-2031 Housing Element

Reminder: Community Workshop #3 Today, Wednesday, March 16th!

Join us for a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing in St. Helena!

WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)?

Affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

- California Department of Housing and Community Development

The duty to affirmatively further fair housing extends to all of the City's activities and programs relating to housing and community development. Join us at the workshop to learn more.

Wednesday, March 16, 2022 6:00 pm

Participate on ZOOM

1. To join the meeting: **CLICK HERE** or go to Zoom.us or app and enter the meeting ID: **884 5188 3836**

2. To make a comment, virtually raise your hand by pressing the red hand icon on the ZOOM toolbar.

Participate by phone

1. Call **(669) 900-6833**
2. At the prompt, enter meeting ID: **884 5188 3836**
3. Press #
4. Press *9 to speak.

Email a Public Comment

1. Email your comment to: **publiccomment@cityofsthelena.org**
2. In the subject line include: 'Comment on Housing Sites'

Click Here to download the event flyer.

ST. HELENA CALIFORNIA

HOUSING ELEMENT 2023 - 2031

St. Helena 2023-2031 Housing Element

CONTACT:
Senior Planner – Aaron Hecock, AICP
ahecock@cityofsthelena.org | (707) 968-2659

Public Workshops

Throughout the Housing Element Update, City staff worked with the consultant team to hold community workshops at critical points in the process.

Workshop #1: Housing Element Basics

On September 16, 2021 the City held a community workshop to introduce the housing element and discuss housing needs, opportunities, and constraints in St. Helena.





The workshop presentation highlighted engagement efforts and let participants know how they can connect with the Project Team.

During the Workshop, participants were prompted to comment on housing needs, issues, and constraints in the community. Several public comments were received and are documented below. These comments and information provided during this discussion ~~was~~ were used to inform and confirm data in the Needs Assessment. Additionally, input related to sites and constraints were considered in the development of the initial sites inventory. Finally, comments related to housing needs helped to inform implementation actions and priorities. The City has included a number of programs to address constraints, incentivize affordable and special needs housing development, and encourage workforce and missing middle housing opportunities. ~~.~~

Comment
Jenny
▪ Shortage of affordable housing compounded by 2020 fires ▪ Rents have increased but wages haven't kept up ▪ Many residents are struggling to pay rent. ▪ There is a long waiting list for affordable housing (5 year waiting list) ▪ Smoke Free housing is needed, as 2nd hand smoke is an issue in multifamily housing
Nancy
▪ Demand is such that large-scale developments are needed ▪ Overcrowding is an issue in the city ▪ Many St. Helena workers commute into the city because they can't afford to live here.
Joe
▪ Multifamily is challenging as affordability is difficult to make cost effective. Subsidies are required to create housing that is affordable. Financing for these projects is difficult. ▪ Affordable projects move slowly and this increases costs. ▪ Market partners may be able to help solve the housing problem. ▪ What in the zoning code can be changed to help reduce costs? ▪ Development standards such as Density, Parking, Height, and Water Neutrality, as well as fees, can be obstacles to development. ▪ NIMBY opposition and land costs can be constraints ▪ Sites: feasibility is a problem and owners need to be engaged. ▪ Larger sites are located near the urban limit, but density is needed near city center. Height limits should be reconsidered. ▪ Main Street has commercial/retail vacancies. Potential for housing as mixed use. ▪ 900 Crane is for sale and may be a potential site. ▪ Can we expedite rezones for housing? ▪ Multifamily areas that only allow up to a triplex are a constraint. We need to allow more building forms. ▪ Please clear as many hurdles to development as possible.
Ester
▪ Many properties are small and can't hold larger projects. Lot consolidation may be needed. Adams St. property could be a potential low-income housing site.
Paul

- Please consider public safety issues and make sure that sites are feasible and safe.

Workshop #2: Housing Opportunity Sites

On January 20, 2022, the City held a Community Workshop to discuss the Housing Element Update and available housing sites in St. Helena. Following the workshop, a map of potential sites was posted to the Housing Element website and the City encouraged residents and stakeholders to submit through the "Comments" button.

The table below shows public input received at the event and how each participant's input was incorporated into the Draft Housing Element.



Comment	Response
Jeff Farmer: Consider closed catholic school. Some talk with church officials there. Also, the city corp yard. It may be available. ADUs, concern about lack of ADU rentals	The City investigated potential sites and considered ADU affordability trends in the sites inventory.

Comment	Response
Norma: Potential sites: corner of Fulton and east of the railroad tracks, both the north and south side of Fulton. What happened with the big property by vineyard valley (Hunter project). Regarding Pope, there is another site east toward college there may be a big vacant site to consider.	The City investigated potential sites based on public comments and revised the inventory, as necessary.
Joe McGrath: 1998 Spring Street just changed hands and may have a vineyard lease. The 3-acre site. McCorkle sites have a pending contract and may have other plans One other McCorkle site was just renovated Fulton site had interest for housing development in the past. Other sites to consider: across from corps yard on Charter Oak. Consider this please.	The City considered the constraints and sites mentioned here.
Jordan Bentley: 1998 Spring Street changed hands and has a vineyard lease. Please provide a list of properties that can be developed.	The City investigated the constraint mentioned here. The City also provided a list of properties with online map via the project website.
Pat Friday: Crane is a good place for housing. Keep it. Across from Episcopal church, there is a vacant parcel that used to be a church. This may be a possibility. Walking distance to everything. Spring Street across from the cemetery there is a big area of vacant land.	The City investigated potential sites based on public comments and revised the inventory, as necessary.

Comment	Response
Rick Crebs: Consider workforce housing for the missing middle types and incomes.	The City considered workforce and missing middle housing in crafting the Policy Document. Several programs are included to respond to these topics specifically.
Mary Stephenson: Concern that ADUs are not being rented. Over 40 percent of land in city limits is in vineyards. How much of this is zoned for housing? Can we look at these and create a long-term plan? What will remain in vineyard and what will remain in housing? The process to rezone is expensive and time-consuming Lots of expensive houses with ADUs that won't be rented. It's an extension of the main house.	The City considered ADU affordability trends in the sites inventory and are working to promote ADU development through implementation programs. Additionally, the City included a program to explore the removal of the Urban Limit Line.
John Sales: Site on Crane Avenue by the creek has a major power line running across the property. This has to be dealt with before housing can be built on the site.	The City considered the constraint mentioned here and revised the sites inventory accordingly.
Jennifer La Liberte: North Crane: there's another parcel close to the one considered. Consider this. Suggests we include this site if Crane Avenue site is included.	The City investigated potential sites based on public comments and revised the inventory, as necessary.

Comment	Response
Tracy McBride: The City needs low income housing that is ownership based. On the map on your website. The lower income sites are east of main street and site 9 is west of main street. Keep this site to disperse lower income sites around the city. How can we incentivize housing development? With by-right this can make things easier if nothing is developed and the site is reused in the next round. Adams St and church sites: why can't we use these sites? Are churches really harder to redevelop?	The City investigated potential sites based on public comments and revised the inventory, as necessary. The City also worked to provide sites consistent with the goals of AFFH. The City also crafted a number of implementation programs that work to incentivize development of lower and moderate income housing.
Joe McGrath: PG&E property on Mitchell: Consider the site. Adams: would subdivision help the political situation?	The City investigated potential sites based on public comments and revised the inventory, as necessary. The City Council is considering a number of options for the Adams Street property.
Jennifer La Liberte: Please let the public know which sites have been ruled out and why.	The City included information about sites investigated but not selected in the materials posted to the project website following the event.
Nancy Dervin Encourages the City to include feasible sites. Some sites could be higher density and available to lower income families. The site map shows moderate on west site and lower on the east side of town. Is there a disparity between east and west? Please don't force the lowest income earners into the most-dense areas of the city. Mix up housing opportunities.	The City considered feasibility in the selection of each site. Additionally, the City investigated opportunities for density increases at each site. The City also worked to provide sites consistent with the goals of AFFH.

Comment	Response
Steve Goldfarb: Adams Street. Why not include it? Advantages to this property: publicly owned (it can be sold). Please include this. It's feasible. Subdivision may be necessary, and it can house a lot of people across a lot of income categories.	The City Council is considering a number of options for the Adams Street property.
Pat Friday: We need to develop Adams Street; agrees that the property may need to be subdivided.	The City Council is considering a number of options for the Adams Street property.
Norma Ferriz: Consider vineyards that are further out than the city center. The edges of town may have potential for housing.	The City included a program in the DraftHousing Element to explore the removal of the Urban Limit Line.
Tracy McBride: Consider new laws regarding subdivision of sf homes (SB 9).	The City encourages lot splits and ADU development consistent with SB9. The Housing Element includes a program committing the City to allowing and incentivizing SB 9 projects.

Workshop #3: Affirmatively Furthering Fair Housing

On March 16, 2022, the City held a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing (AFFH) in St. Helena. The workshop included an introduction to AFFH, a presentation of initial findings and potential actions, and opportunities for the public to join the discussion and provide comments.

COMMUNITY WORKSHOP #3

On March 16, 2022, the City held a Community Workshop on the Housing Element Update and Affirmatively Furthering Fair Housing in St. Helena. A video of the event can be viewed below.

WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)?

Affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.
- California Department of Housing and Community Development

The duty to affirmatively further fair housing extends to all of the City's activities and programs relating to housing and community development. Join us at the workshop to learn more.

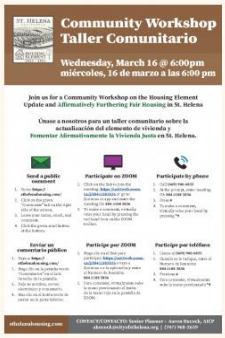


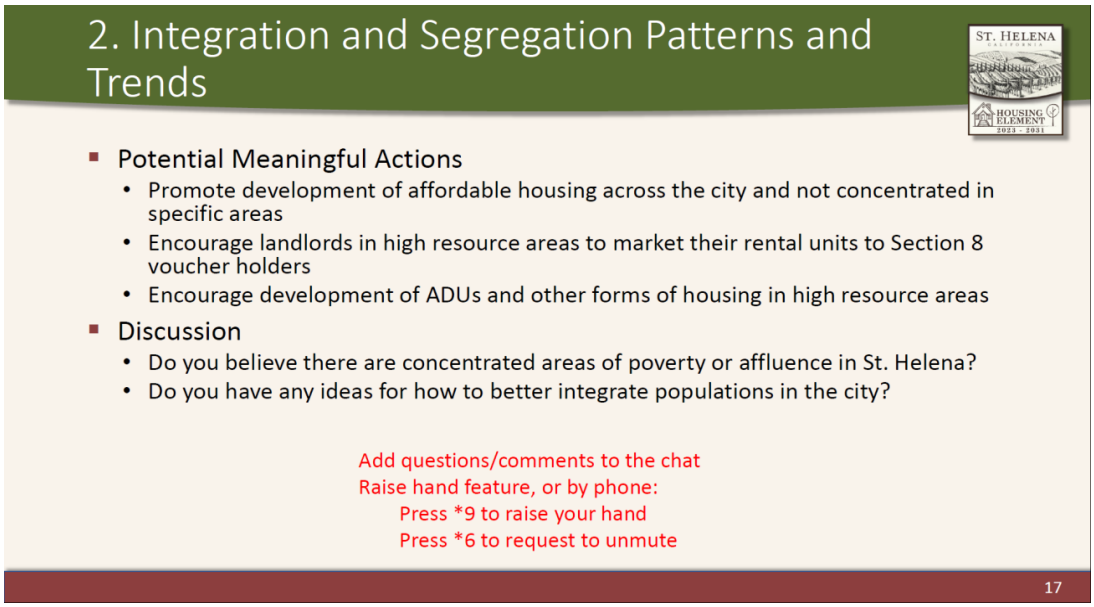
VIRTUAL WORKSHOP HELD MARCH 16, 2022

Public Comments Received:
Click Here to Download

Event Presentation:
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EVENT FLYER:
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An example slide from the workshop presentation. Presentation available at sthelenahousing.com

The following is a summary of comments that emerged through the public discussion and comment period of the workshop, as well as how the comments informed the Draft Housing Element~~.~~

Comment	Response
The city needs more housing units and people.	The City has provided sites with capacity to meet the RHNA and to incentivize development citywide.
There is no evidence that ADUs accommodate affordable units.	The City considered ADU affordability trends in the development of the sites inventory and worked to incentivize accessory dwelling units and affordable rental ADUs through implementation programs.
The City of Napa has technical assistance and funding for people that agree to deed restrict ADUs and the City of St. Helena should look at this program.	The City has investigated these and other incentives to the construction of affordable rental ADUs, and has included an implementation program committing the City to providing incentives and technical assistance to support the construction of these units.
The City should have policies that promote both low- and moderate-income housing units.	The City has included implementation programs with objectives aimed at promoting housing for households of all incomes, including moderate-income households.
The cost of construction makes it difficult for the private market to accommodate affordable housing and public financing can help produce deed restricted units.	This comment supports the findings of the constraints analysis. The City provides funding and loans to assist in the development of affordable housing.

Requiring a CUP for multi-family project in the Medium Density district limits opportunities for more units.	The City is currently (2022) exploring changes to development standard through the comprehensive zoning code update.

Focus Group Meetings

As part of the Housing Element Update project, the City formed a Focus Group to assist in the development and review of the Housing Element and Safety Element. The Focus Group served as a technical working group that assisted in generating ideas and commenting on direction. Recommendations from the Focus Group were used to revise drafts of the Housing and Safety Elements and provide recommendations to the Planning Commission and City Council.

The members of the Focus Group were as follows:

- City Councilmember Paul Dohring
- Planning Commissioner Autumn Anderson
- Planning Commissioner Rosaura Segura
- Jennifer La Liberte (Our Town St. Helena)
- Mary Koberstein (Former Councilmember)

The Focus Group was active throughout the Update project. The following provides an overview of meetings.

Past Meetings

Focus Group Meeting #1: Housing Element Overview

Provided an overview of the Housing Element process and project schedule. Collected expectations for the project and insights on housing issues, priorities, and concerns that informed the Needs Assessment. The Focus Group provided critical input related to the most pressing housing needs in the community and encouraged the City to pursue sites that are feasible and can provide capacity for a larger number of units.

Focus Group Meeting #2: Preparing for the Housing Element

Discussed results of Community Workshop #1 and the integration of community input into the Housing Element Update. Reviewed the next steps in the Update with a focus on site assessment. The Focus Group reviewed the engagement strategy and provided ideas for additional outreach efforts.

Focus Group Meeting #3: Sites Assessment Review

Discussed the results of the vacant and underutilized sites inventory and reviewed sites inventory methodology and assumptions. Focus Group input provided guidance on individual sites, capacity assumptions, and feasibility of affordable unit production.

Focus Group Meeting #4: Public Input on the Sites Assessment

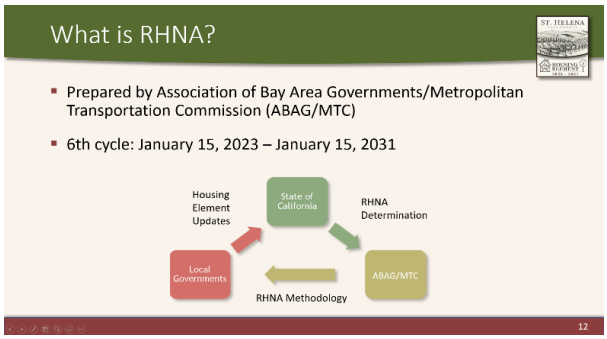
Discussed the results of Community Workshop #2 and how to address community concerns in the Housing Element. The Focus Group considered public comment and provided additional direction on each site. Following this final Focus Group Input, the sites inventory was revised and presented to the City Council for final direction.

Public Meetings with City Leadership

Past Meetings

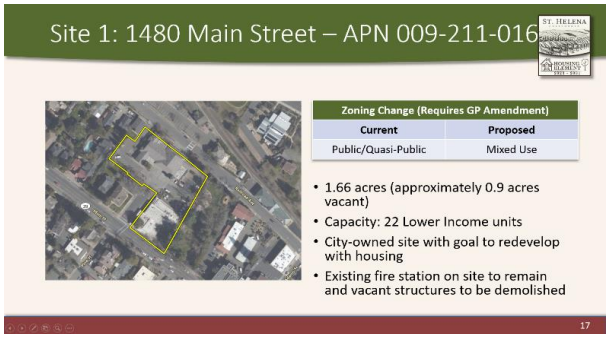
Planning Commission/City Council
Joint Study Session 1: Housing Element Overview
Held March 23, 2021

Provided an overview of the Housing Element process, project schedule, and project expectations. Discuss housing issues, priorities, and concerns.



Planning Commission/City Council
Joint Study Session 2: Sites Assessment
Held February 22, 2022

Discussed the RHNA and the sites inventory process and presented a walkthrough of potential housing opportunity sites. Discussed the results of Community Workshop #2 and public input on housing sites. Commissions and Councilmembers provided input on sites included in the draft sites inventory and reviewed each for potential constraints. The draft sites inventory was revised according to direction taken during this meeting in the preparation of the public review draft.



Planning Commission/City Council Joint Study Session: Public Review Draft Housing Element
Held July 21, 2022

Solicited input on the Public Review Draft Housing Element. Discussed next steps, HCD review, revisions, and remaining project schedule. Input from this event informed the City's response to comments on the Public Review Draft, discussed in Appendix B.

Future Meetings

- **Planning Commission Public Hearing: Recommendation for Adoption**
  To present the Draft Housing and Safety Elements, associated General Plan and Zoning Code Amendments, and responses to comments from previous Planning Commission and City Council Public Hearings and seek recommendation for adoption to City Council.

- **City Council Adoption Hearing: Adopt Housing and Safety Elements**
  To present the Final Housing and Safety Elements, associated General Plan and Zoning Code Amendments, and responses to comments from previous Planning Commission and City Council Public hearings and seek adoption of the Housing and Safety Elements from City Council.

Other Outreach Activities

St. Helena set out to collect as much feedback as possible from the community, from their general concerns and ideas to where new housing could go. It was also important to us to consider community outreach best practices and consult and partner with organizations working in the community, to ensure we were reaching as many people as possible and doing so thoughtfully.

Sites Inventory Mapping Exercise

As discussed in the summary of Workshop #2 above, the City produced an interactive online map that allowed residents and stakeholders to view and comment on potential housing opportunity sites. The online map was posted for more than a month following the workshop and the City encouraged all those interested in the Housing Element to submit their comments. The City incorporated comments on potential housing sites into the Sites Inventory by removing or revising constrained sites and considering additional sites with potential for residential uses.

Equity Advisory Group

In alignment with community outreach best practices, it was important to include the guidance of and foster partnerships with community organizations to help ensure everyone's voices were heard during the Housing Element update. In response, an Equity Advisory Group (EAG) was formed consisting of 15 organizations or leaders across the region that are advancing equity and affordable housing. A stipend of $1,500 was originally provided for meeting four to five times over 12 months to advise on Housing Element outreach and helping get the word out to the communities they work with.

After meeting twice in 2021, it was decided the best use of the EAG moving forward would be to provide more focused support in 2022 based on jurisdiction need and organization expertise. To date, EAG members have facilitated and hosted community meetings in partnership with 21 Elements, collected community housing stories to put a face to housing needs, advised on messaging, and amplified events and activities to their communities. The EAG continue to work collaboratively with jurisdictions and deepen partnerships, as well as connect community members to the Housing Element Update process. All participating organizations are featured on the Let's Talk Housing website and include the following:

- Ayudando Lations A Soñar (ALAS) www.alashmb.org
- Community Legal Services www.clsepa.org
- El Comite de Vecinos del Lado Oeste (El Comite) www.tenantstogether.org/resources/el-comité-de-vecinos-del-lado-oeste-east-palo-alto
- EPACANDO www.epacando.org

- Faith in Action www.faithinaction.org/federation/faith-in-action-bay-area/
- Housing Choices www.housingchoices.org
- Housing Leadership Council www.hlcsmc.org
- Menlo Together www.menlotogether.org
- Nuestra Casa www.nuestracasa.org
- One San Mateo www.onesanmateo.org
- Peninsula for Everyone www.peninsulaforeveryone.org
- Puente de la Costa Sur www.mypuente.org
- San Mateo County Health www.gethealthysmc.org
- Youth Leadership Institute www.yli.org/region/san-mateo
- Youth United for Community Action www.youthunited.net

Over six sessions, the EAG discussed explicit and implicit barriers to obtaining and maintaining affordable housing and this document outlines key findings, repeated themes, and recommendations from the EAG to the Napa Sonoma Collaborative. Key findings include:

- The current approach to housing policies throughout the region is ad hoc and piecemeal and what is really needed is a holistic approach to housing and homelessness issues
    - Affordable homeownership is missing from the conversation
    - Transitional and supportive housing as a more integrated part of the whole conversation is missing
    - The traditional paradigm of designing affordable housing should be changed at the educational level; design professionals should be educated to think holistically about designing communities and integrating affordable housing patterns into community design
- A lack of community trust leads to a lack of honest and transparent communication and engagement between local governments, partner agencies and the community members
- Additional housing costs are not factored into the affordable housing definition
    - The official definition of affordable housing does not include all related housing costs
        i. Those who live in deed-restricted affordable housing face food shortages, high insurance rates, and rising utility costs to name a few, which are not factored into the official definition of affordable housing. Yet these are costs that must be included in an already strained budget
    - Supercommuting leads to higher gas costs and more wear and tear on cars but is necessary to find and maintain affordable housing
    - The housing situation within the region leads to students working to support their families, creating an unintended consequence of students dropping out of their educational careers and/or leaving the community after they matriculate from High School since they cannot afford housing
    - Onerous regulation leads to displacement

- Affordable homeownership is missing from the conversation as renting is not a sustainable approach for all and it prevents people from accessing the "American Dream"
- The lack of affordable and safe housing due to high development costs, loss of units due to disasters, and/or gentrification are some of the contributing factors to the housing crisis within the region.
- Discrimination is both subtle and overt
    - Tenants are susceptible to landlords taking advantage of them due to a very specific cocktail of issues including but not limited to:
        i. Language barriers
        ii. Cultural Barriers
        iii. Stereotypes
        iv. Disabilities
        v. Income
    - Discrimination is a multilayered situation:
        i. Tenants in substandard/unhealthy housing live in precarious situations and are afraid to complain due to the fear of being evicted (which means that they live in substandard living conditions)
        ii. There is a very real fear that rents will increase if tenants complain about substandard situations
    - Stereotypes associated with low-income tenants and voucher holders are a real barrier to obtaining housing
        i. Criminal backgrounds and subsidies contribute to stereotypes which make landlords leery of renting.
        ii. SB 329 makes it illegal to reject housing vouchers, however, it still occurs
    - Discrimination is hard to determine since there aren't enough vacancies to even apply for housing
- The lack of available land coupled with regulations and high impact fees are contributing factors to astronomical development costs

The City considered these key findings in the development of the Needs Assessment and Policy Document. The Policy Document includes programs focused on regional coordination on housing issues, increasing affordable homeownership opportunities, providing transparency on housing-related decisions and actions, removing governmental constraints, incentivizing affordable housing construction, and working with Fair Housing Napa Valley to provide fair housing services.

2. Review of the Existing Housing Element

This section examines the effectiveness of the 2015 Housing Element, the progress made in achieving the goals, objectives and policies outlined in the Housing Element, along with a discussion of the Element's appropriateness given current conditions within the City of St. Helena. This evaluation will inform the policies and programs developed as part of the 2023-2031 Housing Element Update.

Housing Production During the 2015-2023 Planning Period

The City's RHNA for the 2015-2023 planning period was for eight units affordable to very low-income households, five units affordable to low-income households, five units affordable to moderate income households, and 13 units affordable to above moderate-income households, for a total of 31 housing units. Table 1 compares units permitted and constructed to the 5th cycle RHNA. Between 2015 and 2021, the City permitted a total of 110 units, including seven very low-, nine low-, and four moderate-income units. All permitted projects have been constructed.

Table 1 Progress Toward the 5th Cycle RHNA

	Very Low	Low	Moderate	Above Moderate	Total
RHNA	8	5	5	13	31
Permitted Units	7	9	4	90	110

Source: City of St. Helena, 2021 Housing Element Annual Progress Report, 2022.

Progress toward the Lower Income Housing Goals

The City has issued building permits for the Turley Flats affordable housing project, an 8-unit multifamily project with loan funding from the Affordable Housing Trust Fund (all low income), and occupancy of all units occurred in 2019. Further, the City has issued building permits for the Brenkle Court 8-unit affordable housing project (two very-low and six low income). In 2020, the City approved a deed restricted affordable housing project (four low to very-low income and one moderate income) at 963 Pope Street. The combined affordability of these units is expected to help the City make significant progress toward meeting these unit counts.

Most of the housing permitted during this planning period was above moderate-income housing. Between 2015 and 2021, 90 of the 110 units constructed were above moderate-income units.

Progress in Implementation

The 2015 Housing Element established the six goals with coordinated policies and implementing programs, organized around the following goal areas:

1. A Diversity of Housing to Meet Local Needs
2. Efficient Land Use and High-Quality Neighborhoods
3. Conservation of Existing Housing
4. Assistance to Support Affordable Housing
5. Resource Conservation
6. Equal Housing Opportunities

Table 2 provides a detailed evaluation of the implementing programs that support each of these goals, and the subsequent sections discuss the extent to which the 2015 Housing Element policies and implementing programs helped the City of St. Helena meet the goals.

Diversity of Housing to Meet Local Needs

Facilitate development of a variety of housing types to meet the full range of housing needs in our community, with particular emphasis on housing for our local workforce, people with special housing needs, and people with extremely low, very low, low and moderate incomes.

In order to supply a diversity of housing types to meet local needs, the 2015 Housing Element developed Policies 1.1 through 1.6 and implementing Actions 1.A through 1.K. Policies 1.1 through 1.6 focus on ensuring that the City provides a sufficient supply of residential land to meet the housing needs of the community, encouraging and facilitating the development of affordable housing, removing constraints to housing production, and providing workforce and mixed-use development near downtown. In line with these policies, the City proceeded with successfully implementing Actions 1.A through 1.K, which range from large efforts, such as streamlining approvals for affordable multifamily projects and providing priority access to water and sewer infrastructure to development with affordable units, to smaller efforts, such as encouraging non-traditional housing types. While many of these programs were completed, the City did not revise the definition of "family" within the Municipal Code for consistency with State law and must include a program in the 2023-2031 Housing Element to address this compliance issue.

Efficient Land Use and High-Quality Neighborhoods

Make efficient use of land within the Urban Limit Line to protect agricultural lands, promoting compact, well-designed developments that 'fit in' with existing neighborhoods and contribute to the overall livability of our community. Encourage a balance of housing types throughout the entire community.

Policies 2.1 through 2.6 encourage higher density development where appropriate, mixed-use development, second units, and a variety of housing type throughout the community. These policies are supported by Implementing Actions 2.A through 2.P. Most notable among these actions is the progress towards incentivizing

higher density housing (Action 2.A), which has been supported by the removal of the Use Permit requirement for multi-family housing in the High Density Residential land use designation and Housing Opportunity Sites located on parcels designated Medium Density Residential. Additionally, the City has implemented state-mandated ADU regulations (Action 2.I) and integrated a mixed-use land use designation into the 2040 General Plan (Action 2.H). While some of these programs were completed with the recent General Plan Update, programs related to zoning changes are being undertaking in the current (2022) comprehensive Zoning Code update. These programs should be continued in the 2023-2031 Housing Element.

Conservation of Existing Housing

Improve and conserve existing housing, with particular attention to the rehabilitation and retention of existing affordable units.

Policies 3.1 and 3.2 are designed to conserve the existing housing stock through restricting conversion of rental units to condominiums and to monitor housing conditions citywide. Actions 3.A through 3.E implement these policies. Actions 3.A, 3.C, and 3.D help protect current housing stock by working to limit conversion to more limited uses, such as vacation rentals, or to nonresidential uses. Action 3.B implements an affordable housing impact fee to help monetarily incentivize the conversion of existing housing units. Action 3.E describes reporting requirements and commits the City to producing an annual Housing Element progress report, as required by HCD. Since the last Housing Element, the City has implemented a Housing Impact Fee, actively limits short-term rentals to twenty five units, and continuously looks for methods to promote the conservation of existing housing.

Assistance to Support Affordable Housing

Provide technical and financial resources to support development of affordable housing in our community, especially housing that meets the needs of our local workforce, people with special housing needs, and people with moderate, low, and very low incomes.

Policies 4.1 through 4.5, as well as Implementing Actions 4.A through 4.L, are designed to support this goal of actively assisting affordable housing growth, especially for special needs groups, such as farmworkers, seniors, and persons with disabilities. The City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. During the 5th cycle, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects (Turley Flats, Brenkle Court, and 963 Pope), anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. The City has also passed Measure E, which increased the Transit Occupancy Tax rate by one percent, which generates further funds towards affordable housing. Estimated annual revenue from this measure is approximately $280,000. Since 2015, the City has fully funded all funding requests made by affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.

Resource Conservation

Promote resource conservation by encouraging housing types and designs that use fewer resources (water, electricity, etc.) and therefore cost less to operate over time, supporting long-term housing affordability.

The City of St. Helena took an active role in promoting the use of alternative energy sources and encouraging energy conservation, as targeted by Policies 5.1 and 5.2 and Programs 5.A through 5.H. During the 5th cycle, the City implemented these actions by adopting the 2019 State Building Codes, including the CALGreen Building Code, creating a "Rapid Permit" procedure for solar installations, and adopting a "water neutral" policy for new development. Additionally, the City is engaged with the Napa Valley Transportation Authority to adopt a countywide bicycle and pedestrian plan, which works to increase accessibility and promote tourism across the county while reducing vehicles on the road.

Equal Housing Opportunities

Assure that housing programs maximize choice, avoid economic segregation and avoid discrimination based upon age, sex, race, sexual orientation, religion and ethnic background

The sixth and final goal has one policy and two implementing programs, which commit the City to supporting Fair Housing Napa Valley as the City Fair Housing Provider. The City works with Fair Housing Napa Valley to provide information to the public regarding the rights and responsibilities and resources available to address fair housing issues. The City provides funding to Fair Housing Napa Valley and responds to all referrals from the agency. This governmental cooperation between local and county level agencies allows for enhanced coordination to combat housing insecurity across the region.

In the upcoming cycle, the City should be strengthened to promote a proactive approach to fair housing consistent with the State's requirements related affirmatively further fair housing (AFFH). Additional policies and programs will be needed to address fair housing issues. Additionally, the City should analyze all goals, policies, and programs through the lens of AFFH, and should apply fair housing objectives as appropriate.

Effectiveness of 2015 Housing Element

As discussed in the preceding section and in Table 2, the City implemented many policies and programs to facilitate housing production. Most importantly, the City has made great strides in securing additional funding for affordable housing and working with local stakeholders and county organizations to improve housing accessibility. From preserving existing housing and promoting the expansion of multifamily housing through relaxed regulation, the City recognizes the severity of the housing crisis and has worked progressively to do its part in adding housing towards meeting and exceeding RHNA goals. However, in some cases, the City did not have the necessary staff resources or funding to implement programs. While the 2040 General Plan Update process required significant staff time and delayed implementation of some Municipal Code amendments, the City is currently (2022) undertaking a comprehensive Zoning Code update that will address the remaining code amendment implementation measures during the 6th cycle. As the code update draws to its conclusion, the City

will have more resources available to implement remaining implementation actions, which have been continued in the 2022 Housing Element Update.

Effectiveness in Meeting the Needs of Special Needs Populations

The previous Housing Element had one program targeting special needs populations, Program 1.F. Program 1.F calls for the fast-tracking of housing developments that meet lower income and special needs populations. During the fifth cycle, 13 units of deed restricted affordable housing units were approved. No housing developments specifically tailored to the needs of special needs communities, such as seniors and farmworkers, were approved or built during the planning period. The previous housing element also contained the following quantified objectives tailored towards Special Needs Households:

- Assist in the acquisition of low-interest loans to 10 first-time homebuyers.
- 20 percent of new units to meet senior needs.
- 10 percent of new units accessible to persons with disabilities.
- Purchase of 3 existing housing units and conversion to regulated affordable housing for lower-income households.

The City of St. Helena did not meet any of the previously listed quantified objectives during the fifth cycle. However, the City made significant progress with the construction of 8 units of market-rate housing that was fully compliant with Americans with Disabilities Act (ADA) requirements. This equates to 7.3 percent of new units being accessible to persons with disabilities during the fifth cycle.

The 2023 Housing Element Update provides new and updated programs to commit the City new actions that work to meet the needs of special needs populations. Program H-E~~Program H-F~~, a revised version of Program 1.F, ~~calls~~commits the City to providing a streamlined ministerial review process for special needs housing, with a goal of encouraging the development of 6 units for seniors, farmworkers, or persons with disabilities. ~~The program also specifically highlights the need for more farmworker housing in the City.~~ Program H-BB, a new program, commits the City to pursuing funding to assist with rehabilitation costs for lower income households and seniors. Program H-KK specifically commits the City to supporting efforts to improve access to farmworker housing in the City and region. Program H-LL commits the City to encouraging developers to include units dedicated to those with special housing needs in new developments. Finally, Program H-NN commits the City to pursu~~ing~~e funding to assist with funding new housing projects for populations with special needs.

Table 2 Program Implementation Status pursuant to GC Section 65583

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE1.A	Continue to exempt permits for regulated affordable units as well as second units from Growth Management System	Ongoing	The City currently exempts all units, including affordable housing units and Accessory Dwelling Units from the Growth Management system in compliance with current state law. This provision will be removed in a future zoning code update.	Modify to reflect removal of the GMS
HE1.B	Review and possibly amend the Growth Management System to encourage the production of regulated affordable and workforce housing units.	2017	The City Council reviewed the Growth Management system in 2016 (as required) and provided direction to update and potentially amend the GMS Ordinance, after the 2040 General Plan update is completed. Given that the only multi-family housing applications reviewed by the City in recent years have been approved, it does not appear that the current GMS Ordinance is affecting the development of workforce housing. As explained above, the Growth Management System will be removed from the Municipal Code as part of the comprehensive zoning code update.	Modify to reflect removal of the GMS, merge with HE1.A
HE1.C	Give projects that include affordable housing units priority access to water and sewer resources over other new projects should the capacity of the local water or sewer systems become inadequate to meet the full demand for new connections.	Ongoing	The City provides priority access to water and sewer resources to projects to affordable housing projects.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE1.D	Revise the permitting process to streamline the review of affordable housing and market rate multifamily projects.	2016	In an effort to implement this Goal, the City has removed the Use Permit requirement for multi-family housing in the High Density Residential (HR) ~~land use designation~~zone and all of the Housing Opportunity Sites (Key Housing Sites, see Section 17.40.020(N)) located within the Medium Density Residential (MR) zone~~other designations~~ and has established a streamlined approval process consistent with SB35 and SB330. Further, as mentioned above, affordable housing units are not subject to the GMS Ordinance limitations.	Delete
HE1.E	Work with private property owners/developers to plan for road and utility improvements necessary to support housing on key opportunity sites, in the event these sites are developed.	Ongoing	The City is continually looking for grant and other funding opportunities to off-set the costs of infrastructure Further, the 2040 General Plan update and current Capital Improvement Program provide direction and discussion regarding needed infrastructure improvements.	Keep
HE1.F	When possible, fast-track housing developments that meet lower income and special housing needs.	Ongoing	The City is committed to expediting any affordable housing applications that are submitted for review and action. Eight owner-occupied affordable housing units were approved by the City in Dec. 2016 (Self-Help Affordable Housing Project called the Brenkle Ct. Project from Our Town St. Helena (OTSH)). ~~Building permits~~Building permits for each unit were issued in 2019. An additional five deed restricted affordable units were approved in 2020 however building permits have not yet been issued.	Modify
HE1.G	Maintain the local preference policy to possibly include people needed for work during city emergencies.	2017	No revisions to the current local preference policy for affordable housing units has been made as of yet.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE1.H	Explore, and adopt as appropriate, a program to address the housing needs of "workforce" households, which have incomes above 120 percent of AMI, but are still unable to afford market rate housing.	2017	The City Council has expressed an interest in reviewing housing needs Citywide. Pending development applications anticipated to increase the demand for employee housing are being asked to make efforts to address the housing impacts associated with their individual developments.	Modify and Expand
HE1.I	Implement a program to provide financial assistance for the development of second units in exchange for affordability restrictions that will provide workforce housing.	Ongoing	The City Council has expressed an interest in finding ways to deed restrict and/or incentivize the use of ADUs as rental units.	Keep
HE1.J	Encourage development of co-housing, ecohousing, 'green' manufactured homes and other 'nontraditional' forms of housing. Ensure these housing types are addressed in the development of design guidelines to streamline to approval process.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide now that the 2040 St Helena General Plan has been adopted. In addition, the Comprehensive Zoning Code update includes standards for small lot development and standards to encourage a variety of housing types.	Keep
HE1.K	Amend the Zoning Ordinance to define "family" as one or more persons living together as a single housekeeping unit in a dwelling unit. The definition should not distinguish between related and unrelated individuals and should not impose a numerical limit on the # of persons that constitute a family.	Ongoing	No revisions to the current zoning code definition of family have been made as of yet as the comprehensive zoning code update is still underway. However, all City actions are made in keeping with California State law, as it has precedence over any in-consistent locally adopted land use definitions.	Required Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.A	Provide incentives for higher density housing. Explore possible incentives for building attached market rate housing units for rent and for sale.	Ongoing	In an effort to implement this Goal, the City has removed the Use Permit requirement for multi-family housing in the High Density Residential land use designation and all of the Housing Opportunity Sites located within other land use designations (Medium Density Residential). In addition, the City has created an SB 330 Checklist to further streamline the design and approval of by-right multi-family units within the community.	Keep
HE2.B	Study potential modifications to the Zoning Ordinance to facilitate higher density housing [and discourage construction of oversize homes]. Modify the Zoning Ordinance to encourage higher density developments [and restrict construction of large single-family units], including current floor area ratios and yard and setback requirements.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide. The comprehensive zoning code update is in progress and these items will be addressed as part of that effort.	Keep
HE2.C	Amend regulations to discourage exemptions from the minimum density requirements. The City shall discourage exemptions for minimum density requirements and establish mitigation measures for exemptions in the Zoning Ordinance.	Ongoing	The comprehensive zoning code update is in progress and these items will be addressed as part of that effort. However, all City actions are made in keeping with California State law, as it has precedence over any in-consistent locally adopted land use definitions.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.D	Modify section 17.100 of the Zoning Ordinance to rename the Mobilehome Park Overlay District to "Manufactured Housing Overlay District". Develop policies to streamline the review process for this overlay district on residential land for projects that create land-ownership opportunities for residents. Support giving residents the right of first refusal if an existing park is to be sold.	Ongoing	No revisions to the current zoning code have been made yet as the comprehensive zoning code update is currently underway. However, all City actions are made in keeping with California State law and any request to implement a Manufactured Housing Overlay District would be reviewed as such.	Delete
HE2.E	Amend the "Subdivisions" section of the Municipal Code. The City will amend Title 16 of the Municipal Code to prevent subdivision activity from effectively resulting in lower densities and a loss of potential housing units on the site.	Ongoing	No revisions to the current "Subdivisions" section of the Municipal Code have been made as of yet. The City Council has expressed an interest in reviewing housing needs Citywide.	Delete
HE2.F	Update the General Plan Land Use Element in consideration of the established Housing Element land use goals and policies. Amend General Plan Elements concurrent with adoption of the General Plan Update as needed to ensure internal consistency.	2015	The St Helena 2040 General Plan update incorporates the adopted 2015 Housing Element. The Housing Element and General Plan are consistent.	Modify for required Safety Element Update

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.G	Promote both 'vertical' and 'horizontal' mixed-use. Encourage mixed-use developments that combine compatible uses on the same site, either in the same structure or adjacent structures. Amend the Zoning Ordinance accordingly. Amendments to the Zoning Ordinance include permitting the FAR for the residential component of a mixed-use development to be 'additive' rather than within the established FAR for that zone, and allowing commercial and residential users to 'share' their parking, resulting in a lower overall parking requirement. Requirements for covered parking should also be reconsidered.	2017	The St Helena 2040 General Plan update incorporates the adopted 2015 Housing Element. This update includes the creation of a mixed-use land use designation and will be followed by a comprehensive zoning code update, intended to create and implement the development criteria set for mixed use development within St Helena.	Revise for zoning code consistency

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.H	Explore the possibility of allowing mixed use and live/work units in non-residential zoning districts. Explore and adopt as appropriate modifications to non-residential Zones that would permit, either as of right or as a conditional use, residential uses including mixed use and integrated live/work units. Analyze requirements that commercial projects provide housing for a portion of the employment that will be generated on site. The City will study and determine what portion of employment generated will require housing, whether housing will be required on-site or allowed off-site, if pricing for the non-inclusionary units will be tied to anticipated salaries for employees in the commercial portion of the project, and if in-lieu fees will be permitted for smaller sized projects. Explore and adopt as appropriate development incentives such as higher density and height allowances, a streamlined design review process, and financial incentives, including fee reductions and waivers and contributions from the City's Housing Trust Fund, to encourage employers to provide on-site employee housing.	2017	The St Helena 2040 General Plan update includes the creation of a mixed-use land use designation. The comprehensive zoning code update will create and implement the development criteria for mixed-use development within St Helena.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.I	Review and revise development standards pertaining to second units. Ensure that the development of second units is physically and financially feasible in targeted areas. Give particular attention to parking standards, setbacks, and impact fees.	Ongoing	In 2020, the City adopted updated ADU regulations which streamlined the review process for ADU construction and conversion, in keeping with the requirements of State law. The St Helena 2040 General Plan update was adopted in May 2019. A comprehensive zoning code has begun and will include additional direction regarding the development of Accessory Dwelling Units.	Delete
HE2.J	Provide financial assistance for second unit development. Incentives might include low interest loans or fee waivers.	2020	The City of St. Helena has amended its zoning ordinance to be compliant with state law with regards to ADUs, their permitting, and reduced impact fees.	Modify and Expand
HE2.K	Target specific areas for second unit incentives. Create incentives to construct second units in the medium density areas near downtown. Incentives to adopt as appropriate include, but are not restricted to, fast tracking development applications, deferred development fees, and reduced parking and/or other city standards.	Ongoing	The City of St. Helena has amended its zoning ordinance to be compliant with state law with regards to ADUs, their permitting, and reduced impact fees.	Keep
HE2.M	Link financial incentives and development standard variances to affordability requirements for second units. Require that either the main house or the second unit is used as a rental unit that is affordable to moderate or below moderate households whenever the City assists in development through financial incentives or by granting a variance.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide which is expected to occur along with the comprehensive zoning code update. The City has also begun its 6th Cycle Housing Element Update which will identify Key Housing Opportunity Sites and potential rezoning opportunities withing the City.	Modify

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE2.N	Respond to complaints regarding illegal units. The City will work with the property owners to help bring illegal units up to code and to abate the use of non-habitable buildings as living units	Ongoing	While the City does not have a dedicated Code Enforcement Department, Planning and Community Improvement Department staff is responsible for responding to Code Enforcement complaints and prioritize life and safety issues, such as substandard housing, in these efforts. Additional Code Enforcement improvements have been identified as an element of the adopted City Council goals.	Keep
HE2.O	Identify appropriate 'target' areas for conversion of single-family homes to multi-unit dwellings, Identify areas, zoning districts, or specific sites where conversion would be appropriate or desirable.	Ongoing	A majority of the City's residential land is designated as Medium Density Residential, allowing conversion of existing SFD to MFD at a density of 5.1-16 units per acre. The City has also begun its 6th Cycle Housing Element Update which will identify Key Housing Opportunity Sites and potential rezoning opportunities withing the City. The 6th Cycle Housing Element identifies sites for rezoning to increase density and encourage affordable housing production.	Delete
HE2.P	Develop a program to encourage affordable housing in clusters of 4-6 units on Infill parcels on west side of town. The City will post an inventory of available sites on the City's website. City will explore and adopt as appropriate incentives to encourage affordable housing clusters, including, but not limited to priority permitting processing, reduced or waived development fees, reduced parking and/or other city standards, and an additional density bonus.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide and have prioritized creation of a Citywide Housing Strategy as one of the Council Goals. This is expected to occur along with the comprehensive zoning code update. Incentives for the development of these units including parking ratio reductions, will be included as a part of this review. Further, a majority of the City's residential land is designated as Medium Density Residential, allowing conversion of existing SFD to MFD at a density of 5.1-16 units per acre. The City has also begun its 6th Cycle Housing Element Update which will identify Key Housing Opportunity Sites and potential rezoning opportunities withing the City.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE3.A	Restrict conversion of rental units to condominiums. Current policy allows conversion to condominiums under certain circumstances when the vacancy rate is high. The presence of second homes results in an inflated vacancy rate. The policy should be further studied to reflect a general guiding principle of preserving the affordable housing stock while eliminating the current linkage to vacancy rates.	Ongoing	The City will endeavor to work the Napa Housing Authority to create regulations to restrict the conversion of rental units to condominiums.	Keep
HE3.B	Charge an affordable housing impact fee whenever housing units are converted to other uses. Exempt conversion projects that create affordable for-sale housing from this impact fee.	Ongoing	The City currently charges an Housing Impact Fee. Further, the City Council has expressed an interest in reviewing housing needs Citywide and have prioritized creation of a Citywide Housing Strategy as one of the Council Goals. This is expected to occur concurrently with the comprehensive zoning code update.	Keep
HE3.C	Address the potential loss of assisted units. Identify assisted properties at risk of conversion to market rates and work with the property owners and/or other parties to ensure that they are conserved as affordable housing.	Ongoing	The City Council has expressed an interest in reviewing housing needs; the maintenance of assisted units will be a part of this discussion.	Modify based on current at-risk units
HE3.D	Continue to limit the conversion of market rate housing to vacation rentals. Abate the use of illegal vacation rentals, including time shares and fractional interests.	Ongoing	The City strictly limits the use of residential units for short-term rental (STR) use to a maximum of 25 STR units within the City. Funds collected from these units are utilized to assist with active and aggressive enforcement of these limitations. This enforcement continued to be a priority throughout the planning period.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE3.E	Review housing needs, achievements and challenges as part of the City's regular General Plan review. As required by State law, submit a progress report to the State Department of Housing and Community Development and Governor's Office of Planning and Research by April 1st of each year.	Annually	This report is being done as a part of this Goal and as of 2021 reporting year (submitted April 2022), the City of St. Helena is up to date on its reporting requirements regarding Housing Element implementation with the Office and HCD.	Keep
HE4.A	Review and possibly amend the inclusionary housing ordinance to: Adjust the inclusionary housing ordinance to require further distribution of affordable units within the various income categories… Balance collecting housing impact fees with the requirement to construct affordable housing, either on or off site depending on the size of the site and other site conditions, for larger commercial developments… Increase as appropriate residential construction in-lieu fees and/or create a sliding scale for larger houses. Add an above moderate-income workforce housing component to the Inclusionary Housing Ordinance requirements.	Ongoing	The City Council has expressed an interest in reviewing housing needs Citywide. Potential revisions to the inclusionary housing requirements will be included as a part of this review.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.B	Generate Revenues for Affordable Housing through the Transient Occupancy Tax. Either increase the Transient Occupancy Tax or increase the number of transient occupancy rooms and apply the increased revenue to support affordable housing.	Ongoing	The City passed Measure E which increased the Transit Occupancy Tax rate by 1% and those funds raised go towards affordable housing.	Keep
HE4.C	Reduce, defer, or waive fees for affordable housing developments. The City will establish a set of criteria for project eligibility to have fees reduced, deferred or waived. The City will explore and adopt as appropriate higher incentives for affordable housing developments with units affordable to extremely low and very low income households.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. Since 2016, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects, anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. Since 2015, the City has fully funded all funding requests made by an affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.	Keep
HE4.D	Prioritize the use of Housing Trust Funds in support of the development and preservation of regulated affordable units for extremely low-income households.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. Since 2016, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects, anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. Since 2015, the City has fully funded all funding requests made by an affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.E	Pursue mortgage revenue bonds and/or mortgage credit certificates. Promote affordable homeownership opportunities for moderate- and lower-income households.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part of continued Citywide housing review.	Keep
HE4.F	Pursue additional funding for affordable housing. Explore other options for affordable housing funding, including a real property transfer tax and Housing Trust Fund contributions from the wine and hospitality industry in Napa Valley.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. In 2018, the City joined with all municipalities in Napa County, put Measure E on the ballot, requesting voter approval of a special tax to increase Transit Occupancy Taxes on hotels by one percent, with these additional funds being for the sole purpose of housing. This measure was approved and went into effect January 1, 2019. Estimated annual revenue from this measure is approximately $280,000.	Keep
HE4.G	Continue Section 8 rent subsidy certificates. Work with the City of Napa Housing Authority to provide continued rental assistance to low, very low and extremely low-income households.	Ongoing	The City continues to contract with the City of Napa for Housing Authority services, including Section 8.	Keep
HE4.H	Explore the possibility of establishing a full-time, shared Housing Coordinator for the up-valley communities to promote development of new affordable housing and enter into a cost-sharing agreement if feasible. The position would serve all of the up-valley communities, including Napa County.	Ongoing	The City continues to contract with the City of Napa for Housing Authority services, including Section 8.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.I	Address farmworker housing needs. The City will contribute staff time and City resources, as appropriate, to countywide farmworker housing efforts that may occur during the Housing Element planning period. The City will reach out to affordable housing developers to support regional and City efforts to develop farmworker housing, including assisting with financing or applications, incentives and concessions, expedited review or other strategies to encourage the development of housing for farmworkers.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part continued Citywide housing review.	Keep
HE4.J	Establish regulations requiring that a portion of units in all new developments meet the special housing needs of seniors and persons with disabilities, including developmental disabilities. Target 20 percent of new housing units to meet senior household needs and 10 percent accessible to persons with disabilities.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part continued Citywide housing review. A recent eight-unit market rate project (632 McCorkle) approved within the City will provide two fully compliant ADA units.	Delete
HE4.K	The City shall participate with mediation between property owners if needed to facilitate affordable housing. The City will provide staff resources and/or work with affected parties along with an outside mediator if necessary to address issues raised by community members in response to affordable housing development applications.	Ongoing	The City continues to look for options to incentivize affordable housing development, and will expand these efforts as a part continued Citywide housing review.	Delete

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE4.L	Explore the potential of using Housing Trust Fund money to purchase existing housing for conversion to restricted affordable housing and commit funding as appropriate. Priority use of Housing Trust Fund monies will be given to the creation of housing affordable to extremely low-income households.	Ongoing	Since 2010, the City has made significant efforts to provide financial incentives, including reducing the application and impact fees for affordable housing projects and will continue to do so into the foreseeable future. Since 2016, the City committed substantial amounts of Affordable Housing Trust Fund monies (approximately $2,450,000) to three different affordable housing projects, anticipated to result in the construction and/or occupancy of 21 new affordable housing units in St. Helena through 2021. Since 2015, the City has fully funded all funding requests made by an affordable housing developers to assist with the design and construction of affordable housing units within St. Helena.	Keep
HE5.A	Adopt a Green Building Ordinance. The City shall adopt building code standards that meet or exceed the State's Green Building Standards Code. The Planning and Building Department shall coordinate this effort with the Climate Protection Task Force.	Ongoing	The City adopted the most recent standard building code updates in 2017 and again in 2019 and will continue to do so as updates are required.	Keep
HE5.B	Encourage use of alternative energy technologies. Create incentives for the use of solar energy in new and rehabilitated housing. Incentives to adopt as appropriate include, but are not restricted to, ensuring a streamlined review process for applications, deferred fees, and reduced applicable city standards.	Ongoing	The City currently issues building permits for solar panel installation, backup battery installation, and electric vehicle charging infrastructure under the "Rapid Permit" category and will continue to do so into the foreseeable future. The City has extended services for Solar Permits to be submitted via email and paid over the phone to expedite further the process and reduce the number of trips into City Hall to get the permit.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE5.C	Provide public information on alternative energy technologies for residential developers, contractors, and property owners. The City will provide information on its web site and/or at City Hall regarding alternative energy technology options, possible sources of financing, and any applicable information regarding necessary local permits.	Ongoing	The City currently provides Green Building Code information upon request and has updated the City website, allowing additional information to be provided on an on-going basis.	Keep
HE5.D	Require cost-effective energy conservation measures in all new and rehabilitated housing to promote long-term affordability for occupants. The City will adopt the State's new Energy Efficiency Standards as part of any update to the California Building Standards Code and ensure that all new housing units constructed in the City meet or exceed these standards.	Tri-Annually	The City continues to work toward concurrent building code adoption along with standard building code updates. The last update being January 1, 2020, with adoption of the 2019 Code Standards.	Keep

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE5.E	Provide low-interest loans for implementation of energy conservation measures. The City will identify a source of loan funds to provide energy conservation assistance to homeowners and homebuilders. The City will continue to participate in AB-811 programs and will explore additional state and federal sources of funding to finance local energy conservation measures. Sources of state and federal funds include, but are not limited to, the California Energy Commission State Energy Program and Energy Efficiency and Conservation Block Grant Program, and the Low Income Home Energy Assistance Program.	Ongoing	No additional ability to provide loans from City funds have been identified as of yet, however the City continues to seek opportunities to assist home owners with low-cost options for energy conservation.	Keep
HE5.F	Provide public information on alternative energy technologies for residential developers, contractors, and property owners. The City will provide information on its website and/or City Hall regarding alternative energy technology options, possible sources of financing, and any applicable information regarding necessary local permits.	Ongoing	The City currently provides Green Building Code information upon request and has recently updated the City website, allowing additional information to be provided on an on-going basis. In 2018, the City added information regarding solar panel installation, backup battery installation, and electric vehicle charging infrastructure to the City's website to ease access to the requirements and incentives available.	Delete or merge with 5.C

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
HE5.G	Require bicycle and pedestrian amenities and connectivity to surrounding areas, in all new housing developments. Support programs to develop more local and regional walking and biking trails. In addition to requiring bicycle and pedestrian connectivity in all new residential developments, the City will provide staff time in support of regional trail programs.	Ongoing	The City engaged with the Napa Valley Transportation Authority on the adoption of a county wide bicycle and pedestrian plan. Further, the City has engaged with the Vine Trail organization in an effort to assist with implementation of the best route for the trail through St Helena. The City has established a Trails Committee and a Trails and Open Space Plan to promote pedestrian connectivity has been drafted and is expected to be adopted by the City Council in 2023. Finally, it is anticipated the comprehensive zoning code update, will include additional requirements for bicycle parking.	Delete
HE5.H	Continue to apply Municipal Code provisions pertaining to water resources. City will continue to require water-efficient landscaping for new residential and commercial construction, as well as implementing the Water Use Efficiency and Use Guidelines.	Ongoing	The City has adopted a "Water Neutral" policy for all new development (Municipal Code Chapter 13.12) and continues to implement a Water Efficient Landscape Ordinance (MWELO) in keeping with anticipated State requirements.	Keep
HE6.A	Provide educational materials at City Hall, through the press and directly to interested parties to educate real estate professionals, property owners and tenants on their rights and responsibilities and the resources available to address fair housing issues.	Ongoing	The City works with Fair Housing Napa Valley to put on an annual housing workshop to highlight the rights and responsibilities of tenants and landlords, in addition to discussing affordable housing challenges generally.	Keep
HE6.B	Continue to utilize and support Fair Housing Napa Valley for implementing fair housing programs, receiving complaints, and providing referrals to available resources when necessary.	Ongoing	The City contracts with Fair Housing Napa Valley to support fair housing and allocates direct funding as part of the budget process for their assistance.	Merge with 6.A

#	Implementation Actions	Timeframe	Status of Program Implementation	Recommen-dation
Goal 3 Quantified Objective:	Assist in the acquisition of low-interest loans for rehabilitation, including energy conservation, of 10 lower-income housing units by January 31, 2023, of the end of the Housing Element planning period (two extremely low income, two very low income, three low income, and three moderate income households).	12/31/2022	City was awarded $500,000 HOME funds grant in 2017 and initiated implementation of a program to make 0-interest, 0-payment 30-year loans for rehabilitation work to owners of deed restricted homes. To date, the City has expended or committed approximately $448,000 of these funds to assist 18 low-income homeowners and continues to roll out funds as loans are repaid. The City was awarded another $500,000 in HOME funds in 2020 however the City is waiting for approval from HCD to begin processing loan requests as they review the updated guidelines and environmental documentation.	Establish new Quantified Objectives in the Housing Element Update
Goal 1- Quantified Objective:	Construct four units of affordable housing to Extremely-Low income households; four units of housing affordable housing to Very Low Income households; five units for Low Income households; five units for Moderate Income households; and 13 units for above Moderate Income households by October 31, 2022 (31 total RHNA).	12/31/2022	The City has issued building permits for the Turley Flats affordable housing project, an 8-unit multifamily project with loan funding from the Affordable Housing Trust Fund (all low income). Occupancy of all units occurred in 2019. Further, the City has issued building permits for the Brenkle Court 8-unit affordable housing project (two very-low and six low income). In 2020, the City approved a deed restricted affordable housing project (four low to very-low income and one moderate income) at 963 Pope Street. The combined affordability of these units is expected to help the City make significant progress toward meeting these unit counts.	Establish new Quantified Objectives in the Housing Element Update
Goal 4 Quantified Objective:	Reduce, defer or waive fees for 18 housing units affordable to extremely low, low, very low- and moderate-income households.	12/31/2022	The City has both reduced and deferred fees (through a loan from the Affordable Housing Trust Fund) for the Turley Flats Affordable Housing Project, an 8-unit multi-family development at 1105 Pope St, the Brenkle Court 8-unit affordable housing project access off of McCorkle, and the 5-unit affordable housing project at 963 Pope Street. Combined, the City has reduced, deferred or waived fees for 21 affordable housing units as of Jan. 1, 2022.	Establish new Quantified Objectives in the Housing Element Update

3. Demographic and Economic Trends

In order to understand the current housing needs of St. Helena residents, this section examines historic, current, and projected population, household, and employment trends. The figures for St. Helena are compared with the equivalent figures for Napa County and the Bay Area, to frame the St. Helena figures within the trends of the greater region.[3]

The data for the analysis of population, household characteristics, and employment come from the last four decennial Censuses, the 2015-2019 American Community Survey, the U.S. Department of Housing and Urban Development's (HUD) 2013-2017 Comprehensive Housing Affordability Strategy, the California Department of Housing and Community Development's (HCD) 2020 5th Cycle Annual Progress Report Permit Summary, the California Department of Finance's (DoF) 2020 E-5 series, and the 2010-2021 California Employment Development Department (EDD) Local Area Unemployment Statistics.

The Association of Bay Area Governments (ABAG) supplied an HCD Preapproved Data Package that included the vast majority of the data included in this analysis. Additionally, ABAG, in coordination with Baird + Driskell Community Planning provided a Housing Needs Data Report that directly informed this section of the Needs Analysis.[4]

The Bay Area continues to see growth in both population and jobs, which means more housing of various types and sizes is needed to ensure that residents across all income levels, ages, and abilities have a place to call home. While the number of people drawn to the region over the past 30 years has steadily increased, housing production has stalled, contributing to the housing shortage that communities are experiencing today. In many cities, this has resulted in residents being priced out, increased traffic congestion caused by longer commutes, and fewer people across incomes being able to purchase homes or meet surging rents.

The 2023-2031 Housing Element Update provides a roadmap for how to meet our growth and housing challenges. Required by the state, the Housing Element identifies the existing housing conditions and community needs, reiterates goals, and creates a plan for more housing. The Housing Element is an integral part of the General Plan, which guides the policies of St. Helena.

This section presents information regarding population, household, and income trends between 2010 and 2019, with some additional analysis for the period between 2000 and 2010.

[3] For the purposes of this Housing Needs Assessment, the Bay Area is defined to include the following counties in the Association of Bay Area Governments (ABAG): Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Sonoma, and Solano.

[4] ABAG/MTC Staff and Baird + Driskell Community Planning, Housing Needs Data Report: St. Helena, May 2021.

Key Findings

- **Population**. Generally, the population of the Bay Area continues to increase because of natural growth and the strong economy drawing new residents to the region. The population of St. Helena increased by 2.1 percent from 2000 to 2020, which is lower than the growth rate of the Bay Area.

- **Age.** In 2019, St. Helena's youth population under the age of 18 was 1,050 and senior population 65 and older was 1,636. These age groups represent 17.2 percent and 26.8 percent, respectively, of St. Helena's population.

- **Race/Ethnicity.** In 2020, 65.1 percent of St. Helena's population was White while 1.6 percent was African American, 1.3 percent was Asian, and 30.9 percent was Hispanic or Latinx. People of color in St. Helena comprise a proportion below the overall proportion in the Bay Area as a whole.

- **Employment.** St. Helena residents most commonly work in the Health & Educational Services industry. From January 2010 to January 2021, the unemployment rate in St. Helena increased by 1.3 percentage points. Since 2010, the number of jobs located in the jurisdiction decreased by 2,620 (32.4 percent). Additionally, the jobs-household ratio in St. Helena has decreased from 3.47 jobs per household in 2002 to 2.23 in 2018.

Population Trends

The Bay Area is the fifth-largest metropolitan area in the nation and has seen a steady increase in population since 1990, except for a dip during the Great Recession. Many cities in the region have experienced significant growth in jobs and population. While these trends have led to a corresponding increase in demand for housing across the region, the regional production of housing has largely not kept pace with job and population growth. Table 3 shows population growth trends. In 2020, the population of St. Helena was estimated to be 6,073. From 1990 to 2000, the population increased by 19.2 percent, while it decreased by 2.3 percent during the first decade of the 2000s. In the most recent decade, the population increased by 4.5 percent to 6,073. The population of St. Helena makes up 4.4 percent of Napa County.[5]

Table 3 Population Growth Trends

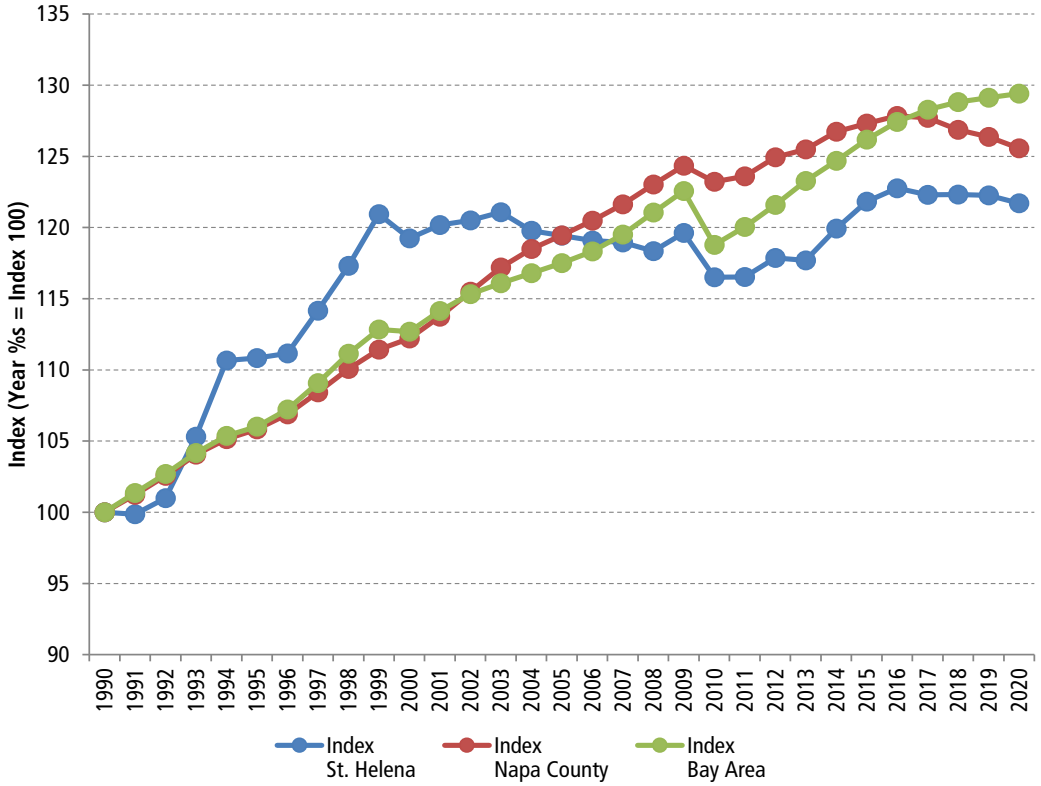
	1990	1995	2000	2005	2010	2015	2020
St. Helena	4,990	5,531	5,950	5,960	5,814	6,079	6,073
Napa County	110,765	117,216	124,279	132,314	136,484	141,010	139,088
Bay Area	6,020,147	6381961	6,784,348	7,073,912	7,150,739	7,595,694	7,790,537

Source: California Department of Finance, E-5 series, 2020.

[5] *To compare the rate of growth across various geographic scales, Figure 1 shows population for the jurisdiction, county, and region indexed to the population in the year 1990. This means that the data points represent the population growth (i.e. percent change) in each of these geographies relative to their populations in 1990.*

Figure 1 displays population growth trends indexed to the population in the year 1990. Since 2000, St. Helena's population has increased by 2.1 percent; this rate is below that of the region as a whole, at 14.8 percent. In St. Helena, roughly 8.7 percent of its population moved during the past year, a number 4.8 percentage points smaller than the regional rate of 13.4 percent.

Figure 1 Population Growth Trends, Indexed to 1990



Source: California Department of Finance, E-5 series Note: The data shown on the graph represents population for the jurisdiction, county, and region indexed to the population in the first year shown. The data points represent the relative population growth in each of these geographies relative to their populations in that year.
For some jurisdictions, a break may appear at the end of each decade (1999, 2009) as estimates are compared to census counts. DOF uses the decennial census to benchmark subsequent population estimates.
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-01.

Household Trends

As shown in Table 4, between 1990 and 2020, the number of households in St. Helena increased moderately, by an average 0.73 percent annually, however much of this growth occurred prior to the year 2000. From 1990 and 2000, the number of households increased at a rate of 2.1 percent annually. Between 2000 and 2010, this rate decreased to an increase of only 0.1 percent annually, or about 21 households per year. The rate increased slightly to an average of 0.5 percent per year between 2010 and 2020, or about 105 households per year. In

contrast, the number of Napa County households grew by one percent annually between 2010 and 2020, representing an increase of about 5,000 households per year.

Table 4 Household Trends

Household Trends	1990	2000	2010	2020	Average Annual Growth 1990-2000	Average Annual Growth 2000-2010	Average Annual Growth 2010-2020
St. Helena	2,138	2,380	2,401	2,866	1.2%	0.1%	2.0%
Napa County	41,312	45,402	48,876	48,484	1.1%	0.8%	-0.1%

Source: Census 1990, 2000, 2010, 2020.

Average Household Size

Average household size (Table 5~~Table 5~~) is a function of the number of people living in households divided by the number of occupied housing units in a given area. In general, a decline or increase in average household size signals that the population and the number of households are growing at different rates. Overall, the average household size in St. Helena was slightly smaller than in Napa County in 1990, 2000, and 2010 and considerably smaller in 2020. With the number of households growing, and a slight drop in population in St. Helena between 2000 and 2020, average household sizes fell from 2.48 to 2.38 persons per household between 2000 and 2010 and then to 2.08 persons per household by 2020. In contrast, the population in Napa County increased more rapidly than the number of households, leading to increases in the average household size from 2.62 to 2.69 persons per household between 2000 and 2010 and up to 2.78 by 2020.

Table 5 Average Household Size, St. Helena and Napa County

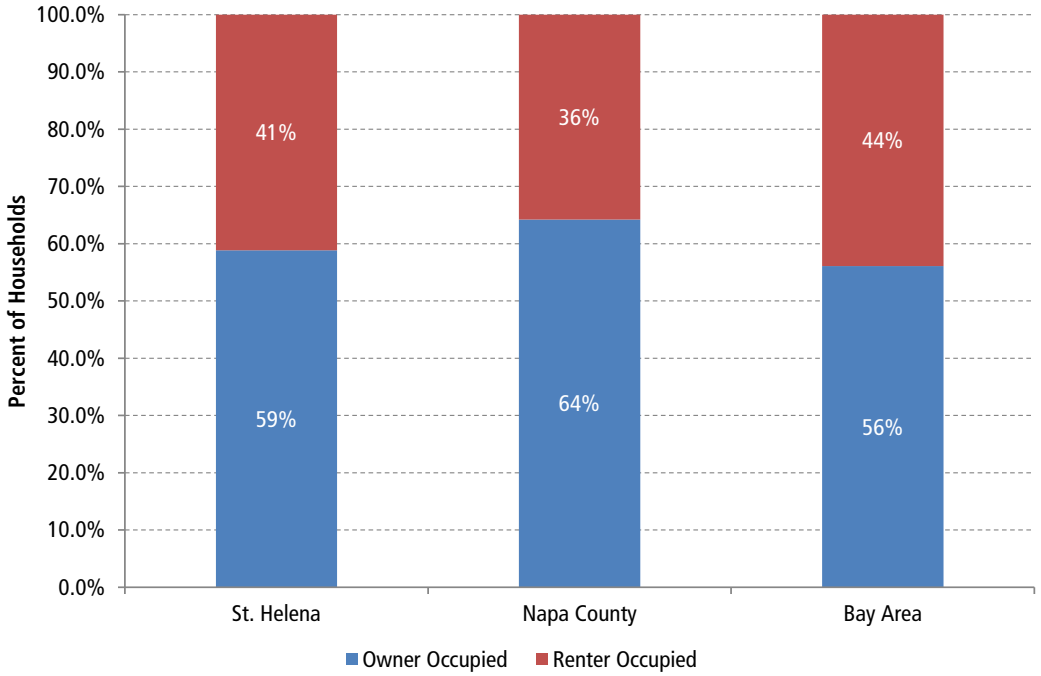
	1990	2000	2010	2020
St. Helena	2.31	2.48	2.38	2.08
Napa County	2.54	2.62	2.69	2.78

Source: Census 1990, 2000, 2010, 2020.

Household Tenure

The number of residents who own their homes compared to those who rent their homes can help identify the level of housing insecurity – ability for individuals to stay in their homes – in a city and region. Generally, renters may be displaced more quickly if prices increase. In St. Helena there are a total of 2,702 housing units, and fewer residents rent than own their homes: 41.2 percent versus 58.8 percent (Figure 2). By comparison, 35.8 percent of households in Napa County are renters, while 44 percent of Bay Area households rent their homes.

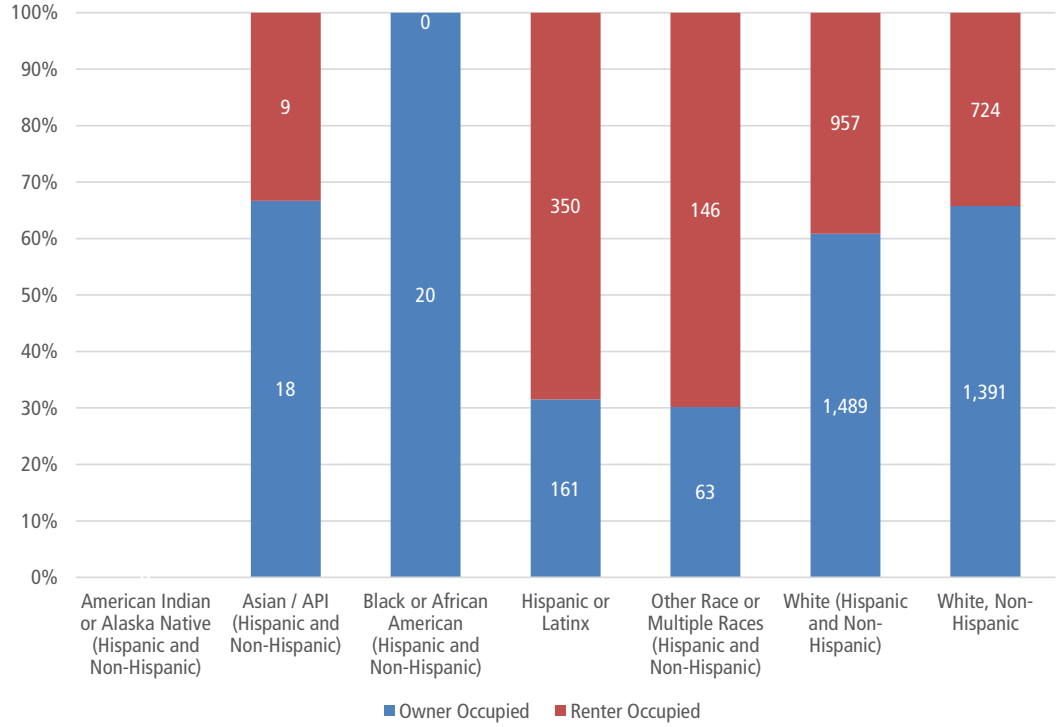
Figure 2 Housing Tenure



Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-16.

Homeownership rates often vary considerably across race/ethnicity in the Bay Area and throughout the country. These disparities not only reflect differences in income and wealth but also stem from Federal, State, and local policies that limited access to homeownership for communities of color while facilitating homebuying for white residents. While many of these policies, such as redlining, have been formally disbanded, the impacts of race-based policy are still evident across Bay Area communities. Figure 3 shows housing tenure by race. In St. Helena, 100.0 percent of Black households owned their homes, while homeownership rates were 66.7 percent for Asian households, 31.5 percent for Hispanic or Latinx households, and 60.9 percent for White households. Notably, recent changes to state law require local jurisdictions to examine these dynamics and other fair housing issues when updating their Housing Elements.

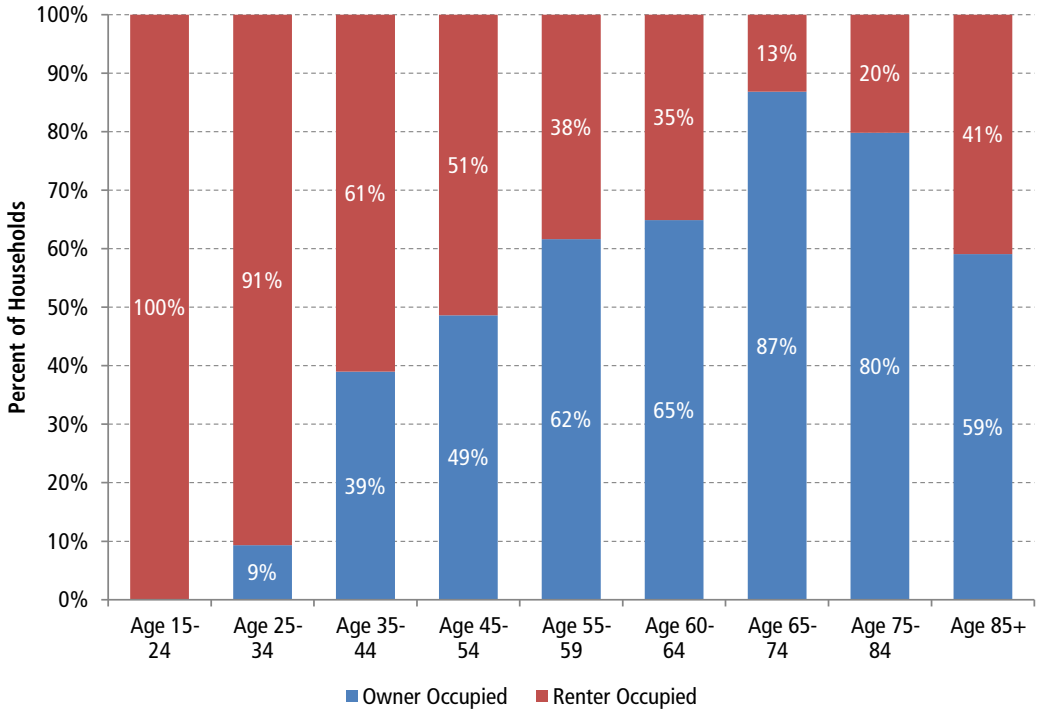
Figure 3 Housing Tenure by Race of Householder



Universe: Occupied housing units
Notes: For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25003(A-I)For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-20.

The age of residents who rent or own their home can also signal the housing challenges a community is experiencing. Younger households tend to rent and may struggle to buy a first home in the Bay Area due to high housing costs. At the same time, senior homeowners seeking to downsize may have limited options in an expensive housing market. In St. Helena, 75.1 percent of householders between the ages of 25 and 44 are renters, while 19.7 percent of householders over 65 are (Figure 4).

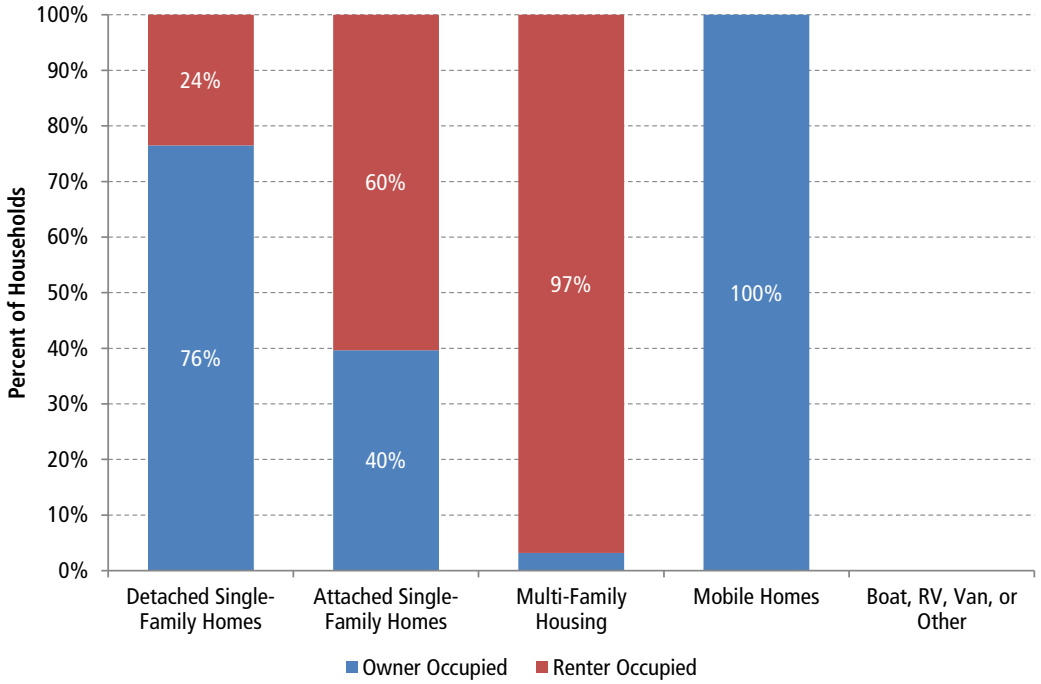
Figure 4 Housing Tenure by Age



Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25007 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-18.

In many cities, homeownership rates for households in single-family homes are substantially higher than the rates for households in multi-family housing. In St. Helena, 76.5 percent of households in detached single-family homes are homeowners, while 3.2 percent of households in multi-family housing are homeowners (Figure 5).

Figure 5 Housing Tenure by Housing Type



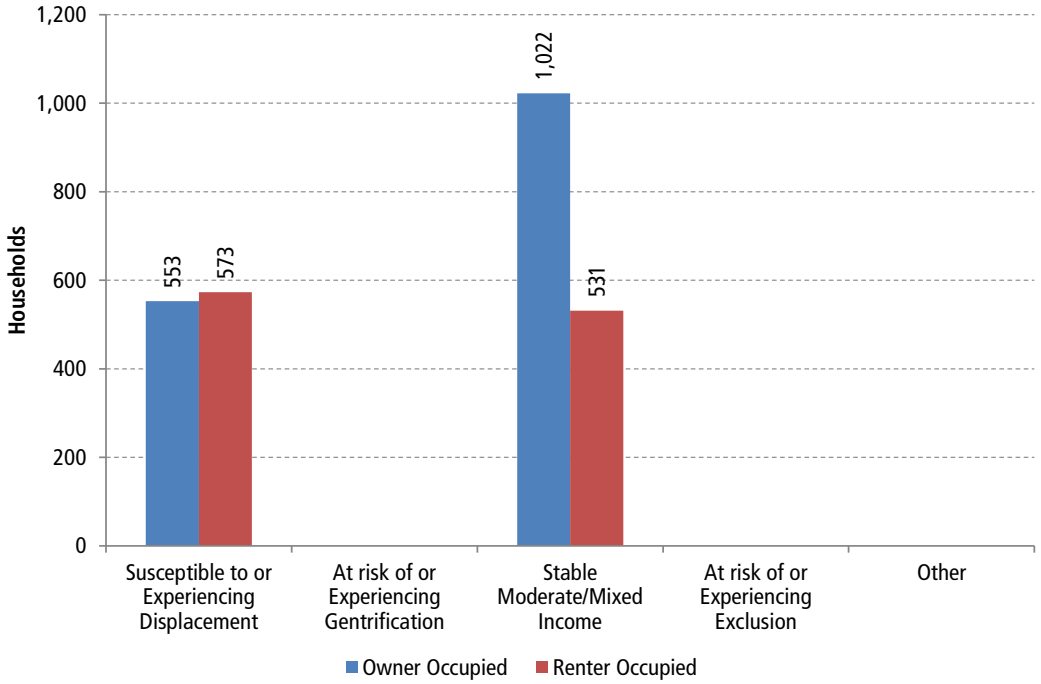
Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25032 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-22.

Households by Displacement Risk

Because of increasing housing prices, displacement is a major concern in the Bay Area. Displacement has the most severe impacts on low- and moderate-income residents. When individuals or families are forced to leave their homes and communities, they also lose their support network.

The University of California, Berkeley has mapped all neighborhoods in the Bay area, identifying their risk for gentrification. They find that in St. Helena, 42.0 percent of households live in neighborhoods that are susceptible to or experiencing displacement and 0.0 percent live in neighborhoods at risk of or undergoing gentrification. Figure 6 shows households by displacement risk and tenure.

Figure 6 Households by Displacement Risk and Tenure



Universe: Households
Notes: Displacement data is available at the census tract level. Staff aggregated tracts up to jurisdiction level using census 2010 population weights, assigning a tract to jurisdiction in proportion to block level population weights. Total household count may differ slightly from counts in other tables sourced from jurisdiction level sources. Categories are combined as follows for simplicity: At risk of or Experiencing Exclusion: At Risk of Becoming Exclusive; Becoming Exclusive; Stable/Advanced Exclusive At risk of or Experiencing Gentrification: At Risk of Gentrification; Early/Ongoing Gentrification; Advanced Gentrification Stable Moderate/Mixed Income: Stable Moderate/Mixed Income Susceptible to or Experiencing Displacement: Low-Income/Susceptible to Displacement; Ongoing Displacement Other: High Student Population; Unavailable or Unreliable Data
Source: Urban Displacement Project for classification, American Community Survey 5-Year Data (2015-2019), Table B25003 for tenure.
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-25.

Equally important, some neighborhoods in the Bay Area do not have housing appropriate for a broad section of the workforce. UC Berkeley estimates no households in St. Helena are in neighborhoods where low-income households are likely to be excluded due to prohibitive housing costs.[6]

[6] *More information about this gentrification and displacement data is available at the Urban Displacement Project's webpage: https://www.urbandisplacement.org/. Specifically, one can learn more about the different gentrification/displacement typologies shown in Figure 18 at this link: https://www.urbandisplacement.org/sites/default/files/typology_sheet_2018_0.png. Additionally, one can view maps that show which typologies correspond to which parts of a jurisdiction here: https://www.urbandisplacement.org/san-francisco/sf-bay-area-gentrification-and-displacement*

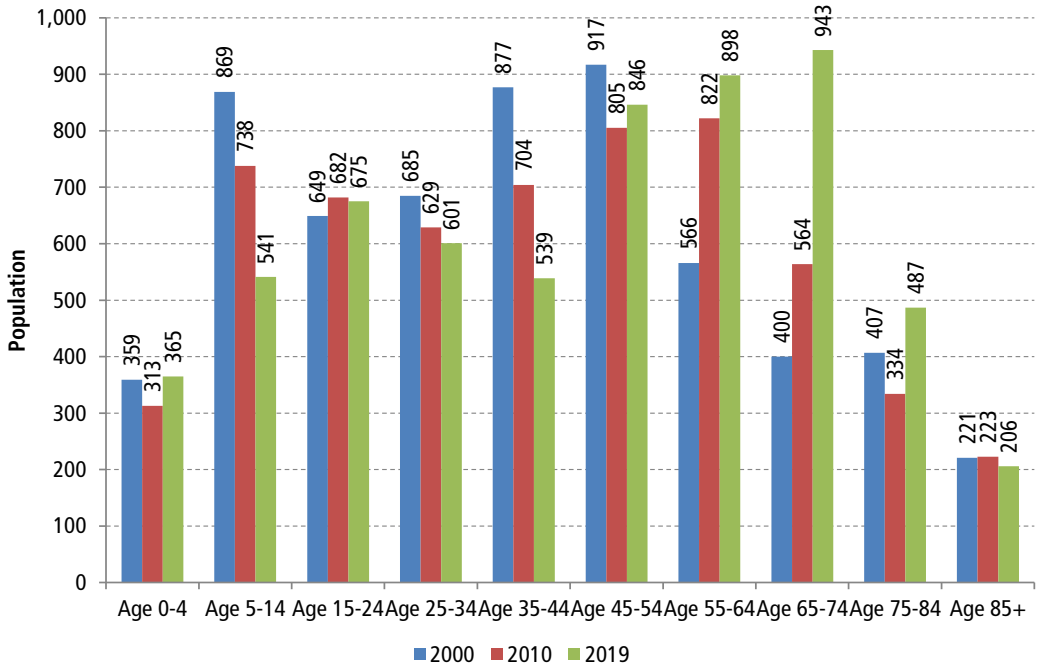
Demographic Trends

Age Distribution

The distribution of age groups in a city shapes what types of housing the community may need in the near future. An increase in the older population may mean there is a developing need for more senior housing options, while higher numbers of children and young families can point to the need for more family housing options and related services. There has also been a move by many to age-in-place or downsize to stay within their communities, which can mean more multifamily and accessible units are also needed.

Figure 7 shows population growth trends. In St. Helena, the median age in 2000 was 39.2; by 2019, this figure had increased, landing at around 49 years. More specifically, the population of those under 14 has decreased since 2010, while the 65- and-over population has increased.

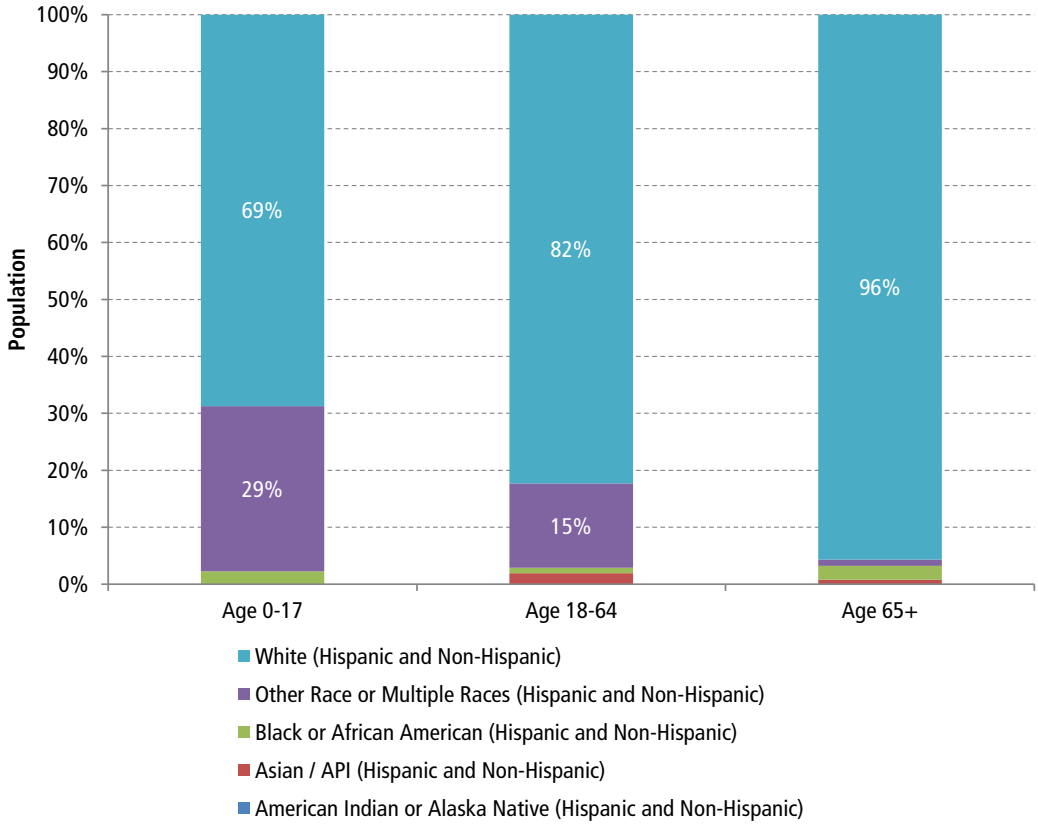
Figure 7 Population Growth Trends



Universe: Total population
Source: U.S. Census Bureau, Census 2000 SF1, Table P12; U.S. Census Bureau, Census 2010 SF1, Table P12; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-04.

Looking at the senior and youth population by race can add an additional layer of understanding, as families and seniors of color are even more likely to experience challenges finding affordable housing. People of color make up 4.3 percent of seniors and 31.2 percent of youth under 18 (Figure 8).

Figure 8 Senior and Youth Population by Race

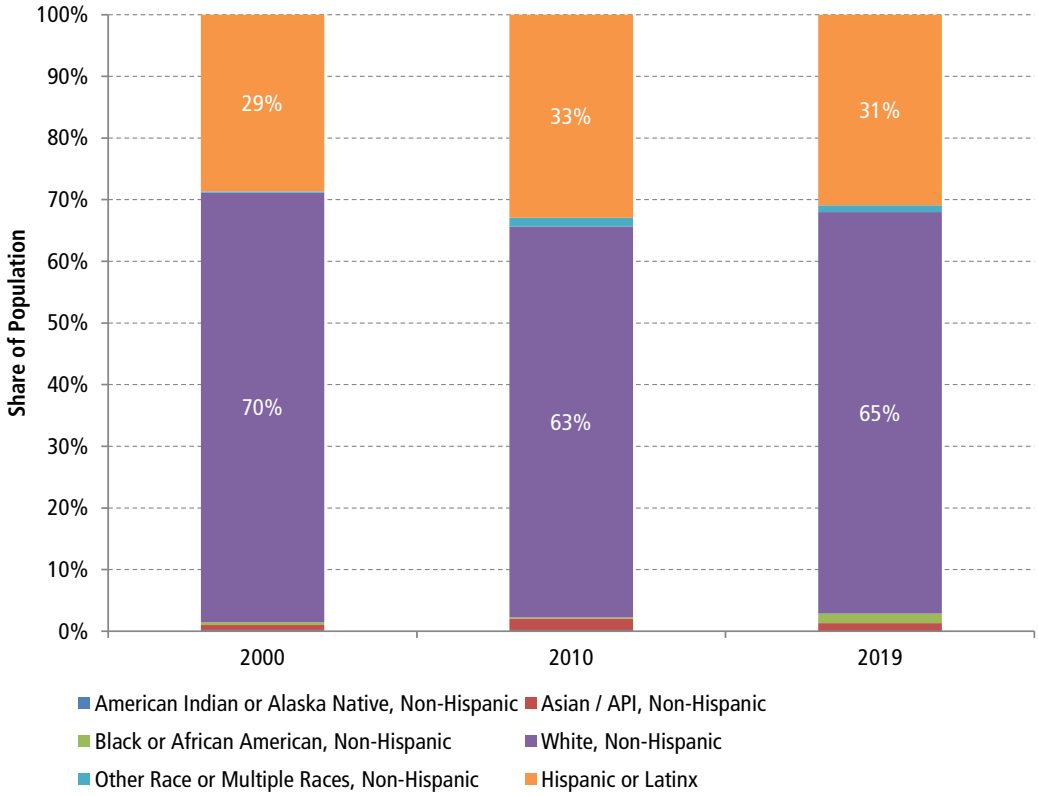


Universe: Total population
Notes: In the sources for this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity, and an overlapping category of Hispanic / non-Hispanic groups has not been shown to avoid double counting in the stacked bar chart.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-G)
For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-02.

Race and Ethnicity

Understanding the racial makeup of a city and region is important for designing and implementing effective housing policies and programs. These patterns are shaped by both market factors and government actions, such as exclusionary zoning, discriminatory lending practices and displacement that has occurred over time and continues to impact communities of color today. Since 2000, the percentage of residents in St. Helena identifying as White has decreased – and by the same token the percentage of residents of all other races and ethnicities has increased – by 4.6 percent, with the 2019 population standing at 3,973. In absolute terms, the Hispanic or Latinx population increased the most while the White, Non-Hispanic population decreased the most. Figure 9 shows population trends by race.

Figure 9 Population by Race, St. Helena, 2000-2019



Universe: Total population
Notes: Data for 2019 represents 2015-2019 ACS estimates. The Census Bureau defines Hispanic/Latinx ethnicity separate from racial categories. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.
Source: U.S. Census Bureau, Census 2000, Table P004; U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B03002
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-02.

Income

Household Income Distribution

Despite the economic and job growth experienced throughout the region since 1990, the income gap has continued to widen. California is one of the most economically unequal states in the nation, and the Bay Area has the highest income inequality between high- and low-income households in the state.[7]

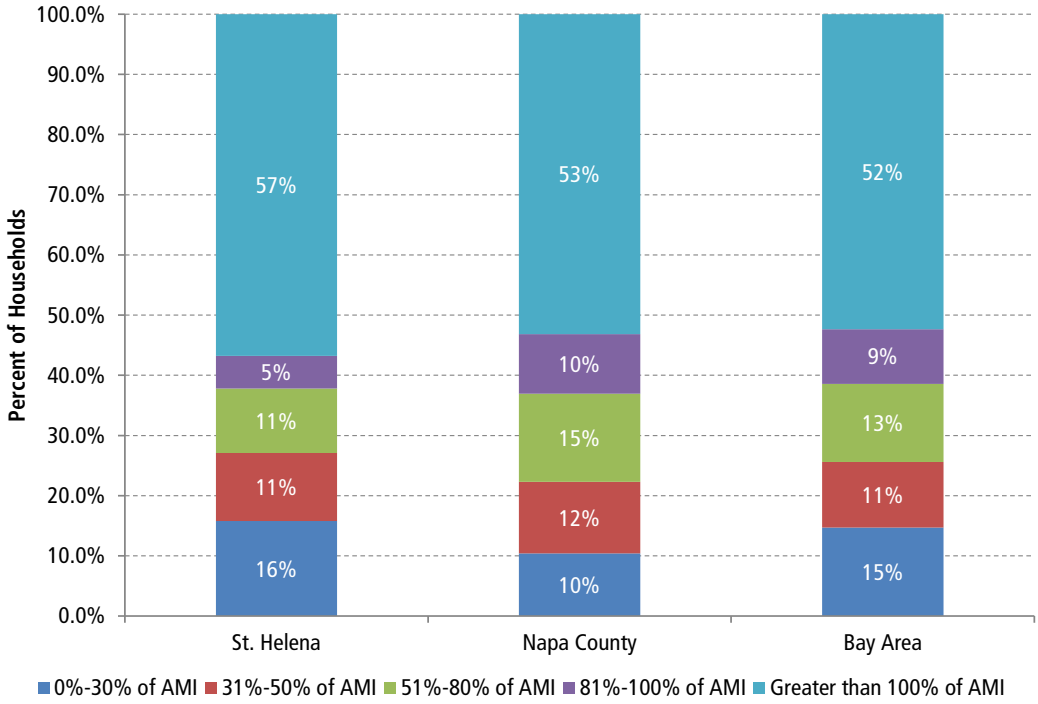
[7] *Bohn, S.et al. 2020. Income Inequality and Economic Opportunity in California. Public Policy Institute ofCalifornia.*

Household Income Categories

The Department of Housing and Urban Development defines income categories as a percentage of the Area Median Income (AMI). Households whose income equals 30 percent or less of the AMI are considered extremely low-income; households with incomes between 30 and 50 percent of the AMI are classified as very low-income; and those between 50 and 80 percent of the AFI are low-income. The CHAS data set also provides information on households earning between 80 and 100 percent of the AMI and households with incomes above 100 percent of the AMI.

In St. Helena, 56.8 percent of households make more than 100 percent of the Area Median Income (AMI)[8], compared to 15.8 percent making less than 30 percent of AMI, which is considered extremely low-income (Figure 10).

Figure 10 Households by Household Income Level



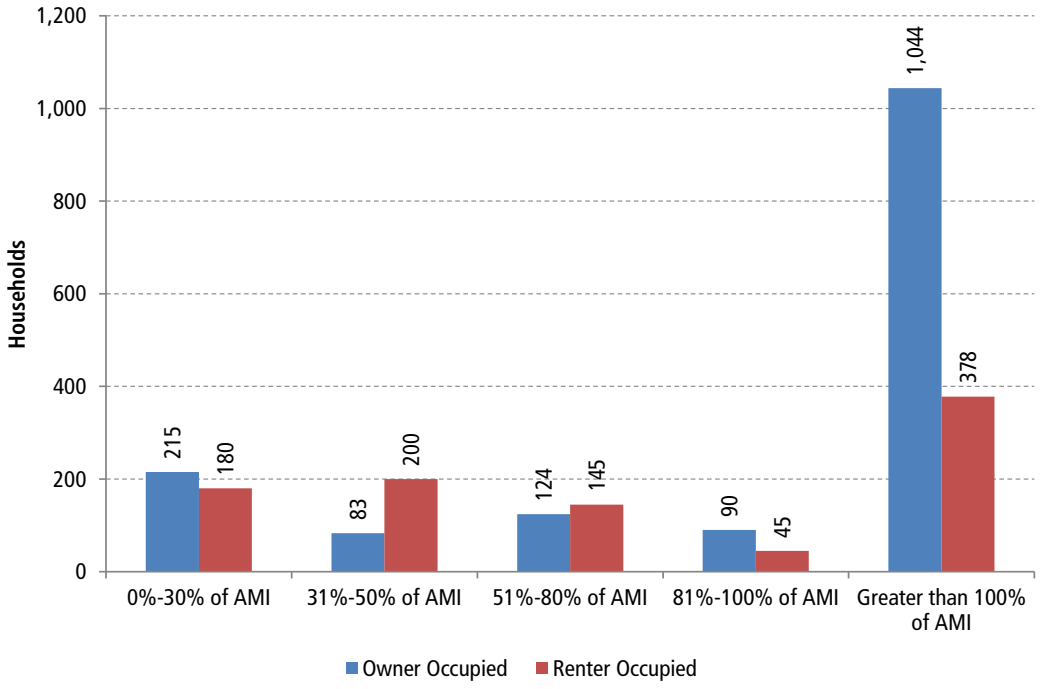
Universe: Occupied housing units
Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San

[8] *Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). This is then adjusted for household size.*

Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located. The data that is reported for the Bay Area is not based on a regional AMI but instead refers to the regional total of households in an income group relative to the AMI for the county where that household is located. Local jurisdictions are required to provide an estimate for their projected extremely low-income households (0-30 percent AMI) in their Housing Elements. HCD's official Housing Element guidance notes that jurisdictions can use their RHNA for very low-income households (those making 0-50 percent AMI) to calculate their projected extremely low-income households. As Bay Area jurisdictions have not yet received their final RHNA numbers, this document does not contain the required data point of projected extremely low-income households. The report portion of the housing data needs packet contains more specific guidance for how local staff can calculate an estimate for projected extremely low-income households once jurisdictions receive their 6th cycle RHNA numbers.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-01.

Throughout the region, there are disparities between the incomes of homeowners and renters. Typically, the number of low-income renters greatly outpaces the amount of housing available that is affordable for these households. In St. Helena, the largest proportion of renters falls in the Greater than 100 percent of AMI income group, while the largest proportion of homeowners are found in the Greater than 100 percent of AMI group (Figure 11).

Figure 11 Household Income Level by Tenure

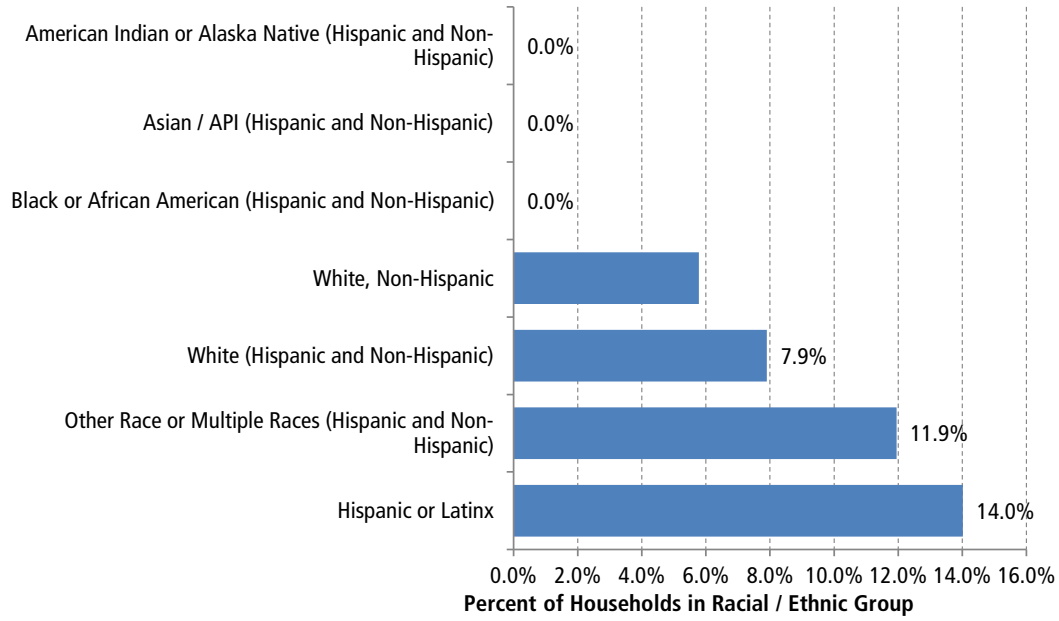


Universe: Occupied housing units
Notes: Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County),

and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-21.

Currently, people of color are more likely to experience poverty and financial instability as a result offederal and local housing policies that have historically excluded them from the same opportunities extended to white residents.[9] These economic disparities also leave communities of color at higher risk for housing insecurity, displacement or homelessness. In St. Helena, Other Race or Multiple Races (Hispanic and Non-Hispanic) residents experience the highest rates of poverty, followed by White (Hispanic and Non-Hispanic) residents (Figure 12).

Figure 12 Poverty Status by Race



Universe: Population for whom poverty status is determined
Notes: The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the population for whom poverty status is determined for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the population for whom poverty status is determined.

[9] *Moore, E., Montojo, N. and Mauri, N., 2019. Roots, Race & Place: A History of Racially Exclusionary Housing the San Francisco Bay Area. Hass Institute.*

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17001(A-I) For the data table behind this figure, please refer to the Data Packet Workbook, Table ELI-03.

Extremely Low-Income Households

In St. Helena, 56.8 percent of households make more than 100 percent of the Area Median Income (AMI), compared to 15.8 percent making less than 30 percent of AMI, which is considered extremely low-income (see Figure 10). Regionally, more than half of all households make more than 100 percent AMI, while 15 percent make less than 30 percent AMI. In Napa County, 30 percent AMI is the equivalent to the annual income of $27,950 for a family of four. Many households with multiple wage earners – including food service workers, full-time students, teachers, farmworkers, and healthcare professionals – can fall into lower AMI categories due to relatively stagnant wages in many industries.

Within the Housing Element, cities must estimate the extremely low-income housing need in the community. Based on HCD guidance, the City of St. Helena estimates that approximately 52 extremely low-income housing units are needed in the planning period. This estimate was calculated based on HCD guidance, as 50 percent of the very low-income housing need, as identified by the RHNA (Table 6).

Table 6 St. Helena Regional Housing Needs Allocation

Geography	Very Low Income (<50 percent of AMI)	Low Income (50%-80 percent of AMI)	Moderate Income (80%-120 percent of AMI)	Above Moderate Income (>120 percent of AMI)
St. Helena	104	59	26	67

[1] Per HCD guidance, the extremely low-income need in St. Helena is estimated at 50 percent of the very low income RHNA requirement, or approximately 52 units.

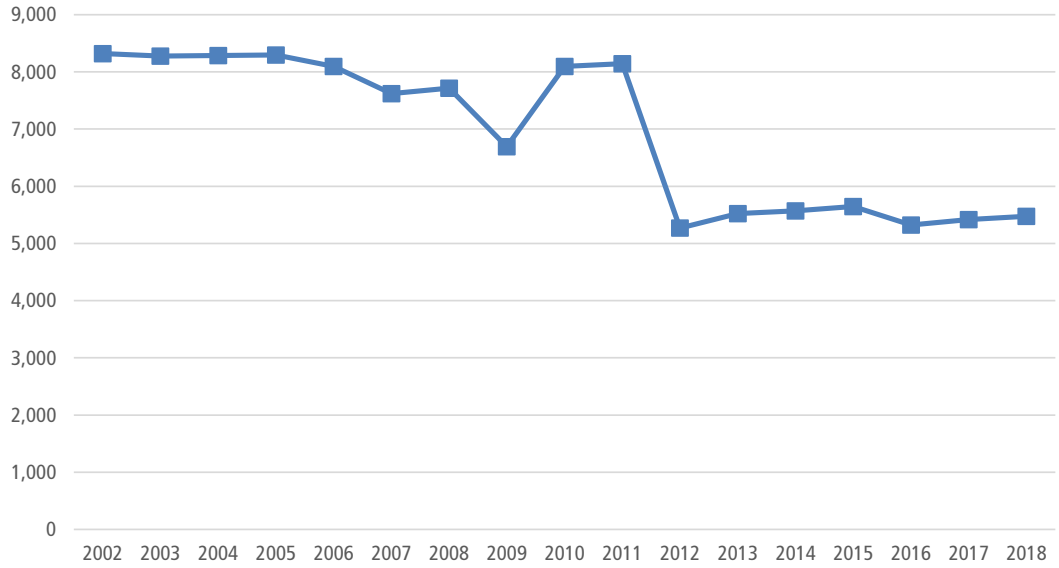
Employment Trends

Balance of Jobs and Workers

A city houses employed residents who either work in the community where they live or work elsewherein the region. Conversely, a city may have job sites that employ residents from the same city, but more often employ workers commuting from outside of it. Smaller cities typically will have more employed residents than jobs and export workers, while larger cities tend to have a surplus of jobs and import workers. To some extent the regional transportation system is set up for this flow of workers to the region's core job centers. At the same time, as the housing affordability crisis has illustrated, local imbalances may be severe, where local jobs and worker populations are out of sync at a sub-regional scale.

One measure of this is the relationship between workers and jobs. A city with a surplus of workers "exports" workers to other parts of the region, while a city with a surplus of jobs must conversely "import" them. Between 2002 and 2018, the number of jobs in St. Helena decreased by 34.2 percent (Figure 13).

Figure 13 Jobs in St. Helena



Universe: Jobs from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment
Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files, 2002-2018
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-11.

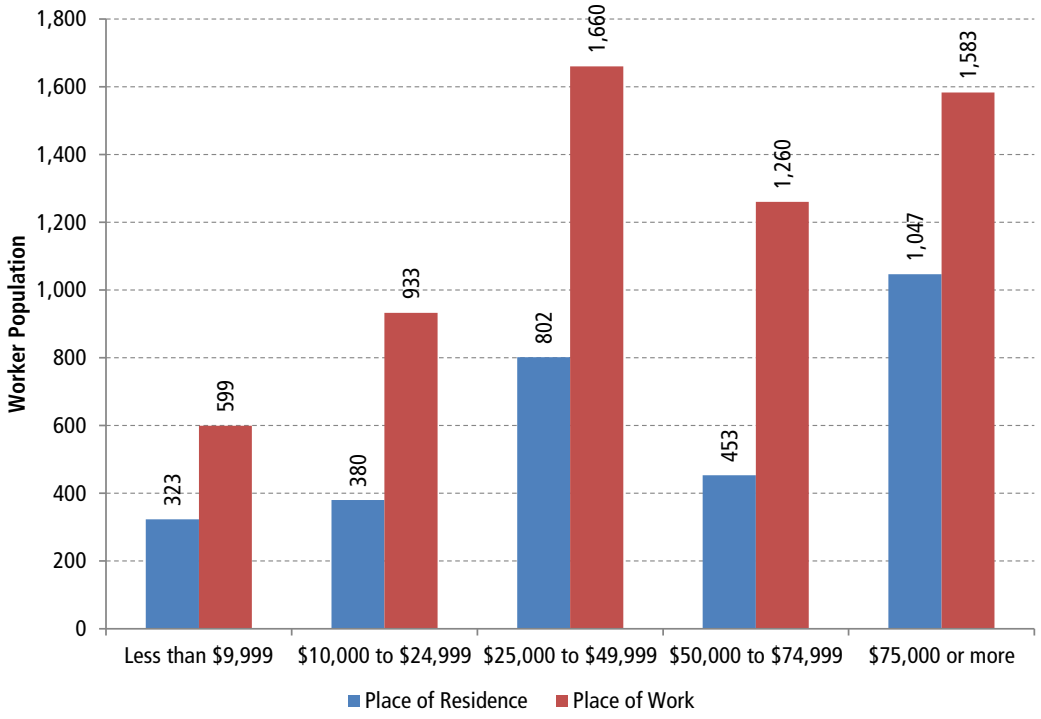
There are 3,005 employed residents, and 5,476 jobs[10] in St. Helena - the ratio of jobs to resident workers is 1.82; St. Helena is a net importer of workers. Figure 14 shows the balance when comparing jobs to workers, broken down by different wage groups, offering additional insight into local dynamics. A community may offer employment for relatively low-income workers but have relatively few housing options for those workers - or conversely, it may house residents who are low wage workers but offer few employment opportunities for them. Such relationships may cast extra light on potentially pent-up demand for housing in particular price categories. A surplus of jobs relative to residents in a given wage category suggests the need to import those workers, while conversely, surpluses of workers in a wage group relative to jobs means the community will export those workers to other jurisdictions. Such flows are not inherently bad, though over time, sub-regional imbalances may appear.

St. Helena has more low-wage jobs than low-wage residents (where low-wage refers to jobs paying less than $25,000). This disparity implies that, every day, low wage workers commute to St. Helena from their residences outside of the city. At the other end of the wage spectrum, the city has more high-wage jobs than high-wage

[10] *Employed residents in a jurisdiction is counted by place of residence (they may work elsewhere) while jobs in a jurisdiction are counted by place of work (they may live elsewhere). The jobs may differ from those reported in Figure 5 as the source for the time series is from administrative data, while the cross-sectional data is from a survey.*

residents (where high-wage refers to jobs paying more than $75,000). This figure suggests that high-wage workers are also commuting into St. Helena. Since both high wage workers and low wage workers are faced with commuting into St. Helena for work, it suggests a lack of housing, both market-rate and affordable, within the city. (Figure 14).[11]

Figure 14 Workers by Earnings, by Jurisdiction as Place of Work and Place of Residence

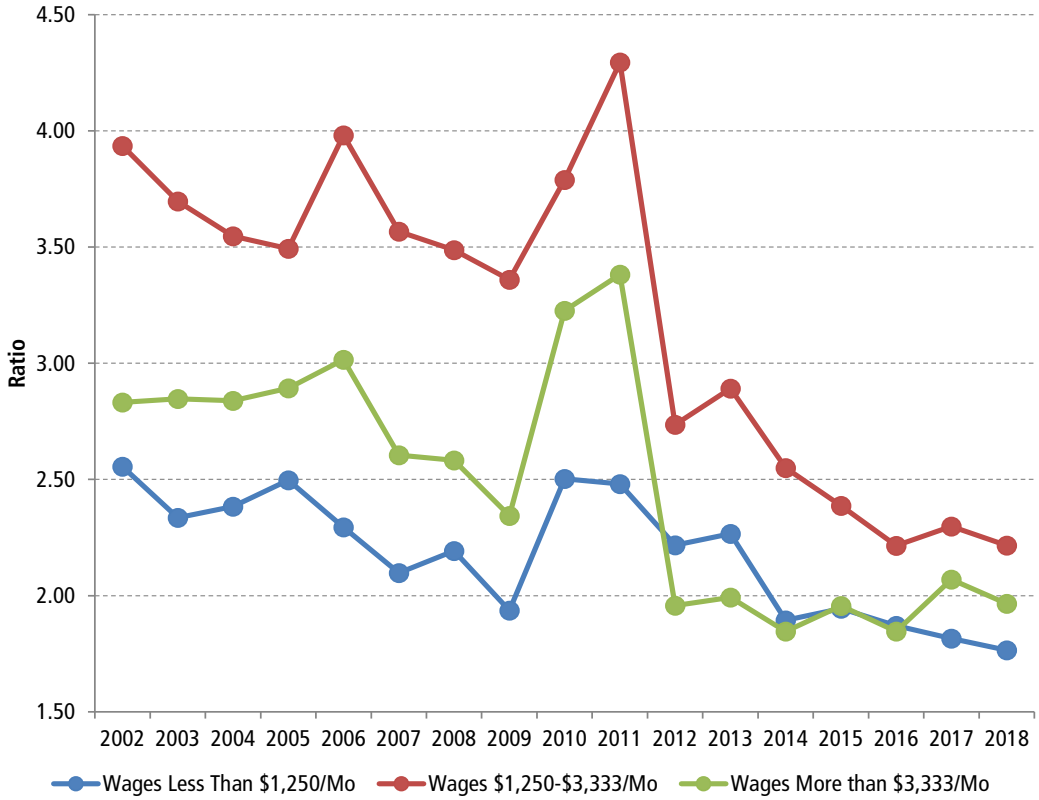


Universe: Workers 16 years and over with earnings
Source: U.S. Census Bureau, American Community Survey 5-Year Data 2015-2019, B08119, B08519 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-10.

Figure 15 shows the balance of a jurisdiction's resident workers to the jobs located there for different wage groups as a ratio instead - a value of one means that a city has the same number of jobs in a wage group as it has resident workers - in principle, a balance. Values above one indicate a jurisdiction will need to import workers for jobs in a given wage group. At the regional scale, this ratio is 1.04 jobs for each worker, implying a modest import of workers from outside the region (Figure 15).

[11] *The source table is top-coded at $75,000, precluding more fine grained analysis at the higher end of the wage spectrum.*

Figure 15 Jobs-Worker Ratios, By Wage Group

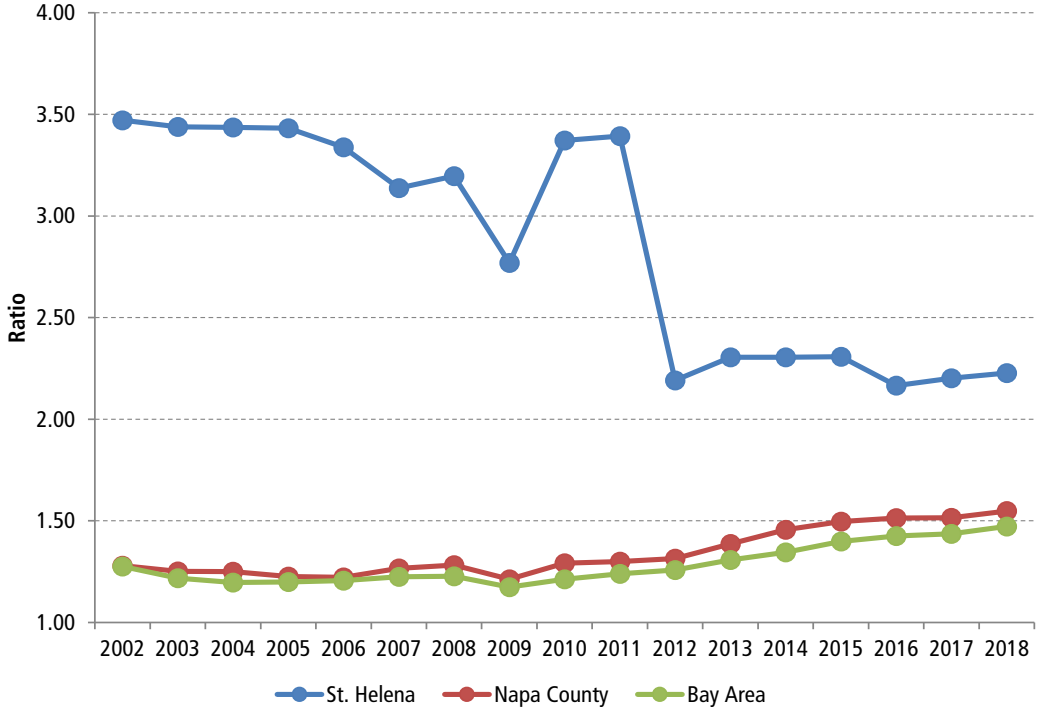


Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment
Notes: The ratio compares job counts by wage group from two tabulations of LEHD data: Counts by place of work relative to counts by place of residence. See text for details.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs); Residence Area Characteristics (RAC) files (Employed Residents), 2010-2018
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-14.

Such balances between jobs and workers may directly influence the housing demand in a community. New jobs may draw new residents, and when there is high demand for housing relative to supply, many workers may be unable to afford to live where they work, particularly where job growth has been in relatively lower wage jobs. This dynamic not only means many workers will need to prepare for long commutes and time spent on the road, but in the aggregate, it contributes to traffic congestion and time lost for all road users.

If there are more jobs than employed residents, it means a city is relatively jobs-rich, typically also with a high jobs to household ratio. Thus, bringing housing into the measure, the jobs-household ratio in St. Helena has decreased from 3.47 in 2002, to 2.23 jobs per household in 2018 (Figure 16).

Figure 16 Jobs-Household Ratio

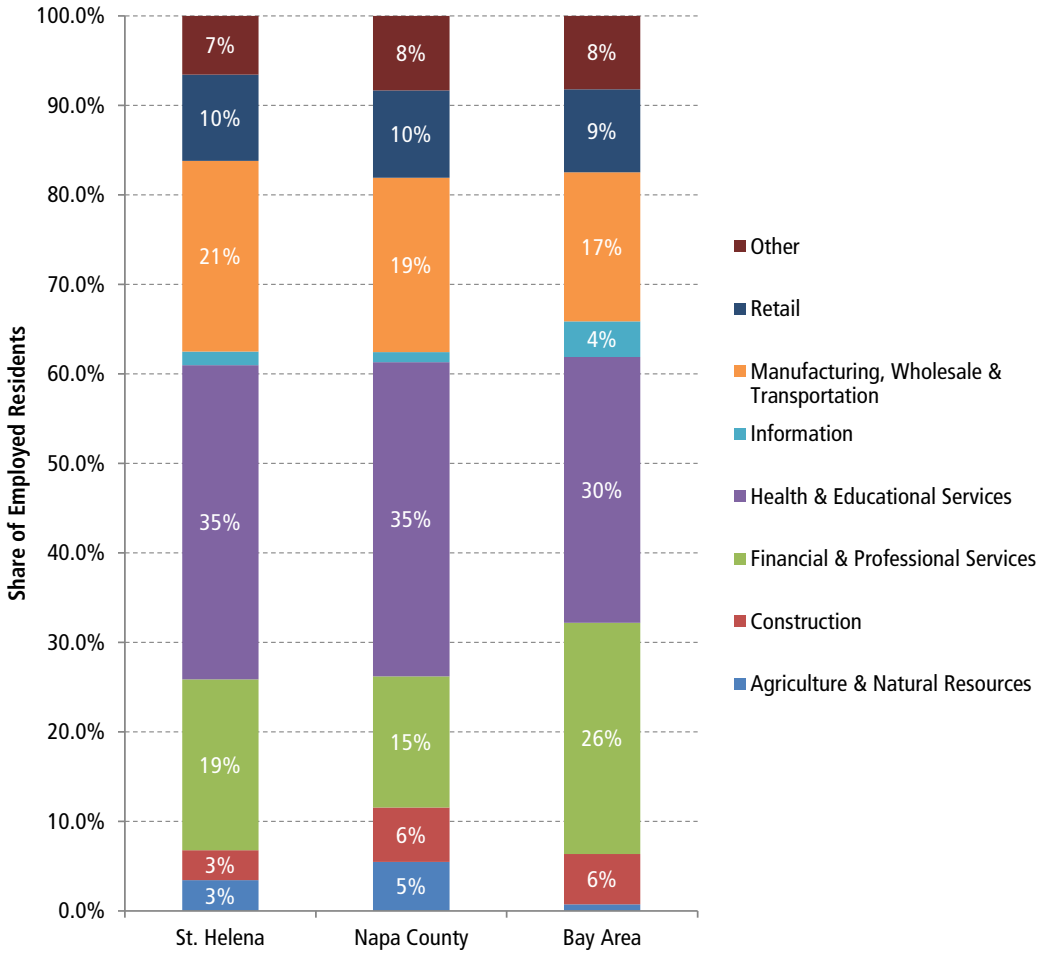


Universe: Jobs in a jurisdiction from unemployment insurance-covered employment (private, state and local government) plus United States Office of Personnel Management-sourced Federal employment; households in a jurisdiction
Notes: The data is tabulated by place of work, regardless of where a worker lives. The source data is provided at the census block level. These are crosswalked to jurisdictions and summarized. The ratio compares place of work wage and salary jobs with households, or occupied housing units. A similar measure is the ratio of jobs to housing units. However, this jobs-household ratio serves to compare the number of jobs in a jurisdiction to the number of housing units that are actually occupied. The difference between a jurisdiction's jobs-housing ratio and jobs-household ratio will be most pronounced in jurisdictions with high vacancy rates, a high rate of units used for seasonal use, or a high rate of units used as short-term rentals.
Source: U.S. Census Bureau, Longitudinal Employer-Household Dynamics, Workplace Area Characteristics (WAC) files (Jobs), 2002-2018; California Department of Finance, E-5 (Households)
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-13.

Employment by Industry

In terms of sectoral composition, the largest industry in which St. Helena residents work is Health & Educational Services, and the largest sector in which Napa residents work is Health & Educational Services (Figure 17). For the Bay Area as a whole, the Health & Educational Services industry employs the most workers of any sector.

Figure 17 Resident Employment by Industry

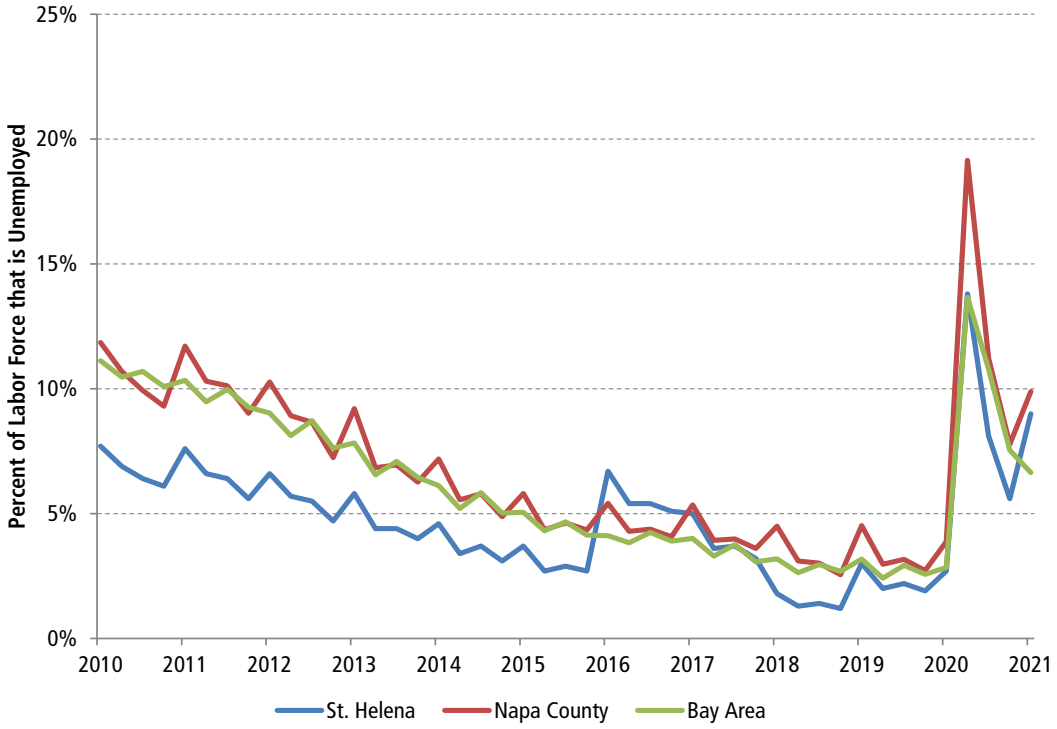


Universe: Civilian employed population age 16 years and over
Notes: The data displayed shows the industries in which jurisdiction residents work, regardless of the location where those residents are employed (whether within the jurisdiction or not). Categories are derived from the following source tables: Agriculture & Natural Resources: C24030_003E, C24030_030E; Construction: C24030_006E, C24030_033E; Manufacturing, Wholesale & Transportation: C24030_007E, C24030_034E, C24030_008E, C24030_035E, C24030_010E, C24030_037E; Retail: C24030_009E, C24030_036E; Information: C24030_013E, C24030_040E; Financial & Professional Services: C24030_014E, C24030_041E, C24030_017E, C24030_044E; Health & Educational Services: C24030_021E, C24030_024E, C24030_048E, C24030_051E; Other: C24030_027E, C24030_054E, C24030_028E, C24030_055E
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table C24030 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-06.

Unemployment

Figure 18 shows the unemployment rate for St. Helena, Napa County, and the Bay Area. In St. Helena, there was a 1.3 percentage point increase in the unemployment rate between January 2010 and January 2021. Jurisdictions through the region experienced a sharp rise in unemployment in 2020 due to impacts related to the COVID-19 pandemic, though with a general improvement and recovery in the later months of 2020.

Figure 18 Unemployment Rate



Universe: Civilian noninstitutional population ages 16 and older
Notes: Unemployment rates for the jurisdiction level is derived from larger-geography estimates. This method assumes that the rates of change in employment and unemployment are exactly the same in each sub-county area as at the county level. If this assumption is not true for a specific sub-county area, then the estimates for that area may not be representative of the current economic conditions. Since this assumption is untested, caution should be employed when using these data. Only not seasonally-adjusted labor force (unemployment rates) data are developed for cities and CDPs.
Source: California Employment Development Department, Local Area Unemployment Statistics (LAUS), Sub-county areas monthly updates, 2010-2021.
For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-15.

4. Population and Employment Projections

This section uses population, household, and employment projections provided by the Association of Bay Area Governments (ABAG), the California Department of Finance (DoF), and Plan Bay Area. Data specific to St. Helena is used when available (typically from Plan Bay Area 2040) and is supplemented by regional projections for North Napa County (Calistoga, St. Helena, and Yountville) and the Bay Area, available through the recently (2021) released Plan Bay Area 2050.

Key Findings

- ABAG anticipates much higher growth across the Bay Area than in St. Helena. While Plan Bay Area 2050 projects a 35 percent increase in total population from 2015 to 2050 (approximately 2.7 million new residents) across the nine counties of the Bay Area, it projects less than one percent growth in Calistoga, St. Helena, and Yountville.

Population

While Plan Bay Area 2050 does not provide jurisdiction-specific population projections, Plan Bay Area 2040 (2017) projected a 17 percent increase in total population from 2010 to 2040 for St. Helena, which translates to 1,550 new residents, as shown in Table 7. Countywide, Plan Bay Area 2040 projected a similar increase of 16 percent for Napa County.

Table 7 St. Helena, Population Totals and Projections, 2010-2040, Plan Bay Area 2040

Year	2010	2015	2020	2025	2030	2035	2040	Percent Change (2010-2040)
St. Helena	5,830	5,920	6,085	6,415	6,655	6,715	6,800	+17%
Napa County	135,880	136,885	141,240	146,130	151,445	155,860	158,050	+16%

Source: Plan Bay Area 2040.

For comparison, the DoF projects a countywide increase of seven percent in total population between 2010 to 2050, which translates to 9,463 new Napa County residents (Table 8).

Table 8 Department of Finance Population Projections, Napa County, 2010-2050

Year	2010	2015	2020	2025	2030	2035	2040	2045	2050	Percent Change
St. Helena	136,587	141,390	138,711	140,748	143,223	145,444	146,602	146,641	146,050	+7%

Source: California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2010-2060 (Baseline 2019 Population Projections; Vintage 2020 Release). Sacramento: California. July 2021.

ABAG anticipates much higher growth across the Bay Area then in St. Helena. While Plan Bay Area 2050 projects a 35 percent increase in total population from 2015 to 2050 (approximately 2.7 million new residents)

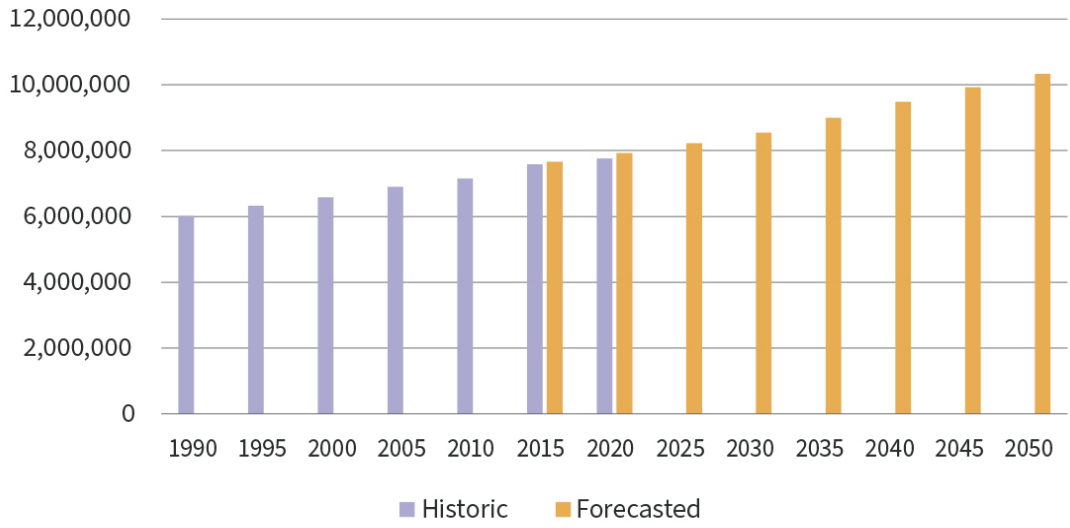
across the nine counties of the Bay Area, the Plan projects less than one percent growth in the North Napa County superdistrict (including Calistoga, St. Helena, and Yountville). Table 9 and Figure 19 show Plan Bay Area 2050 population projections for the Bay Area. While the Plan includes this regional population totals, data for individual subregions, termed superdistricts, is provided for households and jobs rather than population. For more information, please see the discussions on household and job projections below.

Table 9 Plan Bay Area 2050 Population Projections, Bay Area, 2015-2050

	2015	2020	2025	2030	2035	2040	2045	2050	Percent Change
Bay Area	7,660,000	7,940,000	8,230,000	8,560,000	9,010,000	9,490,000	9,930,000	10,330,000	+35%

Source: California Department of Finance. Demographic Research Unit. Report P-2A: Total Population Projections, California Counties, 2010-2060 (Baseline 2019 Population Projections; Vintage 2020 Release). Sacramento: California. July 2021.

Figure 19 Bay Area, Population Totals and Projections, 1990-2050, Plan Bay Area 2050.



Source: Plan Bay Area 2050.

Households

In 2017, Plan Bay Area 2040 projected a one percent increase in total households from 2010-2040 in St. Helena, which translates to 300 or more new households (Table 10). Similarly, Plan Bay Area 2050 projects that the number of households in the Northern Napa County superdistrict (including Calistoga, St. Helena, and Yountville) will grow by less than one percent by 2050, compared to 51 percent growth in the projected number of households in the Bay Area (Table 11).

Table 10 Table 2: St. Helena, Household Totals and Projections, 2010-2040, Plan Bay Area 2040

	2010	2015	2020	2025	2030	2035	2040
Total Households	2,150	2,400	2,425	2,490	2,620	2,705	2,700

For 2010, the base year, a tabulation from the 2010 pre-run microdata, designed to approximate (but may still differ from) Census 2010 counts, is used. Numbers may not add to totals due to rounding. 2015 are modeled estimates, not observed.
Source: Plan Bay Area 2040.

Table 11 Household Projections by Region, 2015-2050

Region	2015	2050	Growth	Percent Growth	Share of Regional Growth
North Napa County	16,000	16,000	0	<1%	0%
Bay Area	2,677,000	4,043,000	1,366,000	+51%	100%

Source: Plan Bay Area 2050.

Jobs

According to Plan Bay Area 2040, ABAG projected in increase of 280 jobs (five percent increase) between 2010 and 2040, which calculates to an annual average growth rate of 0.8 percent (Table 12). Employment is projected to increase in three categories: retail (+27 percent), Information, Government, and Construction (+12 percent), and Health, Educational, and Recreational Services Jobs (+5 percent). In contrast, ABAG expects that employment in the areas of manufacturing and wholesale; agriculture and natural resources, and financial and professional services to stagnate or slightly decrease. Countywide, Plan Bay Area 2040 projected an increase of 12,765 jobs (18 percent increase) at annual average employment growth rate of 2.8 percent in the same time period.

Table 12 Job Totals and Projections, St. Helena and Napa County, 2010-2040

Year	2010	2015	2020	2025	2030	2035	2040	Percent Change (2010-2040)
St. Helena	5,700	5,750	5,765	5,805	5,820	5,820	5,980	5%
Napa County	70,680	70,880	71,905	72,580	74,255	77,260	83,355	18%

Source: Plan Bay Area 2040.

Plan Bay Area 2050, however, projects that employment in the North Napa County superdistrict will decrease by 4,000 jobs by 2050 (Table 13). Employment in the region is assumed to be constrained based on limited job centers and transit options, as well as current and potential future wildfire impacts. Regionally however, the Bay Area job totals are projected to increase by 35 percent between 2015 and 2050, which coincides with the expected Bay Area population growth during that time (also 35 percent). This increase translates to 1,403,000 new jobs.

Table 13 Job Totals and Projections, North Napa County and the Bay Area, 2015-2050

Region	2015	2050	Growth	Percent Growth	Share of Regional Growth
North Napa County	24,000	20,000	-4,000	<1%	0%
Bay Area	4,005,000	5,408,000	1,403,000	35%	100%

Source: Plan Bay Area 2050.

5. Housing Conditions

The following section details the housing conditions in St. Helena and, where available, compares the data to Napa County and the Bay Area. Data sources include the Census, the American Community Survey, DoF, HUD, including the Comprehensive Housing Affordability Strategy (CHAS) dataset, and HCD).

ABAG supplied an HCD Preapproved Data Package that provided much of the data included in this analysis for the City. Additionally, ABAG, in coordination with Baird + Driskell Community Planning provided a Housing Needs Data Report that directly informed this section of the Needs Analysis.[12]

Key Findings

- **Number of Homes.** The number of new homes built in the Bay Area has not kept pace with the demand, resulting in longer commutes, increasing prices, and exacerbating issues of displacement and homelessness. The number of homes in St. Helena increased, 4.4 percent from 2010 to 2020, which is above the growth rate for Napa County and below the growth rate of the region's housing stock during this time period.

- **Home Prices.** A diversity of homes at all income levels creates opportunities for all St. Helena residents to live and thrive in the community.

  - **Ownership.** The largest proportion of homes had a value in the range of $1 million-$1.5 million in 2019. Home prices increased by 118.2 percent from 2010 to 2020.

  - **Rental Prices.** The typical contract rent for an apartment in St. Helena was $1,470 in 2019. Rental prices increased by 15.7 percent from 2009 to 2019. To rent a typical apartment without cost burden, a household would need to make $59,160 per year.

- **Housing Type.** It is important to have a variety of housing types to meet the needs of a community today and in the future. In 2020, 63.9 percent of homes in St. Helena were single family detached, 6.1 percent were single family attached, 6.2 percent were small multifamily (2-4 units), and 18.4 percent were medium or large multifamily (5+ units). Between 2010 and 2020, the number of single-family units increased more than multi-family units. Generally, in St. Helena, the share of the housing stock that is detached single family homes is above that of other jurisdictions in the region.

- **Vacancy Rate.** Vacant units make up 17.4 percent of the overall housing stock in St. Helena. The rental vacancy rate stands at 3.1 percent, while the ownership vacancy rate is 5.3 percent. Of the vacant units, the most common type of vacancy is for seasonal, recreational, or occasional use. This statistic highlights how St. Helena contains many "second homes," which may sit unoccupied for a majority of the year. Additionally, with the increasing popularity of short-term rental sites, such as

[12] *ABAG/MTC Staff and Baird + Driskell Community Planning, Housing Needs Data Report: St. Helena, May 2021.*

AirBNB, at vacation destinations such as Napa Valley, many homes may be vacant in the sense of not having permanent residents.

- **Overcrowding.** Overcrowding often disproportionately impacts low-income households. 2.5 percent of very low-income households (below 50 percent AMI) experience severe overcrowding, while none of the households above 100 percent of the AMI experience this level of overcrowding.

- **Cost Burden.** The U.S. Department of Housing and Urban Development considers housing to be affordable for a household if the household spends less than 30 percent of its income on housing costs. A household is considered "cost-burdened" if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered "severely cost-burdened." In St. Helena, 21.1 percent of households spend 30-50 percent of their income on housing, while 16.6 percent of households are severely cost burden and use the majority of their income for housing. Lower-income, Latinx, and large households are disproportionally impacted by housing cost burdens.[13]

Existing Housing Conditions

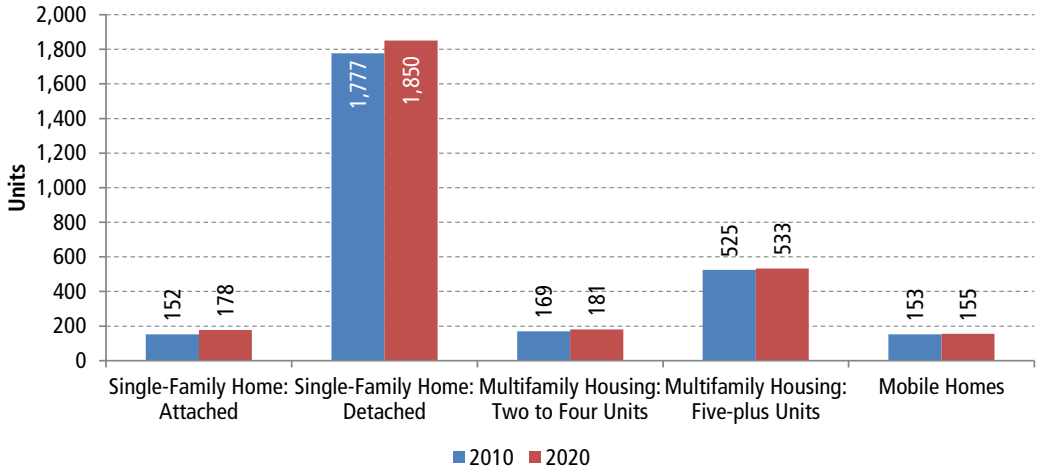
Housing Stock Characteristics

In recent years, most housing produced in the region and across the state consisted of single-family homes and larger multi-unit buildings. However, some households are increasingly interested in "missing middle housing" – including duplexes, triplexes, townhomes, cottage clusters and accessory dwelling units (ADUs). These housing types may open up more options across incomes and tenure, from young households seeking homeownership options to seniors looking to downsize and age-in-place.

The housing stock of St. Helena in 2020 was made up of 63.9 percent single family detached homes, 6.1 percent single family attached homes, 6.2 percent multifamily homes with two to four units, 18.4 percent multifamily homes with five or more units, and 5.4 percent mobile homes (Figure 20). In St. Helena, the housing type that experienced the most growth between 2010 and 2020 was the detached single-family home.

[13] *Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070; U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.*

Figure 20 Housing Type Trends



Universe: Housing units
Source: California Department of Finance, E-5 series
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-01.

Age of Housing Stock

Production has not kept up with housing demand for several decades in the Bay Area, as the total number of units built and available has not come close to meeting the population and job growth experienced throughout the region. According to American Community Survey estimates, in St. Helena, the largest proportion of the housing stock was built 1960 to 1979, with 1,217 units constructed during this period (Figure 21). Since 2010, 1.9 percent of the current housing stock was built, which is 63 units. Between 2015 and 2019, 74 housing units were issued permits in St. Helena. During this time, 73.0 percent of permits issued in St. Helena were for above moderate-income housing, 5.4 percent were for moderate-income housing, and 21.6 percent were for low- or very low-income housing (Table 14).

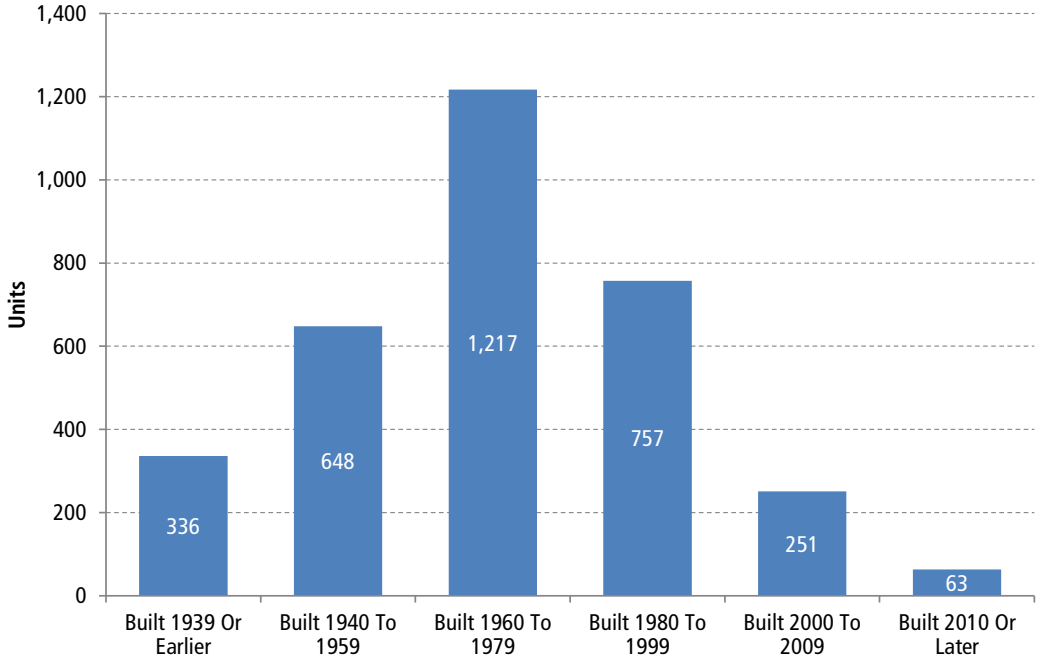
Table 14 Housing Permitting from 2015-2019 St. Helena

Income Group	Value
Above Moderate-Income Permits	54
Low Income Permits	9
Very Low-Income Permits	7
Moderate Income Permits	4

Source: California Department of Housing and Community Development (HCD), 5th Cycle Annual Progress Report Permit Summary (2020)

According to City records, however, these American Community Survey estimates are low. As reported in Table 1 above, the City permitted 110 units between 2015 and 2021, of which all units have been constructed.

Figure 21 Housing Units by Year Structure Built



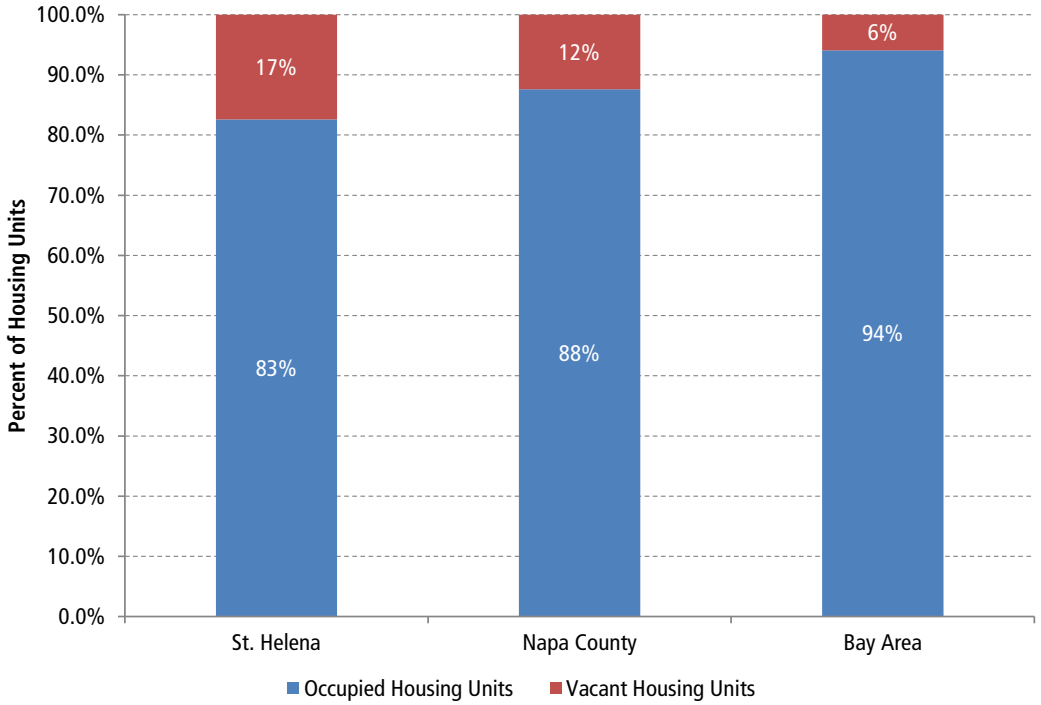
Universe: Housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25034 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-04.

Occupancy Rates

Vacant units make up 17.4 percent of the overall housing stock in St. Helena (Figure 22). The rental vacancy rate stands at 3.1 percent, while the ownership vacancy rate is 5.3 percent. Of the vacant units, the most common type of vacancy is for seasonal, recreational, or occasional use. Figure 23 shows the distribution of vacancies by type.[14]

[14] *The vacancy rates by tenure is for a smaller universe than the total vacancy rate first reported, which in principle includes the full stock (17.4%). The vacancy by tenure counts are rates relative to the rental stock (occupied and vacant) and ownership stock (occupied and vacant) - but exclude a significant number of vacancy categories, including the numerically significant other vacant.*

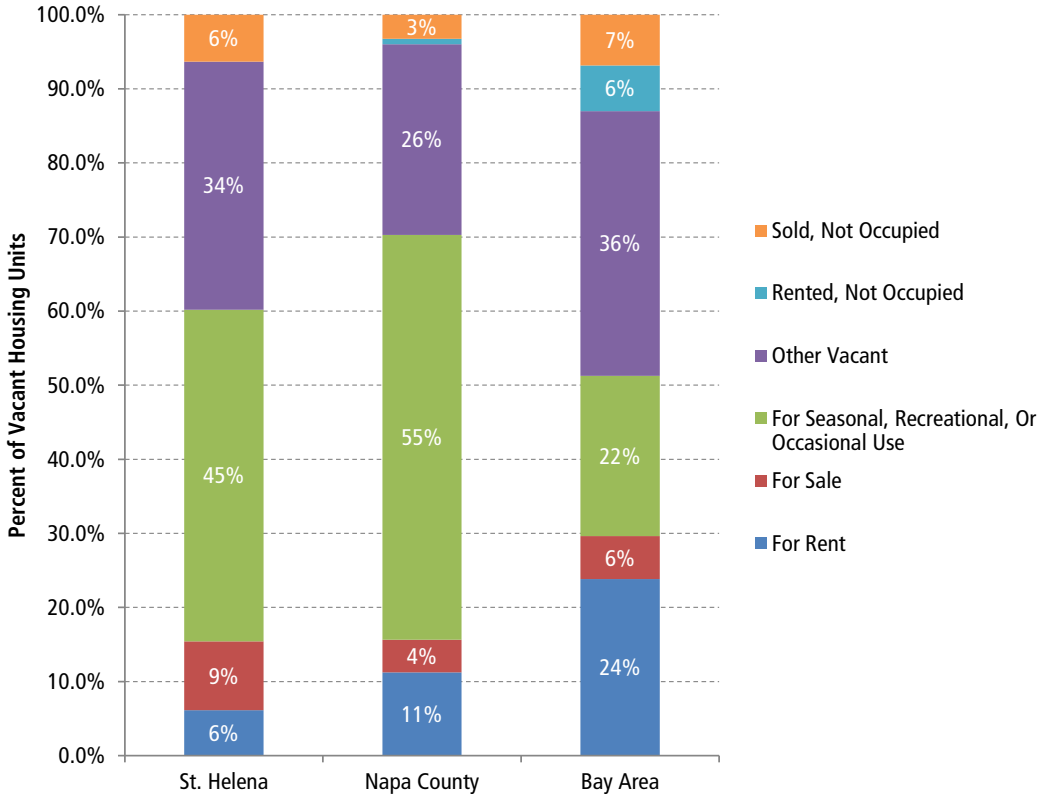
Figure 22 Occupancy Status



Universe: Housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25002Throughout the Bay Area, vacancies make up 2.6 percent of the total housing units, with homes listed for rent; units used for recreational or occasional use, and units not otherwise classified (other vacant) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the American Community Survey or Decennial Census. Vacant units classified as "for recreational or occasional use" are those that are held for short- term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like AirBnB are likely to fall in this category. The Census Bureau classifies units as "other vacant" if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration.[15] In a region with a thriving economy and housing market like the Bay Area, units being renovated/repaired and prepared for rental or sale are likely to represent a large portion of the "other vacant" category.

[15] *For more information, see pages 3 through 6 of this list of definitions prepared by the Census Bureau: https://www.census.gov/housing/hvs/definitions.pdf.*

Figure 23 Vacant Units by Type



Universe: Vacant housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25004 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-03.

Throughout the Bay Area, vacancies make up 2.6 percent of the total housing units, with homes listed for rent; units used for recreational or occasional use, and units not otherwise classified (other vacant) making up the majority of vacancies. The Census Bureau classifies a unit as vacant if no one is occupying it when census interviewers are conducting the American Community Survey or Decennial Census. Vacant units classified as "for recreational or occasional use" are those that are held for short- term periods of use throughout the year. Accordingly, vacation rentals and short-term rentals like AirBnB are likely to fall in this category. The Census Bureau classifies units as "other vacant" if they are vacant due to foreclosure, personal/family reasons, legal proceedings, repairs/renovations, abandonment, preparation for being rented or sold, or vacant for an extended absence for reasons such as a work assignment, military duty, or incarceration. In a region with a thriving economy and housing market like the Bay Area, units being renovated/repaired and prepared for rental or sale are likely to represent a large portion of the "other vacant" category

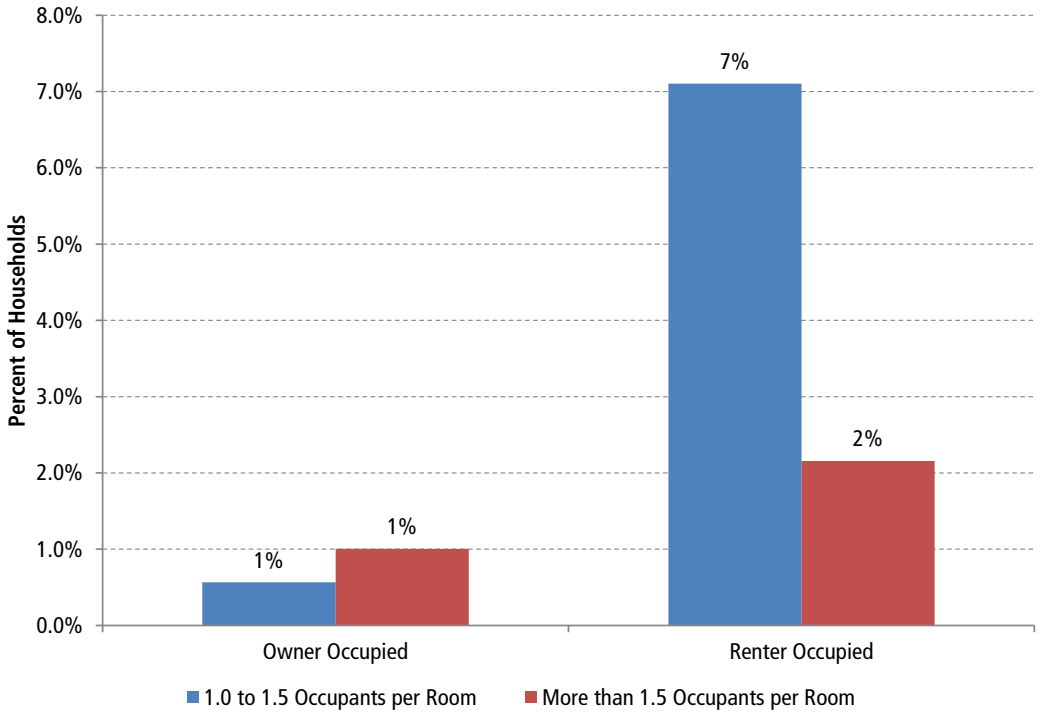
Overcrowding

Overcrowding occurs when the number of people living in a household is greater than the home was designed to accommodate. There are several different standards for defining overcrowding, but this report uses the Census Bureau definition, which is more than one occupant per room (not including bathrooms or kitchens).

Additionally, the Census Bureau considers units with more than 1.5 occupants per room to be severely overcrowded.

Overcrowding is often related to the cost of housing and can occur when demand in a city or region is high. In many cities, overcrowding is seen more amongst those that are renting, with multiple households sharing a unit to make it possible to stay in their communities. In St. Helena, 2.2 percent of households that rent are severely overcrowded (more than 1.5 occupants per room), compared to 1.0 percent of households that own (Figure 24). In St. Helena, 7.1 percent of renters experience moderate overcrowding (1 to 1.5 occupants per room), compared to 0.6 percent for those own.

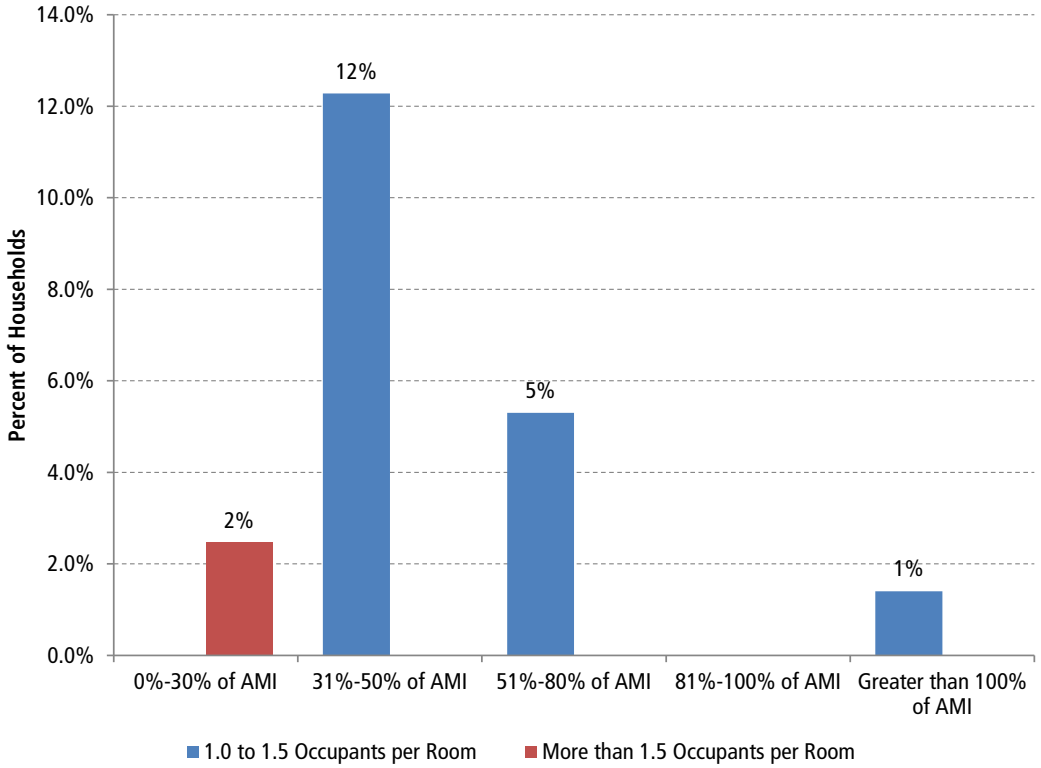
Figure 24 Overcrowding by Tenure and Severity



Universe: Occupied housing units
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-01.

Overcrowding often disproportionately impacts low-income households. 2.5 percent of very low-income households (below 50 percent AMI) experience severe overcrowding, while 0.0 percent of households above 100 percent experience this level of overcrowding (Figure 25).

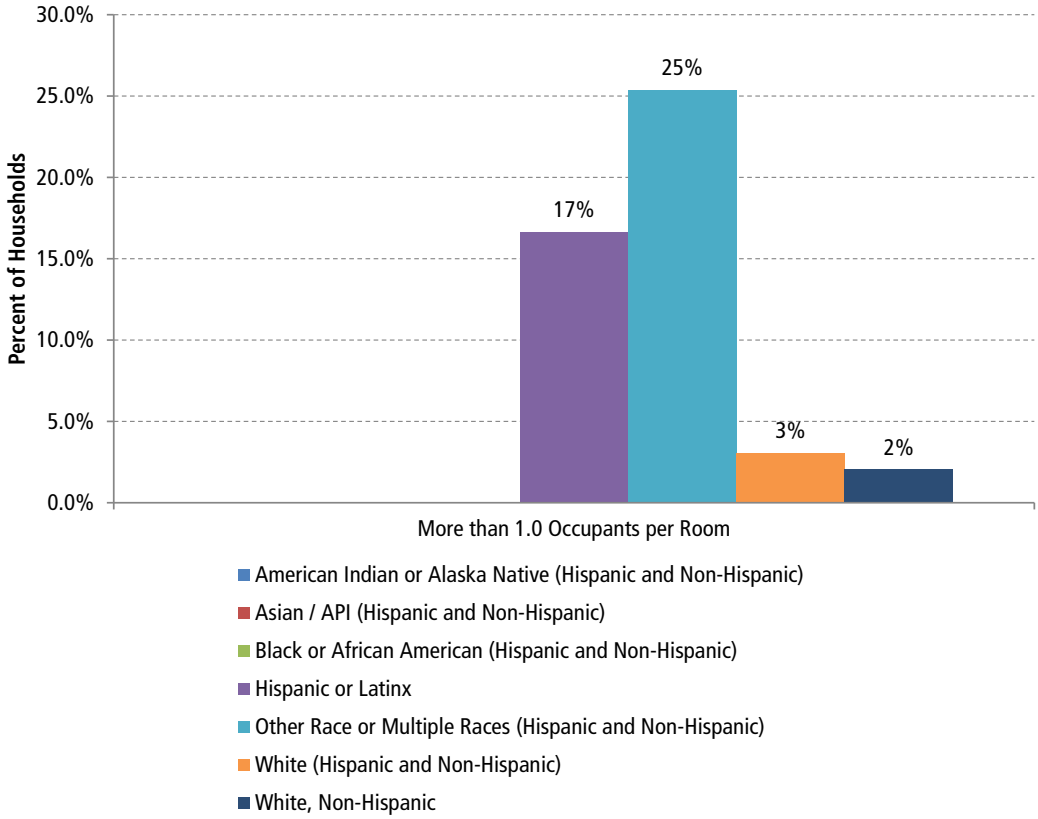
Figure 25 Overcrowding by Income Level and Severity



Universe: Occupied housing units
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-04.

People of color tend to experience overcrowding at higher rates than White residents. In St. Helena, the racial group with the largest overcrowding rate is other race or multiple races (Hispanic and Non-Hispanic) (Figure 26).

Figure 26 Overcrowding by Race



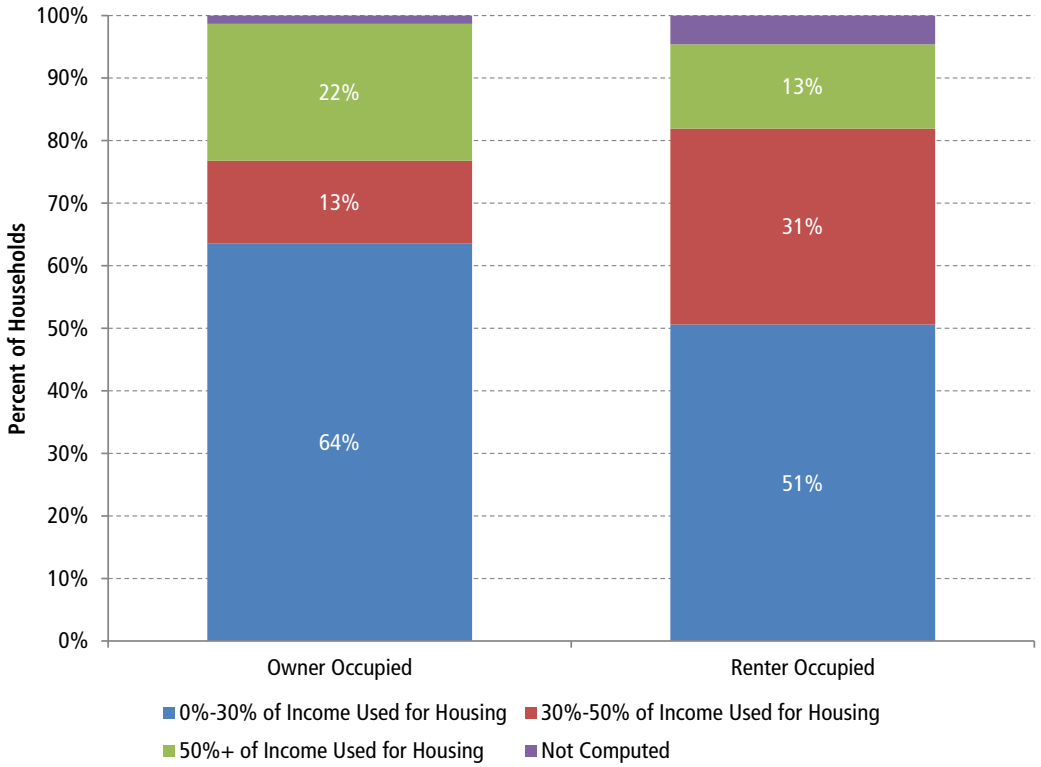
Universe: Occupied housing units
Notes: The Census Bureau defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens), and units with more than 1.5 persons per room are considered severely overcrowded. For this table, the Census Bureau does not disaggregate racial groups by Hispanic/Latinx ethnicity. However, data for the white racial group is also reported for white householders who are not Hispanic/Latinx. Since residents who identify as white and Hispanic/Latinx may have very different experiences within the housing market and the economy from those who identify as white and non-Hispanic/Latinx, data for multiple white sub-groups are reported here. The racial/ethnic groups reported in this table are not all mutually exclusive. Therefore, the data should not be summed as the sum exceeds the total number of occupied housing units for this jurisdiction. However, all groups labelled "Hispanic and Non-Hispanic" are mutually exclusive, and the sum of the data for these groups is equivalent to the total number of occupied housing units.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25014 For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-03.

Housing Cost Burden

A household is considered "cost-burdened" if it spends more than 30 percent of its monthly income on housing costs, while those who spend more than 50 percent of their income on housing costs are considered "severely cost-burdened." Low-income residents are the most impacted by high housing costs and experience the highest rates of cost burden. Spending such large portions of their income on housing puts low-income households at higher risk of displacement, eviction, or homelessness.

Renters are often more cost-burdened than owners. While the housing market has resulted in home prices increasing dramatically, homeowners often have mortgages with fixed rates, whereas renters aremore likely to be impacted by market increases. When looking at the cost burden across tenure in St. Helena (Figure 27), 31.3 percent of renters spend 30 percent to 50 percent of their income on housing compared to 13.3 percent of those that own. Additionally, 13.5 percent of renters spend 50 percent or more of their income on housing,while 21.9 percent of owners are severely cost-burdened.

Figure 27 Cost Burden by Tenure

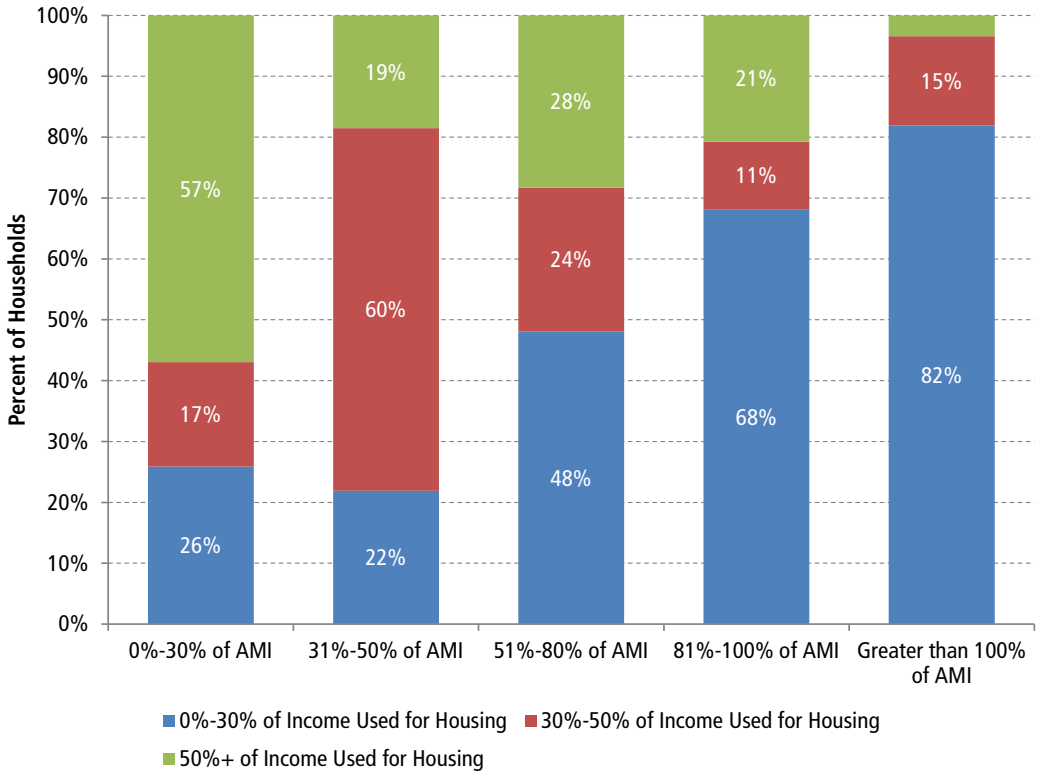


Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25070, B25091 For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-06.

In St. Helena, 16.6 percent of households spend 50 percent or more of their income on housing, while 21.1 percent spend 30 to 50 percent. However, these rates vary greatly across income categories (Figure 28). For example, 56.9 percent of St. Helena households making less than 30 percent of AMI spend the majority of their income on housing. For St. Helena residents making more than 100 percent of AMI, just 3.4 percent are severely

cost-burdened,and 81.9 percent of those making more than 100 percent of AMI spend less than 30 percent of their income on housing.

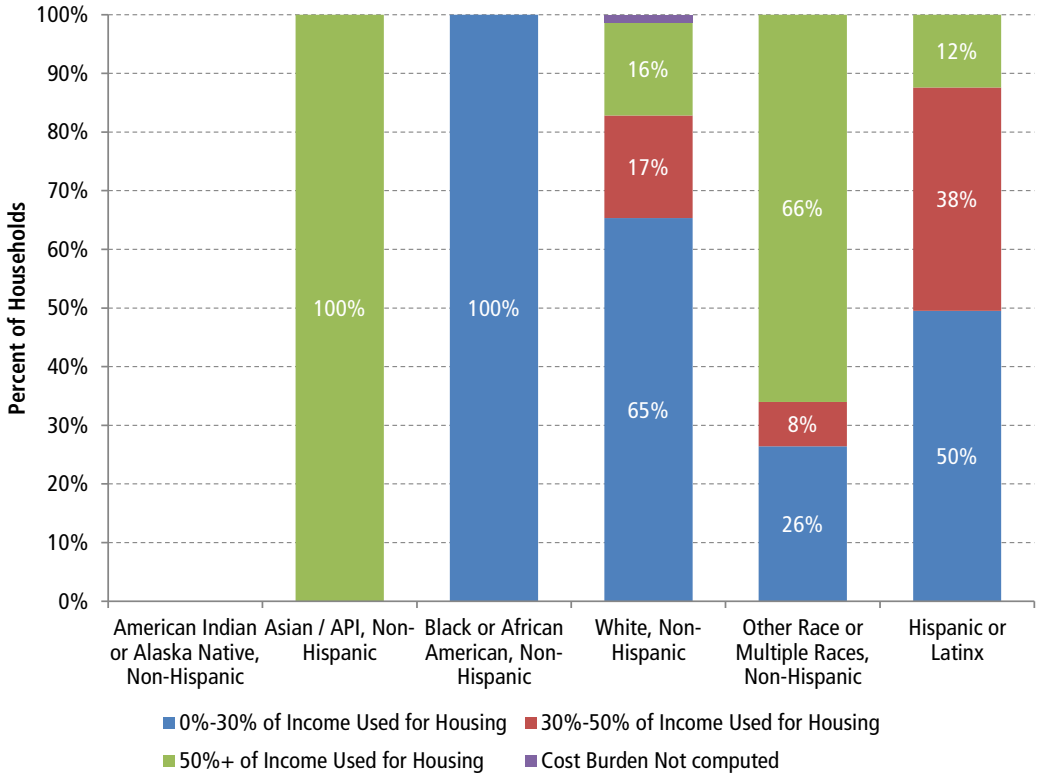
Figure 28 Cost Burden by Income Level



Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release.
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-05.

Hispanic or Latinx residents are the most cost burdened with 38.1 percent spending 30 percent to 50 percent of their income on housing, and Asian / API, Non-Hispanic residents are the most severely cost burdened with 100.0 percent spending more than 50 percent of their income on housing (Figure 29).

Figure 29 Cost Burden by Race



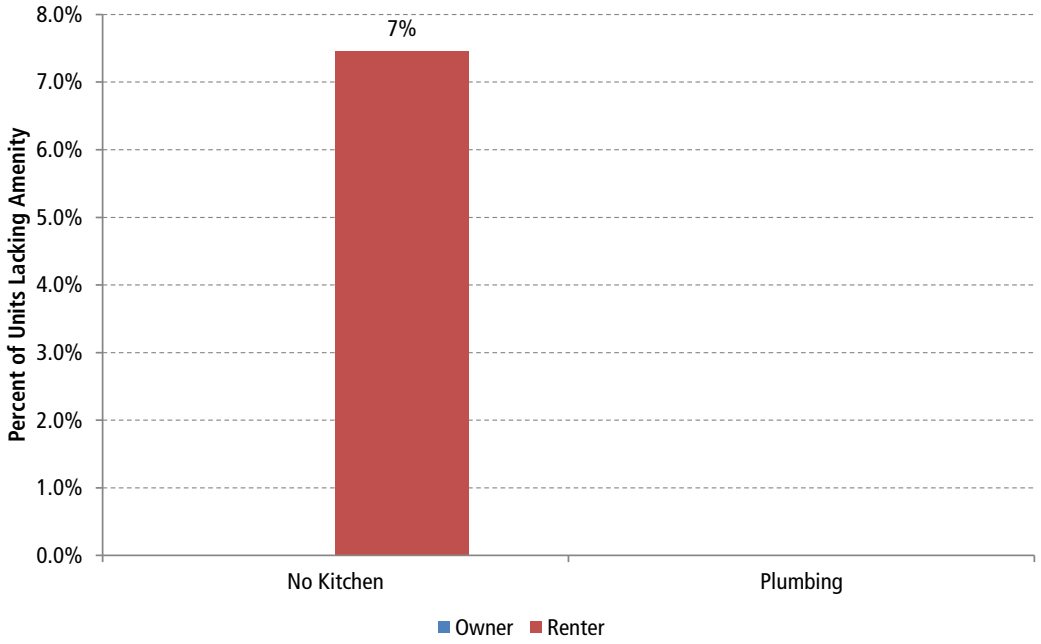
Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly
income. For the purposes of this graph, the "Hispanic or Latinx" racial/ethnic group represents those who identify as having Hispanic/Latinx ethnicity and may also be members of any racial group. All other racial categories on this graph represent those who identify with that racial category and do not identify with Hispanic/Latinx ethnicity.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-08.

Physical Housing Conditions

In general, the condition of the housing stock in St. Helena is good. This is primarily due to the high value of residential property, recent new construction, and minor to extensive remodeling which has been performed within the last ten years. Property owners are motivated to keep housing in good condition because of the high value of houses and rents.

Housing costs in the region are among the highest in the country, which could result in households, particularly renters, needing to live in substandard conditions in order to afford housing. Generally, there is limited data on the extent of substandard housing issues in a community. However, American Community Survey data (Figure 30) gives a sense of some of the substandard conditions that may be present in St. Helena. For example, 7.5 percent of renters in St. Helena reported lacking a kitchen and no renters lack plumbing. No owners reported lacking either a kitchen or plumbing.

Figure 30 Substandard Housing Issues, St. Helena, 2019



Universe: Occupied housing units
Notes: Per HCD guidance, this data should be supplemented by local estimates of units needing to be rehabilitated or replaced based on recent windshield surveys, local building department data, knowledgeable builders/developers in the community, or nonprofit housing developers or organizations.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25053, Table B25043, Table B25049
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-06.

There are scattered areas where housing condition can be an issue. City staff estimates approximately two percent of the single-family houses and one percent of multi-family units need replacement. These units have improvement costs that exceed the estimated replacement cost. Approximately four percent of single-family houses (approximately 85 units) and two percent of multifamily units (approximately 15 units) are in need of significant rehabilitation, which is defined as having major deficiencies that may require immediate repair. About five percent of the housing stock needs limited rehabilitation (approximately 140 units). These structures exhibit minor repair need and are not considered to have major safety issues.

6. Housing Market Conditions

This section provides information on the private housing market in St. Helena and assesses the market's ability to accommodate the housing needs of residents. ABAG supplied an HCD Preapproved Data Package that provided data on home values, affordability, and contract rents in the City. Additionally, ABAG, in coordination with Baird + Driskell Community Planning provided a Housing Needs Data Report that directly informed this section of the Needs Analysis.[16]

Key Findings

- **Home Values.** Home values in St. Helena are high. The typical home value (December 2020) was $1,665,790 in St. Helena, $768,410 in Napa County and $1,077,230 the Bay Area.

- **Affordability.** The current market conditions in St. Helena enable only above moderate-income households to purchase homes, though affordable rental and for-sale housing complexes in St. Helena provide 256 units of affordable housing.

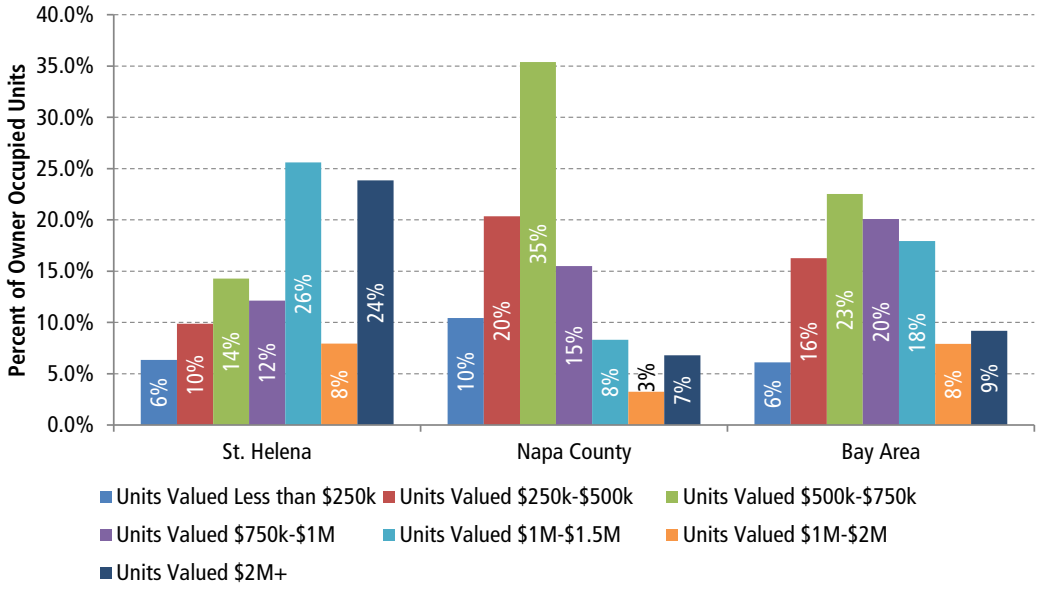
For-Sale Housing

Home prices reflect a complex mix of supply and demand factors, including an area's demographic profile, labor market, prevailing wages and job outlook, and land and construction costs. In the Bay Area, the costs of housing have long been among the highest in the nation. The typical home value in St. Helena was $1,665,790 by December of 2020, per data from Zillow. The largest proportion of homes were between $1 million and $1.5 million (Figure 31). By comparison, the typical home value is $768,410 in Napa County and $1,077,230 the Bay Area, with the largest share of units valued $500,000 to $750, 000.

The region's home values have increased steadily since 2000, besides a decrease during the Great Recession. The rise in home prices has been especially steep since 2012, with the median home value in the Bay Area nearly doubling during this time. Since 2001, the typical home value has increased 156.7 percent in St. Helena from $648,900 to $1,665,790. This change is above the change in Napa County, and above the change for the region (Figure 32).

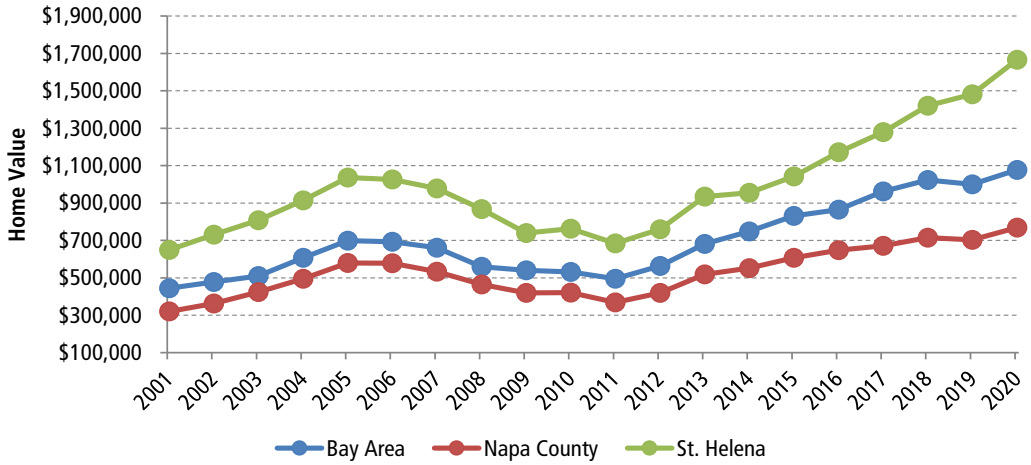
[16] *ABAG/MTC Staff and Baird + Driskell Community Planning, Housing Needs Data Report: St. Helena, May 2021.*

Figure 31 Home Values of Owner-occupied Units



Universe: Owner-occupied units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25075 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-07.

Figure 32 Zillow Home Value Index (ZHVI)



Universe: Owner-occupied housing units
Notes: Zillow describes the ZHVI as a smoothed, seasonally adjusted measure of the typical home value and market changes across a given region and housing type. The ZHVI reflects the typical value for lower to moderate valued homes in a

neighborhood. Specifically, the ZHVI is based upon the valuations of homes between 35th to 65th percentile range on a standardized curve encompassing all owner-occupied housing units, including both single-family homes and condominiums.

More information on the ZHVI is available from Zillow. The regional estimate is a household-weighted average of county-level ZHVI files, where household counts are yearly estimates from DOF's E-5 series For unincorporated areas, the value is a population weighted average of unincorporated communities in the county matched to census-designated population counts.
Source: Zillow, Zillow Home Value Index (ZHVI)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-08.

Affordable Home Purchase Prices

Table 15 examines affordability in another way. Instead of presenting the income required to buy a market rate house in St. Helena, Table 15 examines how much very low-, low-, and moderate-income households in St. Helena could afford to pay for housing, along with the corresponding maximum affordable home price. The table assumes 10 percent down payment, modeling a situation that is more typical of first-time homebuyers who have not amassed sufficient financial resources to make a larger down payment. These buyers are more likely to be in need of affordable housing options than the typical buyers of market rate housing in St. Helena. The lower down payment amount requires the owner to buy mortgage insurance.

As shown, in the case of a three-person household, the affordable home price varies from approximately $203,461 for very low-income, to $325,372 for low-income, and $406,922 for moderate income households. The income limits increase with household size, and a six-person household with very low, low, or moderate income can afford to buy a home priced at $262,243, $419,548, and $542,493, respectively. Based on this data and current market prices, lower-income households have very few options for purchasing a home in St. Helena, while moderate-income households may be able to afford to purchase a condominium or a small single-family home.

Table 15 Affordable Home Purchase Prices by Income Level, Napa County

Extremely Low-Income Households at 30 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$22,950	$24,550	$29,500	$32,750	$38,000	$39,300
Max. Monthly Gross Rent [1]	$574	$614	$738	$819	$950	$983
Max. Purchase Price [2]	$95,004	$101,627	$122,118	$135,572	$157,304	$162,686

Very Low-Income Households at 50 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$38,200	$40,950	$49,150	$54,600	$63,350	$65,500
Max. Monthly Gross Rent (1)	$955	$1,024	$1,229	$1,365	$1,584	$1,638
Max. Purchase Price (2)	$158,132	$169,516	$203,461	$226,022	$262,243	$271,143

Low-Income Households at 80 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$61,150	$65,500	$78,600	$87,350	$101,350	$104,850
Max. Monthly Gross Rent (1)	$1,529	$1,638	$1,965	$2,184	$2,534	$2,621
Max. Purchase Price (2)	$253,136	$271,143	$325,372	$361,593	$419,548	$434,036

Median-Income Households at 100 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$76,450	$81,900	$98,300	$109,200	$126,650	$131,050
Max. Monthly Gross Rent (1)	$1,911	$2,048	$2,458	$2,730	$3,166	$3,276
Max. Purchase Price (2)	$316,472	$339,033	$406,922	$452,043	$524,279	$542,493

Moderate-Income Households at 120 percent of Median Family Income

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	5 Bedroom
Number of Persons	1	1.5	3	4	6	7.5
Income Level	$91,750	$98,300	$117,950	$131,050	$152,000	$157,250
Max. Monthly Gross Rent/Payments (1)	$2,294	$2,458	$2,949	$3,276	$3,800	$3,931
Max. Purchase Price (2)	$379,808	$406,922	$488,265	$542,493	$629,218	$650,951

Note: Based on 2021 Napa County Area Family Income (Family of 4) of $109,200, per State income limits .
[1]Assumes that 30 percent (35 percent for moderate) of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowners' insurance.
[2]Assumes 90.0 percent loan at 5.0 percent annual interest rate and 30-year term; assumes taxes, mortgage insurance, and homeowners' insurance account for 20 percent of total monthly payments.
Source: Mintier Harnish, 2021.

Current Market Rate For-Sale Housing

~~Matching the extremely high average home values present in St. Helena, almost all housing units currently (January 2023) for sale in the city are over $1,000,000.~~ Since 2019, the price of for-sale housing in St. Helena has shifted even higher, making home ownership practically unattainable to working class residents of St. Helena. All single-family homes are for sale at prices greater than $1,000,000. The median price of for-sale housing is $1,872,500 and the average price of for-sale housing is $2,965,458, which are both prices

unaffordable to ~~most people~~lower- and moderate-income households. Currently there are only four ~~homes~~units listed for under $1,000,000: three mobile homes and one condominium.

Table 16 Residential Properties for Sale, January 2023

Address	Bedroom	Bathrooms	Square Footage	For-Sale Price	Cost per Square Foot
1210-1250 Oakwood Ln	6	8	6,800	$10,880,000	$1,600.00
~~512 Meadowood Ln~~	~~5~~	~~7~~	~~11,208~~	~~$8,950,000~~	~~$798.54~~
1933 Spring St	2	2	1,664	$7,995,000	$4,804.69
1817 Main St	6	6	7,000	$5,500,000	$785.71
1057 Pratt Ave	6	7	3,979	$4,950,000	$1,244.03
2490 Spring Mountain Rd	3	4	4,210	$3,600,000	$855.11
1820 Spring Mountain Rd	3	3	2,520	$3,500,000	$1,388.89
1721 Scott St	3	3	1,950	$2,999,000	$1,537.95
1648 Scott St	3	2	1,458	$2,850,000	$1,954.73
704 Hunt Ave	3	3	2,426	$2,450,000	$1,009.89
1434 Sylvaner Ave	3	2	1,968	$2,250,000	$1,143.29
1362 Stockton St	3	2	1,682	$1,895,000	$1,126.63
1626 Tainter St	2	2	1,758	$1,850,000	$1,052.33
1186 Meadowcreek Cir	3	2	2,078	$1,795,000	$863.81
1291 Sylvaner Ave	3	2	1,511	$1,650,000	$1,091.99
1727 Crinella Dr	3	2	1,683	$1,395,000	$828.88
1344 Magnolia Ave	3	3	2,082	$1,375,000	$660.42
24 Volker Ct	3	2	1,320	$1,150,000	$871.21
1382 Park St	3	2	1,800	$1,084,000	$602.22
16 Henry Ct	2	2	1,000	$1,075,000	$1,075.00
945 Hunt Ave	2	3	1,212	$790,000	$651.82
16 San Juan Ct	2	2	1,440	$439,000	$304.86
55 Laguna Seca Ct	2	2	1,512	$365,000	$241.40
10 Los Robles Ct	2	2	1,248	$360,000	$288.46

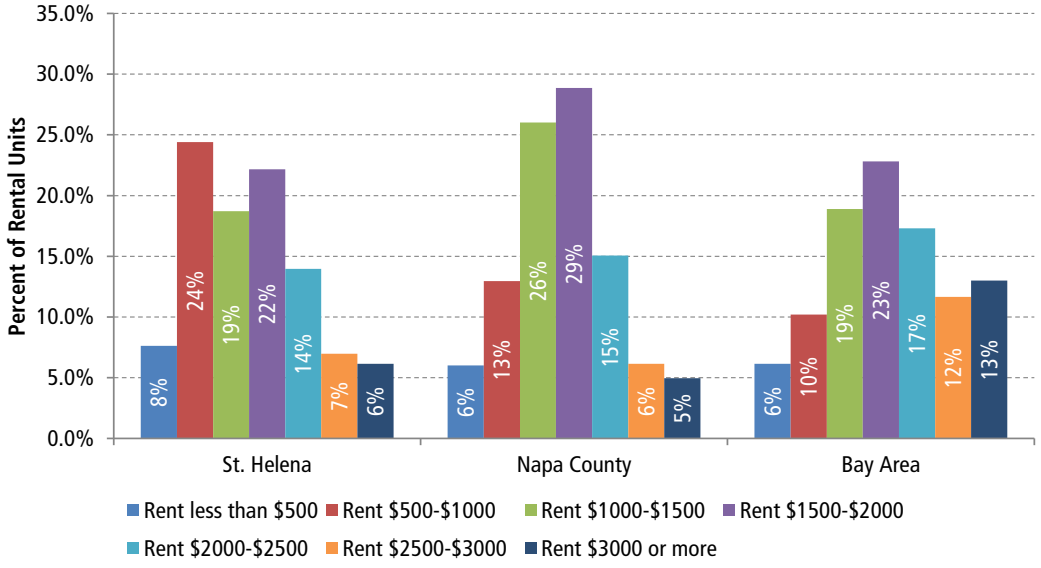
Source: Zillow.com, January 9, 2023.

Rental Housing

Similar to home values, rents have also increased dramatically across the Bay Area in recent years. Regionwide, some renters were priced out, evicted, or displaced, particularly communities of color. Residents finding themselves in one of these situations may have had to choose between commuting long distances to their jobs and schools or moving out of the region, and sometimes, out of the state.

In St. Helena, the largest proportion of rental units rented in the $500 to $1000 per month category, totaling 24.4 percent, followed by 22.2 percent of units renting in the $1500 to $2000 per month category (Figure 33). Both countywide, and in the Bay Area as a whole, the largest share of units is in the $1500 to $2000 per month category.

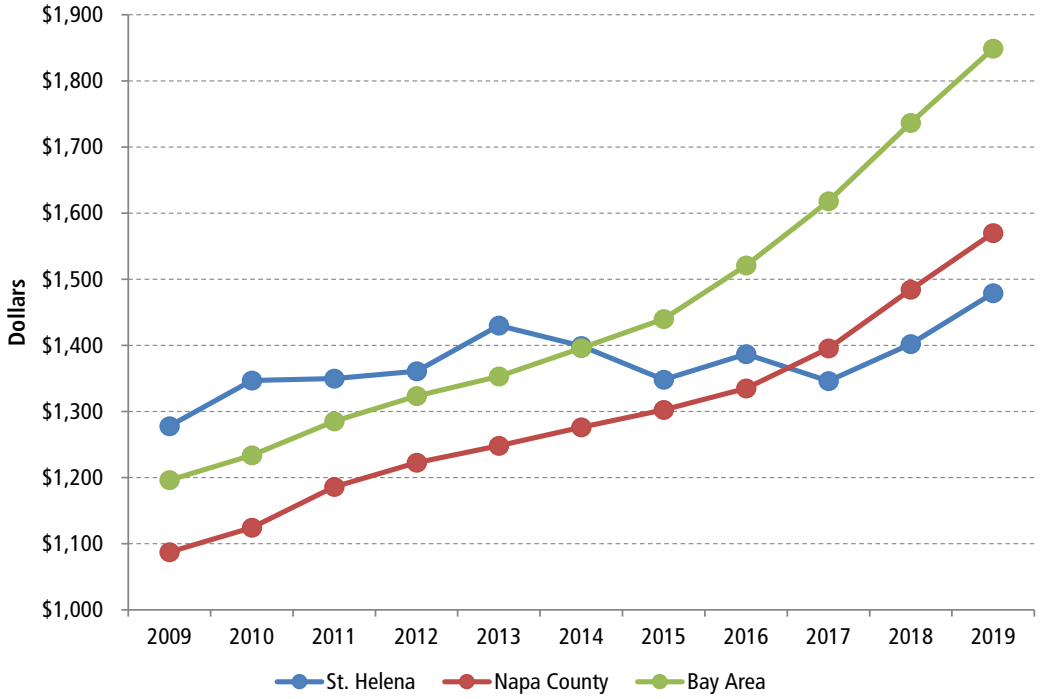
Figure 33 Contract Monthly Rents for Renter-occupied Units



Universe: Renter-occupied housing units paying cash rent
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25056 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-09.

Since 2009, the median rent has increased by 15.7 percent in St. Helena, from $1,390 to $1,470 per month (Figure 34). In Napa County, the median rent has increased 23.0 percent , from $1,270 to $1,560 per month. The median rent in the region has increased significantly during this time from $1,200 to $1,850 per month, a 54 percent increase.

Figure 34 Median Contract Monthly Rent



Universe: Renter-occupied housing units paying cash rent
Notes: For unincorporated areas, median is calculated using distribution in B25056.
Source: U.S. Census Bureau, American Community Survey 5-Year Data releases, starting with 2005-2009 through 2015-2019, B25058, B25056 (for unincorporated areas). County and regional counts are weighted averages of jurisdiction median using B25003 rental unit counts from the relevant year.
For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-10.

Affordable Rental Rates

In addition to maximum home purchase price, Table 15 also calculates maximum monthly gross rent. This calculation assumes that 30 percent (35 percent for moderate) of income is available for either: monthly rent, including utilities; or mortgage payment, taxes, mortgage insurance, and homeowners' insurance. Among three-person households, the maximum monthly gross rent that can be paid is calculated at $1,229 for very low-income households, $1,965 or low-income households, and $2,458 for moderate income households. While a studio, one-bedroom, and some of the two-bedroom market rate apartments in St. Helena are affordable to low income and a portion of very low-income households, they are in limited supply. Average apartment rents throughout Napa County are only affordable to low-, moderate-, and above moderate- households. In addition, single family rental units are significantly more expensive and are affordable only to above moderate-income households.

Affordable Housing Complexes

Table 17 lists affordable housing complexes and units in St. Helena, which are shown on Figure 35. These include four rental complexes, five for-sale subdivisions, and 13 regulated affordable units in the City, that increase the supply of housing and focus on meeting the housing needs unmet by the private housing market

- The rental complexes noted in Table 17 provide 214 units of affordable housing to St. Helena residents. Waiting lists for affordable units can be quite long. For instance, as of January 2022, Hunt's Grove Apartments has a five-year waiting list[17] and Stonebridge has a three to four year waiting list.[18] Recently, the City has reduced and deferred fees for a five-unit affordable project at 963 Pope Street, which is currently under construction.

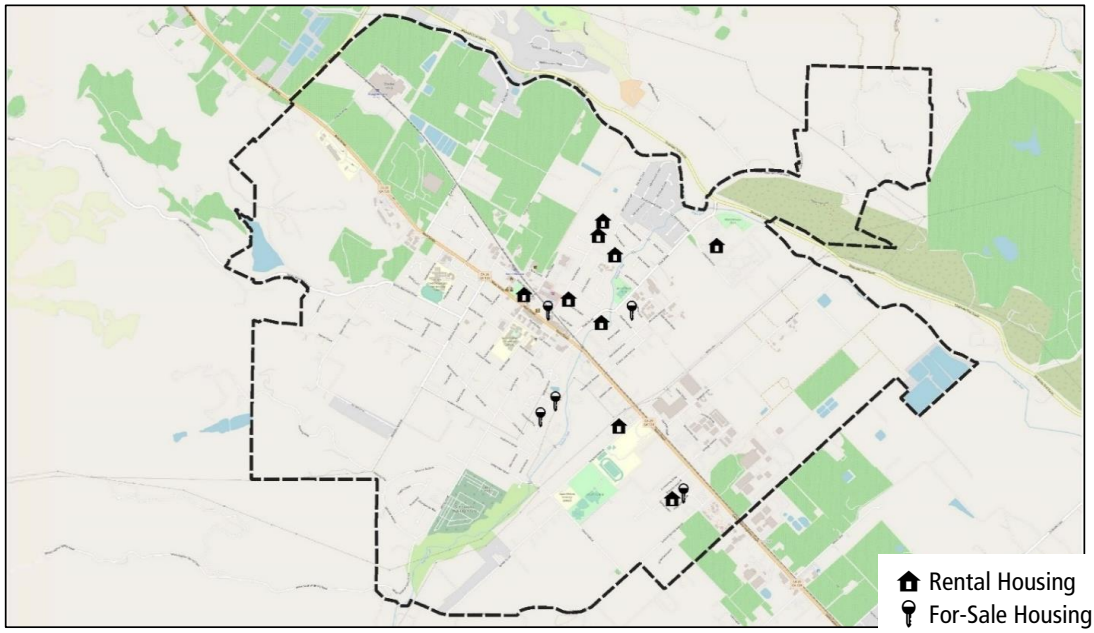
- The five for-sale subdivisions (Marietta Townhomes, Wallis Subdivision, Magnolia Oaks, and Brenkle Court) provide 41 affordable for-sale units with deed restrictions. The City of St. Helena contributed funds to the Marietta townhomes in 1997, including $130,000 in silent second mortgages and $12,500 in building fees. The City also reduced fees and contributed significant funds to the Brenkle Court development in 2016 and approved an additional five deed-restricted affordable units at this location in 2020.

- The 13 regulated affordable apartments in the City are incorporated into the Wydown Hotel, Hunt Street Apartments, Turley Flats, and Grayson Avenue Apartments. The City has both reduced and deferred fees (through a loan from the Affordable Housing Trust Fund) for the Turley Flats Affordable Housing Project, an 8-unit multi-family development.

In addition, mobile home parks like Vineyard Valley, although not officially regulated as affordable housing, do represent a housing option in St. Helena that is affordable to moderate income households.

[17] *Personal communication, January 26, 2022.*
[18] *Personal communication. January 26, 2022.*

Figure 35 Map of Affordable Housing Units, St. Helena



Source: City of St. Helena, 2022. Map data from OpenStreetMap.org Contributors.

~~Table 16~~Table 17 Affordable Rental Housing Units, St. Helena

Name	Affordable Units	Bedrooms/ Bathrooms	Special Needs	Current Owner	Funding Sources	Status	Affordability Requirement
Hunts Grove	56	14 - 1 bdr/1 bath 28 - 2 bdr/1 bath 14 - 3 bdr/2 bath	n.a.	Bridge Housing	9 percent Tax Credit Equity; Residential Housing Construction Program; Bank of American, First Nationwide Bank, City of St. Helena, First Financial Management	Active	Low and Very Low Income
Stonebridge Apts.	78	8 - 1 bdr/1 bath 23 - 2 bdr/1 bath 28 - 3 bdr/2 bath 8 - 4 bdr/2 bath	n.a.	EAH Nonprofit Housing Corporation	9 percent Tax Credit Equity; HCD; Residential Housing Construction Program; City of St. Helena; Federal Home Loan Bank, Affordable Housing Program	Active	Low and Very Low Income
Woodbridge Apts.	49	48 - 1 bdr/1 bath 2 - 2 bdr/1 bath	Senior Citizens	Woodbridge RAL	CHFA, Section 8	Active	Very Low Income
Magnolia Oaks	14	10 - 2 bdr apartments 4- 1 bdr second units	n.a.	n.a.	Developer Financed	Active	Low and Moderate Income
Wydown Hotel	1	1 - 1 bdr	n.a.	Wydown Hotel	Developer Financed	Active	Very Low Income
Hunt Street Apartments	2	Studio	n.a.	Jack Ibrahim	Owner Financed	Active	Very Low Income
Turley Flats	8	2-3 bdr multifamily	n.a.	n.a.	Private Financing, City and County Loans		
Grayson Apartments	2	2 bdr/1 bath	n.a.	n.a.	Private funds	Active	Low and Moderate Income
Christine Apartments	4	2 bdr/1 bath	n.a.	Our Town St. Helena	Private funds	Active	Very Low and Low Income
					RENTAL TOTAL		214

Source: City of St. Helena, 2022.

~~Table 17~~Table 18 **Affordable For-Sale Housing Units, St. Helena**

Name	Affordable Units	Bedrooms/ Bathrooms	Special Needs	Current Owner	Funding Sources	Status	Affordability Requirement
Wallis Subdivision	20	2bdr/2 bath	n.a.	n.a.	Developer Financed	Active	Moderate Income
Marietta Townhomes	10	Unknown	n.a.	n.a.	Napa Valley Community; City of St. Helena	Active	Moderate Income
Sherwin	1	4 bdr single family	n.a.	n.a.	Developer Financed	Active	Moderate Income
Magnolia Oaks	2	3 bdr single family	n.a.	n.a.	Developer Financed	Active	Moderate Income
Brenkle Court	8	3bdr/1.5 bath	n.a.	n.a.	City and County Loans, USDA & sweat equity	Under Construction	Low and Moderate Income
					FOR SALE TOTAL		41

Source: City of St. Helena, 2022.

Current Market Rate Rental Housing

Since the ~~collection~~release of the 2019 ACS data, the cost of rental housing in St. Helena has increased dramatically. For most looking to move to St. Helena, the price of market rate housing is almost entirely out of reach. Based on Zillow data, there are two available apartments for rent in St. Helena posted for a contract rent rate of $1,850 and $2,150. Several detached single-family homes are listed for rent at prices which are wholly out of reach of lower, moderate, and most above moderate-income households. The average market rent rate of available ~~units~~single-family homes is $8,356 per month and the median rent is $6,450 per month.

Table 19 Residential Properties for Rent, January 2023

Address	Bedroom	Bathrooms	Square Footage	Monthly Rent	Cost per Square Foot
709 Hunt Ave	4	4	2,915	$24,500	$8.40
679 Dowdell Ln	4	3.5	2,800	$22,000	$7.85
466 Pratt Ave	4	5	4,789	$15,000	$3.13
489 Fulton Ln	3	2	1,645	$14,000	$8.51
1316 Sulphur Springs Ave	3	2	1,648	$9,500	$5.76
925 Pratt Ave	3	3	2,523	$8,500	$3.37
1860 Quail Ct	2	2.5	2,433	$6,500	$2.67
911 Chiles Ave	3	2.5	2,217	$6,500	$2.93
1320 Elmhurst Ave	3	2	1,512	$6,450	$4.27
1629 Madrona Ave	4	3	2,746	$6,000	$2.18
963 McCorkle Ave	3	2	1,378	$5,900	$4.28
1091 Mariposa Ln	3	2	1,316	$5,500	$4.18

1220 Peppertree Cir	3	2	1,450	$4,650	$3.21
1969 Vineyard Ave	3	2	1,000	$4,400	$4.40
1328 Magnolia Ave	3	3	2,082	$3,800	$1.83
210 Nemo Ct	2	2	2,000	$3,200	$1.60
1444 Edwards St, Unit C	2	1	N/A	$2,150	N/A
1444 Edwards St, Unit B	1	1	N/A	$1,850	N/A

Source: Zillow.com, January 9, 2023.

"At Risk" Units

State law requires an analysis of the risk of conversion of affordable housing to market-rate housing within the next ten years. The 2009 Housing Element identified one affordable housing complex, the Woodbridge Apartments, as at-risk for losing its federal subsidies. In 2013, the City worked with the property owners and CalHFA to re-finance and renovate 50 units of affordable housing. Through this effort the Woodbridge Apartment Complex will continue to offer regulated affordable housing through November 2067. The 2014-2022 Housing Element reported no units at-risk of conversion.

The California Housing Partnership provides information on affordable housing developments subsidized through HUD, the U.S. Department of Agriculture, the Low-Income Housing Tax Credit Program, and public housing. Table 20, shows data on assisted affordable units with information on the estimated affordability end year and an estimation of at-risk status. As shown on the table, the California Housing Partnership's Preservation Database (2020) does not identify any affordable housing developments with subsidies expiring during the 2023-2031 planning period.

~~Table 18~~Table 20 Assisted Affordable Housing Developments by Conversion Risk Status, St. Helena

Universal ID	Name	Address	Zip	Affordable Units	Total Units	Funding Program	Estimated Affordability End Year	Risk Level
CA00001362	Woodbridge Village Apartments	727 Hunt Avenue	94574	49	50	LIHTC; HUD; CalHFA	2067	Low
CA00002539	Hunt's Grove Apartments	548 Hunt Avenue	94574	56	56	LIHTC; HCD	2047	Low
CA00002582	Stonebridge Apartments	990 College Ave	94574	78	80	LIHTC; HCD	2068	Low

Source: California Housing Partnership Preservation Database, 2021.

7. Special Housing Needs

California Government Code Section 65583 (a) (7) requires an analysis of any special housing needs, "such as those of the elderly, persons with disabilities, large families, farm workers, families with female heads of household, and families and persons in need of emergency shelter."[19] This section provides estimates of the prevalence of each of these special needs populations, discusses special housing concerns, and analyzes their housing cost burdens within St. Helena to the extent that available data allows. Data sources include the HCD Preapproved Data Package and Housing Needs Data Report prepared for St. Helena by ABAG, as well as the U.S. Census Bureau, American Community Survey.

Key Findings

- **People with Disabilities.** In St. Helena, people with disabilities make up around 12 percent of the total population. Children (under 18) make up around 38 percent of the developmentally disabled population, while adults make up around 62 percent. Most of the developmentally disabled population reside with their parent, family, or guardian.

- **Senior Households.** Senior households represent a higher percentage of the total households in St. Helena, at about 39 percent of households in the City. There is a large income disparity between seniors who rent housing and seniors who own their home. Most seniors who rent make 0 to 30 percent of AMI, and sixty-eight percent of senior households in this income category have housing cost burdens. By contrast, most seniors who own make greater than 100 percent of AMI; thirteen percent of senior households in this category experience housing cost burdens.

- **Large Households.** In St. Helena, most large households are renters. Among units with three or more bedrooms in St. Helena, approximately 77 percent renter occupied. In St. Helena, 43.2 percent of large family households experience a cost burden of 30 to 50 percent, and an additional 6.8 percent of households spend more than half of their income on housing.

- **Female-headed households.** Female-headed households in St. Helena make up 10 percent of the total population, while married-couple family households make up around 42 percent. In St. Helena, around 23 percent of female-headed households with children fall below the federal poverty line, while around 18 percent of female-headed households without children fall below the federal poverty line.

- **Farmworkers**. The number of permanent farm workers in Napa County has increase from 2,916 in 2002 to 4,290 in 2017, while the number of seasonal farm workers decreased from 7,855 to 5,734. The

[19] *California Government Code Section 65583 (a) (7) at https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65583. Accessed March 20, 2022.*

migrant worker student population totaled 20 during the 2019-20 school year, an increase of two students since the 2016-17 school year.

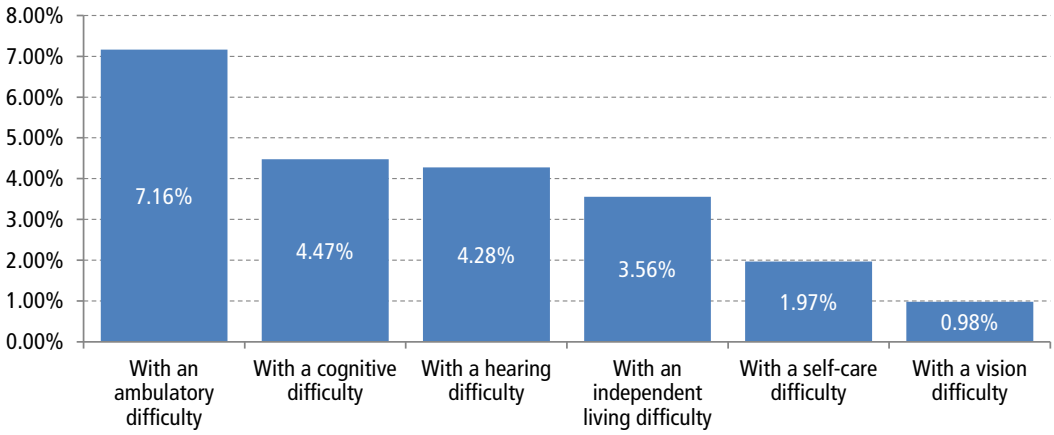
- **Persons experiencing homelessness.** According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. Countywide, many of the persons experiencing homelessness report chronic substance abuse or mental illness.

People with Disabilities

People with disabilities face additional housing challenges. Encompassing a broad group of individuals living with a variety of physical, cognitive and sensory impairments, many people with disabilities live on fixed incomes and need specialized care, yet often rely on family members for assistance due to the high cost of care.

When it comes to housing, people with disabilities are not only in need of affordable housing but accessibly designed housing, which offers greater mobility and opportunity for independence. Unfortunately, the need typically outweighs availability, particularly in a housing market with such high demand. People with disabilities are at a high risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. Figure 36 shows the rates at which different disabilities are present among residents of St. Helena. Overall, 11.9 percent of people in St. Helena have a disability of any kind.

Figure 36 Disability by Type



Universe: Civilian noninstitutionalized population 18 years and over
Notes: These disabilities are counted separately and are not mutually exclusive, as an individual may report more than one disability. These counts should not be summed. The Census Bureau provides the following definitions for these disability types: Hearing difficulty: deaf or has serious difficulty hearing. Vision difficulty: blind or has serious difficulty seeing even with glasses. Cognitive difficulty: has serious difficulty concentrating, remembering, or making decisions. Ambulatory difficulty: has serious difficulty walking or climbing stairs. Self-care difficulty: has difficulty dressing or bathing. Independent living difficulty has difficulty doing errands alone such as visiting a doctor's office or shopping.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.
For the data table behind this figure, please refer to the Data Packet Workbook, Table DISAB-01.

Existing Resources

People with disabilities often face issues with getting the medical services and assistance they need on a regular basis. Given St. Helena's rural location, In-Home Supportive Services (IHSS), offered by Napa County, is a helpful resource to help allow persons with disabilities to find the help they need. IHSS offers personal in-home care services to low income aged, blind, and persons with disabilities who are at risk for out-of-home placement.

Gaps in Resources and Action Items

To address the unmet needs of people with disabilities in St. Helena, Programs H-BBH-Z, H-LLH-JJ, and H-NN H-LL are included to directly improve housing accessibility and increase housing options for persons with disabilities. Program H-BBH-Z commits the City to pursuing State and Federal grants to gain funds necessary to construct and rehabilitate housing units accessible to persons with a disability. Program H-NN H-LL includes funding to assist with construction and rehabilitation of homes accessible to those with special housing needs. Program H-LL H-JJ is designed to encourage developers to incorporate the needs of persons with disabilities.

People Living with Developmental Disabilities

Developmental disabilities are defined as severe, chronic, and attributed to a mental or physical impairment that begins before a person turns 18 years old. This can include Down's Syndrome, autism, epilepsy, cerebral palsy, and mild to severe mental retardation. Some people with developmental disabilities are unable to work, rely on Supplemental Security Income, and live with family members. In addition to their specific housing needs, they are at increased risk of housing insecurity after an aging parent or family member is no longer able to care for them. Table 21Table 21 contains data on people with developmental disabilities in St. Helena. In St. Helena, of the population with a developmental disability, children under the age of 18 make up 38.1 percent, while adults account for 61.9 percent.

Table 19Table 21 People with Developmental Disabilities by Age, St. Helena

Age Group	Total
Age 18+	12
Age Under 18	20
Total	32

Universe: Population with developmental disabilities
Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.
Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Age Group (January 2022)

Existing Resources

There are several housing types appropriate for people living with a development disability: rent subsidized homes, licensed and unlicensed single-family homes, inclusionary housing, Section 8 vouchers, special programs for home purchase, HUD housing, and SB 962 homes. The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this need group. Incorporating 'barrier-free' design in all, new multifamily housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for disabled residents. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income. The most common living arrangement for individuals with disabilities in St. Helena is the home of a parent, family member, or guardian (Table 22).

People living with developmental disabilities often face problems finding employment or a ~~stable support system~~supportive housing. In Napa, Sonoma, and Solano counties, North Bay Regional Center aids those with developmental disabilities with the process of gaining employment and establishing independence, along with providing general community access and family support. North Bay Regional Center is one of twenty-one Regional Centers in California dedicated to assisting those with developmental disabilities. North Bay Regional Center is based out of the Napa County Airport Business Park located north of American Canyon, which is accessible from St. Helena via the 10 and 11 bus lines.

Gaps in Resources and Action Items

Recently, an eight-unit market rate fully ADA compliant housing development was completed in St. Helena, providing some much-needed housing to persons with special needs. The City wishes to encourage more ADA compliant developments to address the unmet needs of people with developmental disabilities. To pursue this goal, Program H-LL~~H-JJ~~ is included in the Housing Element to encourage new developments to allocate a portion of units being built to meet the needs of special needs groups, including people with developmental disabilities.

~~Table 20~~Table 22 People with Developmental Disabilities by Residence

Residence Type	Total
Home of Parent / Family /Guardian	31
Foster / Family Home	0
Independent / Supported Living	<11
Intermediate Care Facility	0
Community Care Facility	0
Other	0

Universe: Population with developmental disabilities
Notes: The California Department of Developmental Services is responsible for overseeing the coordination and delivery of services to more than 330,000 Californians with developmental disabilities including cerebral palsy, intellectual disability, Down syndrome, autism, epilepsy, and related conditions. The California Department of Developmental Services provides ZIP code level counts. To get jurisdiction-level estimates, ZIP code counts were crosswalked to jurisdictions using census block population counts from Census 2010 SF1 to determine the share of a ZIP code to assign to a given jurisdiction.
Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Residence Type (January 2022)

Seniors

Senior households often experience a combination of factors that can make accessing or keeping affordable housing a challenge. They often live on fixed incomes and are more likely to have disabilities, chronic health conditions and/or reduced mobility.

Senior Households

Table 23 shows data for households by age of householder for occupied housing units. As shown, in St. Helena, approximately 39 percent of households are 65 and older.

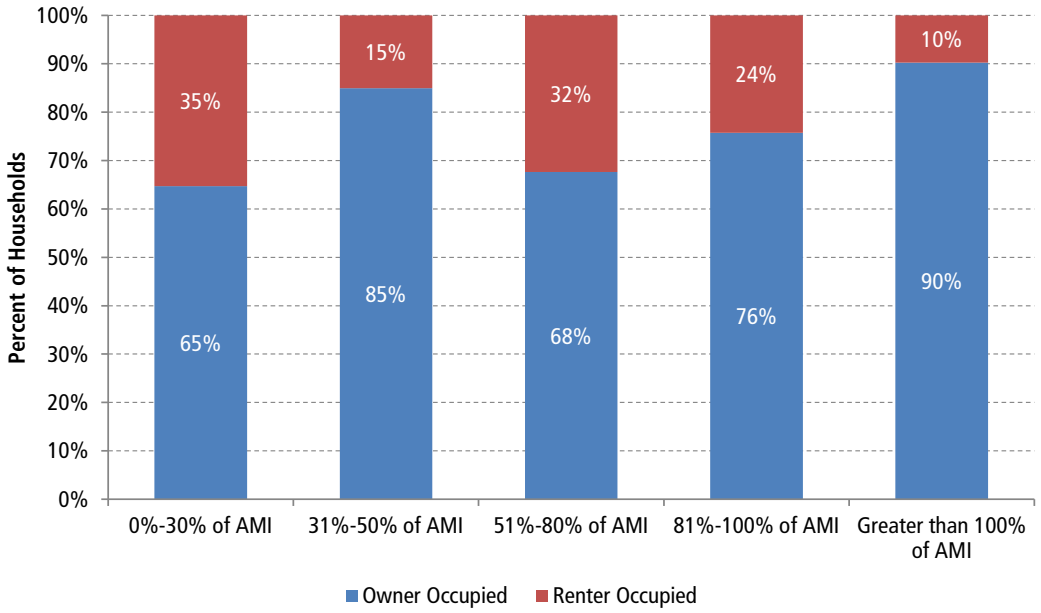
~~Table 21~~Table 23 Households by Age

Age	Number	Total by Grouping	Percent
Age 15-24	37		
Age 25-34	247		
Age 35-44	272		
Age 45-54	510	1,646	61%
Age 55-59	352		
Age 60-64	228		
Age 65-74	525		
Age 75-84	377	1,056	39%
Age 85+	154		
Total	2,702	2,702	100%

Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25007

Seniors who rent may be at even greater risk for housing challenges than those who own, due to income differences between these groups. The largest proportion of senior households who rent make 0-30 percent of AMI, while the largest proportion of senior households who are homeowners falls in the income group Greater than 100 percent of AMI (Figure 37).

Figure 37 Senior Households by Income and Tenure

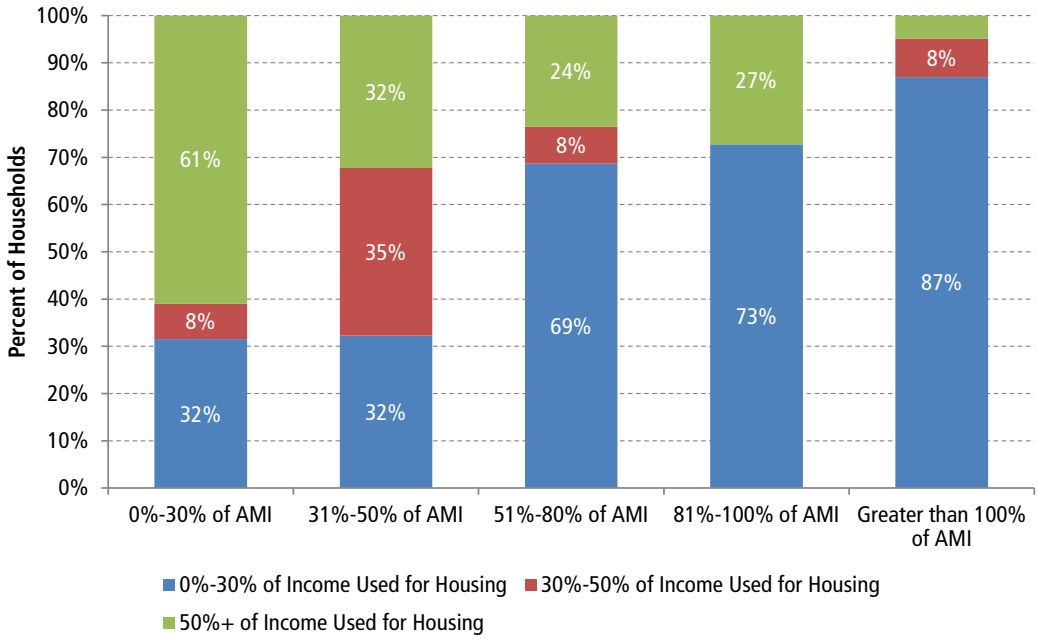


Universe: Senior households
Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-01.

Elderly Housing Cost Burden

When cost-burdened seniors are no longer able to make house payments or pay rents, displacement from their homes can occur, putting further stress on the local rental market or forcing residents out of the community they call home. Understanding how seniors might be cost-burdened is of particular importance due to their special housing needs, particularly for low-income seniors. 60.9 percent of seniors making less than 30 percent of AMI are spending the majority of their income on housing. For seniors making more than 100 percent of AMI, 87.0 percent are not cost-burdened and spend less than 30 percent of their income on housing (Figure 38).

Figure 38 Cost-Burdened Senior Households by Income Level



Universe: Senior households
Notes: For the purposes of this graph, senior households are those with a householder who is aged 62 or older. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30% of monthly income,

while severely cost-burdened households are those whose monthly housing costs exceed 50% of monthly income. Income groups are based on HUD calculations for Area Median Income (AMI). HUD calculates the AMI for different metropolitan areas, and the nine county Bay Area includes the following metropolitan areas: Napa Metro Area (Napa County), Oakland-Fremont Metro Area (Alameda and Contra Costa Counties), San Francisco Metro Area (Marin, San Francisco, and San Mateo Counties), San Jose-Sunnyvale-Santa Clara Metro Area (Santa Clara County), Santa Rosa Metro Area (Sonoma County), and Vallejo-Fairfield Metro Area (Solano County). The AMI levels in this chart are based on the HUD metro area where this jurisdiction is located.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table SEN-03.

Senior Living FacilitiesExisting Senior Housing Resources

Within St. Helena, there are 159 senior housing units, as shown on Table 24. With approximately 1,056 seniors households in the city, the city has a need for both market rate and affordable senior living facilities. The largest senior living facility, locally owned Silverado Orchards, has a residential capacity of 103. This facility is not income restricted. The only income restricted senior living facility, Woodbridge Village, has 50 units, with most being one-bedroom units. As a stark representation of the high demand and low supply of affordable senior living units, according to a manager at Woodbridge Village, there is a waiting list stretching several years to live in their affordable senior housing complex.

Table 22Table 24 Senior Housing Units, St. Helena.

Facility Name	Address	Tenure	Number of Units	Income Restriction
Silverado Orchards	601 Pope Street	Rent	103	No
Saint Helena Home Care	2011 Olive Avenue	Rent	6	No
Woodbridge Village	727 Hunt Avenue	Rent	50	Yes

Source: City of St. Helena, 2022; U.S. News, 2016.

Additional Senior Housing Needs Gaps in Resources and Action Items

Given the high proportion of St. Helena households that are senior, especially seniors aged 75 and older, it is important to work to address their housing needs. The Rianda house provides seniors with a meeting place and valuable information on topics ranging from housing and income-assistance to medical referrals, as a welcome and positive resource for seniors in St. Helena. There are still many needs of seniors that are not being met, however, and changes to St. Helena's housing policies could make it easier for seniors to age in place. Often, when seniors are released from a hospital stay and return to their own homes, they have trouble navigating inside the home and getting to neighborhood services like the grocery store and doctor's office.

The 2023-2031 Housing Element includes three programs directly related the senior housing.

- Program H-BB commits the City to pursuing funding for costs specifically associated with housing rehabilitation for lower income households and seniors. Such funding can help with the conservation of 20 units accessible to seniors, along with other units for persons with a disability.

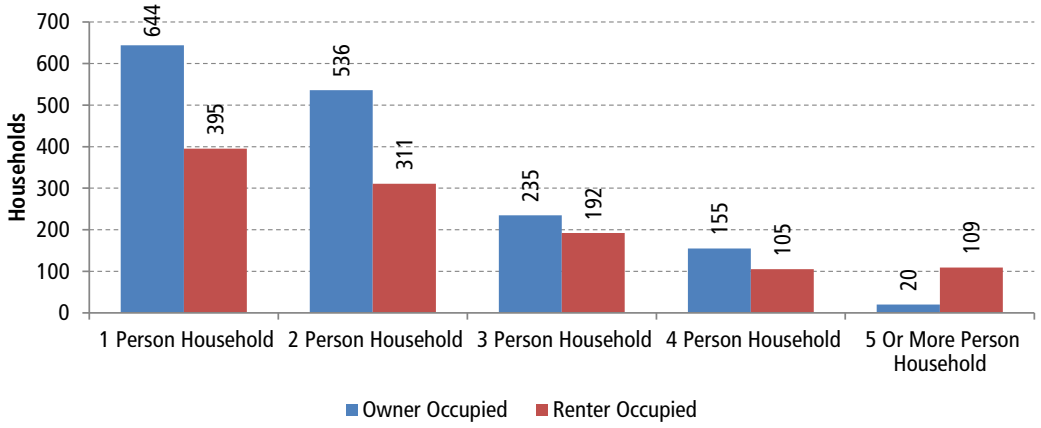
- Program H-LL commits the city to encouraging new developments accessible to persons with special needs, which includes seniors. This program specifies 10 senior-accessible units being constructed in the next Planning Period.
- Program H-NN commits the City to pursuing federal and State funding for costs associated with both new construction and rehabilitation for lower-income households and seniors. Such funding can support the development of 20 units accessible to seniors.

Additional policies and programs that the City should consider include zoning that encourages families to consider ADUs and JADUs to accommodate their aging relatives or caregivers. Such policies could also provide for more elder-friendly neighborhoods, improved lighting to increase visibility, and safe accessible sidewalks and walking paths.

Large Households

Large households often have different housing needs than smaller households. If a city's rental housing stock does not include larger apartments, large households who rent could end up living in overcrowded conditions. In St. Helena, for large households with five or more persons, most units (84.5 percent) are renter occupied (Figure 39). In 2017, 47.3 percent of large households were very low-income, earning less than 50 percent of the area median income (AMI).

Figure 39 Household Size by Tenure



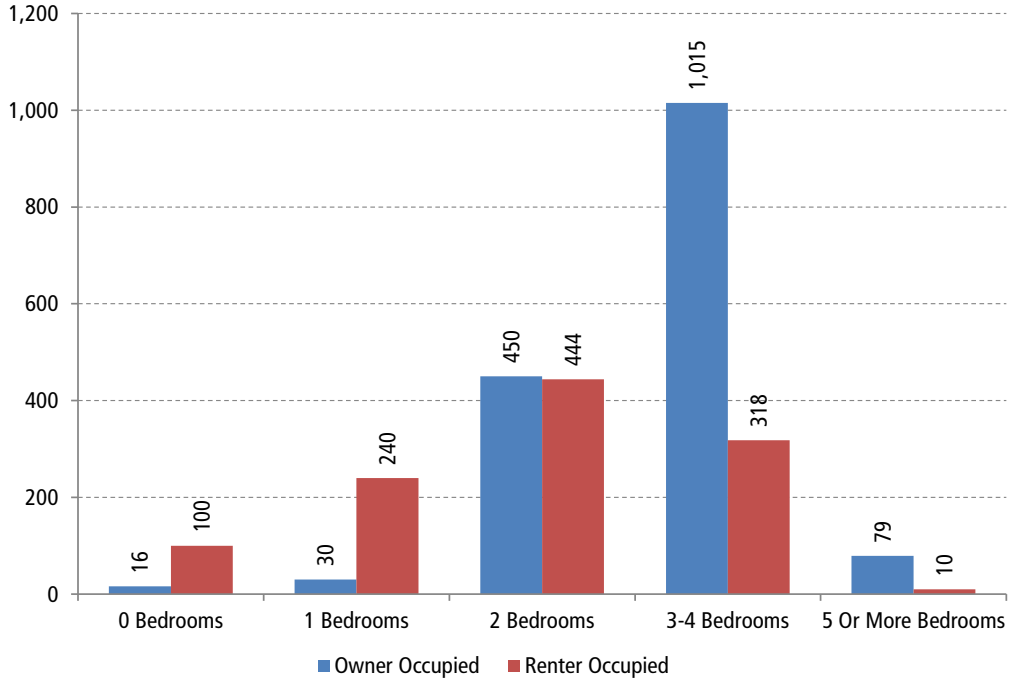
Universe: Occupied housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25009 For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-01.

Existing Resources

The unit sizes available in a community affect the household sizes that can access that community. Large families are generally served by housing units with three or more bedrooms, of which there are 1,422 units in

St. Helena. Among these large units with three or more bedrooms, 23.1 percent are owner-occupied and 76.9 percent are renter occupied (Figure 40).

Figure 40 Housing Units by Number of Bedrooms



Universe: Housing units
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B25042 For the data table behind this figure, please refer to the Data Packet Workbook, Table HSG-05.

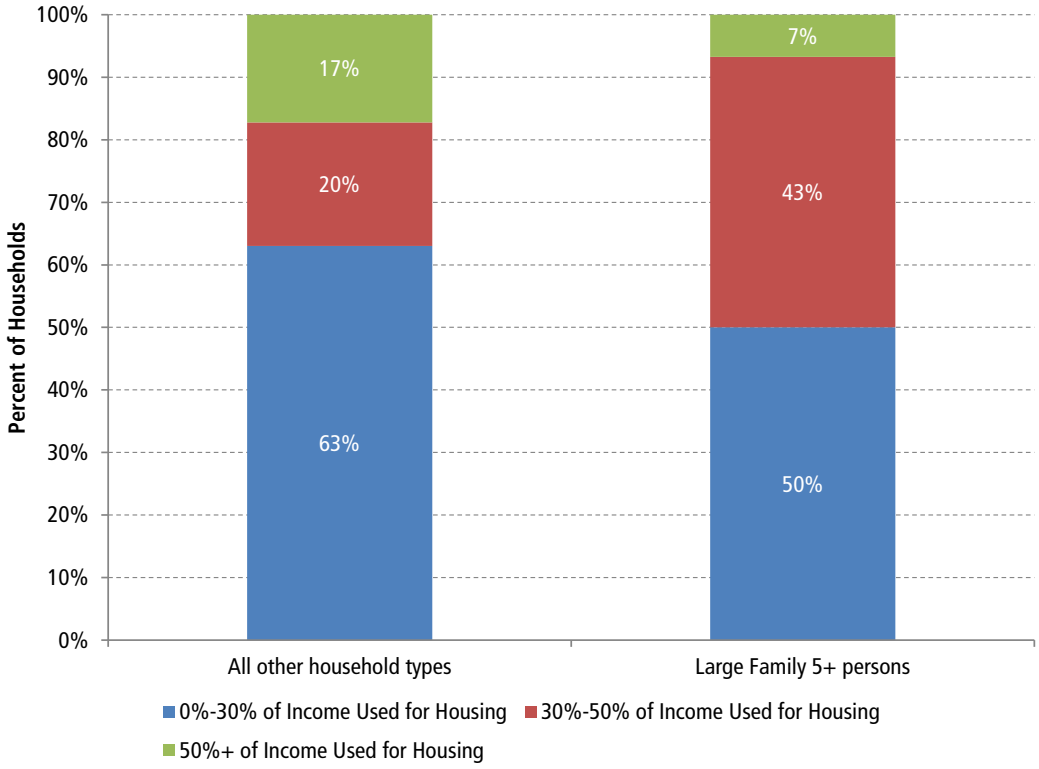
Gaps in Resources

~~Large Family Housing Cost Burden~~

Large family households often have special housing needs due to a lack of adequately sized affordable housing available. The higher costs required for homes with multiple bedrooms can result in larger families experiencing a disproportionate cost burden than the rest of the population and can increase the risk of housing insecurity.

In St. Helena, 43.2 percent of large family households experience a cost burden of 30 to 50 percent, while 6.8 percent of households spend more than half of their income on housing. Some 19.7 percent of all other households have a cost burden of 30 to 50 percent, with 17.2 percent of households spending more than 50 percent of their income on housing (Figure 41).

Figure 41 Cost Burden by Household Size

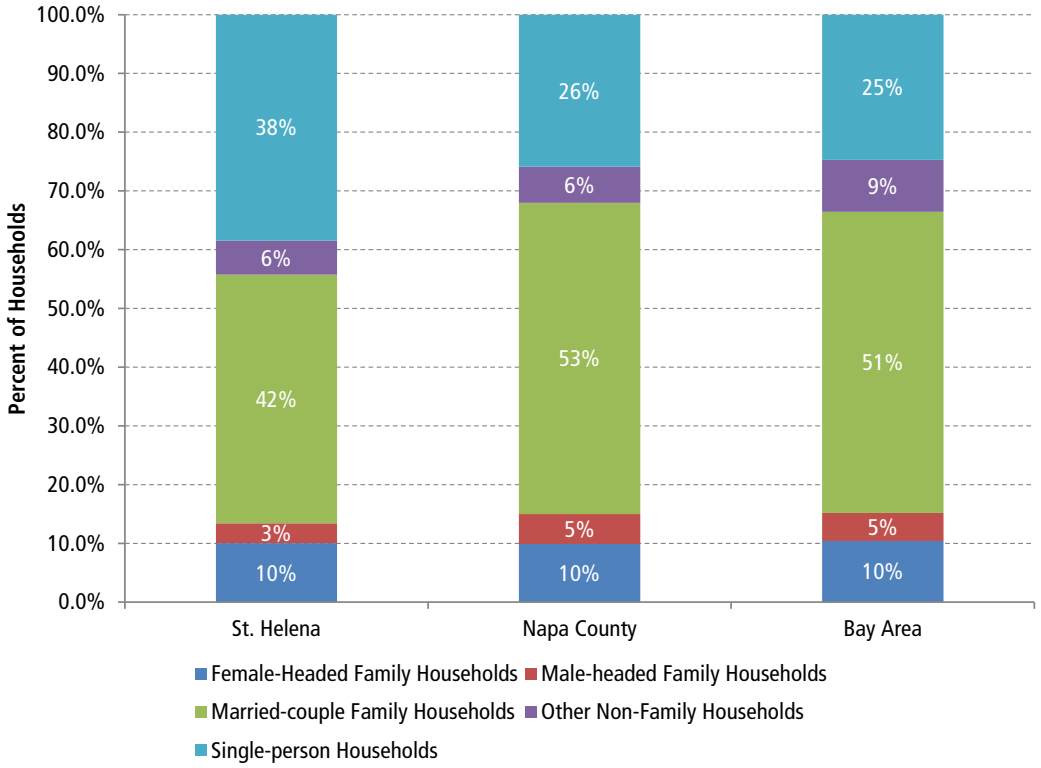


Universe: Occupied housing units
Notes: Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. HUD defines cost-burdened households as those whose monthly housing costs exceed 30 percent of monthly income, while severely cost-burdened households are those whose monthly housing costs exceed 50 percent of monthly income.
Source: U.S. Department of Housing and Urban Development (HUD), Comprehensive Housing Affordability Strategy (CHAS) ACS tabulation, 2013-2017 release
For the data table behind this figure, please refer to the Data Packet Workbook, Table OVER-09.

Female-Headed Households

Households headed by one person are often at greater risk of housing insecurity, particularly female- headed households, who may be supporting children or a family with only one income. In St. Helena, the largest proportion of households is Married-couple Family Households at 42.3 percent of total, while Female-Headed Households make up 10.0 percent of all households (Figure 42).

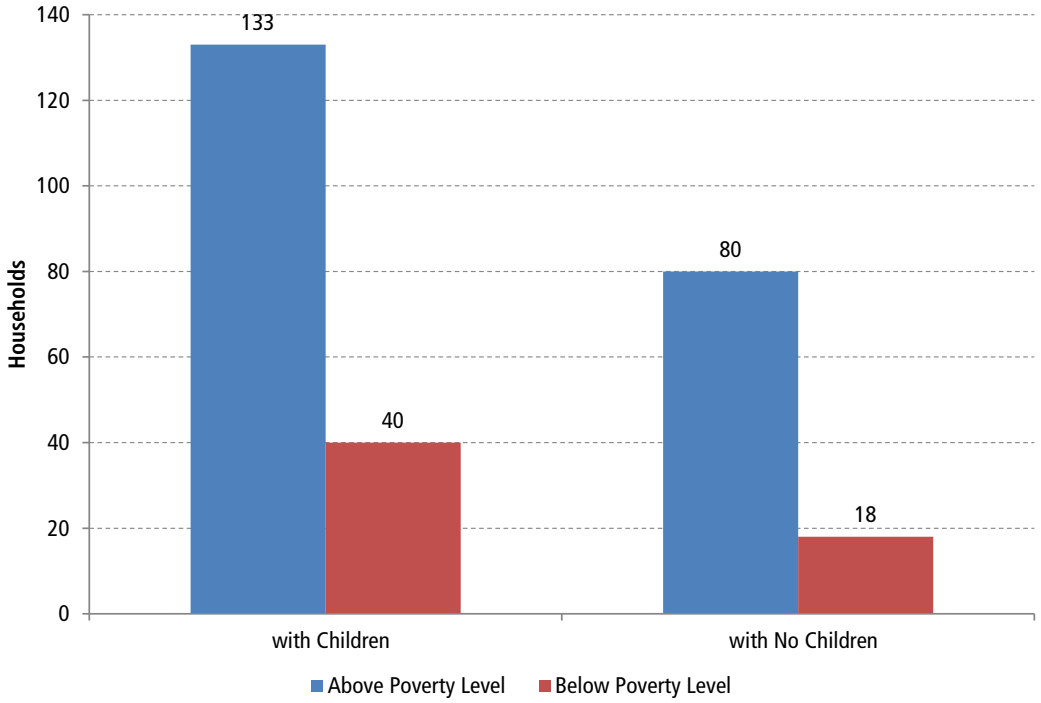
Figure 42 Household Type



Universe: Households
Notes: For data from the Census Bureau, a "family household" is a household where two or more people are related by birth, marriage, or adoption. "Non-family households" are households of one person living alone, as well as households where none of the people are related to each other.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B11001 For the data table behind this figure, please refer to the Data Packet Workbook, Table POPEMP-23.

Female-headed households with children may face unique housing challenges, with pervasive gender inequality resulting in lower wages for women. Moreover, the added need for childcare can make finding a home that is affordable more challenging. In St. Helena, 40 female-headed households with children fall below the Federal Poverty Line, while 18 female-headed households without children live in poverty (Figure 43).

Figure 43 Female-Headed Households by Poverty Status



Universe: Female Households
Notes: The Census Bureau uses a federally defined poverty threshold that remains constant throughout the country and does not correspond to Area Median Income.
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B17012 For the data table behind this figure, please refer to the Data Packet Workbook, Table LGFEM-05.

Existing Resources

As discussed previously, childcare is a major concern for female-headed households, especially those with very young toddlers who need constant care and supervision. In St. Helena, the St. Helena Preschool For All, Inc. provides scholarships to low-income families to allow their children will be able to attend two years of preschool from ages 3 to 4. St. Helena Preschool for All, Inc. also partners with local childcare facilities, including Mila's Preschool and Childcare Center, to help facilitate their program.

Gaps in Resources and Action Items

St. Helena's northwestern area contains a higher proportion of female single-parent households compared to the rest of St. Helena and most of Napa County. As such, the City recognizes the importance of meeting the needs of female-headed households within the city. A major cost to female-headed households and single-parent households is transportation. All sites in the sites inventory of this Housing Element, which projects possible housing locations for the planning period, are located within walking distance of the no. 10 bus route, which enables direct ~~commuting~~connection to Napa or Calistoga. Additionally, all sites are within proximity of

the central commercial district of St. Helena, which allows for cheaper, easier access to ~~restaurants~~markets and ~~markets~~commercial services.

Farmworkers

Across the state, housing for farmworkers has been recognized as an important and unique concern. Farmworkers generally receive wages that are considerably lower than other jobs and may have temporary housing needs. Finding decent and affordable housing can be challenging, particularly in the current housing market.

Table 25 estimates the migrant worker student population between 2016 and 2020. In St. Helena, the migrant worker student population totaled 20 during the 2019-20 school year, an increase of two students since the 2016-17 school year. The trend for the region for the past few years has been a decline of 2.4 percent in the number of migrant worker students since the 2016-17 school year. The change at the county level is a 19.4 percent increase in the number of migrant worker students since the 2016-17 school year.

~~Table 23~~Table 25 Migrant Worker Student Population

Academic Year	St. Helena	Napa County	Bay Area
2016-17	18	903	4,630
2017-18	12	1173	4,607
2018-19	22	1,090	4,075
2019-20	20	1,078	3,976

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools
Notes: The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.
Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020)
This table is included in the Data Packet Workbook as Table FARM-01.

Table 26 presents an estimate of the total farmworkers in Napa County. Since 2007, the county has seen an increase in farmworker jobs. As of 2017, the county is reported to have more than 10,000 hired farm workers, of which 43 percent worked more than 150 days. The number of permanent farm workers in Napa County has increased since 2002, totaling 4,290 in 2017, while the number of seasonal farm workers has decreased, totaling 5,734 in 2017 (Figure 44). Notably, hired farm workers in Napa County represent a large proportion of the Bay Area's permanent (24.8 percent) and seasonal (31.4 percent) farm workers (Table 26).

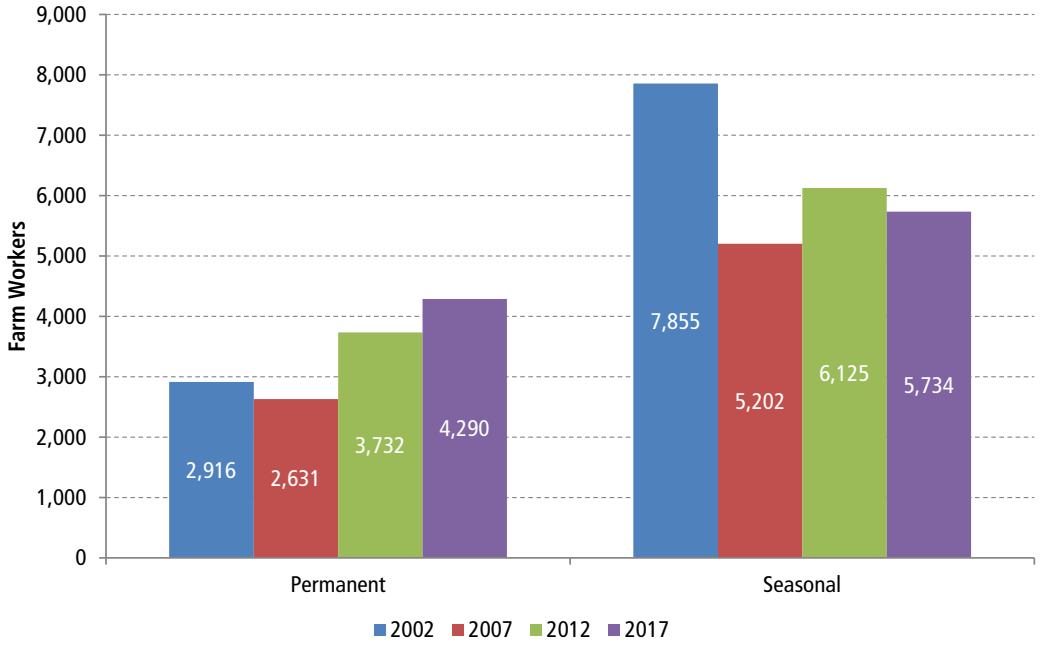
~~Table 24~~Table 26 Farm Labor, Napa County

	2002	2007	2012	2017	County Distribution	Percent of Total Bay Area Farmworkers
Permanent	2,916	2,631	3,732	4,290	43%	24.80%

Seasonal	7,855	5,202	6,125	5,734	57%	31.40%
Totals	10,771	7,833	9,857	10,024	100%	28.20%

Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors)
Notes: Farm workers are considered seasonal if they work on a farm less than 150 days in a year, while farm workers who work on a farm more than 150 days are considered to be permanent workers for that farm.
Source: U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor

Figure 44 Farm Labor by County, Napa County



Universe: Hired farm workers (including direct hires and agricultural service workers who are often hired through labor contractors)
Notes: Farm workers are considered seasonal if they work on a farm less than 150 days in a year, while farm workers who work on a farm more than 150 days are permanent workers for that farm.
Source: U.S. Department of Agriculture, Census of Farmworkers (2002, 2007, 2012, 2017), Table 7: Hired Farm Labor For the data table behind this figure, please refer to the Data Packet Workbook, Table FARM-02.

Existing Resources

Five different kinds of housing exist for farmworkers in Napa County: farmworker centers, owned and operated by the Napa County Housing Authority (NCHA); private accommodations designated for agriculture employees that accommodate five or more employees and are monitored by the Napa County Department of Environmental Management; private accommodations designated as farm labor dwellings accommodating fewer than five residents, private apartments or other housing rented or owned by farmworkers; and affordable

housing projects subsidized by the County and by incorporated cities, some of which have units set aside specifically for farmworker households.

Gaps in Resources and Action Items

Given the special housing needs of farmworkers in the region, the Housing Element contains Program H-H~~H-H~~, which specifically encourages the development of more workforce or farmworker housing during the planning period through various incentives. Of the ~~offered~~discussed incentives, most impactful is the City's~~Program~~ commitment to explore opportunities to use ~~'s language of committing the City to, if appropriate, using~~ funds from the City's Housing Trust Fund to help ~~construct~~assist in the construction of farmworker housing. Additionally, programs H-E~~H-D, H-E, and~~, H-I, H-KK, H-LL, H-NN ~~H-I~~ also commit the City to exploring a variety of methods ~~, such as allowing a variety of housing types,~~ to better meet the housing needs of special needs households, including farmworkers.

Extremely Low-Income Households

Extremely-low income households are defined as households that make less than 30 percent of AMI, which equates to $27,950 for a family of four. Approximately 395 households in St. Helena are extremely-low income households, which includes 215 homeowners and 180 renters (see Figure 11). The City currently estimates that there is a need for 52 additional housing units for extremely low-income households in the current planning period, which is 50 percent of projected very low-income housing needs (see Table 6).

Existing Resources

Currently, St. Helena has an estimated 214 units of deed restricted affordable housing, listed on Table 17. This figure stretches across the need for extremely low, very low, low, and moderate-income housing. Given that there are ~~395~~52 units needed for ~~households of~~ extremely low-income households, there is clearly a lack of adequate housing supply for extremely-low income households.

Beyond the availability of deed restricted affordable housing, ~~St. Helena offers~~there are a ~~wide~~ variety of resources available to assist extremely-low-income households with their recurring expenses. Extremely low-income households who are enrolled in the Supplemental Nutritional Assistance Program (SNAP), or any other qualifying government program, are eligible to be enrolled in the PG&E CARE Program, which allows for the lowest available electricity rates. Additionally, when households are enrolled in CARE, they are also permitted access to a fifty percent discount on their bill from the St. Helena Water District. The City also offers hardship payment agreements that can be arranged in person at City Hall to prevent water or sewer shutoff.

Gaps in Resources and Action Items

To help address the needs of extremely low-income households, numerous programs are included in this Housing Element to commit the City to preserving and expanding access to affordable housing to extremely low-income households. Program H-EE ~~H-CC~~ commits the city to continue reducing, deferring, or waiving the development fees for ~~extremely-low~~extremely low- and very low-income units. Program H-FF ~~H-DD~~ commits the City to prioritizing using the Affordable Housing Trust Fund to preserve existing or develop new extremely low-

income housing units. H-II~~H-GG~~ commits the City to continue supporting and participating in the Section 8 housing program with the City of Napa Housing Authority. Program H-OO ~~H-MM~~ commits the City to exploring the possibility of working with property owners of market rate multifamily complexes to convert some units to extremely low-income deed-restricted units.

Persons Experiencing Homelessness

Homelessness remains an urgent challenge in many communities across the state, reflecting a range of social, economic, and psychological factors. Rising housing costs result in increased risks of community members experiencing homelessness. Far too many residents who have found themselves housing insecure have ended up unhoused or homeless in recent years, either temporarily or longer term.

Addressing the specific housing needs for the unhoused population remains a priority throughout the region, particularly since homelessness is disproportionately experienced by people of color, people with disabilities, those struggling with addiction and those dealing with traumatic life circumstances. According to the City of St. Helena, there is one homeless person who resides in St. Helena. This data was provided by a point in time assessment by the Police Chief of the St. Helena Police Department in 2021.

Gaps in Resources

Countywide, the most common type of household experiencing homelessness is those without children in their care. Among households experiencing homelessness that do not have children, 53.7 percent are unsheltered. Of homeless households with children, most are sheltered in transitional housing (Table 27).

~~Table 25~~Table 27 Homelessness by Household Type and Shelter Status, Napa County

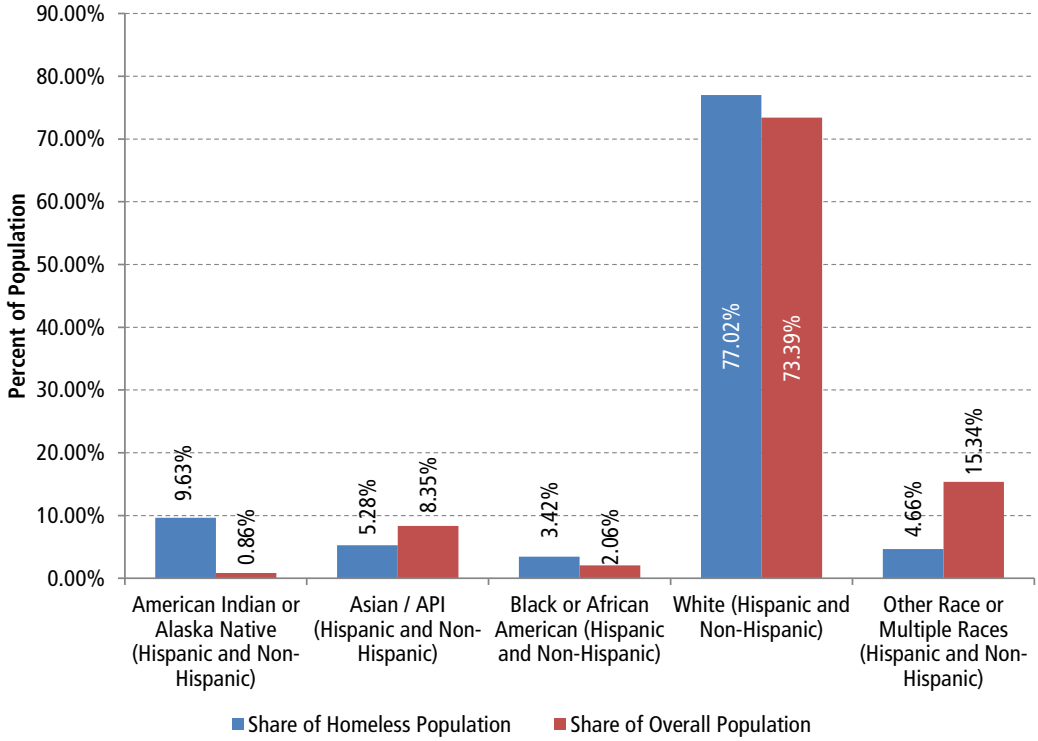
	People in Households Composed Solely of Children Under 18	People in Households with Adults and Children	People in Households without Children Under 18
Sheltered - Emergency Shelter	0	13	119
Sheltered - Transitional Housing	0	34	6
Unsheltered	0	5	145

Universe: Population experiencing homelessness
Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness.
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-01.

People of color are often disproportionately impacted by homelessness, particularly Black residents of the Bay Area. In Napa County, White (Hispanic and Non-Hispanic) residents represent the largest proportion of residents

experiencing homelessness and account for 77.0 percent of the homeless population, while making up 73.4 percent of the overall population (Figure 45).

Figure 45 Racial Group Share of General and Homeless Populations, Napa County

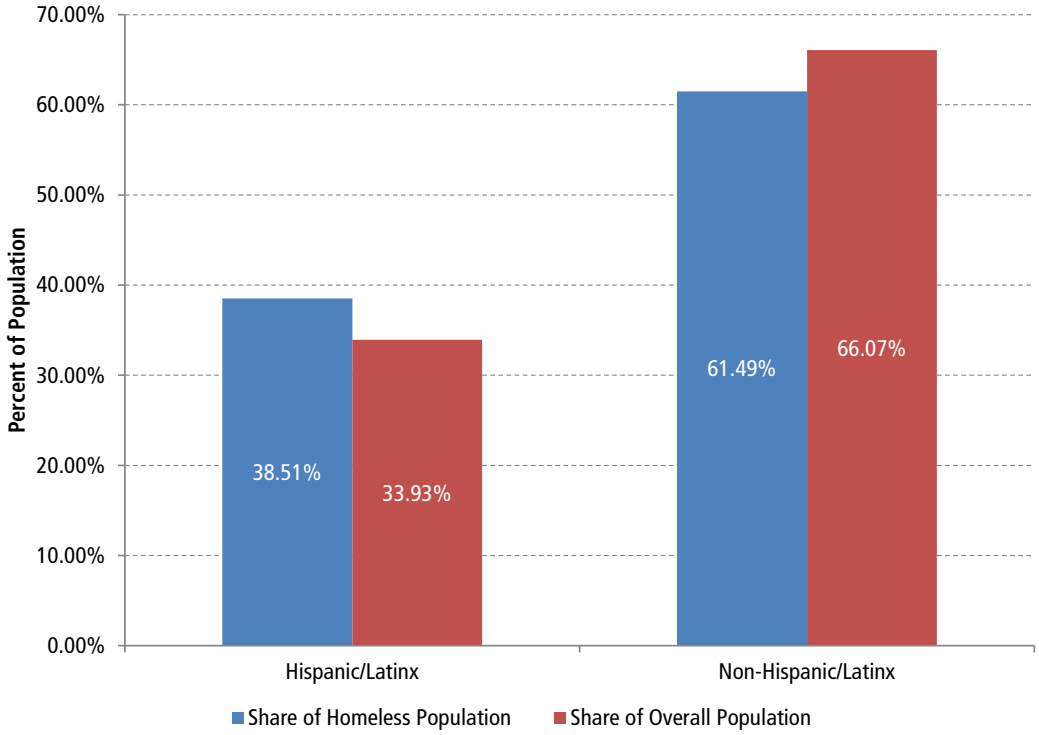


Universe: Population experiencing homelessness

Notes: This data is based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January. Each Bay Area county is its own CoC, and so the data for this table is provided at the county-level. Per HCD's requirements, jurisdictions will need to supplement this county-level data with local estimates of people experiencing homelessness. HUD does not disaggregate racial demographic data by Hispanic/Latinx ethnicity for people experiencing homelessness. Instead, HUD reports data on Hispanic/Latinx ethnicity for people experiencing homelessness in a separate table. Accordingly, the racial group data listed here includes both Hispanic/Latinx and non-Hispanic/Latinx individuals.
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-02.

In Napa County, Latinx residents represent 38.5 percent of the population experiencing homelessness, while Hispanic or Latinx residents comprise 33.9 percent of the general population (Figure 46).

Figure 46 Hispanic or Latinx Share of General and Homeless Populations, Napa County



Universe: Population experiencing homelessness
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019); U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B01001(A-I)
For the data table behind this figure, please refer to the Data Packet Workbook, Table HOMELS-03.

Many of those experiencing homelessness are dealing with severe issues – including mental illness, substance abuse and domestic violence – that are potentially life threatening and require additional assistance. In Napa County, homeless individuals are commonly challenged by severe mental illness, with 177 reporting this condition (0). Of those, some 44.1 percent are unsheltered, further adding to the challenge of handling the issue.

~~Table 26~~Table 28 Characteristics for the Population Experiencing Homelessness, Napa County

	Chronic Substance Abuse	HIV/AIDS	Severely Mentally Ill	Veterans	Victims of Domestic Violence
Sheltered - Emergency Shelter	70	0	91	8	11
Sheltered - Transitional Housing	0	0	8	0	4
Unsheltered	91	1	78	6	17

Universe: Population experiencing homelessness
Source: U.S. Department of Housing and Urban Development (HUD), Continuum of Care (CoC) Homeless Populations and Subpopulations Reports (2019)

In St. Helena, there were no reported students experiencing homelessness in the 2019-20 school year (Table 29). Napa County has seen a 29.1 percent decrease in the population of students experiencing homelessness, and the Bay Areas as a whole experienced an 8.5 percent decrease. However, during the 2019-2020 school year, there were still some 13,718 students experiencing homelessness throughout the region, adding undue burdens on learning and thriving, with the potential for longer term negative effects.

~~Table 27~~Table 29 Students in Local Public Schools Experiencing Homelessness

Geography	2016-17	2017-18	2018-19	2019-20
St. Helena	0	0	0	0
Napa County	381	433	249	270
Bay Area	14,990	15,142	15,427	13,718

Universe: Total number of unduplicated primary and short-term enrollments within the academic year (July 1 to June 30), public schools
Notes: The California Department of Education considers students to be homeless if they are unsheltered, living in temporary shelters for people experiencing homelessness, living in hotels/motels, or temporarily doubled up and sharing the housing of other persons due to the loss of housing or economic hardship. The data used for this table was obtained at the school site level, matched to a file containing school locations, geocoded and assigned to jurisdiction, and finally summarized by geography.
Source: California Department of Education, California Longitudinal Pupil Achievement Data System (CALPADS), Cumulative Enrollment Data (Academic Years 2016-2017, 2017-2018, 2018-2019, 2019-2020)

Existing Resources & Action Items

Given the documented need for emergency shelters in Napa County, St. Helena is subject to Government Code Section 65583(a) (4). This code section, which became effective as of January 1, 2008, requires jurisdictions to designate zoning districts adequate for facilities to accommodate the identified need for emergency shelters, wherein emergency shelters must be allowed without a conditional use or other discretionary permit.[20] [21] The City is in compliance, as emergency shelters are currently a permitted use by-right in the Service Commercial and Industrial zones.

[20] *Building Block for Effective Housing Elements, "Adequate Sites Inventory and Analysis: Zoning for Emergency Shelters and Transitional Housing". http://www.hcd.ca.gov/hpd/housing_element2/SIA_variety.php. Accessed February 14, 2014.*
[21] *Senate Bill 2, Chapter 633. Amendment to Acts 655582, 65583 and 65589.5. Approved by Governor on October 13, 2007. Effective January 1, 2008. Accessed February 17, 2014.*

The City is in compliance with State laws related to emergency shelters, supportive housing, and transitional housing. Emergency shelters are identified as a by-right use in the I and SC zoning districts. According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. There are several parcels in these zones that can accommodate an emergency shelter, including APN 009-580-022-000 (I zoning district) and APN 009-194-005-000 (SC zoning district). These parcels are vacant, habitable, and in proximity to transportation and services. Combined, they total 1.48 acres and can provide capacity for 15 beds, by conservative assumption of 10 beds/acre.

In addition, the City must allow transitional housing, as defined in Section 50675.2 of the Health and Safety Code, and supportive housing, as defined in Section 50675.14 of the Health and Safety Code, as residential uses. As required by state law, transitional and supportive housing must be subject only to the same permitting process as other similar residential uses in the same zone without undue special regulatory requirements. For example, a proposed multifamily supportive housing project would be subject to the same permitting process as any other similar multifamily development in the same zoning district. As required, the City allows transitional and supportive housing in all residential, commercial, and mixed use~~-~~ districts, subject only to the requirements of residential uses.

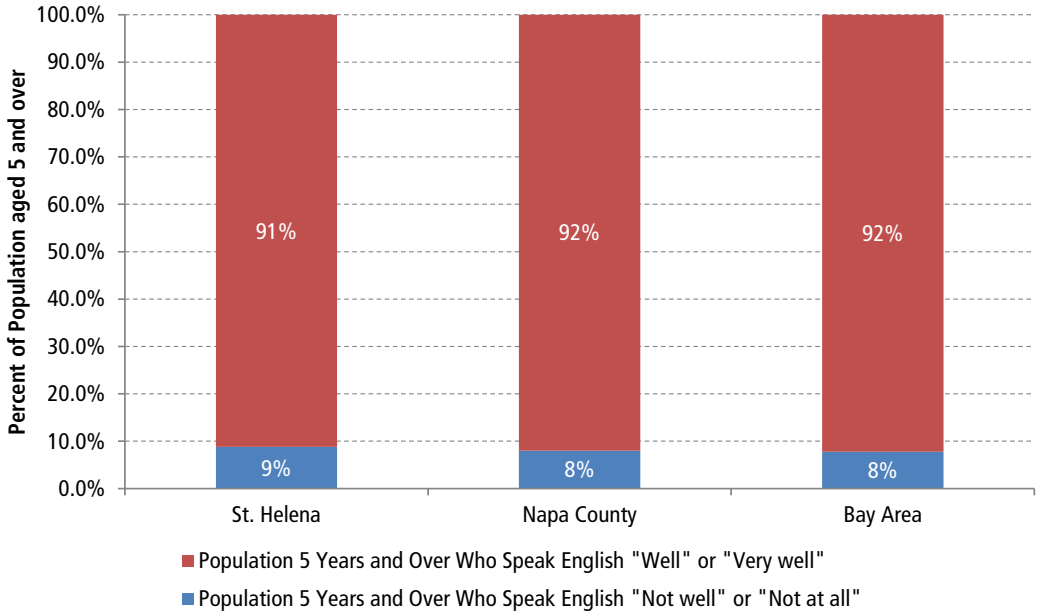
Emergency shelters, transitional housing, and supportive housing are subject to subjective design review, which poses a significant constraint to development. To overcome this constraint, Program H-F ~~H-F~~ commits the City to adopting objective design standards, as well as a by-right streamlined review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330.

Non-English Speakers

California has long been an immigration gateway to the United States, which means that many languages are spoken throughout the Bay Area. Since learning a new language is universally challenging, it is not uncommon for residents who have immigrated to the United States to have limited English proficiency. This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights, or they might be wary to engage due to immigration status concerns.

Figure 47 shows population data by English proficiency. In St. Helena, nine percent of residents five years and older identify as speaking English not well or not at all, which is slightly higher than the proportion for Napa County. Throughout the region the proportion of residents five years and older with limited English proficiency is nine percent.

Figure 47 Population with Limited English Proficiency



Universe: Population five years and over
Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B16005For the data table behind this figure, please refer to the Data Packet Workbook, Table AFFH-03.

8. Non-governmental and Governmental Constraints

Constraints on the development of housing are divided into non-governmental constraints and governmental constraints. Non-governmental constraints include the price of land, cost of construction, flooding, conservation easements and long-term vineyard leases, and a lack of rental accessory dwelling units. Potential governmental constraints include land use controls, codes and code enforcement, on and off-site improvements, fees and exactions, processing and permit procedures, and regulations affecting housing for persons with disabilities.

Key Findings

- The possible non-governmental constraints discussed include the price of land, cost of construction, flooding, conservation easements and long-term vineyard leases, and a lack of rental accessory dwelling units. Land costs represent a significant component of the cost of housing development in St. Helena because the high price of vacant land. The cost of construction in St. Helena higher than the state average and further constrains development. Overall housing production costs for both single-family and multiple-family rental development indicate that a subsidy would probably be necessary for some moderate-income households, and all lower income households to own or rent new units in St. Helena.

- The governmental controls analyzed in this section were land use controls, codes and enforcements, on-and off-site improvements, fees and exactions, processing and permit procedures, and regulations affecting housing for persons with disabilities. The land use controls including zoning and current General Plan land use designations do not constrain residential development; however, some changes are necessary to streamline the design review process.

- The Growth Management System (GMS) does not appear to place an undue burden on market rate development, since there has never been a year when the demand for residential building permits has exceed the number of available permits. Furthermore, housing projects affordable to households at up to 120 percent of AMI are exempt from the GMS. Due to recent state laws, the GMS is not currently enforceable.

- The on- and off-site improvement standards related to water, sewer, parking, and other miscellaneous regulations impact housing development in a variety of different ways. Sewer capacity is sufficient to support additional development. Water capacity during a normal year is sufficient and is expected to remain sufficient through 2023, but there will always be water shortages in dry years. The City has demonstrated its commitment to providing water and sewer service to affordable housing developments, and has included a program committing the City to continue to do so throughout the planning period.

- Neither the building codes nor the building fees represent a governmental constraint to development. St. Helena adopted the 2019 California Building Codes Standards, and although they have made some changes to the Code such as seismic control measures, these changes were necessary for safety and do not unduly affect housing production. The fee structure for both single-family and multiple-family development reflects the costs of the development to the City, and therefore does not present an unnecessary constraint on residential development.

- The City works diligently to process applications quickly and without unnecessary delay. Permitting and processing procedures and timelines for residential development, both single and multifamily, are not a constraint to development.

Non-governmental Constraints

Price of Land

According to Zillow.com, there were approximately eighteen vacant lots for sale in St. Helena in March 2022, though many are large and in undeveloped rural areas. Sales are reported between $229,000 and $17,500,000 for properties ranging in size from less than one acre to 280 acres. A public comment made during a community workshop indicated that larger vacant sites tend to be located near or beyond the urban limit.

~~Table 28~~Table 30 Price of Vacant Land, March 2022

Site	Acres	List Price	Price per Acre
10 Acres or Less	0.35	$525,000	$1,500,000
	0.74	$595,000	$804,054
	1.00	$375,000	$375,000
	1.00	$225,000	$225,000
	1.00	$975,000	$975,000
	1.08	$450,000	$416,667
	1.14	$5,000,000	$4,385,965
	1.58	$475,000	$300,633
	2.40	$1,000,000	$416,667
	5.01	$1,850,000	$369,261
	10.00	$2,695,000	$269,500
Total	25.30	$14,165,000	$559,881

Site	Acres	List Price	Price per Acre
More Than 10 Acres	15.90	$3,995,000	$251,258
	23.09	$2,950,000	$127,761
	32.00	$17,500,000	$546,875
	92.72	$229,000	$2,470
	110.63	$1,795,000	$16,225
	160.69	$549,500	$3,420
	280.00	$649,000	$2,318
Total	715.03	$27,667,500	$38,694

Source: Zillow.com, accessed March 28, 2022.

Construction Costs

Construction costs include both hard costs, such as labor and materials, and soft costs, including architectural and engineering services and development fees. Average residential construction costs in St. Helena begin at $300 to $700 per square foot, which is higher than statewide averages, which are currently ranging between $131 per square foot to $195 per square foot.[22] High-end, custom-built single-family homes, both locally and statewide, can cost more than $500 per square foot. Soft costs (including architectural and engineering fees, property taxes during construction, city and utility fees, and construction loan interest and fees) typically increase these costs by approximately 35 to 40 percent. Construction costs can be higher if lots require substantial site work due to steep slopes, unstable soils, waterways, and other environmental concerns.

Public comments made during Housing Element workshops indicated that construction costs are a major constraint to the production of affordable housing, and that 100 percent affordable projects are not profitable without public subsidies, grant funding, or other public investment.

Flooding

Napa Valley areas near the Napa River and along some of its tributaries are prone to flooding. Napa River flows are largely influenced by precipitation; peak flows generally occur in January and February. Some of the worst flooding in the immediate area of St. Helena has occurred in and around the Vineyard Valley Mobilehome Park, which is near the confluence of Sulphur Creek and the Napa River. Flood hazards also exist in the York Creek and Sulphur Creek Watersheds in St. Helena.

[22] *Local estimate provided by city staff communication with Joe McGrath in March 2022. Statewide estimate sourced from: ProMatcher Home Construction, California Home Construction Costs & Prices, provided at https://home-builders.promatcher.com/cost/california.aspx*

All new construction and substantial improvements in special flood hazard areas as defined by the Federal Emergency Management Agency are required to comply with the provisions of Municipal Code Chapter 15.52 "Flood Damage Prevention." The development standards are intended to meet, if not exceed, minimum National Flood Insurance Program (NFIP) criteria for requirements for floodplain management regulations. New development in these areas is required to assure that proposed development: 1) is designed or modified and anchored to prevent flotation, collapse and lateral movement of the structure; 3) uses construction materials and utility equipment that are resistant to flood damage; and 4) uses construction methods that minimize flood damage. In addition, projects must be elevated 18 inches above the base flood elevation.

Conservation Easements and Vineyard Leases

Agricultural land in St. Helena is valued for both a productive agricultural land and as open space that helps shape the character of St. Helena. Focus Group members and community workshop participants expressed, however, that conservation easements and long-term vineyard leases are a barrier housing production in the City. Sites included in the available sites inventory were screened for these constraints.

Lack of Rental Accessory Dwelling Units (ADUs)

While ADUs are often a less expensive housing option, Focus Group members and community workshop participants expressed that many ADUs in the City are not being rented, but are being used as additional square footage for the primary resident, a friend, a relative, or as a vacation rental. Programs H-Q, H-R, and H-S~~H-P, H-Q, and H-R in this housing element~~ work to encourage and incentivize development of accessory dwelling units.

Availability of Financing

A number of funding opportunities are currently available to support affordable housing development and the creation and preservation of homeownership opportunities. The Department of Housing and Community Developments lists active programs with current funding available to developers, non-profits, and local governments online. Statewide programs available for affordable housing development include Community Development and Block Grant (CDBG), Emergency Solutions Grants (ESG), HOME Investments Partnerships Programs (HOME), Housing for Healthy California (HHC), and the Multifamily Housing Program (MHP), among others. Programs available for homeowners or to assist in the creation or preservation of homeownership opportunities include CalHome, the Foreclosure Interventions Housing Preservation Program, and Homeownership Super NOFA. For a complete list, please see https://www.hcd.ca.gov/programs-active. Additionally, policies and programs under Goal 4: Assistance to Support Affordable Housing work to address non-governmental constraints by committing the City to seek additional funding opportunities to support affordable housing development, work to reduce fees for developers for affordable housing developers, and pursue mortgage credit certificates to assist prospective homeowners.

Governmental Constraints

Local government can directly influence housing production cost through land use controls, building codes, on and off-site improvement standards, fees and exactions, processing and permit procedures, regulations affecting housing for persons with disabilities, locally adopted ordinances, and with government codes and enforcement. This section discusses each of these topics and identifies the governmental controls that may adversely affect housing production.

Preservation of Agricultural Land

One of the major thrusts of the City's land use controls is to encourage in-fill development while preserving land for agriculture. The agricultural soils of St. Helena are identified as Prime Farmland by the California State Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. The wines produced from the grapes in this region achieve international recognition for their superb quality.

Roughly one-half of the 3,254 acres within the incorporated limits of the City are considered urbanized area. This portion of the St. Helena is defined by an Urban Limit Line (ULL) which denotes the area within which urban development is allowed. Cities use ULLs to establish where they intend to encourage and discourage land development through public infrastructure investments, land-use regulations, land acquisitions, and other actions. Within the ULL, cities typically adopt land use policies that encourage urban development (i.e., in-fill development). Outside the ULL, cities set aside lands to be used for less urban land uses, such as preserving land for agriculture and open space. There are 1,779 acres of land outside of the ULL, but inside the incorporated limits of the City of St. Helena. Most of this land is farmed and planted to vineyards.

Land-Use Controls

St. Helena has a variety of land use controls to maintain the standard of living, local environment, and safety of its residents. The two major instruments dictating land use control in the City are the Zoning Code and General Plan, which The St. Helena Zoning Code and General Plannaturally affect housing production because they determine the location, amount of land, development standards, and density of housing. These tools, as well as the City's agricultural preservation measures are discussed in this section.

Preservation of Agricultural Land

One major overarching theme and goal of the City's land use controls is to encourage in-fill development while preserving land for agriculture. The agricultural soils of St. Helena are identified as Prime Farmland by the California State Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program. The wines produced from the grapes in this region achieve international recognition for their superb quality, sustaining an industry at the heart of the City and region's economy.

Roughly one-half of the 3,254 acres within the incorporated limits of the City are considered urbanized area. This portion of the St. Helena is defined by an Urban Limit Line (ULL) which denotes the area within which

urban development is allowed. Cities use ULLs to establish where they intend to encourage and discourage land development through public-infrastructure investments, land-use regulations, land acquisitions, and other actions. Within the ULL, cities typically adopt land use policies that encourage urban development (i.e., in-fill development). Outside the ULL, cities set aside lands to be used for less urban land uses, such as preserving land for agriculture and open space. There are 1,779 acres of land outside of the ULL, but inside the incorporated limits of the City of St. Helena. Most of this land is farmed and planted for vineyards.

Zoning Code

Title 17 of the St. Helena Municipal Code outlines both the residential and nonresidential zoning designations. Table 31 provides a list of all of the residential zoning districts as well as information on the rights and requirements associated with each district. Residential uses are permitted, subject to design review, ~~by right~~ in the following zones: Twenty-Acre Agriculture (A-20), Winery (W), Woodland Watershed (WW), Agricultural Preserve (AP), Low Density Residential One Acre Minimum (LR-1A), Low Density Residential (LR), Medium Density Residential (MR), and High Density Residential (HR). Table 31 shows permitted residential uses by zoning district.

~~Table 29~~Table 31 Zoning Districts that Permit Residential Uses

Residential Use	Zoning District							
	A-20	W	WW	AP	LR-1A	LR	MR	HR
Agricultural Employee Housing	P	P	P	P	P	P	P	P
Dwelling, Accessory Dwelling Unit (ADU)	P	P	P	-	P	P	P	P
Dwelling, Duplex (new)	-	-	-	-	-	-	UP	P
Dwelling, Multiple-Family	-	-	-	-	-	-	-	P
Dwelling, Multiple-Family (key housing sites only)	-	-	-	-	-	-	P	P
Dwelling, Single-Family	P	P	P	P	P	P	P	P
Dwelling, Triplex (new)	-	-	-	-	-	-	UP	P
Intermediate Care Facility (seven or more persons)	-	-	-	-	UP	UP	UP	UP
Intermediate Care Facility (six or fewer persons)	-	-	-	-	P	P	P	P
Mobile/Manufactured Homes	-	-	-	-	P	P	P	P
Residential Care Facility (seven or more persons)	-	-	-	-	UP	UP	UP	UP
Residential Care Facility (six or fewer persons)	-	-	-	-	P	P	P	P
Single Room Occupancy	-	-	-	-	-	-	-	P
Supportive Housing	P	P	P	P	P	P	P	P
Transitional Housing	P	P	P	P	P	P	P	P
P = Permitted; UP = Use Permit Required; (-) = Not Permitted								

Source: City of St. Helena, 2022.
Note: For an expanded table with more uses, notes on conditions, and zones where residential uses are conditionally permitted, see Table 42.

In terms of units per acre, the lowest allowable density is in the AP district. The AP district permits, by right, one single-family dwelling per lot, agricultural employee housing (up to 36 beds or 12 units), supportive housing, and transitional housing. The A-20 and W districts allow one single-family dwelling and one second unit by right on 20 acres of land. With a Use Permit, these districts can accommodate more than one single-family dwelling, as well as farm labor housing above the initially permitted density. Both the LR and LR-1A districts permit by right single-family dwellings, mobile and manufactured homes, and intermediate and residential care facilities for six or fewer persons. In addition, both districts permit as a conditional use single-family dwellings at less than one unit per acre and intermediate and residential care facilities for seven or more persons.

The MR district allows the same uses by rightsubject to design review and with a conditional use permit as the LR district and also allows duplexes and triplexes with a Use Permit. Unlike the previously mentioned districts, the MR district allows multiple-family dwelling projects that are located on "key sites" subject to design reviewby right. The HR district, in addition to allowing the same residential uses by right as the LR and MR districts, permits multiple-family dwellings, apartments, and dwelling groups containing four units or less. With a Use Permit, structures with more than four units, multiple-family dwellings, apartments, and dwelling groups are permitted. The HR district is the only district that permits single room occupancy units (SROs).

In addition to the residential districts described above, some overlay districts can affect the type and amount of housing that can be built, including the Planned Development, Rural-Residential, Specific Plan, Flood Plain, Historic Preservation, and Mobile Home Park overlay district. An overlay district expands upon the regulations already set by the underlying zoning district. For example, the Planned Development Overlay District (PD) allows for a wider variety of development, including mixed-use development not otherwise allowed in the Zoning Code. The PD zone is often applied to large pieces of land and requires approval of a rezoning and a conditional use permit application.

Table 32 shows density and intensity ranges allowed in the General PlanZoning Code for each residential zoning district in dwelling units per acre (du/ac), or Floor Area Ratio (FAR) for commercial districts. Table 33Table 31 shows development standards by residential zoning district. As shown, density is allowed up to 28 dwelling units per acre and development standards are minimal, required setbacks for residential development are between 10 and 30 feet, depending on the zone, and minimum unit sizes are not regulated in residential zones. Further, the HDR zone, the City's primary multifamily zone, allows three-story developments up to 35 feet in height. AdditionallyFinally, the City is in the process of creating a new Mixed-Use zone to increase residential capacity in previously commercial and professional office districts.

Development standards related to maximum lot coverage and height pose potential constraints to multifamily affordable housing development. Currently the City allows 45 percent lot coverage and a maximum height of 30 feet in the MR and HR zones. Due to the potential to constraint affordable housing development, the City has, in the proposed Draft Zoning Code and in Program H-N: Zoning to Facilitate Higher Density Housing included development standards and actions, respectively, that commit the City to increasing lot coverage to 55 percent

and maximum height to 42' (three stories) in the HR zone and on multifamily sites in the MR zone. Please note that the MR zone is a single-family zone, but the zoning code has been updated to allow multifamily uses on housing opportunity sites identified in the 5th Cycle Housing Element Update. Additionally, the program commits the City to allowing minor modifications to these standards that can be approved by the Community Development Director without a public hearing. Minor modifications should include up to 10 percent modification to maximum lot coverage and up to five percent (or two feet, whichever is greater) modification in maximum height.

~~Table 30~~Table 32 ~~General Plan~~ Density/Intensity Standards by ~~Residential~~ Zoning District

Residential Zoning District	Corresponding General Plan Land Use Designation(s)	Minimum Density of Land Use Designation	Maximum Density of Land Use Designation
A-20	Agriculture	Min. 5 acres/parcel	Max. 40 acres/parcel
W	Woodland and Watershed	Min. 5 acres/parcel	No maximum
WW	Woodland and Watershed	Min. 5 acres/parcel	No maximum
AP	Agriculture	Min. 5 acres/parcel	Max. 40 acres/parcel
LR-1A	Low Density Residential	1.0 du/ac	5.0 du/ac
LR	Low Density Residential	1.0 du/ac	5.0 du/ac
MR	Medium Density Residential	5.1 du/ac	16.0 du/ac
HR	Higher Density Residential	16.1 du/ac	28.0 du/ac
CB	Central Business	N/A	Max. FAR 2.0
SC	Service Commercial	N/A	Max. FAR 0.5
BPO	Business and Professional Office	N/A	Max. FAR 0.5
Mixed Use[1]	Mixed Use	12 du/ac	20 du/ac

1: The City has adopted a new mixed-use designation within the 2040 General Plan Update and has released a Draft Comprehensive Zoning Code Update that includes a new Mixed-Use zone. Because the sites inventory assumes rezoning land to the new Mixed-Use zoning district, mixed-use development standards are shown in this table based on the October 2022 Public Review Draft Zoning Code.

Source: City of St. Helena, 2022.

~~Table 31 Typical Residential Zones Development Standards~~

~~Development Standard~~	~~Zoning District~~							
	~~A-20~~	~~W~~	~~WW~~	~~AP~~	~~LR-1A~~	~~LR~~	~~MR~~	~~HR~~
~~Parcel Standards~~								
~~Minimum Size~~	~~20 acres~~	~~20 acres~~	~~5-40 acres~~	~~40 acres~~	~~1 acre~~	~~7,000 square feet~~	~~7,000 square feet~~	~~7,000 square feet~~
~~Maximum Parcel Coverage~~	~~1 acre(1)~~	~~50 percent~~	~~10 percent, or 20,000 square feet~~	~~N/A~~	~~35 percent~~	~~35 percent~~	~~45 percent~~	~~45 percent~~
~~Parcel Width (feet)~~	~~N/A~~	~~300 (min.)~~	~~20-200~~	~~N/A~~	~~70 (min.)~~	~~70 (min.)~~	~~70 (min.)~~	~~70 (min.)~~
~~Minimum Setbacks (feet)~~								
~~Front~~	~~50(1)~~	~~100~~	~~10 percent of parcel depth~~	~~20~~	~~20-30(2)~~	~~20-30(2)~~	~~20-30(2)~~	~~20~~
~~Side~~	~~50(1)~~	~~50~~	~~20-50 feet, or 10 percent of side yard width~~	~~20~~	~~20-30(2)~~	~~20-30(2)~~	~~20-30(2)~~	~~20~~

Side Yard	20	75	20-50 feet, or 10 percent of parcel width	20	10-15(2)	10-15(2)	10-15(2)	10
Rear	20	50	10 percent of parcel depth	20	20-30(2)	20-30(2)	20-30(2)	20
Height (feet) (max.)	30	45	35	35	30	30	30	35

Notes:
** The standards contained in this table are "typical" and are for illustrative purposes only. More specific development regulations and exceptions may apply. See Chapter 17 (Zoning) of the Municipal Code for additional development standards and requirements*
(1) As measured from the centerline of abutting street.
(2) Setbacks determined by overall structure height.
Source: City of St. Helena; Mintier Harnish, 2022.

During the previous housing element cycle (2014-2023) there were no requests to develop housing opportunity sites below allowable density.

Table 33 Residential Base Zone Development Standards by Zone

Residential Zone	LR	LR-1A	MR	HR
MinimumDevelopment Standards				
Maximum lot coverage	35%	35%	45%	45%
Maximum height of principal building	30 feet	30 feet	30 feet	30 feet (if 4 du or less) 35 feet (if 5 du or more)
Maximum height of accessory building	15 feet	15 feet	15 feet	15 feet
Maximum floor area ratio (FAR)	Dictated by Parcel Size See SHMC 17.32.070	Dictated by Parcel Size See SHMC 17.32.060	Dictated by Parcel Size See SHMC 17.40.070	Dictated by Parcel Size See SHMC 17.40.070
Maximum width	=< 60% of lot width, subject to further requirements in SHMC 17.32.060	=< 60% of lot width, subject to further requirements in SHMC 17.32.030	=< 60% of lot width, subject to further requirements in SHMC 17.32.030	N/A
Minimum Unit Size	N/A	N/A	N/A	N/A
Minimum standards for parcels except for flag lots and small lots				
Lot Area	7,000 sq feet	1 acre	7,000 sq ft	7,000 sq ft
Lot width	70 feet	70 feet	70 feet	70 feet
Lot frontage	70 feet	70 feet	70 feet	70 feet
Minimum standards for structures with a maximum height of twenty-five (25) feet or less				
Front setback	20 feet	20 feet	20 feet	20 feet
Side setback	20 feet	20 feet	20 feet	20 feet
Side yard	10 feet	10 feet	10 feet	10 feet
Rear yard	20 feet	20 feet	20 feet	20 feet

Minimum standards for structures with a maximum height greater than twenty-five (25) feet and thirty (30) feet or less				
Front setback	30 feet	30 feet	30 feet	N/A
Side setback	30 feet	30 feet	30 feet	
Side yard	15 feet	15 feet	15 feet	
Rear yard	30 feet	30 feet	30 feet	

Nonresidential Zones				
Non-Residential Zone	CB	SC	BPO	Mixed Use[1]
Development Standards				
Maximum lot coverage	10,000 sq feet. of floor	10,000 sq feet of floor area	N/A	Max. 15,000 sq feet per building
Maximum height of principal building	35 feet or 30 feet if abutting residential use	35 feet	30 feet	Pitched roof: 45 ft/3 stories; 30 ft/2 stories within 20 feet of a residential district. Flat roof: 40 ft/3 stories; 26 ft/2 stories within 20 feet of a residential district
Maximum height of accessory building	35 feet or 30 feet if abutting residential use	35 feet	N/A	16 feet
Maximum floor area ratio (FAR)	2.0	0.5 by General Plan designation	0.5 by General Plan designation	1.0, inclusive of residential uses
Maximum width	N/A	N/A	N/A	Min. 50% of lot width
Minimum Unit Size	200 sq feet	200 sq feet	N/A	N/A
Lot Area	5,000 sq feet	10,000 sq feet	7,000 sq ft	5,000 sq ft
Lot width	N/A	70 feet	N/A	45 feet
Lot frontage	N/A	70 feet	N/A	70 feet
Minimum Setbacks				
Front setback	0 feet, or 10 feet if abutting residential use	35 feet	20 feet	Nonresidential: Max 10 feet; Residential: No setback allowed north of Mitchell Dr.; 5-15 ft everywhere else
Side setback	0 feet, or 10 feet if abutting residential use	25 feet	10 feet	0 feet on street side; 10 ft. abutting a residential district
Side yard	0 feet, or 10 feet if abutting residential use	10 feet/floor	10 feet	N/A
Rear yard	0 feet, or 10 feet if abutting residential use	15 feet, or 20 feet if abutting residential use	15 feet	0 ft; 10 ft. abutting a residential district

** The standards contained in this table are "typical" and are for illustrative purposes only. More specific development regulations and exceptions may apply. See Chapter 17 (Zoning) of the Municipal Code for additional development standards and requirements.*

1: The City has adopted a new mixed-use designation within the 2040 General Plan Update and has released a Draft Comprehensive Zoning Code Update. Because the sites inventory assumes rezoning land to the new Mixed Use zoning district,

mixed-use development standards are shown in this table based on the October 2022 Public Review Draft Zoning Code.
Source: St. Helena Municipal Code, Title 17; St. Helena Public Review Draft Zoning Code Update, October 2022.

Overlay Zones

The Zoning Code outlines standards for several overlay zones that allow residential uses. The following summarizes each of these overlay zones. During the previous housing element cycle (2014-2023) there were no requests to develop housing opportunity sites below allowable density.

Historic Preservation Overlay Zone. The purpose of the HP overlay district regulations is to preserve the unique architectural character of those certain specific structures which have contributed to the city's historic development. No permits for remodeling or demolition shall be issued for properties within the HP district which would result in exterior changes to building facades, structures, or to passage ways providing inter-accessibility within a block, unless such change is approved by the planning commission. When it can be demonstrated to the satisfaction of the Planning Commission and City Council that preservation and/or restoration of designated properties cannot and is not economically viable, the City may grant certain incentives in the form of relaxation of certain provisions of this chapter only when it can be shown that such relaxation makes preservation or restoration economically feasible. The HP overlay zone does not impose additional development standards beyond those of the base zoning district.

Mobilehome Park Overlay (MHP) District. The purpose of the MHP mobilehome park overlay district is to provide, when combined with an underlying residential zoning district, a place which allows the establishment and operation of mobilehome parks. The city of St. Helena's MHP mobilehome park regulations are intended to complement and be subordinate to state law. The state law governing mobilehome parks is entitled the "Mobilehome Parks Act" and may be found in Division 13, Parts 2.1 and 2.3 of the California Health and Safety Code. Mobilehome park regulations are contained in the California Code of Regulations, Title 25, Division 1, Chapters 2 and 2.2. The city of St. Helena does not assume responsibility for the enforcement of the regulations contained therein and all mobilehome parks within the city remain subject to the jurisdiction of the California Housing and Community Development Department in its role as the enforcement agency for the above described State laws. Nothing contained in this chapter shall be construed to abrogate, void or minimize such other pertinent regulations and all pertinent state and city regulations concerning the development and operation of mobilehome parks shall be observed. Mobilehomes located within areas of special flood hazard are required to be in compliance with Chapter 15.52, Flood Damage Prevention. The MHP overlay district does not impose additional development standards beyond that of the base zoning district.

Planned Development Overlay (PD) District. It is the purpose of the PD planned development overlay district to encourage high quality, innovative and creative development in the city. The PD planned development overlay district is intended to provide for the consideration and approval of development plans which serve public objectives more fully than development permitted under conventional zoning regulations.

Planned development overlay districts are typically characterized by (in whole or in part): significant variations from the standards of the zoning ordinance, mixed land uses, a variety of housing types, the assembly of small parcels of land into a larger more effective unit, the preservation of open space, natural features or historical structures and structures with diverse building setbacks, lot sizes and building heights. The PD planned development overlay district may be combined with any existing zoning district provided both design and the proposed uses including density for residential land use designations can be found consistent with the policies of the General Plan. Development standards applicable to the zoning district which the planned development district is being combined shall be required unless modified in conjunction with approval of the planned development overlay district. The city shall address issues related to landscaping, parking, site design, ingress and egress, signage, lighting, relationship to adjoining properties and land uses, setbacks and yards and any other items toward achieving an integrated and compatible project within the city and environs.

Specific Plan Overlay (SP) District. The SP district is established to implement the policies of the general plan which call for the preparation and adoption of specific plans in certain areas of the community described in the general plan. In addition, the SP district is established to provide the city with the ability to require and/or to implement specific plans when the city council finds it necessary and appropriate. When applied to properties in advance of the adoption of a specific plan, the SP district serves to alert individuals to the requirement for a specific plan. When applied to properties after the adoption of a specific plan it serves to alert individuals to the policies and regulations of a specific plan. No new development will be approved within the specific plan areas designated in the general plan until a specific plan meeting the requirements of Section 65451 of the Government Code, has been adopted by the city. The city council may determine that a site development plan for a specific property may be prepared in-lieu of a specific plan for the entire specific plan area. The site development plan shall be prepared and adopted prior to approval of new development. The site development plan shall include an analysis of infrastructure improvements as determined during review of a pre-application pursuant to Section 17.84.030. Based on the pre-application review, the city council shall determine the scope of the proposed specific plan or site development plan. The proposed specific plan or site development plan and associated documents shall be prepared under the supervision of the city with all costs paid by the property owners unless the city determines that all or a portion of the costs will be paid by the city. The SP Overlay district does not impose additional development standards, however standards for any specific plan should be developed under the supervision of the City, as stated previously.

Rural Residential Overlay (RR) District. It is the purpose of the RR rural-residential overlay district to identify those parcels within the city which are not serviced by city water or sewer and which have the ability to subdivide into additional parcels. Minimum lot sizes which are larger than the minimum lot sizes established for the underlying zoning district are required for parcels which do not have city water or sewer services. The following regulations shall apply in all districts with which are combined RR district. The only uses permitted shall be those uses permitted in the district with which the RR district is combined; provided, however, where water is available from a private well, the land may not be subdivided into less than one acre or if water is available from a mutual or utility company the land may be subdivided into parcels of twenty thousand (20,000) square feet or greater as determined by the health officer of the city; or if sanitation and public water are

available the land may be subdivided into parcels not less than ten thousand (10,000) square feet. "Health officer of the city" as used in this section, is defined to mean the official or officials of the city charged with the duty of enforcing the health ordinances of the city and the official or officials of any other governmental agency with whom the city has contracted for the enforcement of such ordinances.

Please note, the Rural Residential Overlay (RR) District is being deleted through the Comprehensive Zoning Code Update currently (2023) underway and scheduled for adoption in fall 2023.

General Plan

St. Helena adopted the current General Plan in 2019. The General Plan has a planning horizon of 2040. The city of St. Helena consists of approximately 3,254 acres. Of that total, 19 percent are designated for residential uses, four percent for commercial uses, 2.5 percent for business/industrial uses, and 69 percent for open space and agriculture.[23] Not all the land within the City Limits are available for development; rather approximately 1,475 acres within the Urban Limit Line (ULL) are eligible for development.[24] Thirteen land use designations cover the land in St. Helena.

The ULL contains land use designations including Low, Medium, and High Density Residential, Central Business, Service Commercial, Industrial, Business and Professional Office, Parks and Recreation, Public/Quasi-Public, Open Space and Agriculture. Some land outside, yet contiguous to the ULL has a General Plan designation of Urban Reserve (UR) indicating that it should be considered first if land outside the ULL is needed for development. All lands with a UR land use designation are zoned A-20.

Residential Growth Management System

The Residential Growth Management System (GMS) limits the number of building permits available for residential growth each year.[25] The stated purpose of the system is "to regulate the residential growth of the City to approximately two percent per year, while providing for both market rate and affordable housing units."[26] The GMS previously instituted a cap of 2,800 units by 2010, which resulted in a restriction of nine permits being issued per year. Program H-B ~~H-B~~ commits the city to removing the GMS from the Zoning Code, thus removing this governmental constraint and further encouraging the construction of housing to meet RHNA goals.

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[23] *City of St. Helena General Plan Update 2040, Chapter Two Land Use and Growth Management. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3505/final_plan_compiled.pdf January 27, 2022.*

[24] *City of St. Helena General Plan Update 2040, Chapter Two Land Use and Growth Management. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3505/final_plan_compiled.pdf January 27, 2022.*

[25] *City of St. Helena Municipal Code. Chapter 17.152. http://www.codepublishing.com/CA/sthelena/. Accessed on January 27, 2022.*

[26] *City of St. Helena Municipal Code. Chapter 17.152. http://www.codepublishing.com/CA/sthelena/. Accessed on January 27, 2022.*

Design Review

Chapter 17.164 of the St. Helena Municipal Code outlines the City's Design Review policies. The purpose of these policies is to go beyond the controls inherent in the land use controls and building codes and examine individual project proposals for the "general form of the land before and after development, the spatial relationships of the structures and open spaces to proximate land uses and the appearances of building and open spaces as they contribute to an area as it is being developed."[27] The Municipal Code lists 14 specific design criteria considered by the Planning Commission:

1. Consistency and compatibility with applicable elements of the general plan;
2. Compatibility of design with the immediate environment of the site
3. Relationship of the design to the site;
4. Determination that the design is compatible in areas considered by the board as having a unified design or historical character;
5. Whether the design promotes harmonious transition in scale and character in areas between different designated land uses;
6. Compatibility with future construction both on and off the site;
7. Whether the architectural design of structures and their materials and colors are appropriate to the function of the project;
8. Whether the planning and siting of the various functions and buildings on the site create an internal sense of order and provide a desirable environment for occupants, visitors and the general community;
9. Whether the amount and arrangement of open space and landscaping are appropriate to the design and the function of the structures;
10. Whether access to the property and circulation systems are safe and convenient for pedestrians, cyclists and vehicles;
11. Whether natural features and vegetation are appropriately preserved and integrated with the project;
12. Whether the materials, textures, colors and details of construction are an appropriate expression of its design concept and function and whether they are compatible with the adjacent and neighboring structures and functions;
13. Whether the landscape design concept for the site, as shown by the relationship of plant masses, open space, scale, plant forms and foliage textures and colors, create a desirable and functional environment and whether the landscape concept depicts an appropriate unity with the various buildings on the site; and
14. Whether sustainability and climate protection are promoted through the use of green building practices such as appropriate site/architectural design, use of green building materials, energy efficient systems and water efficient landscape materials.[28]

[27] *St. Helena Municipal Code. 17.165 Design Review.*
[28] *St. Helena Municipal Code. 17.165 Design Review.*

The Planning Commission examines all proposed new structures and some exterior additions (e.g. additions on historical residential properties, addition of new residential floors) in relation to the above listed design criteria and arrives at one of three recommendations: approve, approve with minor modifications, or disapprove. The City staff had noted that the complex and subjective nature of the design review process can be cumbersome for the Planning Commission, and action is currently being taken in the comprehensive zoning code update, which will address these concerns and make design review processes objective, in compliance with California State Code Section 65582.1.

SB 330

On October 9, 2019, Governor Newsom signed into law SB 330, the Housing Crisis Act of 2019. The act amends existing state laws and creates new regulations around the production, preservation and planning of housing. The bill has been in effect since January 1, 2020 and sunsets on January 1, 2025. SB 330 will affect both project planning procedures and community planning outcomes.

The goal of SB 330 is to create certainty in the development of housing projects, speeding up the review of these projects, preserving affordable housing and preventing certain zoning actions that reduce the availability of housing. SB 330 does the following (not a comprehensive list):

- Creates a new vesting process for zoning and land use ordinances, policies, and standards in place at the time a preliminary application is submitted (with limitations);
- Requires that the historic status or designation of any site be determined at the time an application for a discretionary action is deemed complete;
- Prohibits imposing or enforcing non-objective design review standards established after January 1, 2020;
- Limits the number of public hearings to five for housing projects that meet all objective design standards; and
- Prohibits actions that reduce the total zoned capacity for housing (i.e., down-zoning).

A project that meets any of the following criteria per California Government Code Section 65589.5(h)(2)(B) is subject to the provisions of SB 330:

1. The project consists of residential units only;
2. 1. The project is a mixed-use development consisting of residential and non-residential uses with at least two-thirds of the square footage of the project designated for residential use, including dwelling units and any uses accessory to the residential units; or
3. 1. The project is transitional or supportive housing.

New Preliminary Application Form. SB 330 creates a new vesting process for discretionary housing projects during the five-year period of the bill. It achieves this through the creation of a new "preliminary application" process that establishes a new date for the purposes of locking projects into the ordinances, policies, and standards in effect when a preliminary application (including all required information) is submitted and deemed

complete. This vesting does not apply to California Environmental Quality Act (CEQA) determinations, including historic resource determinations pursuant to CEQA.

Once a complete Preliminary Housing Development Application is submitted (along with other required applications if applicable), the zoning, design, subdivision, and fee requirements in effect as of that date will remain applicable to the project for the duration of the review and entitlement process, provided that all the following provisions are satisfied:

- Complete discretionary entitlement applications must be submitted and accepted by the Planning Department within 180 days of the Preliminary Housing Development Application being deemed complete;
- If the entitlement applications are deemed incomplete after filing, the application must submit all missing or incomplete items to the Planning Department within 90 days of being notified in writing by Planning Department staff;
- The project may not increase by more than 20 percent in the number of units or total square footage indicated in the Preliminary Housing Development Application, except as the project may be revised using the State Density Bonus; and
- The project must commence construction within 30 months of site permit issuance.

Note that the following modifications may be required even when a Preliminary Housing Development Application is on file:

- Development impact fees, application fees, capacity and connection fees, or other charges may be annually adjusted based on a published cost index;
- Requirements necessary to avoid an adverse impact to public health or safety, or to avoid or lessen an impact under CEQA may be applied; and
- Applicants may submit a new or amended Preliminary Housing Development Application at any time, in which case the requirements in effect at that time shall apply.

The City has adopted an SB 330 process and checklist to streamline the design and approval of by-right multi-family units within the community, in compliance with SB 330.

Housing Trust Fund, Housing Impact Fee, and Inclusionary/In-Lieu Fee Requirements

In September 2004, the City Council passed Ordinance 2004-7 adding Chapter 17.146 Housing Trust Fund, Housing Impact Fee, and Inclusionary/In-Lieu Fee Requirements to the St. Helena Municipal Code. The regulations are designed so that new non-residential developments and additions are required to pay a housing impact fee and new residential developments containing five units or more are required to include 20 percent of their units as affordable housing, and developments with less than five units pay an in-lieu fee. The fees collected from the nonresidential and residential development then go into a Housing Trust Fund. The use of

~~Housing Trust Fund monies is directed exclusively to "increase and improve the supply of housing affordable to households of moderate, low and very low income" including costs such as land, construction, financing, and reimbursements to the City.[29] The monies are available for both ownership and rental projects and services.~~

~~These affordable housing requirements do add additional cost to market rate residential development in the process of creating additional affordable housing in St. Helena. To minimize the impact on the price of market rate housing, the Municipal Code allows developers to submit an "alternative equivalent proposal" and offers a series of concessions or incentives.[30] An "alternative equivalent proposal" enables developers to meet the affordable housing requirements through alternative means like dedicating vacant land as long as the proposed alternative aligns with the purpose of the Municipal Code and is approved by the City Council. Concessions and incentives that are automatically available to residential developers who construct inclusionary units include the opportunity to submit a preliminary development proposal, priority in the City application process, and fee deferment. In addition, the City Council can grant additional concessions and incentives including extra density bonuses, changes to City standards, and monetary assistance. The automatic and discretionary concessions and incentives help expedite the process of building affordable housing and therefore minimize the cost to developers.~~

Requests to Develop Below Allowable Density

During the previous housing element cycle (2014-2023) there were no requests to develop housing opportunity sites below allowable density.

Building Codes and Enforcement

For the purpose of establishing proper regulations for the administration of the various codes covered in the Building Code, the City has adopted Chapter 1 of the California Building Code, Chapter 1 of the Plumbing Code, Chapter 1 of the Mechanical Code, and Annex H of the Electrical Code, 2019 Edition, excepting additions, revisions and omissions listed in Section 15.08.020 of the Municipal Code. The major local amendments included the continuation of St. Helena's program for the seismic retrofit of unreinforced buildings and the requirement that all new construction install an approved automatic fire-suppression sprinkler system. Existing residential structures that undergo additions or repairs equal to at least 50 percent of the existing floor area, and units experiencing a change in occupancy to a more hazardous use, also require the installation of an approved sprinkler system.[31] Otherwise, Title 15 of the St. Helena Municipal Code closely adheres to the 2019 California Building Standards Code and places no greater constraints on housing development than any other jurisdiction in the State that follows this model code.

The City has the power to inspect and declare unsafe any structure or piece of equipment, be it existing or under-construction, that does not meet specific Municipal Code standards. These include, but are not limited to, structures with insufficient modes of egress; structures that are unsafe or that have been made structurally

~~[29] St. Helena Municipal Code. 17.146.030~~
~~[30] St. Helena Municipal Code. 17.146.050~~
[31] *Municipal Code, 15.36.060 Fire protection systems.*

unsound due to fire, earthquake, or other natural disaster; buildings that are deemed a public nuisance; and buildings that have been constructed or maintained in violation of local or state law. Once a building has been declared unsafe, the building official may issue notice that the structure be repaired, vacated, or demolished within a reasonable amount of time and with the appropriate permits.[32]

The enforcement of building codes within the City of St. Helena is centered on the inspection of new construction and remodels or renovations requiring building permits. However, for existing structures, City Staff prioritizes code enforcement complaints according to the severity of the violation on the community and individuals. Situations that appear to pose a serious risk to health and safety are given top priority; others are pursued in the order in which they are received, as resources are available. In most cases for non-emergency complaints, a warning letter or courtesy notice is sent to the alleged violator to verify the status of the potential compliant and to obtain compliance. The purpose of this first step is to inform the alleged violator that there is a possible code violation on their property and to give them time to correct it. If the violation still exists after the correction date, the inspector will conduct a subsequent inspection and send a follow up notice with additional correction time. Staff provides detailed instructions on how a violation can be corrected and will meet with the property owner as necessary to assist in getting the violation corrected. The City also contracts with the Napa Housing Authority who assists property owners and tenants with any issues that may arise.

On/Offsite Improvement Standards

The St. Helena Municipal Code lists requirements for new development related t~~o sewer and water connections~~, streets and roadways, including ~~parking~~, ~~curbs, gutters, sidewalks~~street widths, sidewalks, curbs, and gutters, as well as water and sewer connections and parking requirements.~~fire hydrants, and street trees.~~

Street and Roadway Improvements

~~For various standards,~~ ~~T the~~The City of St. Helena Standard Specifications for Public Improvements governs the requirements for public infrastructure improvements. Developers are completely responsible for the cost of these general improvements to the properties.

Residential street widths in St. Helena follow the specifications outlined in Table 34. The requirements for street widths in St. Helena do not serve as barriers to housing production as they are significantly less than the requirements of nearby jurisdictions which have much more housing stock available. The City of St. Helena Standard Specifications for Public Improvements allows for developers to construct subdivisions with narrower streets, thus allowing for more homes with less- ~~acrage~~acreage ~~towards~~reserved for ~~right-of-ways~~rights-of-way.

[32] *City of St. Helena. St. Helena Municipal Code, Title 15. http://www.codepublishing.com/CA/sthelena/. Accessed January 31, 2022.*

Table 34 Residential Street Width Requirements

Type	St. Helena	Napa Yountville	American Canyon
Residential			
Single-Family Residence	16'	Standard: 56' (both sides parking) Rural: 29' With Parking: 48'	40'
2-10 units	20'		
11-60 units	25'		
Over 60 units	30'		
Non-residential			
One-way access drive	16'	60' to 82'	Not Applicable
Two-way access drive	25'		

Source: Section 902, City of St. Helena Standard Specifications for Public Improvements, 2015.

Sidewalks

According to the City of St. Helena Standard Specifications for Public Improvements, Standard No. 315, the minimum standard sidewalk width is four feet in residential areas and 10 feet in business or commercial areas. This sidewalk standard is compliant with Americans with Disabilities Act (ADA) standards and are only what is necessary for the activities occurring in their respective areas. Curbs are required to be designed with a six-inch top, 12-inch gutter, and six-inch rise above the roadway surface. The sidewalk, curb, and gutter standards do not pose a constraint to housing development.

Landscaping

Landscaping is required for projects subject to design review and the Water Efficient Landscape Ordinance. All open space and common areas are required to be landscaped and landscaping plans must be approved through the design review process. Further, St. Helena requires compliance with California's Model Water Efficient Landscape Ordinance (MWELO), which focuses on several goals, including water conservation and environmental quality. Although the MWELO requirements add additional planning cost to projects, they are State mandated requirements.

Landscaping requirements work to ensure efficient water use and basic environmental quality, health, and safety and are not a constraint to development. However, subjecting landscaping plans to the design review process constrains the development of affordable housing. Through the current (2022) comprehensive zoning code update, the City is revising the code to provide a ministerial review process for projects meeting objective design standards, including standards addressing landscaping.

Street Signs

Street signs are not a required improvement to developments to be paid for by the developer. Street signs, and other signs, are subject to the requirements of Municipal Code Section 17.112.

Other

Other miscellaneous improvements required by the City of St. Helena can include curb, gutter and sidewalk treatments, fire hydrants, and street trees. When new development fronts a public street, the developers may be required to provide curb, gutter, and sidewalk treatments to the specifications supplied by the Public Works Director.[33] If the Fire Chief or Public Works Director decides that there is not sufficient supply of fire hydrants nearby, new development would cover the cost of additional hydrants as necessary.[34] Finally, if a new development fronts a planting strip, the owner must care for and maintain the trees and other vegetation in the strip.

Sewer

The City of St. Helena owns the Wastewater Treatment Plant, which provides secondary-level treatment for domestic and commercial wastewater within the City. The plant has a permitted average dry weather treatment capacity of 0.5 million gallons per day (mgd) and can treat up to 2.8 mgd during wet weather.[35] In 2016, the City initiated planning efforts to upgrade the existing Plant in order to meet stricter environmental requirements. Working with the Regional Water Resources Control Board, the City developed a strategy to meet the new requirements, and began construction of the needed improvements in 2022. Construction is expected to be completed by f~~F~~all 2023. [36]

Per Chapter 727, Statutes of 2004 (SB 1087), sewer providers must grant priority for service allocations to proposed development that include housing units affordable to lower-income households. Local public and private wastewater service providers must adopt written policies and procedures that grant priority for service hook-ups to developments that help meet the community's share of the regional need for lower-income housing. In addition, the law prohibits wastewater service providers from denying, conditioning the approval, or reducing the amount of sewer service for an application for development that includes housing units affordable to lower-income households unless written findings are made as specified in Government Code Section 65589.7(c).

Water

The City has three sources of potable water: Bell Canyon Reservoir, water purchased from the City of Napa under a long-term water supply contract, and groundwater from City-owned and operated wells. Bell Canyon Reservoir is the City's primary source of potable water. Bell Canyon is an on-stream reservoir with a physical storage capacity of 2,384 acre-feet, although the maximum amount of water that is available annually to the City is 992 acre-feet (AF). The City also purchases significant water quantities from the City of Napa through a contract, expiring in 2035, which guarantees delivery of a minimum of 600 AF per year. Additionally, the City

[33] *Municipal Code 12.08.090 Plans and specifications.*
[34] *Municipal Code 16.32.110 Fire protection.*
[35] *California Regional Water Quality Control Boar San Francisco Bay Region. Order No. R2-0210-0105, NPDES No. CA0038016. http://www.waterboards.ca.gov/rwqcb2/board_decisions/adopted_orders/2010/R2-2010-0105.pdf.*
[36] *City of St. Helena. Initial Study. WWTRP Phase I Upgrades Project. November 2020. https://www.cityofsthelena.org/sites/default/files/fileattachments/public_works/page/2831/st._helena_wwtrp_public_initial_study_compiled.pdf*
Accessed January 28, 2022.

pumps groundwater from its two wells. The City seeks to limit groundwater withdrawals to 450 AF in normal years.

The City calculates a safe annual yield for its water system as "the quantity of water which can be reliable delivered on an annual basis through most rainfall years, including a dry year (rainfall at 22" to 25.9") without undue hardship on water customers through water shortage restrictions. The City defines "undue hardship" as three or more consecutive months of Phase II water restrictions or Phase III water restrictions. Based on water supplies available in 2020, the City estimates the safe annual yield of its water system is 992 AF.

In 2011, the City adopted a new Water Shortage Emergencies Ordinance. The ordinance establishes three water shortage emergency phases with increasing water use restrictions. Phase I water regulations are triggered when the supply/usage balance is in deficit, meaning that the five-year rolling average of total water usage exceeds the safe annual yield of the City's water system. Under Phase I regulations, water customers are prohibited from expanding or installing new water-using appliances, plumbing, or improvements, such as landscaping and pools, unless the installation will result in no increase in water use. Replacement fixtures must be water efficient. In addition, new water connections for new development may only be approved if the projected water demand for the project can be offset by a corresponding reduction in the existing water demand on the city water system. New development proposals may demonstrate that the project is water-neutral through a combination of on-site water conservation measures, off-site retrofitting or well water.

Phase II water shortage emergency regulations include all Phase I regulations plus mandatory conservation measures. Under Phase II, residential water users are limited to 65 gallons per person per day. An additional allocation of 2,500 gallons per month for single-family homes landscape irrigation is provided during the April through October billing cycle. Multiple-family or mobile home occupants are permitted up to 70 gallons per day per 1,000 square feet of landscaped area or for dedicated irrigation meters, a 60 percent limit of current reference evapotranspiration. There are strict penalties for non-compliance of these mandatory conservation measures. In addition, no new water connections are permitted during a Phase II water emergency. Phase III water shortage emergency regulations limit water use further to 60 gallons per person per day, and place additional limits on landscape irrigation.[37]

The City has adequate water supply to meet current demand, however the effects of climate change will likely reduce water supply from current sources. The City needs to obtain new water supplies and/or achieve more water savings in order to reliably meet future water demand. At the same time, the City recognizes that any new water supply, even if forthcoming, is likely to be expensive, potentially increasing the unit cost of potable water. The main emphasis within the General Plan (regarding water supply) is on conservation, seeking to reduce demand by all classes of users.

[37] *City of St. Helena. Report to the City Council. June, 23 2020. https://sthelena.civicweb.net/document/41860/2020 Accessed January 28, 2022.*

According to the City's Water Shortage Emergency Ordinance, if the City's water balance pursuant to the safe yield calculation is in deficit, then the City must comply with Phase I water restrictions. Most importantly, this requires that any new water demand, such as from a new residential project, must be completely offset by a reduction in current water demand, to the satisfaction of the Director of Public Works. Phases II and III involve the imposition of mandatory water restrictions on customers. If Phase II appears imminent, the City Council must appoint a Water Board which, if Phase II is implemented, will work with the Director of Public Works to ensure compliance by all sectors (residential, commercial, and industrial) with Phase II restrictions. Phase III restrictions are severe.

Per Chapter 727, Statutes of 2004 (SB 1087), water providers must grant priority for service allocations to proposed developments that include housing units affordable to lower-income households. Public and private water providers must adopt written policies and procedures that grant priority for service hook-ups to developments that help meet the community's share of the regional need for lower-income housing. In addition, the law prohibits water providers from denying, conditioning the approval, or reducing the amount of water service for an application for development that includes housing affordable to lower-income households unless written findings are made as specified in Government Code Section 65589.7(c). A city may deny, condition, or reduce water services to developments that include lower-income housing units if the city does not have "sufficient water supply" as defined in Government Code Section 66473.7(a) (2) or is operating under a water shortage emergency as defined in Section 350 of the Water Code.

The 2040 General Plan contains Implementation Action PF1-J that commits the City to granting projects that include affordable housing units priority access to water resources over other new projects should the capacity of local water systems become inadequate to meet the full demand for new connections.

Parking

St. Helena is a rural jurisdiction with limited public transport options, making commuting by automobile a common practice among residents of all income groups. Some local employers, such as wineries located off of the State Highways, only have access through roadways without suitable sidewalks or bus service. Thus, for residential developments in St. Helena, it is necessary to have some adequate amount of parking to sustain regular life for residents of the rural town. Additionally, within neighborhoods, it is important to keep enough cars off the street due to some streets having little to no parking availability. For example, many streets in St. Helena's older neighborhoods only offer one-side parking and some roads on the edges of town have no paved side parking at all.

Residential parking requirements vary according to the number of dwelling units, as follows:

- One to two dwelling units: Minimum of two spaces per unit, with one of the spaces in a garage or carport.
- Three or more dwelling units (s: ~~Minimum~~ tudio and one bedroom units): ~~of one space under cover per unit~~One covered space~~,~~ plus ~~either~~ a half space per unit

- Three or more dwelling units (two or more bedroom units): or oneOne covered space plus one additional whole space per unitdepending on the number of bedrooms in the units.
- Rooming, boarding, or lodging house: Minimum of one space per room, and two spaces for the owner-occupied unit.
- Mobile home: Minimum of two spaces per unit plus centralized space for guest parking.[38]

The one exceptionEexceptions to these requirements is housingincludeare provided for housing subject to the affordable housing ordinance (see Locally Adopted Ordinances for more details). Some examples of parking minimum exceptions include projects built for senior citizens, and deed-restricted affordable projects built with with funding from the Federal or State government that are deed restricted, which is affordable to very low-, low-, and moderate-income households.[39] For all other uses not covered in the Municipal Code or State Density Bonus Law, the Planning Commission has the power to set the parking requirements based upon the general parking guidelines of the City.

The City of St. Helena's parking standards do not impose undue constraints to development of multifamily uses with two or more bedrooms. As shown in Table 35Table 35, when compared to other nearby jurisdictions, St. Helena's housing requirements are not only less restrictive, but much less complex. Additionally, the City is currently reevaluating its parking requirements for residential uses as part of the ongoing Comprehensive Zoning Code Update. However, parking standards for multifamily uses with three or more studio or one-bedroom units require 1.5 parking spaces per unit. This requirement is a constraint to development of smaller unit multifamily uses. Program H-N commits the City to limiting parking requirements for these uses to one space per unit through the currently (2023) ongoing Comprehensive Zoning Code Update scheduled for adoption in fall 2023.

[38] *Municipal Code 17.124.030 Minimum on-site parking requirements*
[39] *Municipal Code 17.144 Affordable Housing*

Table 35 Parking Requirements, St. Helena, Napa, Yountville ~~Across Neighboring Requirements~~

Type	St. Helena	City of Napa	Town of Yountville
1-2 dwelling units	2 spaces per unit with 1 in garage/carport	*Single-family:* 2 spaces per unit with 1 in garage + 1 for each bedroom in excess of 2 and guest parking	2 space, 1 covered and 1 screened; 4 for duplex with 1 covered and 1 screened
3+ dwelling units (studios and 1 bedroom units)	1 covered space + ½ space per unit	1.5 per unit (1-3 units) 1.4 per unit (4-49 units) 1.25 per unit (50+ units)	3 dwelling units – 4 spaces, 2 covered, 2 screened 4 dwelling units – 6 spaces, 3 covered, 3 screened Additional units require 1 additional covered and 1 additional screened space per 2 units
3+ dwelling units (2 or more bedroom units)	2 space per unit with 1 covered	Varies, from 1.75-2 spaces per unit plus 0.4 space for each bedroom in excess of 3	
Rooming, boarding, or lodging house	1 space per room and 2 for owner-occupied unit	1 space per sleeping room with ability for planning commission to override under certain circumstances	1.14 spaces per room
Mobile home	2 spaces per unit with centralized guest parking	*Not specified, however, using single family requirements:* 2 spaces per unit with 1 in garage + 1 for each bedroom in excess of 2 and guest parking	*Not specified, however, using single family requirements:* 2 space, 1 covered and 1 screened; 4 for duplex with 1 covered and 1 screened

Source: Chapter 17.124, City of St. Helena Municipal Code, 2015; Town of Yountville Municipal Code 17.116.020; City of Napa Municipal Code 17.54.040.

~~The City of St. Helena's parking standards do not impose undue constraints to when~~ ~~As part of the Comprehensive Zoning Code Update, the City is reducing proposed parking requirements for residential uses.~~Additionally, pParking requirements are additionally not a constraint given the size of the parcels identified in the Sites Inventory. For example, one site with large capacity identified in the sites inventory is Site 8, a 1.5 acre vacant lot located at 882 and 886 College Avenue. This site is projected to have a capacity of 39 units with 15 lower income and 15 moderate income units. If the complex were to have 15 two~~2~~-bedroom units, 15 one~~1~~-bedroom units, and 9 studios, it would need a total of 66 parking spaces with 39 of them being covered. The St. Helena Standard Specifications for Public Improvements, Standard Number 321A and 321B call for parking spaces that are 19 feet long by 9.5 feet wide, which equates to 180.5 square feet per parking space. Thus, for Site 8, there would be an allocation of 11,913 square feet of surface space allocated for parking, which accounts to approximately 18.23 percent of the site. This allocation does not pose an undue constraint on the project and provides sufficient parking for the projected residents of the project. Further, ~~The~~ developers can ~~additionally~~ design garages, overhangs, and other architectural features which can allow for greater building footprint and thus less land allocated to uncovered parking.

The City's parking minimums are also in line with ~~providing enough parking according to~~ State data. According to the Department of Motor Vehicles, there were 147,603 registered vehicles in Napa County in 2021, equating to approximately 1.06 vehicles per person in Napa County. St. Helena's parking minimums, particularly figures regarding multi-family one-bedroom units, matches the data provided by the DMV.~~Sidewalks~~

To help promote the development of emergency homeless shelters, Assembly Bill 671 (2019) was passed which included a variety of measures to incentivize the construction of such facilities, including the requirement requirement that jurisdictions can only require the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones.that off-street parking would be limited to only what is required for other residential or commercial uses within the same zone. According to Municipal Code Section 17.124, emergency homeless shelters are considered an unlisted use, which leaves it up to the planning commission to determine the parking requirements. However, in compliance with State law, the Planning Commission must only act to require emergency homeless shelters to have the same minimum parking requirements as residential or commercial uses in the same zone. Emergency homeless shelters are only permitted in the Industrial and Service Commercial zoning districts, which only conditionally permit housing. Thus, parking requirements are most likely to be aligned with Ccommercial and industrial parking requirements, which generally require one1 parking space per three hundred300 square--feet of office area, and 1one parking space per six hundred fifty650 square-feet of industrial uses, and one parking space per 1,000 square feet of warehouse space.feet, respectively. Based on these standards, the City does not currently comply with State law. The City is committed through Program H-F to amend the Zoning Code to to require only be the number of spaces necessary for staff working in the shelter and no more than other uses in the same zones.formally comply with State law.

Further, tThe City is also evaluating and revising, as necessary, reviewing other parking requirements for multifamily uses as a part of anthe ongoingcurrently ongoing (2023) Comprehensive Zoning Code Uupdate to review possibleidentify and remove potential constraints to housing development. The Update is scheduled for adoption in fall 2023.

According to the City of St. Helena Standard Specifications for Public Improvements, Standard No. 315, the minimum standard sidewalk width is 4.5 feet in residential areas and 10 feet in business or commercial areas. This sidewalk standard is compliant with Americans with Disabilities Act (ADA) standards and are only what is necessary for the activities occurring in their respective areas. The sidewalk standards do not pose a constraint to housing development.

Landscaping

Landscaping is required for projects subject to requirements outlined in the City of St. Helena Standards for Landscaping. Landscaping is subject to design review. St. Helena also requires compliance with California's Model Water Efficient Landscape Ordinance, which focuses on several goals, including water conservation and environmental quality. The landscape requirements may add additional planning cost to projects, however, they are similar to requirements of most California jurisdictions. There are no special landscaping requirements that are out of standard requirements that ensure basic environmental quality, health, and safety, therefore, landscaping is not a constraint to housing development.

Street Signs

Street signs are not a required improvement to developments to be paid for by the developer. Street signs, and other signs, are subject to the requirements of Municipal Code Section 17.112.

~~*Other*~~

~~Other miscellaneous improvements required by the City of St. Helena include curb, gutter and sidewalk treatments, fire hydrants, and street trees. Whenever new development fronts a public street, the developers are required to provide curb, gutter, and sidewalk treatments to the specifications supplied by the Public Works Director.[40] If the Fire Chief or Public Works Director decides that there is not sufficient supply of fire hydrants nearby, new development would cover the cost of additional hydrants as necessary.[41] Finally, if a new development fronts a planting strip, then the owner must care for and maintain the trees and other vegetation in the strip.~~ The City does not impose any on-site and off-site improvement standards ~~that are~~ beyond those necessary to achieve health and safety requirements. ~~Therefore, these requirements are not a constraint to housing. The water, parking, and other miscellaneous~~The City's on-and-off site improvements standards, including roadway improvements, water and sewer requirements, and parking standards do not constrain residential development in St. Helena.

~~Building Codes and Enforcement~~

~~For the purpose of establishing proper regulations for the administration of the various codes covered in the Building Code, the City has adopted each of Chapter 1 of the California Building Code, Chapter 1 of the Plumbing Code, Chapter 1 of the Mechanical Code, and Annex H of the Electrical Code, 2019 Edition, excepting additions, revisions and omissions listed in Section 15.08.020 of the Municipal Code. The major local amendments included the continuation of St. Helena's program for the seismic retrofit of unreinforced buildings and the requirement that all new construction install an approved automatic fire-suppression sprinkler system. Existing residential structures that undergo additions or repairs equal to at least 50 percent of the existing floor area, and units experiencing a change in occupancy to a more hazardous use, also require the installation of an approved sprinkler system.[42] Otherwise, Title 15 of the St. Helena Municipal Code closely adheres to the 2019 California Building Standards Code and places no greater constraints on housing development than any other jurisdiction in the State that follows this model code.~~

~~The enforcement of building codes within the City of St. Helena is centered on the inspection of new construction and remodels or renovations requiring building permits. The City has the power to inspect and declare unsafe any structure or piece of equipment, be it existing or under-construction, that does not meet specific Municipal Code standards. These include, but are not limited to, structures with insufficient modes of egress; structures that are unsafe or that have been made structurally unsound due to fire, earthquake, or other natural disaster; buildings that are deemed a public nuisance; and buildings that have been constructed or maintained in violation of local or state law. Once a building has been declared unsafe, the building official~~

~~[40] *Municipal Code 12.08.090 Plans and specifications.*~~
~~[41] *Municipal Code 16.32.110 Fire protection.*~~
~~[42] *Municipal Code, 15.36.060 Fire protection systems.*~~

~~may issue notice that the structure be repaired, vacated, or demolished within a reasonable amount of time and with the appropriate permits.~~[43]

Fees and Exactions

The City's building department fee schedule is designed to directly offset the costs incurred by the City when processing and reviewing development applications, and to inspect new construction. Fees are charged when a building permit is issued and are based on building plans and estimated construction costs.

Development impact fees are charged to new projects in order to offset costs for the construction, expansion, and maintenance of off-site improvements that either were built for the purposes of the new project or were existing improvements from which the new developments will benefit. In the case of St. Helena, impact fees are charged for public safety, civic facilities, water and wastewater services, ~~a~~ drainage, traffic mitigation, and schools. In 2013, the City conducted a comprehensive study and update of all of its development impact fees. As a result, total impact fees for single-family houses decreased from $19.78 per square foot to $16.32 per square foot, a 17.5 percent reduction. Fees for multiple-family development increased from $13.78 per square foot to $21.37 per square foot, a 55 percent increase.

The single-family fee calculations shown in Table 36 are based on an example 2,300 square foot single family residence with three-bedrooms and two-bathrooms with a total construction cost estimate of approximately $920,000 ($400 per square foot). The multifamily fee calculations shown in Table 36 are based on an example eight unit, three story 6,780 square foot multi-family development project.

~~[43] City of St. Helena. St. Helena Municipal Code, Title 15. http://www.codepublishing.com/CA/sthelena/. Accessed January 31, 2022.~~

Table 36 Planning and Development Fees

Fee Description	Single-Family	Multiple-Family
Planning and Application Fees		
Variance	$4,500	$4,500
Conditional Use Permit (CUP)	$5,200	$5,200
General Plan Amendment	$13,000 deposit plus staff time	$13,000 deposit plus staff time
Zone Change	$8,200 deposit plus staff time	$8,200 deposit plus staff time
Site Plan Review	$2,578	$2,578
Specific Plan	$25,000 deposit plus staff time	$25,000 deposit plus staff time
Specific Plan Amendment	$4,100	$4,100
Development Agreement	$13,500	$13,500
Building Inspection / Permit	$1,838	$1,838
Home Occupation Permit	$200 standard, $250 expanded	$200 standard, $250 expanded
Lot Subdivision	$6,300 minor; $35,000 major	$6,300 minor; $35,000 major
Lot Line Adjustment	$3,000	$3,000
Tentative Tract Map	$4,500	$4,500
Final Parcel Map	$2,100	$2,100
Design Review	≤1,000 square feet: $2,600 >1,000 square feet: $3,700	$3,700
Environmental Fees		
Negative Declaration	$5,600 plus staff time	$5,600 plus staff time
Mitigated Negative Declaration (In-House)	$11,600 plus staff time	$11,600 plus staff time
Mitigated Negative Declaration (Contract)	$3,200 plus staff time	$3,200 plus staff time
Environmental Impact Report	$9,000 deposit plus staff time	$9,000 deposit plus staff time
Permit Fee	$433	$5,503
City Impact Fees		
Public Safety Fee ($1.04/sq ft)	$2,392	$7,051
Civic Facilities Fee ($1.95/sq ft)	$4,485	$13,221
Parks Fee ($7.16/sq ft)	$16,468	$82,580
Water System Fee ($3.05/sq ft)	$7,015	$16,747
Wastewater System Fee ($0.45/sq ft)	$1,035	$4,475

Drainage System Fee ($0.73/sq ft)	$1,679	$4,678
Transportation Fee ($1.94/sq ft)	$4,462	$16,001
Housing Fee (2.5% of ~~valuation~~construction cost)	$~~23,000~~18,400	$~~23,000~~27,933
Other District Fees		
School District Fee ($3.20/sq ft)	$6,831	$21,696

Source: City of St. Helena Planning Department, Mintier Harnish, 2022.

City impact fees are included in Table 36 above. Among these, the costliest fee is the Parks fee of $7.16 per square foot. These funds are used to develop and maintain City parks, a critical resource in the community. The City's wastewater impact fee ($0.45 per square foot), drainage system fee ($0.73 per square foot) and public safety fee ($1.04 per square foot) are particularly low. Further, the City's civic facilities and transportation fees are both under $2 per square foot. Importantly, City impact fees for multifamily listed in Table 36 are based on an eight-unit development, as explained previously, and have a lower per unit cost than City impact fees shown for a typical single-family use. These impact fees are based on the City's actual costs and are reevaluated and revised each year. The City's impact fees do not impose undue impacts to housing cost, supply, and feasibility, and are not a constraint to the development of housing.

Continuing with the example single-family and multi-family projects used in Table 36, Table 37~~Table 37~~ provides a breakdown of the cost-per-unit and estimated proportion of fee cost for the example project. These fees would be $70,830 and $21,525 per unit, respectively. This represents 7.7 percent of the single-family home project's construction cost and 12.3 percent of the multi-family home project's construction cost.

Table 37 Construction Cost Summary, Cost Per Unit and Cost Per Square-Foot

	Single-Family	Multiple-Family
Building Size (square feet)	2,300	6,780
Construction Cost (per square-foot)	$400	$206.49
Valuation	$920,000	$1,400,000
Total Estimated Fees Per Unit	$70,840	$21,525
Fees as % of Construction Cost	7.7%	12.3%

Source: City of St. Helena Planning Department; Mintier Harnish, 2022

The multiple-family development impact fees have increased to reflect the costs of the improvements necessary to serve multifamily residential development. Without the funds collected through the fees, the City could not afford to make the necessary improvements in infrastructure, and thus the fees do not represent an undue governmental constraint to housing development. In addition, fee reductions and adjustments for affordable

and other housing projects are permitted on a case-by-case basis, as approved by City Council under Section 3, Chapter 3.32 of the St. Helena Municipal Code.

In comparison to nearby jurisdictions, St. Helena's planning fees are similar in range, as shown on Table 38.~~ Generally, St. Helena's planning fees are at the higher end of the range of fees in Napa County. However, the City's are similar or less than some jurisdictions for certain procedures.~~ For rezoning, St. Helena has some of the most expensive fees in the region, however for tentative tract or parcel maps, St. Helena has some of the lowest fees in the region. Overall, St. Helena does not have fees that result in an extremely significant cost difference between development projects situated in the city and those situated outside of the city in nearby jurisdictions.

Table 38 Planning Application Fees – Surrounding Jurisdictions, Single-Family and Multiple-Family

Jurisdiction	General Plan Amendment	Zone Change	Tentative Tract Map	Variance
St. Helena	$13,000 deposit plus staff time	$8,200 deposit plus staff time	$4,500	$4,500
City of Sonoma	$16,581	$981	$3,735 plus $395 per lot plus engineering time	$2,279
Yountville	$7,500 deposit plus staff time	$7,500	$5,000 plus staff time	$2,500
American Canyon	$8,312	$3,714	$8,129	$1,896
County of Napa	Established by resolution of the Board of Supervisors	N/A	$622.90 plus staff time	$6,100.90 plus staff time

Source: City of St. Helena Planning Department; Mintier Harnish, 2022

Given similar fee structures to nearby jurisdictions and the development impact fee study in 2013, St. Helena's fee structure does not pose an undue constraint on the production of housing.

Processing and Permit Procedures

St. Helena, as with other jurisdictions, has two primary types of processing and permit procedures: ministerial and discretionary.

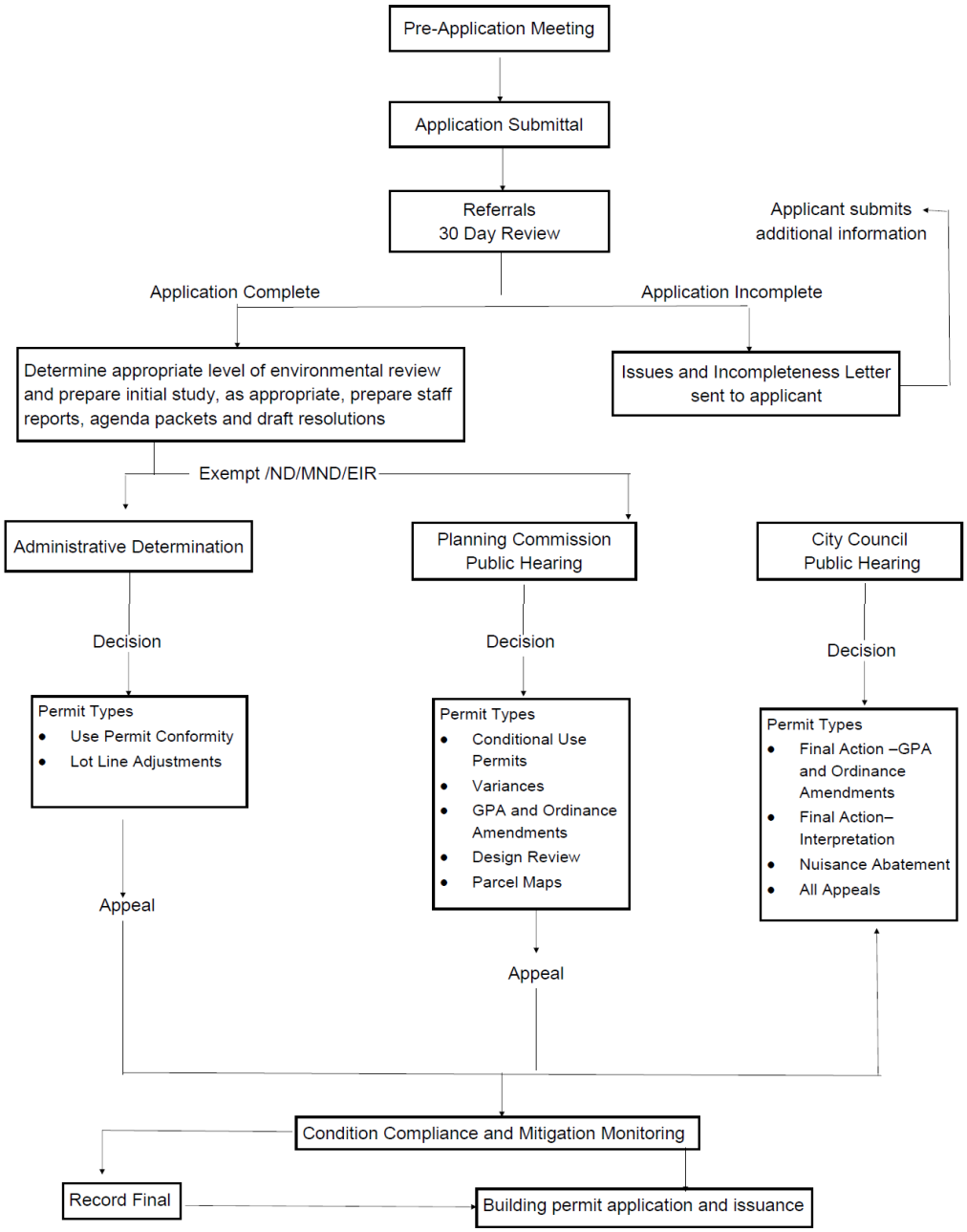
Ministerial Permit Procedures

Ministerial permits are any permits that do not require a decision-making body to provide additional input before its approval. Ministerial permits are handled internally within the planning department and are approved by the planning director. Ministerial permits cover all development that is permitted by right in zones without design review. An example of a common ministerial permit is one for the construction of an accessory dwelling unit on a lot with a preexisting single-family dwelling. Ministerial review typically takes 2-4 weeks. As shown in Table 41, there is very little delay among previous projects. Ministerial permit procedures do not pose a constraint to housing development.

Discretionary Permit Procedures

Discretionary permits are any permits requiring a decision-making body to exercise judgment prior to its approval. As shown in Figure 48, after successfully completing a use permit and passing State environmental review, discretionary permits can be handled administratively through the Planning Director, or through public review ~~through~~with the Planning Commission. If an appeal is made against the project, the project is sent to City Council for review.

Figure 48 Discretionary Permit Process Flowchart



Discretionary permits in St. Helena include general plan amendments, code amendments, specific plans, variances, development agreements, use permits, parcel and subdivision maps, design review, permit/map extensions, lot line adjustments, appeals, revocation of land use permits, and interpretations. As shown in Table 39 and Table 40, most discretionary permits take 3-6 months to process, with some permits taking less time (conditional use permit) or significantly more time (general plan amendment). For the purposes of residential development, conditional use permits (CUPs) and design review are the most pertinent to affecting the affordability, speed, and thus availability of affordable housing.

Table 39 Typical Processing Procedures by Project Type

	Single-Family Unit	Subdivision (20 units)	Multiple-Family (20 Units)
Required Permit Procedures	Ministerial Review - ADU	Tentative Map	Conditional Use Permit
	Design Review – new SFD	Final Map	
		Design Review	Design Review
		Initial Environmental Study~~Design Review~~	Initial Environmental Study
		Environmental Impact Report~~Initial Environmental Study~~	Mitigated Negative Declaration
Estimated Total Processing Time	2 months	12 months	9 months

Source: City of St. Helena, Mintier Harnish, 2022.

Table 40 Timelines for Permit Procedures

Type of Approval or Permit	Typical Processing Time	Approval body
Ministerial Review	2 – 4 weeks	Planning Director
Conditional Use Permit	3 months	Planning Commission
Zone Change	6 months	Planning Commission & City Council
General Plan Amendment	6 months	Planning Commission & City Council
Design Review	3 months	Planning Commission
Subdivision Maps	6 months	Planning Commission & City Council
Parcel Maps	3 months	Planning Commission
Initial Environmental Study	6 months	Planning Commission & City Council, depending on project
Environmental Impact Report	10 months	Planning Commission & City Council

Source: City of St. Helena, Mintier Harnish, 2022.

Actual Project Times

Table 41 outlines a selection of seven~~7~~ projects with their entitlement approval dates and issuance of building permits. The time between entitlement and building permit issuance is negligible in St. Helena and is not a constraint to the city meeting its share of the regional housing need.

Table 41 Timelines for Permit Procedures

Description of Project	Entitlement Approval	Building Permit Issued	Time Elapsed
A single family dwelling with an accessory dwelling unit (601 Fulton)	3/19/2020	3/25/2020	4 days
An accessory dwelling unit (1856 Adams St, B)	3/12/2020	6/2/2020	3 months, 20 days
An accessory dwelling unit (1730 Stockton St, B)	1/6/2020	4/9/2020	3 months, 3 days
An accessory dwelling unit (940 Hunt Ave)	9/17/2020	9/17/2020	Same day
A single family dwelling (222 Pope St)	7/28/2020	7/28/2020	Same day
An accessory dwelling unit (1607 Kearney St, B)	6/1/2020	6/4/2020	3 days
An accessory dwelling unit (1135 Church St, B)	6/8/2020	6/23/2020	15 days

Source: City of St. Helena, Mintier Harnish, 2022.

Conditional Use Permit (CUP)

Conditional use permits (CUPs) are required when a land use is listed as a conditional use for a zoning district in the Zoning Code. Conditional Use Permits are subject to review by the Planning Commission, which considers compatibility with surrounding uses, public input, and staff feedback. Conditional use permits typically take three months to fully process, which is not considered a constraint to residential development. All projects that require a conditional use permit, except for the installation or modification of fences, require design review.

Design Review

Design Review is a process undertaken by the Planning Commission on certain projects to promote environmental quality, foster attractiveness, sustain functional utility, preserve neighborhood character, protect public investments, encourage a mix of uses, and raise the level of community expectations for the quality of the environment.[44] Chapter 17.164 of the St. Helena Municipal Code outlines the City's Design Review policies. The Municipal Code lists 14 specific design criteria considered by the Planning Commission:

1. Consistency and compatibility with applicable elements of the general plan;
2. Compatibility of design with the immediate environment of the site
3. Relationship of the design to the site;
4. Determination that the design is compatible in areas considered by the board as having a unified design or historical character;
5. Whether the design promotes harmonious transition in scale and character in areas between different designated land uses;

[44] *St. Helena Municipal Code. 17.165 Design Review.*

6. Compatibility with future construction both on and off the site;
7. Whether the architectural design of structures and their materials and colors are appropriate to the function of the project;
8. Whether the planning and siting of the various functions and buildings on the site create an internal sense of order and provide a desirable environment for occupants, visitors and the general community;
9. Whether the amount and arrangement of open space and landscaping are appropriate to the design and the function of the structures;
10. Whether access to the property and circulation systems are safe and convenient for pedestrians, cyclists and vehicles;
11. Whether natural features and vegetation are appropriately preserved and integrated with the project;
12. Whether the materials, textures, colors and details of construction are an appropriate expression of its design concept and function and whether they are compatible with the adjacent and neighboring structures and functions;
13. Whether the landscape design concept for the site, as shown by the relationship of plant masses, open space, scale, plant forms and foliage textures and colors, create a desirable and functional environment and whether the landscape concept depicts an appropriate unity with the various buildings on the site; and
14. Whether sustainability and climate protection are promoted through the use of green building practices such as appropriate site/architectural design, use of green building materials, energy efficient systems and water efficient landscape materials.[45]

The Planning Commission examines all proposed new structures and some exterior additions (e.g. additions on historical residential properties, addition of new residential floors) in relation to the above listed design criteria and arrives at one of three recommendations: approve, approve with minor modifications, or disapprove.

Projects that are subject to design review include:

- Any exterior modification to a commercial, multi-family, or designated historic building, including new construction
- The construction of a new single-family home
- Structures, buildings or site modifications requiring use permits in any district, excluding fences
- Additions to a single-family home which create a second or third floor, story or living space where one does not currently exist
- Any new structure prior to the issuance of any future building permits for structures on newly created parcels created on maps approved after January 1992

[45] *St. Helena Municipal Code. 17.165 Design Review.*

- Any new public facility, or modification thereof
- Demolition, except when required for emergency protection of public health, safety or welfare

The following projects are subject to administrative design review, which means that they are ministerially decided on by city planning staff as opposed to the Planning Commission:

- Any form of repair or maintenance where the work solely involves the replacement of materials in like kind and form or to any such work in areas not visible to the public from the public right-of-way or areas accessible to the public
- Accessory dwelling units, subject to requirements identified in SHMC 17.116.030
- Alteration, modification, or addition to an existing single-family home that is not eligible for design review
- Construction of an accessory structure in keeping with all development criteria of the zoning district in which the structure is proposed

Design review is required for practically all projects, including all primary residential ~~projects~~structures. The City has not ~~included~~adopted a design review exemption for affordable housing development in the City. Therefore, design review is considered a significant constraint to ~~a~~affordable ~~I~~housing development in the City.

~~City staff have noted that the~~The complex and subjective nature of the design review process is a constraint housing production~~, and action is currently being taken~~. Through the~~in the~~ current comprehensive zoning code update, ~~which will~~the City is working to ~~address these concerns and make~~codify objective design ~~review processes objective,~~standards for single-family, small lot, and multifamily uses. ~~in compliance with California State Code Section 65582.1. Additionally, the City is committed through~~ Program H-F ~~H-F~~ commits the City to ~~to amend~~amending the ~~Zoning~~Municipal Code to ~~adopt~~provide ~~an objective review process~~objective design standards for residential development and a ministerial, by-right, process for approval of developments meeting all zoning and design standards.

Currently (2023) the MR zone does not allow for multifamily uses without a conditional use permit (CUP), with the exception of 5th Cycle Housing Element opportunity sites. Although the MR zone is primarily a single-family zone, the requirement for a CUP in this zone constrains the development of smaller multifamily uses. Program H-N commits the City to allowing duplexes and triplexes and a density range of 5.1 to 16 dwelling units per acre in the MR zone without a CUP.

Please note: the City implemented 5th Cycle Housing Element program HE1.D which committed the City to eliminating use permit requirement for multifamily projects on Housing Opportunity sites (Key Housing Sites) in the medium density residential zone. Section 17.40.020 was amended to permit the following:

N. Multiple-family dwellings, apartments, and dwelling groups at a density up to the maximum allowed by the medium density residential district shall be allowed as a permitted use on the following MR zoned parcels, which are identified as "Key Housing Sites" in Table 42 of the city's 2015-2023 housing element, and are identified as follows by street address and assessor's parcel number (APN): 567 Pope St. APN 009-070-002; 591 McCorkle Ave. APN 009-070-003; 1817 Spring St. APN 009-322-009; Sulphur Springs Ave.

APN 009-362-015; Spring St. APN 009-441-023 and 009-552-002; 576 Pope St. APN 009-552-003; 1105 Pope St. APN 009-090-003. (Ord. 17-2 § 6 (part); Ord. 16-8 § 1; Ord. 15-2 § 7 (part): Ord. 12-2 § 6: Ord. 07-5 § 2 (part): Ord. 05-4 § 1 (part): Ord. 03-4 § 11: prior code § 27.51)

Further, The City has received SB 2 and LEAP grants from the State of California to assist with encouraging and streamlining affordable housing development in the city. The City has applied these funds to the Comprehensive Zoning Code Update currently underway. The Draft Update works to overcome constraints and encourage development by incorporating objective design standards for residential development and removing CUP requirements for duplexes and triplexes and densities of 5.1 to 16 du/ac in the MR zone, among other efforts.

Table 42 Housing Types Permitted by Base Zoning District

Zone Type	Agricultural			Residential				Commercial/Office			I	WW
Zoning District	A-20	W	AP	LR	LR-1A	MR	HR	CB	SC	BPO		
Design Review Required	No			Yes								
Single-family dwelling	P [1]	P [1,2]	P	P[4]	P	P[4]	P[4]	—	—	—	—	P
Residential units (in a mixed-use setting)	—	—	—	—	—	—	—	C[5]	C[5,7]	C[5]	C[8]	—
Residential Condominium or Townhouse	—	—	—	—	—	C	C	—	—	—	—	—
Duplex or triplex units	—	—	—	—	—	C	P	—	—	—	—	—
Multiple-family dwellings	—	—	—	—	—	P[6]	P	—	—	—	—	—
Mobile homes	—	—	—	P	P	P	P	—	—	—	—	—
Agricultural employee housing	—	—	P	P[3]	P[3]	P[3]	P[3]	—	—	—	—	P[3]
Supportive housing	—	—	P	P	P	P	P	C[5]	C[5,7]	C[5]	—	P
Transitional housing	—	—	P	P	P	P	P	C[5]	C[5,7]	C[5]	—	P
Single room occupancy housing	—	—	—	—	—	—	P	—	—	—	—	—
Intermediate care facility, 6 or fewer persons	—	—	—	P	P	P	P	—	—	—	—	—
Intermediate care facility, 7 or more persons	—	—	—	—	C	C	C	—	—	—	—	—
Residential facility, 6 or fewer persons	—	—	—	P	P	P	P	—	—	—	—	—
Residential facility, 7 or more persons	—	—	—	C	C	C	C	—	—	—	—	—
Emergency Shelter	—	—	—	—	—	—	—	—	P	—	P	—

P=Permitted C=Conditional —=Prohibited

[1]Permitted if the single-family dwelling(s) existed prior to October 1, 1993.

[2]Additional dwellings for occupancy by owners, caretakers and/or other employees, provided density does not exceed one dwelling unit per each five acres of the winery's contiguous property is a Conditional Use.

[3]Six or fewer persons only.

[4]New construction of single-family dwellings where the minimum density of 2 units or greater is a Conditional Use.

[5]Limited to upper floors only.

[6]Permitted only to parcels identified in the adopted Housing Element.

[7]Upper floors only in conjunction with a mixed-use project

[8]Subject to the restrictions outlined in SHMC 17.60.030, including a maximum 850 square feet floor area, one off-street parking space, and residency requirements.

Note: The Zoning Code text takes precedence over this table and there may be additional requirements or limits not noted on this table.

If the zone is not present in the table (PQP, PR, OS), it does not allow any residential uses by right or through any permitting processes.

Source: St. Helena Municipal Code, Title 17.

SB 330 Streamlining

On October 9, 2019, Governor Newsom signed into law SB 330, the Housing Crisis Act of 2019. The act amends existing state laws and creates new regulations around the production, preservation and planning of housing. The bill has been in effect since January 1, 2020 and sunsets on January 1, 2025. SB 330 will affect both project planning procedures and community planning outcomes.

The goal of SB 330 is to create certainty in the development of housing projects, speeding up the review of these projects, preserving affordable housing and preventing certain zoning actions that reduce the availability of housing. SB 330 does the following (not a comprehensive list):

- Creates a new vesting process for zoning and land use ordinances, policies, and standards in place at the time a preliminary application is submitted (with limitations);
- Requires that the historic status or designation of any site be determined at the time an application for a discretionary action is deemed complete;
- Prohibits imposing or enforcing non-objective design review standards established after January 1, 2020;
- Limits the number of public hearings to five for housing projects that meet all objective design standards; and
- Prohibits actions that reduce the total zoned capacity for housing (i.e., down-zoning).

A project that meets any of the following criteria per California Government Code Section 65589.5(h)(2)(B) is subject to the provisions of SB 330:

1. The project consists of residential units only;
2. The project is a mixed-use development consisting of residential and non-residential uses with at least two-thirds of the square footage of the project designated for residential use, including dwelling units and any uses accessory to the residential units; or
3. The project is transitional or supportive housing.

New Preliminary Application Form. SB 330 creates a new vesting process for discretionary housing projects during the five-year period of the bill. It achieves this through the creation of a new "preliminary application" process that establishes a new date for the purposes of locking projects into the ordinances, policies, and standards in effect when a preliminary application (including all required information) is submitted and deemed complete. This vesting does not apply to California Environmental Quality Act (CEQA) determinations, including historic resource determinations pursuant to CEQA.

Once a complete Preliminary Housing Development Application is submitted (along with other required applications if applicable), the zoning, design, subdivision, and fee requirements in effect as of that date will remain applicable to the project for the duration of the review and entitlement process, provided that all the following provisions are satisfied:

- Complete discretionary entitlement applications must be submitted and accepted by the Planning Department within 180 days of the Preliminary Housing Development Application being deemed complete;
- If the entitlement applications are deemed incomplete after filing, the application must submit all missing or incomplete items to the Planning Department within 90 days of being notified in writing by Planning Department staff;
- The project may not increase by more than 20 percent in the number of units or total square footage indicated in the Preliminary Housing Development Application, except as the project may be revised using the State Density Bonus; and
- The project must commence construction within 30 months of site permit issuance.

Note that the following modifications may be required even when a Preliminary Housing Development Application is on file:

- Development impact fees, application fees, capacity and connection fees, or other charges may be annually adjusted based on a published cost index;
- Requirements necessary to avoid an adverse impact to public health or safety, or to avoid or lessen an impact under CEQA may be applied; and
- Applicants may submit a new or amended Preliminary Housing Development Application at any time, in which case the requirements in effect at that time shall apply.

The City has created a preliminary SB 330 process and checklist to streamline the design and approval of by-right multi-family units within the community. ~~This process has not been adopted yet and is being incorporated into the Zoning Code Update.~~ Program H-F ~~H-F~~ provides a by-right streamlined review process for affordable housing developments meeting state affordability thresholds, in compliance with SB 35 and SB 330.~~commits the City to incorporating SB 330 streamlining procedures as a part of its ongoing Zoning Code Update~~.

Procedures for Selected Housing Types

The following section describes the processing and permit procedures for selected housing types that are typically ~~utilized~~used by lower income households. For more housing types, see the Zoning for a Variety of Housing Types section.

Multifamily Rental Housing

Multifamily rental housing is housing traditionally identified as any housing available for rent that has greater than one~~1~~ dwelling unit in a building. Some examples of multifamily rental housing include duplexes, triplexes, fourplexes, and apartment buildings. Multifamily rental housing is permitted entirely in the High Density Residential (HR) district only. Multifamily rental housing is permitted in the Medium Density Residential (MR) district only on parcels identified in the housing element. MR zoned parcels identified in the fifth cycle housing

element are currently codified as being the MR zone parcels that allow multifamily housing. Currently, all multifamily rental housing projects, affordable and market rate, are subject to subjective design review. Therefore, multifamily rental housing is constrained by the design requirements set forth in the Zoning Code. Program H-F H-F is included to commit the City to adopting objective design standards to reduce barriers to multifamily rental housing and eliminate subjective design standards.

Mobile Homes

Mobile homes, or manufactured homes, are small, prefabricated homes which are often situated on rented portions of land in mobile home parks. Mobile homes can offer affordable pathways to home ownership and stable shelter for many low-income households. Mobile homes, as shown in Table 42 are permitted in all residential zoning districts in St. Helena. Mobile homes in St. Helena are subject to the following conditions in all residential zoning districts:

- To be occupied only as a single-family residential use,
- To be subject to all provisions of the zoning ordinance applicable to conventionally built dwellings,
- To be attached to a permanent foundation system in compliance with all applicable building regulations,
- To be covered with an exterior material customarily used on conventionally built dwellings extending to the top of the foundation,
- To have parapet walls or roofs which utilize shingles or other materials customarily used on conventionally built dwellings;

These requirements do not constitute a constraint to the development of mobile homes. However, mobile homes are subject to subjective design review, which poses a significant constraint to their development. Program H-FH- F is included to commit the City to adopting objective design standards to reduce barriers to mobile home development and eliminate subjective design standards.s the City to incorporate objective design standards for single-family, small lot, and multifamily developments, including mobile homes, that provide a ministerial design review process for projects that meet zoning and design standards.

Housing for Agricultural Employees

Housing for agricultural employees is permitted in the agricultural zone for up to 36 persons, thus complying with California Health and Safety Code Section 17026.1. Housing for agricultural employees is also permitted for up to six persons in all residential zones and in the WW zone. Housing for agricultural employees is subject to subjective design review, which poses a significant constraint to development. Program H-FH-F is included to commits the City to -incorporate objective design standards for single-family, small lot, and multifamily developments, including farmworker housing, that provide a ministerial design review process for projects that meet zoning and design standards.

~~adopting objective design standards to reduce barriers to housing for agricultural employees and eliminate subjective design standards.~~

Supportive and Transitional Housing

Supportive and transitional housing is permitted in the AP zone, all residential zones, and the WW zone. Supportive and transitional housing is subject to subjective design review, which poses a significant constraint to development. Program H-F ~~H-F is~~ commits the City to incorporate objective design standards for single-family, small lot, and multifamily developments, including transitional and support housing, that provide a ministerial design review process for projects that meet zoning and design standards.~~included to commit the City to adopting objective design standards to reduce barriers to supportive and transitional housing and eliminate subjective design standards.~~

Constraints to Housing for Persons with Disabilities

On January 1, 2002, SB 520 went into effect, requiring local jurisdictions to analyze potential governmental constraints to the development, improvement, and maintenance of housing for persons with disabilities as part of a jurisdictions housing element update. Under SB 520, housing elements must also include one of the following: 1) a program to remove constraints, or 2) provide reasonable accommodations for, "housing designed for occupancy by, or with supportive services for, persons with disabilities." A jurisdiction can fulfill this second clause in a variety of ways including establishing policies that facilitate the provision of housing that is physically accessible to people with mobility impairments, residential care facilities for individuals with Alzheimer's, housing for persons with AIDS/HIV, and transitional housing that serves homeless with disabilities.

Reasonable Accommodation

The City of St. Helena adopted a reasonable accommodation ordinance in 2015 that provides a procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts) in the application of zoning laws and other land use regulations, policies, and procedures.

A request for reasonable accommodation may be made by any person with a disability, their representative or any entity, when the application of a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities. A person with a disability is a person who has a physical or mental impairment that limits or substantially limits one or more major life activities, anyone who is regarded as having such impairment or anyone who has a record of such impairment. This chapter is intended to apply to those persons who are defined as disabled under the Acts.

A request for reasonable accommodation may include a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice. Requests for reasonable accommodation shall be made in the manner prescribed in Section 17.200.030.

Requests for reasonable accommodation are submitted on an application form provided by the Planning Department, or in the form of a letter, to the Planning Director and should contain the following information:

1. The applicant's name, address, and telephone number.
2. Address of the property for which the request is being made.
3. The current actual use of the property.
4. The basis for the claim that the individual is considered disabled under the Acts.
5. The zoning code provision, regulation or policy that is the subject of the applicant's requested reasonable accommodation, and a narrative and graphic (where applicable) description of the specific accommodation requested.
6. Why the reasonable accommodation is necessary to make the specific property accessible to the individual.

Requests for reasonable accommodation shall be reviewed by the Planning Director if no discretionary permit approval is required other than the request for reasonable accommodation. Requests for reasonable accommodation submitted for concurrent review with another discretionary permit application shall be reviewed by the review authority reviewing the discretionary permit application. The Director shall make a written determination within forty-five (45) days and either grant, grant with modifications, or deny a request for reasonable accommodation in accordance with Section 17.200.060. The written decision to grant or deny a request for reasonable accommodation will be consistent with the Acts and shall be based on a consideration of the following factors:

1. Whether the housing which is the subject of the request will be used by an individual considered disabled under the Acts.
2. Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability under the Acts.
3. Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the town.
4. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a town program or law, including but not limited to land use or zoning.
5. Whether the requested reasonable accommodation would adversely impact surrounding properties or uses.
6. Whether there are reasonable alternatives that would provide an equivalent level of benefit without requiring a modification or exception to the City's applicable rules, standards and practices.
7. Whether the accommodation would alter the significance of a historic structure.

In granting a request for reasonable accommodation, the Planning Director may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings required by subsection A of this section, including but not limited to the following:

1. Inspection of the property periodically, as specified, to verify compliance with this chapter and any conditions of approval.
2. Removal of the improvements, where removal would not constitute an unreasonable financial burden, when the need for which the accommodation was granted no longer exists.
3. Time limits and/or expiration of the approval if the need for which the accommodation was granted no longer exists.
4. Recordation of a deed restriction requiring removal of the accommodating feature once the need for it no longer exists.
5. Measures to reduce the impact on surrounding uses.
6. Measures in consideration of the physical attributes of the property and structures.
7. Other conditions necessary to protect the public health, safety and welfare.

A determination by the Planning Director to grant or deny a request for reasonable accommodation may be appealed to the City Council in compliance with Section 17.08.180.

The City's required finding *"5. Whether the requested reasonable accommodation would adversely impact surrounding properties or uses"* poses a potential constraint to housing for residents with disabilities seeking equal access to housing under the federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts). HCD indicates that, given its importance in addressing barriers to housing for persons with disabilities, reasonable accommodation should not impose discretionary findings similar to that of a Conditional Use Permit, such as impacts to surround uses. Program H-F~~H-F~~ commits the City to update the municipal code to remove this discretionary finding.

Zoning and Land Use

The City of St. Helena allows residential care facilities serving six or fewer persons as a permitted use in the LR-1A, LR, MR, and HR residential zones. For compliance with state law, the City must allow these uses in any zone allowing single-family uses, subject only to the conditions imposed upon residential uses in the same zone. The City currently allows single-family homes in the A-20, W, and WW zones. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.

Residential care facilities serving seven or more persons require the approval of a Conditional Use Permit. A use permit requirement in zones allowing multifamily uses is a constraint to the development of these uses. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.[46]

Program H-F ~~H-F~~ commits the City to updating the municipal code to allow residential care facilities in all zones, subject only to the requirements imposed upon single-family uses; and facilities of seven or more in all zones, subject only to the same requirements as multifamily uses.[47]

[46] *City of St. Helena Municipal Code, Title 17.*
[47] *City of St. Helena Municipal Code, Title 17.*

The City's parking and loading requirements do not have specific provisions related to persons with disabilities, but there is a provision stating that "rest homes, convalescent hospitals, residential care and similar group care facilities" require only one space for each four beds, which is a reduced requirement compared to the two parking spaces required for typical "one-and two-family dwelling units."[48] Consequently, the reduced parking requirements for group care facilities decrease the parking requirements for some disabled persons, but parking requirements for residential development need to serve all disabled persons.

Permits and Processing

The City's permitting and processing procedures do not negatively affect the ability to design or retrofit homes that will be accessible for the disabled or constrain the siting of group homes. The City, however, applies the same process required for other renovations to retrofitting homes for accessibility, and the City does not have a special process for such retrofits.

As discussed above, residential and intermediate care facilities with fewer than six persons are permitted in residential zones. Although care facilities with seven or more persons are permitted with a Conditional Use Permit in the residential zones, no additional permits are required. This is consistent with the City's requirements for other multifamily uses such as condominiums, townhomes, apartments, and dwelling groups containing more than four units, which also require a Conditional Use Permit. There are no additional requirements placed on residential or intermediate facilities.

Building Codes

In 2019, the City of St. Helena adopted the 2019 California Building Code with minor amendments. The changes made to this Code by the City, enumerated in the Governmental Constraints section of this document, do not unfairly treat residential and intermediate care homes differently than other residential uses. Nevertheless, no specific exemptions to the 2019 California Building Code exist for housing for disabled persons. The City of St. Helena does not have local universal design requirements but adopted a reasonable accommodate ordinance in 2015 which provides a reasonable accommodation procedure related to "a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities", including building codes and the issuance of Building Permits.

Definition of Family

The Municipal Code currently (2022) defined "family" as:

"Family" means any of the following groups living together in the same dwelling unit as a single housekeeping unit:

1. Any number of persons related by blood, marriage or legal adoption;

[48] *City of St. Helena Municipal Code, Chapter 17.124: Parking and Loading Requirements*

2. A nuclear family identified by extended cohabitation;

3. A group not exceeding five persons whose interpersonal relationships relating to shared household expenses, duties and private lives are indistinguishable from groups listed in subsections 1 and 2 above.

The definition of family in a jurisdiction's municipal code can pose some challenges for persons with special needs who may have live-in caregivers, group home arrangements, or other arrangements not reflective of the typical nuclear family. Additionally, the definition used by a city can cause confusion or difficulty when applying to programs such as Community Development Block Grants, which use a more inclusive definition of a family unit.

In the previous element, Program 1.K was included to amend the zoning ordinance to define "family" as one or more persons living together as a single housekeeping unit in a dwelling unit, as required by State law. This change has not been made to the Zoning Code, however, all City actions are made in keeping with California State law, as it has precedence over any in-consistent locally adopted land use definitions. The City is undergoing a comprehensive Zoning Code update, which will address the existing outdated adopted definition of "family." Further, Program H-F~~H.F~~ is included in this Housing Element, committing the City to updating this definition specifically.

Spacing or Concentration Requirements

The City of St. Helena does not have any additional spacing or concentration requirements for housing for persons with disabilities. There are no spacing requirements for group homes, residential care facilities, transitional housing facilities, and supportive housing facilities.

In the Service Commercial (SC) and Central Business (CB) districts, supportive housing is permitted only on the upper floors, which is the same requirement imposed on all other residential developments in these zone.

Locally Adopted Ordinances

St. Helena has passed five development-related local ordinances to help ensure growth of quality housing and to create a balance between the need for affordable housing and the market demands of the tourism industry.

Bed and Breakfast Inns

Bed and breakfast inns, a common sight in many tourist-oriented towns like St. Helena, are regulated by a use permit process that requires certain findings to be made, including that:

A. The establishment of a bed and breakfast inn is consistent with the purpose of the general plan, including policies regarding the displacement of rental units in the housing stock.

B. The establishment of a bed and breakfast inn will not be detrimental to a building, structure or feature of significant aesthetic, cultural, architectural or engineering interest or value of a historical nature.

C. The establishment of a bed and breakfast inn is compatible with and will not be detrimental to the character of the neighborhood and surrounding land uses. [49]

Additionally, bed and breakfast inns are required to only use up to four bedrooms, a requirement that helps ensure that larger homes are still partially available for use as a permanent residential dwelling. Such affordances can be considered helpful to special needs groups, such as large households. Given these strict requirements, St. Helena's bed and breakfast inns ordinance does not pose additional constraints to housing and helps limit potential reduction of housing units in the case of a homeowner wishing to convert their residential property to a bed and breakfast.

Short-Term Rentals

Short term rentals are strictly regulated in the City of St. Helena to reduce the impact on the area's already scarce housing inventory. The City allows only twenty-five short-term rental permits at a time with a maximum of four bedrooms in the household being used for short-term rentals. Additionally, the City restricts uses of the propety by guests and enforces additional regulations on sounds and general activities during the hours of 10 P.M. to 7 A.M. Given the strict measures in place, the short-term rentals ordinance doesn't pose additional constraints to housing. Instead, the ordinance incentivizes property owners to use their homes for other uses with less stringent requirements, which may include long-term rentals.

Time-Share Uses

Time-shares are strictly regulated in the City of St. Helena, are considered commercial uses, and are permitted only in commercial zoning districts. Any existing housing stock in the city is prohibited from being converted into a time-share. As such, the time-share ordinance is not a constraint to housing, but instead assists with ensuring residential land is being put to more productive, residential purposes that assist with alleviating the existing housing crisis.

Affordable Housing

The City's affordable housing ordinance is a codified ordinance that specifies how the City will provide density bonuses, concessions, and incentives for the construction of affordable housing projects that are designed for seniors, low-income, very low-income, and moderate-income (in the case of condonminiums) persons and families. The affordable housing ordinance also specifies how the City will grant priority for the provision of water and sewer services to affordable developments, a requirement stated in California Government Code Section 65589.7. The affordable housing ordinance also describes the process in which a person voluntarily donates land to the City for residential development use. The ordinance additionally allows for vehicular parking ratios to be beneath those required by the city, subject to Californai Government Code 65589.7 and a recorded covenant against the property.

[49] *City of St. Helena. St. Helena Municipal Code, Title 17. http://www.codepublishing.com/CA/sthelena/. Accessed January 9, 2023.*

The affordable housing ordinance does not pose any constraint to housing, but instead acts to formalize State mandated programs and laws designed to incentivize affordable housing.

Housing Trust Fund, Housing Impact Fee and Inclusionary/In-Lieu Fee Requirements

In September 2004, the City Council passed Ordinance 2004-7 adding Chapter 17.146 Housing Trust Fund, Housing Impact Fee, and Inclusionary/In-Lieu Fee Requirements to the St. Helena Municipal Code. The regulations are designed so that new non-residential developments and additions are required to pay a housing impact fee and new residential developments containing five units or more are required to include 20 percent of their units as affordable housing, and developments with less than five units pay an in-lieu fee. The fees collected from the nonresidential and residential development then go into a Housing Trust Fund. The use of Housing Trust Fund monies is directed exclusively to "increase and improve the supply of housing affordable to households of moderate, low and very low income" including costs such as land, construction, financing, and reimbursements to the City.[50] The monies are available for both ownership and rental projects and services.

These affordable housing requirements do add additional cost to market rate residential development in the process of creating additional affordable housing in St. Helena. To minimize the impact on the price of market rate housing, the Municipal Code allows developers to submit an "alternative equivalent proposal" and offers a series of concessions or incentives.[51] An "alternative equivalent proposal" enables developers to meet the affordable housing requirements through alternative means like dedicating vacant land as long as the proposed alternative aligns with the purpose of the Municipal Code and is approved by the City Council. Concessions and incentives that are automatically available to residential developers who construct inclusionary units include the opportunity to submit a preliminary development proposal, priority in the City application process, and fee deferment. In addition, the City Council can grant additional concessions and incentives including extra density bonuses, changes to City standards, and monetary assistance. The automatic and discretionary concessions and incentives help expedite the process of building affordable housing and therefore minimize the cost to developers.

~~Building and Development Impact Fees~~

~~The City's building department fee schedule is designed to directly offset the costs incurred by the City when processing and reviewing development applications, and to inspect new construction. Fees are charged when a building permit is issued and are based on building plans and estimated construction costs.~~

~~Development impact fees are charged to new projects in order to offset costs for the construction, expansion, and maintenance of off-site improvements that either were built for the purposes of the new project or were existing improvements from which the new developments will benefit. In the case of St. Helena, impact fees are charged for public safety, civic facilities, water and wastewater services, a drainage, traffic mitigation, and schools. In 2013, the City conducted a comprehensive study and update of all of its development impact fees. As a result, total impact fees for single-family houses decreased from $19.78 per square foot to $16.32 per~~

[50] *St. Helena Municipal Code. 17.146.030*
[51] *St. Helena Municipal Code. 17.146.050*

square foot, a 17.5 percent reduction. Fees for multiple-family development increased from $13.78 per square foot to $21.37 per square foot, a 55 percent increase.

The single-family fee calculations shown in Table 32 are based on an example 2,300 square foot single family residence with three-bedrooms and two-bathrooms with a total construction cost estimate of approximately $920,000 ($400 per square foot).

Table 32 Building Permit and Development Impact Fees, Single-Family Home

Fee Description	Fee Amount	Total
	Building Department	
Permit Fee	$433	$433
	City Impact Fees (per square-foot)	
Public Safety Fee	$1.04	$2,392
Civic Facilities Fee	$1.95	$4,485
Parks Fee	$7.16	$16,468
Water System Fee	$3.05	$7,015
Wastewater System Fee	$0.45	$1,035
Drainage System Fee	$0.73	$1,679
Transportation Fee	$1.94	$4,462
Housing Fee	2.5% of valuation	$23,000
	Other District Fees (per square-foot)	
School District Fee	$3.20	$6,831
	Example Project	

Source: City of St. Helena Planning Department, Mintier Harnish, 2022.
Source: City of St. Helena Planning Department; Mintier Harnish, 2022
Table 33 shows sample fee calculations for a conceptual multi-family development project. The example is an eight unit, three-story project that totals 6,780 square feet.

Table 33 Building Permit and Development Impact Fees, Multiple-Family Development

Fee Description	Fee Amount	Total
Building Department		
Permit Fee	$5,503	$5,503
City Impact Fees (per square-foot)		
Public Safety Fee	$1.04	$7,051
Civic Facilities Fee	$1.95	$13,221
Parks Fee	$12.18	$82,580
Water System Fee	$2.47	$16,747
Wastewater System Fee	$0.66	$4,475
Drainage System Fee	$0.69	$4,678
Transportation Fee	$2.36	$16,001
Housing Fee	2.5% of valuation	$23,000
Other District Fees (per square-foot)		
School District Fee	$3.20	$21,696
Example Project		
Building Size (square feet)	6,780	
Valuation	$1,400,000	
Fees as % of Construction Cost	12.3%	

Source: City of St. Helena Planning Department, Mintier Harnish, 2022.

The multiple-family development impact fees have increased to reflect the costs of the improvements necessary to serve residential development. Without the funds collected through the fees, the City could not afford to make the necessary improvements in infrastructure, and thus the fees to do not represent an undue governmental constraint to housing development. In addition, fee reductions and adjustments for affordable and other housing projects are permitted on a case by case basis, as approved by City Council under Section 3, Chapter 3.32 of the St. Helena Municipal Code.

~~Processing and Permit Procedures~~

~~Typical Processing Procedures by Project Type~~

	~~Single-Family Unit~~	~~Subdivision (20 units)~~	~~Multiple-Family (20 Units)~~
~~Required Permit Procedures~~	~~Ministerial Review - ADU~~ ~~Design Review – new SFD~~	~~Tentative Map~~ ~~Final Map~~ ~~Design Review~~ ~~Initial Environmental Study~~ ~~Environmental Impact Report~~	~~Conditional Use Permit~~ ~~Design Review~~ ~~Initial Environmental Study~~ ~~Mitigated Negative Declaration~~
~~Estimated Total Processing Time~~	~~2 months~~	~~12 months~~	~~9 months~~

~~*Source: City of St. Helena, Mintier Harnish, 2022.*~~

~~Timelines for Permit Procedures~~

~~Type of Approval or Permit~~	~~Typical Processing Time~~	~~Approval body~~
~~Ministerial Review~~	~~2 – 4 weeks~~	~~Planning Director~~
~~Conditional Use Permit~~	~~3 months~~	~~Planning Commission~~
~~Zone Change~~	~~6 months~~	~~Planning Commission & City Council~~
~~General Plan Amendment~~	~~6 months~~	~~Planning Commission & City Council~~
~~Design Review~~	~~3 months~~	~~Planning Commission~~
~~Subdivision Maps~~	~~6 months~~	~~Planning Commission & City Council~~
~~Parcel Maps~~	~~3 months~~	~~Planning Commission~~
~~Initial Environmental Study~~	~~6 months~~	~~Planning Commission & City Council, depending on project~~
~~Environmental Impact Report~~	~~10 months~~	~~Planning Commission & City Council~~

~~*Source: City of St. Helena, Mintier Harnish, 2022.*~~

~~*SB 330*~~

~~On October 9, 2019, Governor Newsom signed into law SB 330, the Housing Crisis Act of 2019. The act amends existing state laws and creates new regulations around the production, preservation and planning of housing. The bill has been in effect since January 1, 2020 and sunsets on January 1, 2025. SB 330 will affect both project planning procedures and community planning outcomes.~~

~~The goal of SB 330 is to create certainty in the development of housing projects, speeding up the review of these projects, preserving affordable housing and preventing certain zoning actions that reduce the availability of housing. SB 330 does the following (not a comprehensive list):~~

- Creates a new vesting process for zoning and land use ordinances, policies, and standards in place at the time a preliminary application is submitted (with limitations);
- Requires that the historic status or designation of any site be determined at the time an application for a discretionary action is deemed complete;
- Prohibits imposing or enforcing non-objective design review standards established after January 1, 2020;
- Limits the number of public hearings to five for housing projects that meet all objective design standards; and
- Prohibits actions that reduce the total zoned capacity for housing (i.e., down-zoning).

A project that meets any of the following criteria per California Government Code Section 65589.5(h)(2)(B) is subject to the provisions of SB 330:

- The project consists of residential units only;
- The project is a mixed-use development consisting of residential and non-residential uses with at least two-thirds of the square footage of the project designated for residential use, including dwelling units and any uses accessory to the residential units; or
- The project is transitional or supportive housing.

New Preliminary Application Form. SB 330 creates a new vesting process for discretionary housing projects during the five-year period of the bill. It achieves this through the creation of a new "preliminary application" process that establishes a new date for the purposes of locking projects into the ordinances, policies, and standards in effect when a preliminary application (including all required information) is submitted and deemed complete. This vesting does not apply to California Environmental Quality Act (CEQA) determinations, including historic resource determinations pursuant to CEQA.

Once a complete Preliminary Housing Development Application is submitted (along with other required applications if applicable), the zoning, design, subdivision, and fee requirements in effect as of that date will remain applicable to the project for the duration of the review and entitlement process, provided that all the following provisions are satisfied:

- Complete discretionary entitlement applications must be submitted and accepted by the Planning Department within 180 days of the Preliminary Housing Development Application being deemed complete;

- If the entitlement applications are deemed incomplete after filing, the application must submit all missing or incomplete items to the Planning Department within 90 days of being notified in writing by Planning Department staff;

- The project may not increase by more than 20 percent in the number of units or total square footage indicated in the Preliminary Housing Development Application, except as the project may be revised using the State Density Bonus; and

- The project must commence construction within 30 months of site permit issuance.

Note that the following modifications may be required even when a Preliminary Housing Development Application is on file:

- Development impact fees, application fees, capacity and connection fees, or other charges may be annually adjusted based on a published cost index;
- Requirements necessary to avoid an adverse impact to public health or safety, or to avoid or lessen an impact under CEQA may be applied; and
- Applicants may submit a new or amended Preliminary Housing Development Application at any time, in which case the requirements in effect at that time shall apply.

The City has adopted an SB 330 process and checklist to streamline the design and approval of by-right multi-family units within the community, in compliance with SB 330.

The processing and permitting procedures in St. Helena are summarized in Table 34 (Timelines for Permit Procedures) and Table 35 (Typical Processing Time by Project Type) and described below using examples of a single-family unit, a multiple-family affordable housing development, and a market rate single family development. Construction of a new single-family unit requires design review approval from the Planning Commission (three months) and a building permit (four weeks) for a total of approximately four months to process.

Table 34 Timelines for Permit Procedures

Type of Approval or Permit	Typical Processing Time	Approval body
Ministerial Review	2 4 weeks	Planning Director
Conditional Use Permit	3 months	Planning Commission
Zone Change	6 months	Planning Commission & City Council
General Plan Amendment	6 months	Planning Commission & City Council
Design Review	3 months	Planning Commission
Subdivision Maps	6 months	Planning Commission & City Council
Parcel Maps	3 months	Planning Commission
Initial Environmental Study	6 months	Planning Commission & City Council, depending on project
Environmental Impact Report	10 months	Planning Commission & City Council

Source: City of St. Helena, Mintier Harnish, 2022.

Table 35 – Typical Processing Procedures by Project Type

	Single-Family Unit	Subdivision (20 units)	Multiple-Family (20 Units)
Required Permit Procedures	Ministerial Review – ADU Design Review – new SFD	Tentative Map Final Map Design Review Initial Environmental Study Environmental Impact Report	Conditional Use Permit Design Review Initial Environmental Study Mitigated Negative Declaration
Estimated Total Processing Time	2 months	12 months	9 months

Source: City of St. Helena, Mintier Harnish, 2022.

Constraints to Housing for Persons with Disabilities

On January 1, 2002, SB 520 went into effect, requiring local jurisdictions to analyze potential governmental constraints to the development, improvement, and maintenance of housing for persons with disabilities as part of a jurisdictions housing element update. Under SB 520, housing elements must also include one of the following: 1) a program to remove constraints, or 2) provide reasonable accommodations for, "housing designed for occupancy by, or with supportive services for, persons with disabilities." A jurisdiction can fulfill this second clause in a variety of ways including establishing policies that facilitate the provision of housing that is physically accessible to people with mobility impairments, residential care facilities for individuals with Alzheimer's, housing for persons with AIDS/HIV, and transitional housing that serves homeless with disabilities.

Reasonable Accommodation

The City of St. Helena adopted a reasonable accommodation ordinance in 2015 that provides a procedure to request reasonable accommodation for persons with disabilities seeking equal access to housing under the federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts) in the application of zoning laws and other land use regulations, policies, and procedures.

A request for reasonable accommodation may be made by any person with a disability, their representative or any entity, when the application of a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities. A person with a disability is a person who has a physical or mental impairment that limits or substantially limits one or more major life activities, anyone who is regarded as having such impairment or anyone who has a record of such impairment. This chapter is intended to apply to those persons who are defined as disabled under the Acts.

A request for reasonable accommodation may include a modification or exception to the rules, standards and practices for the siting, development and use of housing or housing-related facilities that would eliminate

regulatory barriers and provide a person with a disability equal opportunity to housing of their choice. Requests for reasonable accommodation shall be made in the manner prescribed in Section 17.200.030.

Requests for reasonable accommodation are submitted on an application form provided by the Planning Department, or in the form of a letter, to the Planning Director and should contain the following information:

1. The applicant's name, address, and telephone number.
2. Address of the property for which the request is being made.
3. The current actual use of the property.
4. The basis for the claim that the individual is considered disabled under the Acts.
5. The zoning code provision, regulation or policy that is the subject of the applicant's requested reasonable accommodation, and a narrative and graphic (where applicable) description of the specific accommodation requested.
6. Why the reasonable accommodation is necessary to make the specific property accessible to the individual.

Requests for reasonable accommodation shall be reviewed by the Planning Director if no discretionary permit approval is required other than the request for reasonable accommodation. Other Review Authority. Requests for reasonable accommodation submitted for concurrent review with another discretionary permit application shall be reviewed by the review authority reviewing the discretionary permit application. The Director shall make a written determination within forty-five (45) days and either grant, grant with modifications, or deny a request for reasonable accommodation in accordance with Section 17.200.060. The written decision to grant or deny a request for reasonable accommodation will be consistent with the Acts and shall be based on a consideration of the following factors:

1. Whether the housing which is the subject of the request will be used by an individual considered disabled under the Acts.
2. Whether the request for reasonable accommodation is necessary to make specific housing available to an individual with a disability under the Acts.
3. Whether the requested reasonable accommodation would impose an undue financial or administrative burden on the town.
4. Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a town program or law, including but not limited to land use or zoning.
5. Whether the requested reasonable accommodation would adversely impact surrounding properties or uses.
6. Whether there are reasonable alternatives that would provide an equivalent level of benefit without requiring a modification or exception to the City's applicable rules, standards and practices.
7. Whether the accommodation would alter the significance of a historic structure.

In granting a request for reasonable accommodation, the Planning Director may impose any conditions of approval deemed reasonable and necessary to ensure that the reasonable accommodation would comply with the findings required by subsection A of this section, including but not limited to the following:

1. Inspection of the property periodically, as specified, to verify compliance with this chapter and any conditions of approval.
2. Removal of the improvements, where removal would not constitute an unreasonable financial burden, when the need for which the accommodation was granted no longer exists.
3. Time limits and/or expiration of the approval if the need for which the accommodation was granted no longer exists.
4. Recordation of a deed restriction requiring removal of the accommodating feature once the need for it no longer exists.
5. Measures to reduce the impact on surrounding uses.
6. Measures in consideration of the physical attributes of the property and structures.
7. Other conditions necessary to protect the public health, safety and welfare.

A determination by the Planning Director to grant or deny a request for reasonable accommodation may be appealed to the City Council in compliance with Section 17.08.180.

- The City's required finding *"5. Whether the requested reasonable accommodation would adversely impact surrounding properties or uses"* poses a potential reasonable accommodation ordinance is not a constraint to housing for residents with disabilities seeking equal access to housing under the federal Fair Housing Act and the California Fair Employment and Housing Act (the Acts) in the application of zoning laws and other land use regulations, policies and procedures. HCD indicates that, given its importance in addressing barriers to housing for persons with disabilities, reasonable accommodation should not impose discretionary findings similar to that of a Conditional Use Permit, such as impacts to surround uses. Program H-F commits the City to update the municipal code to remove this discretionary finding.

Zoning and Land Use

The City of St. Helena allows residential care facilities serving six or fewer persons as by-right uses in the LR-1A, LR, MR, and HR residential zones. For compliance with state law, the City must allow these uses in any zone allowing single-family uses, subject only to the conditions imposed upon residential uses in the same zone. The City currently allows single-family homes in the A-20, W, and WW zones. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.

~~Residential care facilities serving seven or more persons require the approval of a Conditional Use Permit. A use permit requirement in zones allowing multifamily uses is a constraint to the development of these uses. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.[52]~~

~~Program H-F commits the City to updating the municipal code to allow residential care facilities in all zones, subject only to the requirements imposed upon single-family uses; and facilities of seven or more in all zones, subject only to the same requirements as multifamily uses.~~

~~The City of St. Helena allows both intermediate care and residential care facilities serving six or fewer persons as by-right uses in the LR-1A, LR, MR, and HR zones, as required by SB520. Intermediate care and residential care facilities serving seven or more persons require the approval of a Conditional Use Permit.[53]~~

~~The City's parking and loading requirements do not have specific provisions related to persons with disabilities, but there is a provision stating that "rest homes, convalescent hospitals, residential care and similar group care facilities" require only one space for each four beds, which is a reduced requirement compared to the two parking spaces required for typical "one-and two-family dwelling units."[54] Consequently, the reduced parking requirements for group care facilities decrease the parking requirements for some disabled persons, but parking requirements for residential development need to serve all disabled persons.~~

~~*Permits and Processing*~~
~~The City's permitting and processing procedures do not negatively affect the ability to design or retrofit homes that will be accessible for the disabled or constrain the siting of group homes. The City, however, applies the same process required for other renovations to retrofitting homes for accessibility, and the City does not have a special process for such retrofits.~~

~~As discussed above, residential and intermediate care facilities with fewer than six persons are allowed by-right. Although care facilities with seven or more persons are permitted with a Conditional Use Permit in the residential zones, no additional permits are required. This is consistent with the City's requirements for other multifamily uses such as condominiums, townhomes, apartments, and dwelling groups containing more than four units, which also require a Conditional Use Permit. There are no additional requirements placed on residential or intermediate facilities.~~

~~*Building Codes*~~
~~In 2019, the City of St. Helena adopted the 2019 California Building Code with minor amendments. The changes made to this Code by the City, enumerated in the Governmental Constraints section of this document, do not unfairly treat residential and intermediate care homes differently than other residential uses. Nevertheless, no specific exemptions to the 2019 California Building Code exist for housing for disabled persons. The City of St. Helena does not have local universal design requirements but adopted a reasonable~~

~~[52] City of St. Helena Municipal Code, Title 17.~~
~~[53] City of St. Helena Municipal Code, Title 17.~~
~~[54] City of St. Helena Municipal Code, Chapter 17.124: Parking and Loading Requirements~~

accommodate ordinance in 2015 which provides a reasonable accommodation procedure related to "a zoning law or other land use regulation, policy or practice acts as a barrier to fair housing opportunities", including building codes and the issuance of Building Permits.

9. Opportunities for Energy Conservation

Government Code Section 65583(a) (7) requires the "analysis of opportunities for energy conservation with respect to residential development." [55] This is important due to the key role played by energy efficiency in determining the relative affordability of housing. Lower rates of energy usage decrease utility costs for residents, making a housing unit more affordable. The discussion that follows outlines current State policies and development standards along with local City policies that promote energy conservation for new and existing development in the City of St. Helena.

Instituted by legislative action in 1978 to reduce overall energy consumption statewide, the California Building Energy Efficiency Standards set thresholds and guidelines for energy efficiency for both residential and nonresidential construction. The revised standards for 2022 went into effect August 11, 2021, under Title 24, Part 6, of the California Code of Regulations. Title 24 is otherwise known as the California Building Standards Code. The energy requirements of the new State code are significantly more stringent than the prior codes (heat pump requirements for single-family and multi-family homes and businesses; electricity-ready requirements for single-family homes; and new solar power requirements for high-rises, hotels/motels, tenant spaces, offices, stores, restaurants, schools, and civic spaces) and are intended to progress to 100 percent clean electricity and carbon neutrality by 2050 or earlier.

In addition to the Building Energy Efficiency Standards, Part 11 of Title 24 contains California's Green Building Standards Code (CALGreen). St. Helena adopted the revised standards in 2019, with amendments to require all new indoors plumbing fixtures to meet the 20 percent reduction in water use, a 20 percent reduction in cement use in foundations, and certified U.S. EPA Phase II certified wood-burning devices or pellet-fueled device. These amendments are not considered an impediment to housing development.

On a local level, the 2040 City of St. Helena General Plan Climate Change Element addresses energy conservation for residential development by including goals such as:

- reducing energy demand through improved building and design;
- reducing consumption and divert waste; and
- increasing community engagement and advocacy.

The City participates in an AB811 program that allows commercial and residential property owners to finance renewable energy, water efficiency, and energy efficiency improvements through a property tax assessment. Additionally, the City of St. Helena is currently implementing a program to reduce GHG emissions from City facilities and has an Active Transportation and Sustainability Committee and a Water Advisory Board that oversee its natural resources for energy conservation.

[55] *HCD Building Blocks for Effective Housing Elements, "Opportunities for Energy Conservation." Accessed September 24, 2008. http://www.hcd.ca.gov/hpd/housing_element/index.html.*

The City has included Programs H-RR ~~H-QQ~~ through H-UU ~~H-TT~~ to educate, encourage, and fund pushes for energy conservation within the community. Through education provided by the City, residents, contractors, and property owners can learn about various ways to integrate energy conservation programs into St. Helena residential developments. The City also intends to stay up to date on State efficiency and building code standards to ensure new and rehabilitated housing developments provide future owners and tenants with long-term cost-savings and energy efficiency.[56] Additionally, to further encourage energy efficiency, the City also aims to explore the possibility of offering low-interest loans for energy conservation measures, in addition to continuing to participate in AB-811 programs to finance local efforts.

[56] *See St. Helena Municipal Code Chapter 15.18*

10. Zoning for a Variety of Housing Types

Key Findings

- St. Helena's Zoning Code allows for a variety of housing types in the City including multiple-family units, transitional and supportive housing, single-room occupancy units, manufactured and mobile homes, and accessory dwelling units. However, to comply with Section 65915 through 65918 of the California Government Code, St. Helena should amend the Zoning Code to reflect the new maximum density bonus provisions that were adopted by the State in 2020. Additionally, St. Helena must also amend the Zoning Code to allow for low barrier navigation centers, consistent with State law.

Multiple-Family Rental Housing

The St. Helena Zoning Code allows multiple-family dwellings ~~by right~~subject to design review in the High Density Residential (HR) zoning district.~~ Projects permitted by right require only routine approvals and are subject to design review by the Planning Commission.~~ In addition, the Medium Density Residential (MR) district permits the construction of attached duplex or triplex units with a Conditional Use Permit.[57] Multiple-family rental housing is subject to subjective design review, which poses a constraint to development. For more information regarding the design review process and development standards applied to multi-family housing, see the Governmental Constraints section.

Density Bonuses for Affordable Housing

Per California Government Code Sections 65915 through 65918, local governments are required to provide density bonus provisions to projects that comply with specific standards. Legislation approved in 2020 increased the maximum density bonus amounts for very-low-, low-, and moderate-income housing. The California Government Code describes how maximum densities shall be calculated for very low-, low-, and moderate-income housing in a tabular format. Additionally, local governments are also required to provide one or more incentives for qualifying projects and are required to accept an incentive proposed by a developer unless the incentive proposal is found to cause environmental harm, a health and safety issue, a cost reduction, a detriment to historical property, or otherwise contrary to law. Both density bonuses and incentives are granted based on the number of affordable units present in each project.

The City of St. Helena currently establishes density bonus provisions for affordable housing in Chapter 17.144 (Affordable Housing). The provisions in that Chapter do not reflect the new maximum density bonus tier framework that was adopted by the State in 2020. Because of this, the City is not currently in compliance and has included Program H-F~~H-G~~ to commit the City to amend the Zoning Code for compliance with California Government Code Sections 65915 through 65918. The City is currently (~~2022~~2023) ~~updating~~ undertaking a Comprehensive Zoning Code Update. Density bonus provisions in the Draft Zoning Code have been revised for

[57] *City of St. Helena. St. Helena Municipal Code, Title 17.*

compliance with State law. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023. ~~the Affordable Housing Chapter for compliance with State law as part of a comprehensive Zoning Code update.~~

Housing for Permanent and Seasonal Agricultural Employees

Sections 17021.5 and 17021.6 of the California Health and Safety Code establish specific requirements for the permitting of agricultural employee housing in a jurisdictions' zoning code. Specifically, Section 17021.5 mandates that "employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure with a residential land use." [58] Furthermore, designated employee housing, as defined above, cannot be subject to Conditional Use Permit requirements, zoning variance, fees, taxes, or any other requirement other than those pertaining to a traditional single-family structure. Section 17021.6 pertains to larger employee housing facilities featuring a maximum of 36 beds in group quarters, or 12 single-family units. Under this legislation, such units are deemed an agricultural land use and cannot be subject to any restrictions, conditional use requirements, zoning variance, fees, taxes, or other requirements not imposed on other agricultural uses in the same zone.

The City is in compliance with Sections 17021.5 or 17021.6 of the California Health and Safety Code. The A-20, AP, and W zoning districts allow large employee housing facilities (12 units or 36 beds) by right. Whereas, the WW, LR-1A, LR, MR, and HR zoning districts allow agriculture employee housing for six or fewer persons ~~by-right~~subject to design review. Housing for permanent and seasonal agricultural employees is subject to subjective design review, which poses a significant constraint to development. Program H-F ~~H-F is included to commit~~commits the City to amending the Zoning Code to replacing subjective design review with objective design standards and SB 330-compliant streamlined review. The City is currently (2023) undertaking a Comprehensive Zoning Code Update. The Draft Zoning Code incorporates objective development and design standards for residential development. These standards will apply to housing for permanent and seasonal agricultural employees. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023.~~.~~

Zoning for Emergency Shelters, Transitional Housing, and Supportive Housing

AB-139 requires local government to identify a zone(s) where emergency shelters are allowed by-right without a conditional use or other discretionary permit. Local governments are authorized to impose only those development standards that apply to residential or commercial development within the same zone. However, a local government may impose specified objective standards, including standards for off-street parking based on demonstrated need, as specified. The intent of these regulations is to help streamline the development of varying housing types.

AB-139 requires the need for emergency shelter to be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time count, the number of shelter beds available on a year-round and seasonal basis, the number of beds that go unused on an average monthly basis, and the percentage

[58] *California Government Health and Safety Code 17021.5 (b)*

of those in emergency shelters that move to permanent housing. The bill also requires sufficient parking for employees and one space per two beds in the shelter. Under AB-139 and California Government Code Section 65651, local governments shall allow supportive and transitional housing as a by-right use in all districts where single-family and multiple-family dwelling unit uses are allowed. Additionally, the State requires that these uses ~~shall~~ be subject only to those regulations that apply to other residential dwellings (i.e., single-family dwellings, multiple-family dwellings) of the same type in the same district.

The City is in compliance with State laws related to emergency shelters, supportive housing, and transitional housing. ~~Currently, t~~The Zoning Code allows both supportive and transitional housing by-right in all residential zoning districts, and allowed in non-residential and mixed use zones subject to the same requirements imposed upon residential uses. ~~Additionally, e~~Emergency shelters are identified as a by-right use in the I and SC zoning districts. According to a Point in Time Count provided by the Chief of Police, there is one homeless person who resides in St. Helena. There are several parcels in these zones that can accommodate an emergency shelter, including APN 009-580-022-000 (I zoning district) and APN 009-194-005-000 (SC zoning district). These parcels are vacant, habitable, and in proximity to transportation and services. Combined, they total 1.48 acres and can provide capacity for 15 beds, by conservative assumption of 10 beds/acre. Emergency shelters, transitional housing, and supportive housing are subject to subjective design review, which poses a significant constraint to development. Program H-F commits ~~H-F is included to commit~~ the City to amending the Zoning Code to replacing subjective design review with objective design standards and SB 330-compliant streamlined review through the currently ongoing (2023) Comprehensive Zoning Code Update. The Draft Zoning Code (released October 2022) incorporated objective development and design standards for residential development. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023.

Residential Care Facilities

California Government Code Section 65583 requires that housing elements provide a program to "address and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing for persons with disabilities. The program shall remove constraints to and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities." In line with encouraging the development of housing for those with disabilities, the State requires that small, licensed residential care facilities (defined as facilities with six or fewer residents) be allowed "by right" in all residential zones. Additionally, the State, through HCD, requires that cities consider constraints to reasonable accommodation for large, licensed residential care facilities (defined as facilities with seven or more residents).[59]

The City of St. Helena allows ~~both intermediate care and~~ residential care facilities serving six or fewer persons as by-right uses in ~~all~~ the LR-1A, LR, MR, and HR residential zones.~~,~~ ~~in~~ For compliance with state law, the City

[59] *HCD Building Blocks for Effective Housing Elements, "Constraints for People with Disabilities." Accessed May 19, 2022. https://www.hcd.ca.gov/community-development/building-blocks/constraints/constraints-for-people-with-disabilities.shtml*

must allow these uses in any zone allowing single-family uses, subject only to the conditions imposed upon residential uses in the same zone. The City currently allows single-family homes in the A-20, W, and WW zones. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones. Just like all other residential uses, residential care facilities are subject to design review, which poses a significant constraint to development. Program H-F H-F is included to commit the City to amending the Zoning Code to replacing subjective design review with objective design standards and SB330-compliant streamlined review through the currently ongoing (2023) Comprehensive Zoning Code Update. The Draft Zoning Code (released October 2022) incorporated objective development and design standards for residential development. The Comprehensive Zoning Code Update is scheduled for adoption in fall 2023.Intermediate care and r

Residential care facilities serving seven or more persons require the approval of a Conditional Use Permit. A use permit requirement in zones allowing multifamily uses is a constraint to the development of these uses. The City should revise the municipal code to allow residential care facilities of six or fewer in these zones.[60]

Program H-F commits the City to updating the municipal code to allow residential care facilities in all zones, subject only to the requirements imposed upon single-family uses and facilities of seven or more in all zones, subject only to the same requirements as multifamily uses.

Low Barrier Navigation Centers

California Government Code Section 65660 identifies low barrier navigation centers are facilities that focus on moving people into permanent housing and connecting temporary residents with opportunities for income, public benefits, health services, shelter, and housing. Similar to displaced persons shelters, these facilities are intended to accommodate people with disabilities, pets and their owners, partners (if not a gender-specific site), the storage of possessions, and survivors of domestic violence. Specifically, the State mandates that low barrier navigation centers have services "to meet the diverse needs of (the) population." As of 2018, low barrier navigation centers are allowed, subject to design review, by right wherever multiple-family dwellings and mixed-use development are allowed. In addition, local governments may not impose parking requirements onto low barrier navigation centers.

The City is not currently in compliance and has included Program H-F H-G to commit the City to amend the Zoning Code for compliance with California Government Code Section 65660. In updating the Code the City shall list low barrier navigation facilities as allowed by-right wherever multiple-unit dwellings and mixed-use development are allowed.

Single Room Occupancy (SRO)

Single-room occupancy residential units are a traditional form of affordable housing for very low- and low-income individuals. These units consist of a single room, often between 80 and 250 square feet in size, with or without cooking and sanitary facilities, that is rented out, often on a daily, weekly, or monthly basis. The St.

[60] *City of St. Helena Municipal Code, Title 17.*

Helena Municipal Code currently permits single-room occupancy type units in the form of Lodging Houses serving up to two paying occupants in an owner-occupied dwelling, as an accessory use in the LR and MR zoning districts. The HR zoning district currently allows single room occupancy units, subject to design review ~~by-right~~. As defined under Chapter 17.04 of the Municipal Code, lodging houses are buildings other than hotels, motels or bed and breakfast inns, where individuals can pay a rent in exchange for accommodations, including room and board, or board alone. Lodging houses serving more than two and up to five occupants require a use permit. Accessory structures featuring cooking and sanitation facilities are required to meet design and building standards like those of standard single-family and second units. Units without such facilities are subject to significantly fewer requirements and are more likely to address very low- and low-income housing needs.[61]

Factory Built Housing and Mobile Homes

Government Code Section 65852.3(a) requires that manufactured and mobile homes, including the lots on which they are installed, meeting certain standards of construction and be subject to the same development standards that apply to conventional, stick built, single-family homes.[62] In accordance with this legislation, the St. Helena Municipal Code, Title 17, defines a single-family dwelling to include a "mobilehome constructed to meet 1976 HUD standards, when placed on a permanent foundation, which is designed or used exclusively as a residence, including only one dwelling unit." [63] Mobile units meeting the above definition are permitted under single-family site development standards in all zones that allow single-family housing units ~~by right~~.

In addition, the Low Density Residential (LR), Low Density Residential One Acre Minimum (LR-1A), Medium Density Residential (MR) and High Density Residential (HR) districts specifically permit as an allowed use, permanent mobile homes constructed in accordance with the 1974 safety standards and installed on a permanent foundation. Chapter 17.100 of the Municipal Code sets forth requirements for the Mobilehome Park Overlay (MHP) zoning district that applies the State Mobilehome Parks Act to the establishment and operation of mobilehome parks within the boundaries of the City of St. Helena.[64] Under these provisions of the Municipal Code, St. Helena fully adheres to the State standards regarding manufactured and mobile homes, and mobile home parks. Factory built housing and mobile homes are subject to subjective design review, which poses a significant constraint to development. Program H-F ~~H-F~~ is included to commit the City to amending the Zoning Code to replacing subjective design review with objective design standards and SB 330-compliant streamlined review through the currently ongoing (2023) Comprehensive Zoning Code Update, scheduled for adoption in fall 2023. The Draft Zoning Code (released October 2022) incorporated objective development and design standards for residential development in compliance with State law.~~.~~

[61] *City of St. Helena. St. Helena Municipal Code, Title 17.*
[62] *GCS 65852.3(a) standards include the constructed or purchased after October 1976, certified under the National Manufactured Housing Construction and Safety Standards Act of 1974, and installed on a foundation system pursuant to Section 18551 of the Health and Safety Code.*
[63] *City of St. Helena. St. Helena Municipal Code, Title 17.*
[64] *City of St. Helena. St. Helena Municipal Code, Title 17.*

Accessory Dwelling Units

The St. Helena Zoning Code allows accessory dwelling units (ADUs) in all residential zoning districts, in compliance with California Government Code Sections 65852.2 and 65852.22. Accessory dwelling units (ADUs) are defined as attached or detached dwelling units that provide independent living facilities on the same parcel as a legal single-unit or multiple-family unit dwelling, and which include permanent provisions for living, sleeping, eating, cooking, and sanitation. Due to the lower cost of construction and reduced environmental impact, the State has enacted many laws aimed at incentivizing the development of ADUs to help combat the worsening housing crisis. The State requires local governments to treat all ADUs that comply with specific standards as ministerial approvals. Local governments reserve the exclusive right to impose specific design and development standards, which include, but are not limited to setbacks, minimum and maximum parcel size, and maximum height. Second units are exempt from the GMS in Municipal Code Section 17.152.040.

The St. Helena Zoning Code allows ADUS in all residential zoning districts, however, toOn January 10, 2023, the City adopted a new ADU Ordinance for achieve compliance with California Government Code Sections 65852.2 and 65852.22. The City now permits ADUs or JADUs on any lot that is zoned to allow single-family dwelling residential use or multifamily dwelling residential use (including all residential, mixed-use, and agriculturally zoned parcels), the City must allow ADUs in all zones that allow for residential uses, including the AP Zone, mixed-use and commercial zones. . Additionally, the several areas of Chapter 17.116.030 need to be revised for compliance with State law. This includes, but is not limited to, The updated Ordinance also addressed compliance issues related to the definition of a cooking facility, definition of an efficiency kitchen, allowing both an ADU and JADU for conversions on a lot with an existing or proposed single-family dwelling, separate conveyance of an ADU or JADU, and restricting bedroom count, to meet the requirements of State law.

The City is currently undertaking a Comprehensive Zoning Code Update that will address theseany remaining compliance issues that HCD may find in their review of the newly Adopted ADU Ordinance. Program H-F in this Housing Element commits the City to revising the code for additional compliance with State law by 2026, though the City expects to adopt the Zoning Code Update in summer/fall 2023.

11. Housing Resources

Future Housing Need

State Housing Element law requires that a local jurisdiction accommodate a share of the region's projected housing needs for the planning period, called the Regional Housing Needs Allocation (RHNA). Compliance with this requirement is measured by the City's ability to providing adequate land with adequate density and appropriate development standards to accommodate the RHNA. The Association of Bay Area Governments (ABAG), as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within the region.

For the sixth Housing Element cycle, the City of St. Helena has been allocated a RHNA of 256 units, divided into four income levels as follows:

- Very Low Income: 104 units (41 percent)[65]
- Low Income: 59 units (23 percent)
- Moderate Income: 26 units (10 percent)
- Above Moderate Income: 67 units (26 percent)

The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units by income category.

Credits Towards RHNA

Projects with housing units approved or permitted that would not be occupied before the start of the planning period can be credited towards meeting the City's RHNA. These units can count towards the RHNA based on affordability and unit count provided it can be demonstrated that the units can be built within the planning period of February 2023 through February 2031. Affordability (income category) is based on the actual or projected sale prices, rent levels, or other mechanisms establishing affordability of the units within the project. In addition, the City can project the number of Accessory Dwelling Units (ADUs) that may be built between 2023 and 2031, based on trends of ADU permitting during the last three years.

Pending or Approved/Entitled Projects

Currently there is one single-family residence and four moderate-income units, not to exceed 120 percent of the AMI, that are approved and undergoing building permit processing. In addition, there are 87 units that are pending planning/entitlement approval under the Hunter Subdivision project. While the Hunter Subdivision

[65] The City has a RHNA allocation of 10~~34~~ very low income units (inclusive of extremely low income units). Pursuant to State law (AB 2634), the City must project the number of extremely low income housing needs based on Census income distribution or assume 50 percent of the very low income units as extremely low. Therefore, the City generally estimates 52 extremely low and 5~~21~~ very low income units.

project is proposing approximately 25 affordable units, because the affordable agreements are not in place at the time of Housing Element, all unit credits were assumed to be above moderate.

On February 7, 2023, the Planning Commission approved a resolution recommending that the City Council approve t~~T~~he Hunter Subdivision project ~~was approved by the Planning Commission on February 7, 2023 and~~. The Project is going before the City Council on May 1, 2023 where it is anticipated to receive ~~planning~~City Council approval ~~in the near future~~. ~~The Final Environmental Impact was released in October 2022 and the project is scheduled for hearing before the City's Planning Commission in February of 2023.~~ Once approved by the City Council, the applicant will need to record the tentative tract map with Napa County Recorders Office which is expected in the fall of 2023 and then submit for final map approval by the City Council in late 2023 to early 2024. The project may then undergo Design Review which could be completed within 12 months of final map approval; with the issuance of building permits expected in 2025. As referenced in Chapter 8, *Non-Governmental and Governmental Constraints*, recent trends show building permits were issued within four months of entitlement approval for recent housing unit developments, with many projects receiving building permits within a week of entitlement approval. Program H-A further ensures the City is committed to supporting the H~~h~~unter Subdivision project through completion and finding alternative solutions if the project is not meeting timelines for the 6th Cycle. As an alternate strategy should there be delays with the Hunter Subdivision beyond control of the City, such as developer financing challenges, ~~The~~the City has also included surplus capacity of 116 units in the above moderate-income category to ensure capacity to meet the RHNA is sustained throughout the planning period. Table 43 details the pending and entitled projects with housing units.

~~Table 36~~Table 43 Pending and Entitled Projects

Project Number	Address	APN	Zoning	Project Description	Net Units
PL20-046	777 Pratt Ave.	009-030-060	Twenty-acre Agriculture District (A-20)	Construction of a single-family residence	1 above moderate-income
PL20-015	963 Pope St.	009-090-012/013	Medium Density Residential	Construction of four (4) new deed restricted affordable housing units on a site with one (1) existing deed restricted unit.	1 moderate and 4 lower-income
#2010-40	Terminus of Adams Street	009-030-057	Medium Density Residential	Hunter Subdivision Tentative Map to subdivide the 16.9-acre parcel into 51 single-family lots and a 3.4-acre multi-family parcel. The applicant intends to construct 51 single-family residences, 11 ADUs, and 25 multi-family units.	87 above moderate-income*

**The project is subject to Inclusionary Housing requirements with 20% affordable housing.*

Projected Accessory Dwelling Units

Pursuant to Government Code Section 65583.1, the City can satisfy its regional housing need using ADU and junior accessory dwelling unit (JADU) trends and existing resources and incentives that promote their development. Using 2018-2021 data on ADUs/JADUs, the City has issued permits for approximately 9 ADUs on

average. Extending this trend over the next 8 years, the City can assume approximately 72 ADU units will be permitted over the next planning period. Feedback from public outreach and research on ADU rental prices indicated that ADUs are typically rented at market rate and should be considered above moderate.

Remaining RHNA

Accounting for the entitled, approved and pending projects, as well as projected ADUs, the City has a remaining RHNA of approximately 184 units, including 159 lower- and 25 moderate-income units. Existing pending and approved projects and ADU trends currently meets the City's above moderate RHNA requirement. Table 44 details the existing progress towards the 6th cycle RHNA and the remaining RHNA that the City must demonstrate the availability of sites with appropriate zoning and development standards.

~~Table 37~~Table 44 **Progress Towards RHNA**

Income/ Affordability Category	RHNA Allocation	Pending or Approved	Estimated ADUs	Remaining RHNA
Lower	163	4	0	159
Moderate	26	1	0	25
Above Moderate	67	88	72	0
Total	256	92	72	184

Residential Site Inventory

Following the analysis of RHNA credits, specific sites throughout the city were considered for potential for housing development. Site selection for the residential site inventory started with City owned sites where residential development is in line with short-term City goals, then vacant and nonvacant sites zoned for residential use, and lastly sites that could be rezoned to accommodate residential development or residential development at a higher density. Several constraints were considered for each site, including environmental concerns, utility or infrastructure access, feasibility of redevelopment during the next planning period, and realistic capacity assumptions. Sites identified for lower income housing must meet certain density and site requirements, including a minimum density of 20 units per acre, parcel size between 0.5 and 10 acres, and access to high performing schools, jobs, amenities, health care facilities, and grocery stores. Zoning designations with allowable density appropriate for lower income housing capacity include Mixed Use (12-20 du/ac) and High Density Residential (16-26 du/ac).

City-Owned Sites

A review of City-owned properties for sites that are feasible for housing and reflect City priorities was conducted by the City Council in 2021. There are three City-owned properties (1480 Main Street, 1572 Railroad Avenue, and Adams Street/Library Lane) where near-term affordable housing development is in line with community and City priorities for these sites. In 2015, Vernazza Wolfe Associates, Inc conducted a *Feasibility Analysis and Comparison of Sites for New Affordable Housing Development* which looked at site feasibility and

capacity for each of the three City-owned sites. The study evaluated potential risks and time to develop each site and identified the number of units, cost per unit, and funding gaps associated with each site. The analysis determined the three City-owned sites included in the site inventory are suitable for development of housing with 100 percent of units dedicated to lower-income housing. The capacity analysis factored in the size of the site, buildable footprints, maximum allowable floor area ratio and height, a ground-floor commercial assumption, and required open and support services spaces. The inventory incorporated the 2015 site feasibility and capacity analysis and revised certain assumptions as needed based on land use changes and new density bonus law. The City is interested in redeveloping these sites and intends to conduct studies to determine the most efficient use of these sites for housing and proceed with the findings for housing development by 2025, consistent with Program H-L. In 2022, the City hired an appraiser to get the most current real estate valuation of all city surplus sites. The City is engaging the services of a consultant in spring 2023 to help begin the surplus land act process.

Site 1: 1480 Main Street (APN 009-211-016)



~~Table 38~~Table 45 Site 1 Summary

Current Use	Fire Stations and Vacant City Hall Structures
Parcel Size	1.66 acres (0.9 acres available for redevelopment)
Existing General Plan Land Use	Central Business and Public/Quasi-Public

Existing Zoning	Public/Quasi-Public
Proposed Land Use and Zoning	Mixed-Use
Allowed Density	12 to 20 units/acre
Site Capacity	22 units
Assumed Capacity and Income Category	6 Lower Income units

Site 1 is a 1.66-acre property owned by the City of St. Helena located at 1480 Main Street. City goals for the site include redevelopment of the portion of the site fronting Main Street with a visitor-serving commercial uses as a primary use and housing as a secondary use. ~~All uses proposed for redevelopment on site are currently vacant. Current uses on site include~~The site is currently developed with the St. Helena Fire Department on the northern portion of the site and a vacant one-story building on the southwestern portion of the site. Only the vacant components of the site are proposed for redevelopment. A General Plan Amendment and Rezone change is proposed to change the land use and zoning designation from Central Business & Public/Quasi-Public to Mixed-Use. While the Mixed-Use Zone could potentially support 100 percent commercial development, the City has identified this site as suitable for mixed use housing development with intentions to develop.

The 2015 site feasibility and capacity analysis evaluated housing capacity of the site by analyzing current and adjacent land uses and zoning, site topography, environmental sensitivities, service connection feasibility, as well as setback, height, lot coverage, FAR, density, parking, and landscape requirements. The analysis identified two development scenarios for the site, resulting in a maximum capacity of approximately 44 units in scenario one or 46 units in scenario two. The assessment also accounted for the required number of-site parking spaces, 82 spaces in scenario one and 88 in scenario two. No environmental constraints or service connection obstacles were identified on the site. According to the analysis, development of 44 housing units would result in a building lot coverage of approximately 39 percent in both development scenarios. In the Draft Zoning Code t~~T~~here is currently no standard for building coverage in the proposed Mixed-Use zone, therefore the resulting lot coverage would not conflict with the City's Zoning Ordinance. Due to the existing Fire Department, ~~T~~the site developable area is assumed to be approximately 0.9 acres~~, with the removal of~~ (the location of the vacant building on the southwestern portion of the site), which is approximately half the area assumed in the 2015 analysis. The inventory conservatively assumes a maximum of 6 housing units, as the site area could approximately 22 units based on half the units assumed in the 2015 study.

Site 2: 1572 Railroad Avenue (APN 009-193-002)



~~Table 39~~Table 46 Site 2 Summary

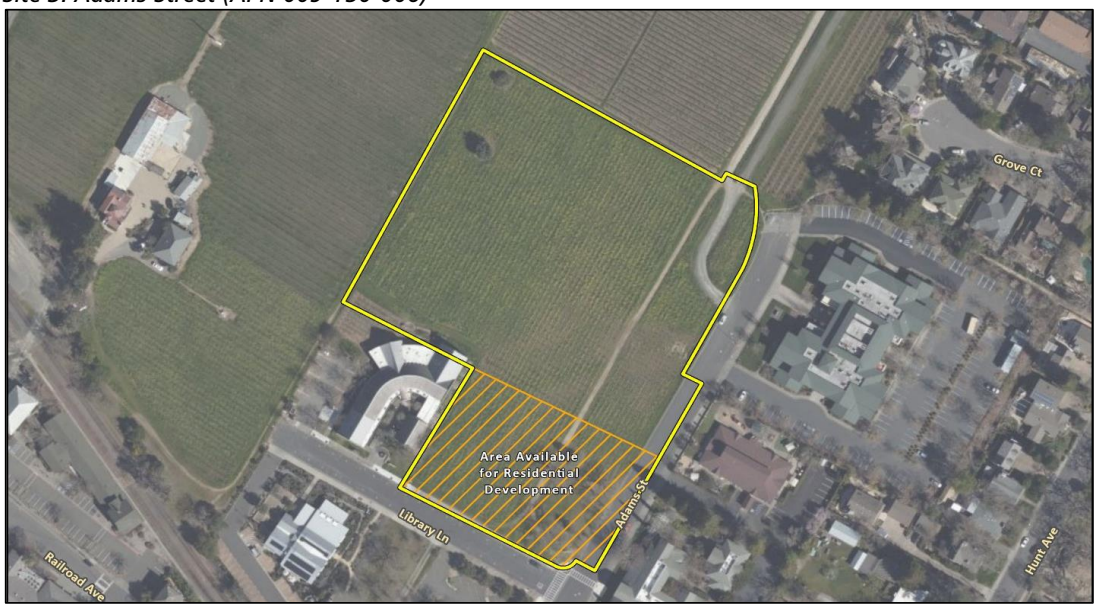
Current Use	Temporary City Hall
Parcel Size	0.93 acres
Existing General Plan Land Use	Business and Professional Office
Existing Zoning	Business and Professional Office
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	24 units
Assumed Capacity and Income Category	20 Lower Income units

Site 2 is a 0.93-acre property owned by the City of St. Helena located at 1572 Railroad Avenue. City goals are in line with affordable housing development on the site. This site is currently used as a temporary location for City Hall. A General Plan Amendment and Rezone is proposed to change the land use and zoning designation to High Density Residential.

The entire 0.93-acre site is able to be redeveloped with the removal of the existing buildings. Based on allowed density under High Density Residential, 24 units would be permitted as a baseline. Density bonus provisions allowed with affordable housing projects would increase the number of units permitted on-site. However, 20 lower-income units were assumed~~, consistent with the 2015 site feasibility and capacity analysis,~~ in order to ensure adequate off-street parking capacity. According to the 2015 site feasibility and capacity analysis, which evaluated housing capacity of the site by analyzing current and adjacent land uses and zoning, site topography, environmental sensitivities, service connection feasibility, as well as setback, height, lot coverage, FAR, density, parking, and landscape requirements, the site can accommodate a total of 20 housing units with adequate area

for the required 38 parking spaces. According to the 2015 assessment, development of 20 housing units on the site would result in a building lot coverage of approximately 31 percent and would be consistent with the maximum lot coverage allowed in High Density Residential zone, 45 percent. The 2015 feasibility analysis and site assessment did not identify any environmental constraints or service connection obstacles that would affect redevelopment of the site. Twenty housing units is slightly higher than 80 percent of the maximum allowable density, at 83 percent. However, given that the City owns and intends to redevelop the site for housing and that this is consistent with the findings 2015 site feasibility and capacity analysis, the development of 20 housing units on-site is considered feasible.

Site 3: Adams Street (APN 009-150-006)



~~Table 40~~Table 47 Site 3 Summary

Current Use	Vacant
Parcel Size	5.6
Existing General Plan Land Use	Central Business
Existing Zoning	Central Business
Proposed Land Use and Zoning	Central Business
Allowed Density	n/a
Site Capacity	n/a
Assumed Capacity and Income Category	31 Lower Income units

Site 3 is a 5.6-acre property owned by the City of St. Helena located at the terminus of Adams Street and the crossroads of Adams Street/Library Lane. City priorities of the site include a mix of public, commercial, and residential uses. The site is currently vacant but being leased for a small vineyard operation. No land use changes are proposed as residential uses are permitted on upper stories within the Central Business district.

The site inventory assumes a portion of the site, approximately 1.3 acres, would be dedicated for affordable housing, while the remainder of the site would be used for other public and commercial uses such as a potential location for City Hall and Police station. Based on the 2015 site feasibility and capacity analysis, which evaluated housing capacity of the site by analyzing current and adjacent land uses and zoning, site topography, environmental sensitivities, service connection feasibility, as well as setback, height, lot coverage, FAR, density,

parking, and landscape requirements, approximately 31 units could be accommodated on the portion of the site adjacent to the Public Library. The site would also accommodate 58 parking spaces where only 53 are required. According to the 2015 site feasibility and capacity analysis, development of 31 housing units on the 1.3 acre portion of the site would result in a building lot coverage of 28 percent. There is no standard for building coverage in the Central Business zone, therefore the resulting lot coverage would not conflict with the City's Zoning Ordinance. No environmental sensitivities or service connection constraints were identified for the site. This site was identified as a housing opportunity site in the 5th housing element cycle.

Privately Owned Vacant and Nonvacant Properties

After reviewing the pending and approved projects, existing ADU/JADU trends, and City-owned properties, additional capacity is needed to fully accommodate the City's RHNA and to allow for a buffer. A desktop and City tour of parcels that could accommodate more housing and meet the City's regional housing needs was conducted. Pursuant to Government Code section 65583.2(a), these included:

- Vacant sites zoned for residential use
- Vacant sites zoned for nonresidential use that allow residential development
- Residentially zoned sites that are capable of being developed at a higher density than existing conditions
- Commercially zoned sites that are capable of being developed at a higher residential density than existing conditions
- Sites suitable for rezoning to allow for residential uses or allow residential uses at a high density
- Sites zoned for residential use or suitable for rezoning to allow residential uses with expressed property owner interest for residential development

Suitability of Nonvacant Sites

The City has recently seen redevelopment of nonvacant, residentially zoned parcels for housing development. Recently redeveloped parcels included those with existing single-family residences. In addition, the City has recently seen the development of housing on sites with existing vineyards. Examples of recent development trends in residential zones and on properties with existing vineyards include the following:

- 632 McCorkle Avenue: The completed project demolished an existing single family residence to construct 8 new housing units
- 684 McCorkle Avenue: The completed project demolished an existing single family residence to construct 8 new, affordable housing units
- 963 Pope Street: The approved project merged two existing parcels with an existing single family home and constructed 4 new multi-family housing units; all 5 units will be affordable
- 500 Mills Lane: The completed project constructed a single-family residence, ADU, and barn on a property with an existing vineyard

- 601 Fulton lane: The completed project constructed a single-family residence, ADU, and barn on a property with an existing vineyard

The site inventory identified nonvacant residentially zoned sites with similar conditions to trends detailed above (nonvacant sites with existing, single-family residences). The projects listed above were infill sites that redeveloped parcels with existing single family residences with multi-family developments and affordable housing. These projects were located on parcels zoned Medium and High Density Residential. The conditions and characteristics of these projects are similar to Sites 6, 7, and 9 which each have one existing single-family residence and are zoned Median and High Density Residential.

The 632 McCorkle Avenue project had a density of 14.9 units per acre which is 57 percent of the maximum allowed density of the site, the 684 McCorkle Avenue project had a density of 14.7 units per acre which is 56 percent of the maximum allowed density, and the 601 Fulton Lane project had a density of 17.1 units per acre which is 107 percent of the maximum allowed density. The recent redevelopment projects have an average density of 15.5 units per acre, which equates to an average of 73 percent of the maximum allowed density on each site. The site inventory assumes a capacity of approximately 80 percent of the maximum allowed density on each site. This is slightly higher than the average density of recently constructed and approved projects. However, the sites identified in the inventory are larger than the recent redevelopment projects listed above which allows for more efficient layout and greater capacity for development. In addition, two of the three recently redeveloped sites were narrow parcels where the parcel size and shape limited the configuration and available area for housing development on-site.

Other jurisdictions in the region have also seen redevelopment of nonvacant, residentially zoned parcels for housing development as well. Additional redevelopment projects on nonvacant, residentially zoned parcels in the region include the following:

- City of Calistoga – 2008 Grant Street: The approved project includes demolition of an existing residential structure, a three-sided wooden garage, and a large, fire-damaged shed on a 5.84-acre parcel and construction of 15 single-family homes
- City of Calistoga – Yellow Rose Ranch: The proposed project consists of the demolition of an existing single-family residence, barn, and four accessory buildings and construction of 46 single-family homes, 33 attached ADUs, and 12 detached ADUs
- City of Napa - Browns Valley Subdivision: The proposed project includes the demolition of a single-family residence, barn, and several outbuildings and construction of 11 single-family homes
- City of Napa – Old Sonoma Road Mixed Use: The proposed project includes the demolition of nine existing non-historic buildings and rehabilitation of three existing historic buildings into two townhome clusters, six new condominium structures, eight single-family homes, and commercial space. The project proposes a total of between 155 and 162 housing units.

- City of Napa – Redwood Grove Housing: The proposed project includes the removal of an existing single-family residence and construction of a two-story, 34-unit, multi-family, 100 percent affordable housing development.

Site 4: 905 Main Street (APN 009-180-008)



~~Table 41~~Table 48 **Site 4 Summary**

Current Use	Vacant
Parcel Size	0.27 acres
Existing General Plan Land Use	Mixed-Use
Existing Zoning	Service Commercial
Proposed Land Use and Zoning	Mixed-Use
Allowed Density	12 to 20 units/acre
Site Capacity	5 units
Assumed Capacity and Income Category	~~4~~5 Above Moderate Income units

Site 4 is a 0.27-acre property located at 905 Main Street. The property is a vacant site in a location prime for development along Main Street. The property owner has expressed interest in development of the site with housing and community members have expressed support for this use. A zoning change is proposed to change the zoning designation from Service Commercial to Mixed-Use, which would bring the property into conformance with the existing General Plan land use designation and incentivize owner redevelopment of the site due to the new allowed on-site uses. In addition, mixed-use development incentives anticipated under Program H-P, such as streamlined design review and fee waivers, would further encourage development of housing on the site. ~~.~~ The Mixed-Use land use designation is a new designation introduced in the City's recent 2040 General Plan Update. The City ~~'s Zoning Ordinance has not yet been updated to include a Mixed-Use zone, however, the City~~ is currently in the process of updating the Zoning Ordinance to include a Mixed-Use zone consistent with the General Plan and anticipates to adopt these changes in Fall of 2023. Because the Mixed-Use zone has not yet been adopted in the Zoning Ordinance, there are no recent development trends in the city for sites zoned Mixed-Use. ~~There are no known recent development projects in other cities within the~~

Napa Valley that are zoned for Mixed-Use but did not include residential uses. According to the City of Napa's Housing Element Update, two recent mixed-use projects in the city had an average of 92 percent of the maximum allowed density of the sites. Napa's sites inventory assumed a realistic density of 80 percent of the maximum allowed density of each site based on the density of recent developments with residential usesmixed-use developments, which averaged 83 percent of the maximum allowed density.[66] There is potential that Site 4 could be developed with 100 percent commercial uses. However, the inventory only includes one site with a Mixed Use land use and only a assumes a total of four above-moderate housing units. In addition, , which is relatively low, and the property owner has expressed to the City that they are interested in developing housing on the site.

The site is vacant, and the entire 0.27-acre site is able to be developed. Based on 80 percent of the maximum allowed density under Mixed-Use, five four above-moderate income units are feasible.

[66] City of Napa. 2022. Housing Element Update. file:///C:/Users/lsegal/Downloads/Napa%20Housing%20Element%20Rev%2002%2020230216.pdf

Site 5: Main Street between Mills Lane and Dowdell Lane (APN 009-660-005)



~~Table 42~~Table 49 Site 5 Summary

Current Use	Vacant
Parcel Size	1.8 acres
Existing General Plan Land Use	Service Commercial
Existing Zoning	Service Commercial
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	4~~5~~6 units
Assumed Capacity and Income Category	~~50~~ 45 Lower Income units

Site 5 is a 1.8-acre property located on Main Street between Mills Lane and Dowdell Lane. The property is a vacant site in a location prime for development along Main Street. The site is privately owned currently but ~~but~~ a local affordable housing non-profit has secured an exclusive option to purchase the property to develop affordable housing~~has been identified as an affordable housing site for future acquistion~~acquisition ~~by an affordable housing non-profit group~~, consistent with an approved development agreement for the Farmstead Hotel. A General Plan Amendment and Rezone is proposed to change the land use and zoning designation from Service Commercial to High Density Residential to allow for affordable housing development. The affordable housing project is in the preliminary site design phase which is pending pursuant to adoption of the Housing Element Update and subsequent rezoning of the property to accommodate multi-family housing.

The entire 1.8-acre site is vacant and able to be developed. Based on allowed density under High Density Residential, a total of ~~46~~ 45 housing units would be permitted. ~~However, the property owner intends to develop~~

the site to accommodate 50 affordable housing units. The affordable housing non-profit organization that owns the site intends to develop a housing project affordable to households earning between 30 percent and 60 percent of the AMI (very low- and low-income). A conceptual site plan was analyzed The non-profit organization is currently developing project plans which consist ofwhich determined four-story development along Fountain Court and three-stories along Main Street with structured parking could yield . The project includes approximately 45 units which wouldand all required parking accommodate the required number of on-site parking spaces. The inventory assumes 45 units. . This is well below the maximum capacity of the site based on the site's zoning and eligible density bonus. To be conservative, the inventory assumes a maximum of 46 housing units. While this is greater than 80 percent of the maximum allowable density of the site, the density bonus anditit is consistent with the non-profit's project plans and less than the maximum density of the project site (46 units). support development of up to the maximum density of the site.

Site 6: 709 ~~and 741~~ McCorkle Avenue (APN 009-100-031~~, -032~~)



~~Table 43~~Table 50 Site 6 Summary

Current Use	Single Family Residences
Parcel Size	0.9 acres ~~each (1.8 acres combined)~~
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	Medium Density Residential
Proposed Land Use and Zoning	Medium Density Residential
Allowed Density	~~5.1 to 16~~14 units/acre
Site Capacity	~~28~~ 5 units
Assumed Capacity and Income Category	~~48~~ Above Moderate Income units

Site 6 is composed of ~~two adjacent~~ a 0.9-acre ~~properties~~ property ~~that total 1.8 acres~~ located at 709 ~~and 741~~ McCorkle Avenue. ~~Both properties are~~The property is underutilized with one existing single family residence and ~~with~~ a large undeveloped space ~~on each property~~. The site is considered underutilized based on the additional density, FAR, height, and lot coverage available. ~~One of t~~The property owner along with community members and local nonprofit groups~~s~~ expressed interest in developing more housing on the site. The property owner inquired with the City regarding the possibility of subdividing the property pursuant to SB9, which would allow ~~each~~ the lot to be split into two lots with development of up to two units on each lot. The current land use and zoning designation is Medium Density Residential and no changes to land use or zoning are proposed.

The site~~s~~ ~~are~~ is composed of ~~two~~ a single family lot~~s~~ which could accommodate ~~28~~ 14 units under current land use regulations. Due to the existing residence~~s~~ on the site~~s~~, the inventory conservatively assumed additional

units would be added pursuant to SB 9. Each lot can be split into two lots with development of up to 2 units on each lot, for a total of ~~8~~ 4 above moderate units (a net increase of ~~6~~ 3 units). In addition, each lot could develop ADUs for a total net capacity of ~~10~~ 5 units. However, a total of ~~8~~ 4 above moderate income units were assumed ~~(4 on each property)~~, given the property owner's development interests.

Site 7: 821 Pope Street (APN 009-503-001)



~~Table 44~~Table 51 **Site 7 Summary**

Current Use	Single Family Residence
Parcel Size	1.0 acres
Existing General Plan Land Use	High Density Residential
Existing Zoning	High Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	26 units
Assumed Capacity and Income Category	10 Lower Income and 10 Moderate Income units

Site 7 is a 1.0-acre property located at 821 Pope Street. The site is underutilized with one existing single-family residence and large undeveloped areas on-site. The site is considered underutilized based on the additional density, FAR, height, and lot coverage available. Land use designations and existing development surrounding the site consist of multi-family housing. The current land use and zoning designation is High Density Residential and no changes to zoning are proposed. This site mirrors the condition of properties that were recently redeveloped with multi-family housing in the city. Similar to the 632 McCorkle Avenue, 684 McCorkle Avenue, and 963 Pope Street projects, this site contains existing single family residences on a large parcel but is underutilized as it is located on a High Density Residential zone

The entire 1.0-acre site is able to be redeveloped. Based on allowed density under High Density Residential, development of 26 units would be permitted. However, a total of 20 units, 10 lower income units and 10 moderate income units, is assumed in order to accommodate off-street parking capacity.

This site was included in the 5th Cycle Housing Element and is considered non-vacant, therefore requiring by-right approval for projects with at least 20% affordable units.

Site 8: 882 and 886 College Avenue (APN 009-070-043, -044, -045)



~~Table 45~~Table 52 **Site 8 Summary**

Current Use	Vacant
Parcel Size	1.5 acres
Existing General Plan Land Use	Public/Quasi-Public
Existing Zoning	A-20 (Agriculture)
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	39 units
Assumed Capacity and Income Category	15 Lower Income and 15 Moderate Income units

Site 8 is composed of three adjacent properties that total 1.5 acres located at 882 and 886 College Avenue. All three properties are vacant and are owned by a single property owner who has expressed interest in residential development on these properties. The site is adjacent to areas with existing multi-family development. A General Plan Amendment and zoning change is proposed to change the land use and zoning designation from Public/Quasi-Public and Agriculture to High Density Residential.

The entire 1.5-acre site is able to be redeveloped. Based on allowed density under High Density Residential, 39 units would be permitted. However, a total of 30 units, 15 lower-income units and 15 moderate income units, is assumed in order to accommodate off-street parking capacity. Future development of the site would not be dependent upon lot consolidation as all three parcels are under the same ownership. Furthermore, Program H-ZZ would incentivize lot consolidation at the time the property is developed.

Site 9: 1447 and 1515 Spring Street (APN 009-590-003, -010)



~~Table 46~~Table 53 Site 9 Summary

Current Use	Single Family Residences
Parcel Size	2.4 acres
Existing General Plan Land Use	High Density Residential
Existing Zoning	High Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	62 units
Income Category	24 Lower Income and 24 Above Moderate Income units

Site 9 is composed of two adjacent properties that total 2.4 acres located at 1447 and 151 Spring Street. Both properties are underutilized with one existing single-family residence and large undeveloped areas on each parcel. The overall site is considered underutilized based on the additional density, FAR, height, and lot coverage available. This site mirrors the condition of properties that were recently redevelopment with multi-family housing in the city. Similar to the ~~693~~632 ~~Mcorkle~~McCorkle Avenue, 684 McCorkle Avenue, and 963 Pope Street projects, this site contains existing single family residences on large parcels but is underutilized as it is located on a High Density Residential zone. The site is surrounded by single- and multi-family development and sites zoned High Density Residential, similar to the ~~693~~632 ~~Mcorkle~~McCorkle Avenue and 684 McCorkle Avenue projects. The current land use and zoning designation is High Density Residential and no changes to zoning are proposed.

The entire 2.4-acre site is able to be redeveloped. Based on allowed density under High Density Residential, 62 units would be permitted. However, a total of 48 units, 24 lower income units and 24 above moderate income

units, is assumed in order to accommodate site circulation improvements and adequate off-street parking capacity. The site is currently underutilized and does not meet the minimum density of the High Density Residential Zone (16.1 units/acre) with a current density of 0.83 units/acre. The site has two existing housing units, which equals approximately three percent of the total allowed capacity of the site (62 units). The existing building lot coverage is approximately eight percent and the maximum allowed lot coverage is 45 percent. Future development of the site would not be dependent upon lot consolidation as all three parcels are under the same ownership. Furthermore, Program H-ZZ would incentivize lot consolidation at the time the property is developed.

This site was included in the 5th Cycle Housing Element, therefore requiring by-right approval for projects with at least 20% affordable units.

Site 10: Spring Street between Hudson Avenue & Valley View Street (APN 009-441-023)



~~Table 47~~Table 54 Site 10 Summary

Current Use	Vineyard
Parcel Size	4.4 acres
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	Medium Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	114 units
Assumed Capacity and Income Category	44 Lower Income and 44 Moderate Income units

Site 10 is a 4.4-acre parcel located on Spring Street between Hudson Avenue and Valley View Street. Recent property owner interest in residential development of the site indicates opportunity for housing. Additionally, Focus Group meetings showed interest in High Density Residential uses on this residentially zoned parcel in the form of town homes, which is compatible with the surrounding residential neighborhoods. The site is considered underutilized as it has a residential land use designation but is currently used as vineyards. As previously discussed, the City has seen recent development of housing on properties with existing vineyards. Site 10 has greater development potential than the recently developed vineyard parcels since it is is located on a residentially zoned parcel, while the 500 Mills Lane and 601 Fulton Lane projects were located on parcels with a land use and zoning designation of Agriculture and therefore are only allowed to develop one housing unit and one ADU per parcel. A General Plan Amendment and zoning change is proposed to change the zoning from Medium Density Residential to High Density Residential.

The entire 4.4-acre site is able to be redeveloped. Based on allowed density under High Density Residential, 114 units would be permitted. However, a total of 88 units, 44 lower income units and 44 moderate income units, is assumed in order to accommodate adequate off-street parking capacity.

This site was included in the 5th Cycle Housing Element and is considered non-vacant, therefore requiring by-right approval for projects with at least 20% affordable units.

~~Site 11: 601 Pope Street (APN 009-502-011)~~



~~Table 48 Site 11 Summary~~

~~Current Use~~	~~Silverado Orchard Apartments~~
~~Parcel Size~~	~~2.9 acres (0.75 acres available for development)~~
~~Existing General Plan Land Use~~	~~High Density Residential~~
~~Existing Zoning~~	~~High Density Residential~~
~~Proposed Land Use and Zoning~~	~~High Density Residential~~
~~Allowed Density~~	~~16.1 to 26 units/acre~~
~~Site Capacity~~	~~19 units~~
~~Assumed Capacity and Income Category~~	~~15 Moderate Income units~~

~~Site 11 is a 2.9-acre parcel located at 601 Pope Street. The site is underdeveloped and is currently occupied by the Silverado Orchard Apartments on the northeastern portion of the site with a large 0.75-acre vacant area on the southwestern portion of the site. There is opportunity to expand the existing high density housing development on-site or develop additional housing. The current land use and zoning designation is High Density Residential and no changes to zoning are proposed.~~

~~The site developable area is assumed to be approximately 0.75 acres on the southwest portion of the site. The redevelopment area could accommodate approximately 19 units based on allowed density alone. However, 15 moderate income units are assumed in order to accommodate adequate off-street parking capacity and existing residential uses.~~

Site 1~~2~~1: 1637 Spring Street (APN 009-600-018)



~~Table 49~~Table 55 Site 1~~2~~1 Summary

Current Use	8 Detached Residential Housing Units
Parcel Size	1.1 acres
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	High Density Residential
Proposed Land Use and Zoning	High Density Residential
Allowed Density	16.1 to 26 units/acre
Site Capacity	28 units
Assumed Capacity and Income Category	8 Additional Lower Income units

Site ~~12~~ 11 is a 1.1-acre parcel located at 1637 Spring Street. Recent property owner interest in adding housing units on-site indicates there is opportunity to develop additional housing. The property owner emailed City Staff on March 7, 2022, interested in the development of additional housing units on the property . The property owner stated a desire to double the number of housing units on the site and expressed support for changing the land use designation from Medium Density Residential to High Density Residential, to match the current zoning. Further, correspondence with the property owner confirmed they are interested in including the site in the site inventory. The land use designation of the site is currently Medium Density Residential, changed from High Density Residential during the latest General Plan Update in 2019. However, the site is still zoned High Density Residential and is adjacent to other parcels zoned High Density Residential. A General Plan Amendment is proposed to change the land use designation from Medium Density Residential to High Density Residential, in conformance with the current zoning designation.

Based on allowed density under High Density Residential, a total of 28 units would be permitted. With the existing 8 units and current on-site structures, the site is underutilized based on density, FAR, and lot coverage.

B~~However, b~~ased on discussions with the property-owner and existing site layout, approximately 8 additional units could be accommodated on-site. Therefore, the inventory assumed 8 lower income units, resulting in 16 units total on-site, based on the property owner's development interests. The site is underutilized and currently does not meet the minimum density of the High Density Residential Zone (16.1 units/acre) with a current density of 7.3 units/acre. The site has 8 existing housing units, which equals approximately 29 percent of the total allowed capacity of the site (28 units). The existing building lot coverage is approximately 30 percent and the maximum allowed lot coverage is 45 percent.

Site 1~~2~~3: 620 McCorkle Avenue (APN 009-502-003)



~~Table 50~~Table 56 Site 1~~2~~3 Summary

Current Use	Single Family Residence
Parcel Size	0.76 acres
Existing General Plan Land Use	Medium Density Residential
Existing Zoning	Medium Density Residential
Proposed Land Use and Zoning	Medium Density Residential
Allowed Density	5.1 to 16 units/acre
Site Capacity	12 units
Assumed Capacity and Income Category	3 Additional Above Moderate Income units

Site 1~~2~~3 is a 0.76-acre parcel located at 620 McCorkle Avenue. The site is considered underutilized as it is zoned medium density residential but is currently developed with a single family residence. The site is considered underutilized based on the additional density, FAR, height, and lot coverage available. The site is surrounded by single- and multi-family development and properties zoned Medium and High Density Residential. In addition, community feedback from public meetings and public comment letters have shown the site is a strategic location for housing and the community is interested in including this site in the site inventory.

The current land use and zoning designation is Medium Density Residential and no changes to zoning are proposed. This site also is adjacent to recent redeveloped sites at 632 McCorkle Avenue and 684 McCorkle Avenue, which removed an existing single-family residence with multi-family units.

The entire site could accommodate approximately 12 units based on allowed density alone. However, three~~3~~ additional above-moderate income units are assumed in order to accommodate adequate off-street parking capacity and existing residential uses. Therefore, the inventory assumed three~~3~~ additional above moderate income units, resulting in four~~4~~ units total onsite.

Summary of Site Inventory

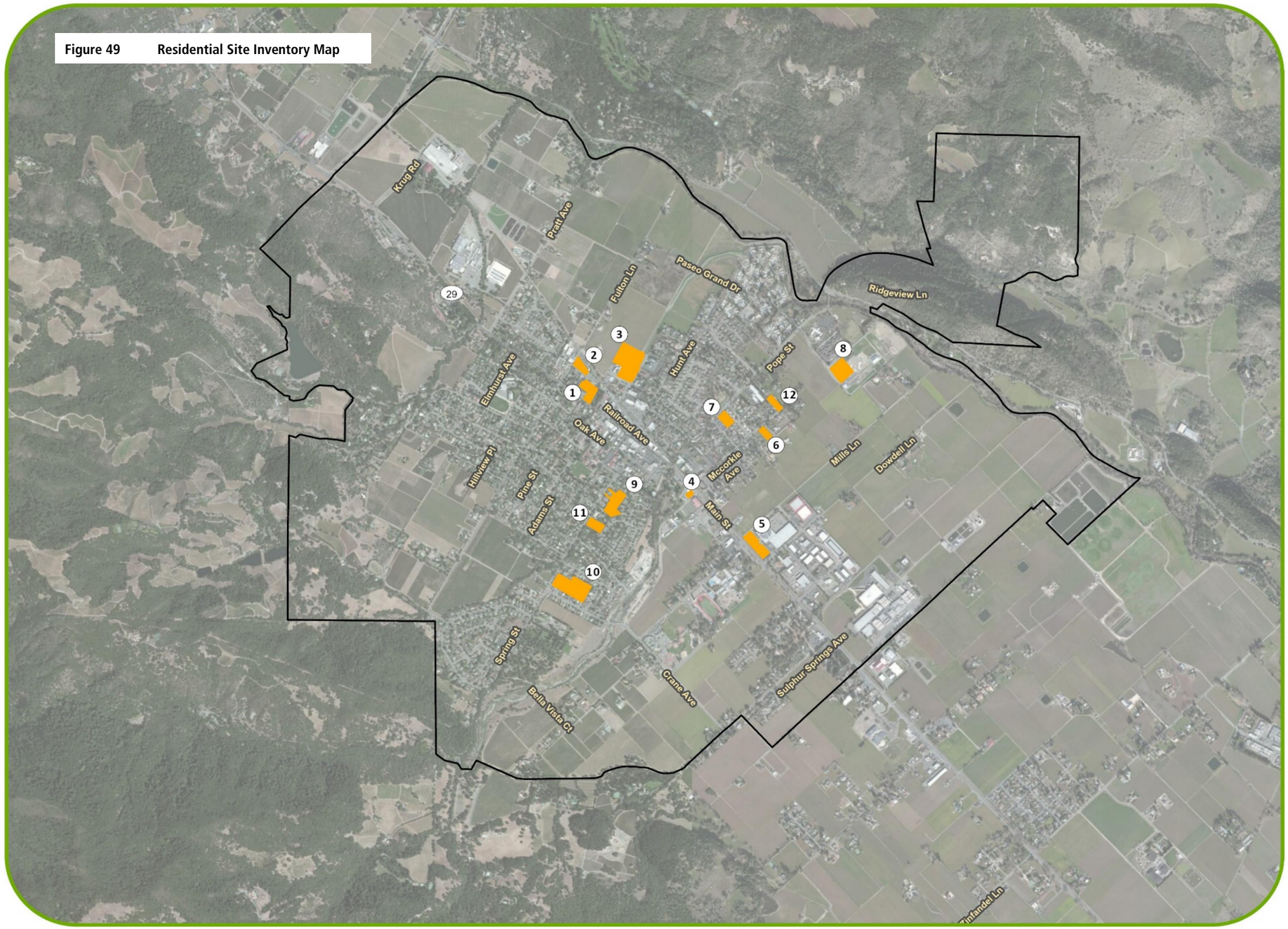
In combination with the City's pending projects and ADU development trends, the site inventory provides adequate sites to meet the City's RHNA allocation and buffer requirements. Between these three methods, the city can accommodate a total of ~~489~~ 470482481472 housing units, including ~~204~~ 207 lower-income, ~~738~~870 moderate-income, and ~~197~~ ~~193~~ 200199195 above moderate-income units. Table 57 shows a summary of the number of housing units accommodated by pending projects, ADU trends, and the site inventory.

~~Table 51~~Table 57 **Summary of Housing Units**

	Lower Income	Moderate Income	Above Moderate Income	Total
Pending Projects	4	1	88	93
ADU Trends	0	0	72	72
Site Inventory				
Site 1 (1480 Main St.)	6	0	0	6
Site 2 (1572 Railroad Ave.)	20	0	0	20
Site 3 (Adams St.)	31	0	0	31
Site 4 (905 Main St.)	0	0	~~54~~	~~54~~
Site 5 (Main St. btw Mills Ln. and Dowdell Ln.)	~~504~~645	0	0	~~504~~645
Site 6 (709 ~~and 714~~ McCorkle Ave.)	0	0	~~48~~	~~84~~
Site 7 (821 Pope St.)	10	10	0	20
Site 8 (882 and 886 College Ave.)	15	15	0	30
Site 9 (1447 and 1515 Spring St.)	24	0	24	48
Site 10 (Spring St. btw Hudson Ave. And Valley View St.)	44	44	0	88
~~Site 11 (601 Pope St.)~~	~~0~~	~~15~~	~~0~~	~~15~~
Site 11~~2~~ (1637 Spring St.)	8	0	0	8
Site 1~~3~~2 (620 McCorkle Ave.)	0	0	3	3
Total	~~212~~208207	~~85~~70	2001965195	4974743472
St. Helena RHNA plus 20% Buffer	192	31	79	302
Surplus	~~201~~615	~~54~~39	~~121117116~~116	~~19195172171~~171

.

Figure 49 Residential Site Inventory Map



City Boundary
Selected Sites

1 - 1480 Main Street
2 - 1572 Railroad Avenue
3 - Adams Street
4 - 905 Main Street
5 - Main Street (between Mills & Dowdell)
6 - 709 McCorkle Avenue
7 - 821 Pope Street
8 - 882 and 886 College Avenue
9 - 1447 and 1515 Spring Street
10 - Spring Street (between Hudson & Valley View)
11 - 1637 Spring Street
12 - 620 McCorkle Avenue

ST. HELENA
CALIFORNIA

0 0.2 0.4 N
Miles

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Additional data provided by County of Napa, 2022.

Table 58 Vacant and Nonvacant Sites

Site Address	APN	Developable Acres	Existing Zoning	Rezone Proposed	Proposed Zoning	Minimum Density	Maximum Density	Used in Previous HE?	Nonvacant	City-Owned	Lower Income	Moderate Income	Above Moderate Income	Total
Site 1 (1480 Main St.)	009-211-016	0.90	Public/Quasi-Public	Yes	Mixed-Use	12	20	No	Nonvacant	Yes	6	0	0	6
Site 2 (1572 Railroad Ave.)	009-193-002	0.93	Business and Professional Office	Yes	High Density Residential	16.1	26	No	Nonvacant	Yes	20	0	0	20
Site 3 (Adams St.)	009-150-006	5.6	Central Business	Yes	High Density Residential	16.1	26	Yes (Moderate Income and Above)	Vacant	Yes	31	0	0	31
Site 4 (905 Main St.)	009-180-008	0.27	Service Commercial	Yes	Mixed-Use	12	20	Yes (Moderate Income and Above)	Vacant	No	0	0	~~5~~4	~~5~~4
Site 5 (Main St. btw Mills Ln. and Dowdell Ln.)	009-660-005	1.8	Service Commercial	Yes	High Density Residential	16.1	26	No	Vacant	No	~~46~~45	0	0	~~46~~45
Site 6 (709 McCorkle Ave.)	009-100-032	0.9	Medium Density Residential	No	Medium Density Residential	5.1	16	No	Nonvacant	No	0	0	4	4
Site 7 (821 Pope St.)	009-503-001	1.0	High Density Residential	No	High Density Residential	16.1	26	Yes (Lower Income)	Nonvacant	No	10	10	0	20
Site 8 (882 and 886 College Ave.)	009-070-043, 009-070-044, 009-070-045	1.5	Agriculture	Yes	High Density Residential	16.1	26	No	Vacant	No	15	15	0	30
Site 9 (1447 and 1515 Spring St.)	009-590-010, 009-590-003	2.4	High Density Residential	No	High Density Residential	16.1	26	Yes (Lower Income)	Nonvacant	No	24	0	24	48
Site 10 (Spring St. btw Hudson Ave. And Valley View St.)	009-441-023	4.4	Medium Density Residential	Yes	High Density Residential	16.1	26	Yes (Moderate Income and Above)	Vacant	No	44	44	0	88
Site 11 (1637 Spring St.)	009-600-018	1.1	High Density Residential	No	High Density Residential	16.1	26	No	Nonvacant	No	8	0	0	8
Site 12: 620 McCorkle	009-502-003	0.76	Medium Density Residential	No	Medium Density Residential	5.1	16	No	Nonvacant	No	0	0	3	3
		Total									~~204~~203	69	36	~~309~~308

	Lower Income Capacity
Lower Income RHNA with 20 percent buffer:	192
Pending and Approved Projects (lower income)	4
Existing HDR capacity: Site 7	10
Existing HDR capacity: Site 9	24
Existing HDR capacity: Site 11	8
Remaining lower income shortfall	146
Sites with proposed rezone to HDR (Sites 2, 3, 5, 8, 10)	156

Availability of Infrastructure and Services

The City of St. Helena is dedicated to improving existing and new infrastructure and facilities to support existing and future development. The City's annual budget devotes funds towards the Public Works Department which provides design, construction, maintenance, and operation of public facilities and infrastructure within the city. Public Works is responsible for infrastructure including streets, storm drains, parks, water treatment, water distribution, wastewater collection, and wastewater treatment. Environmental compliance services provided by Public Works also includes storm water pollution prevention, sustainability, protection of public trees and floodplain administration, response to infrastructure and weather emergencies. The city's existing infrastructure system may require minor upgrades to address age and condition-related issues. New construction would be located in areas served by existing infrastructure.

With implementation of wastewater, water, and storm drainage system infrastructure improvements identified in the City's Integrated Utility Master Plan, there would be adequate capacity to accommodate the City's RHNA. The Integrated Urban Master Plan analyzed future infrastructure and water supply capacity accounting for planned development within the city, including the Hunter Subdivision project, and estimated buildout proposed under the 2040 General Plan, which includes the development of 300 new housing units and population growth of an additional 700 residents within the city limitswould be about 7,400 residents by the year 2040. The City's RHNA plans for the addition of a total of 254256 housing units within the planning period. Currently the city has a population of approximately 6,073. Therefore, the additional 256254 units would not exceed buildout assumed in the Master Plan, well within the 2040 General Plan housing development projection. With the 20 percent buffer, the number of additional housing units would be 302, which is not be significantly higher than what was projected under the 2040 General Plan. Therefore, the City's planned infrastructure capacity can accommodate the City's RHNA.

Wastewater System

The City's Integrated Utility Master Plan was adopted in 2021 and serves as the guiding document for planning and implementing sewer system improvements through the year 2040. The plan is consistent with the population, land use, employment, and housing projections presented in the 2040 General Plan. The City also has a Sewer System Management Plan that was developed in 2006 and last updated in April 2016. The City's sewer system service area consists of the City limits and includes approximately 24 miles of active gravity sewer pipelines, 0.4 miles of force mains, and two lift stations that convey flow to the Wastewater Treatment Plant. Improvements to the Wastewater Treatment Plant began in 2022 to adhere to stricter environmental requirements and are expected to be completed in 2023.

A capacity analysis of the existing wastewater collection system showed a storm event would result in multiple pipeline capacity deficiencies and sanitary sewer overflows at several locations with the existing system. Wastewater collection systems improvement projects proposed by the Utility Master Plan included gravity main improvements with pipeline replacement and lift station improvements. These improvements would be

constructed based on prioritization within the Master Plan and developed as a Capital Improvement Project. The improvements would be financed through City budgeting and collection of project impact fees. As discussed under the Government Constraints section, impact fees in the city do not represent a constraint to housing ~~are appropriately sized to accommodate growth to 2040~~.

Potable Water System

The City's Integrated Utility Master Plan serves as the guiding document for planning and implementing water system improvements through the year 2040, consistent with growth under the 2040 General Plan. Previously, the City utilized the Water Master Plan, developed in 2006, to identify infrastructure need to the year 2020. The City's water system service area extends beyond the City limits to unincorporated areas in the Meadowood Napa Valley Resort/Neighborhood area and area between Chaix Lane and Zinfandel Lane along Main Street. There are three main water supply sources: Bell Canyon Reservoir, Stonebridge wells, and an interconnection with the City of Napa. The City's water system consists of approximately 47 miles of water distribution pipelines.

A capacity analysis of the existing water distribution system showed there is one pump station, the Holmes pup station, that does not have sufficient firm pumping capacity to meet maximum day demand. Evaluation of the existing treated water storage system capacity found one area that does not have adequate capacity to meet peak hour demand, fire flow storage, and emergency storage. Improvement projects proposed by the Utility Master Plan to prevent system failures caused by leaks, fails, and main breaks include rehabilitation and replacement of water main and transmission lines, which would enable the City to meet potable water demands. The potable water improvements would be constructed based on prioritization within the Master Plan and developed as a Capital Improvement Project. The improvements would be financed through City budgeting and collection of project impact fees. As discussed under the Government Constraints section, impact fees in the city do not represent a constraint to housing.

Storm Water System and Drainage System

The City's Integrated Utility Master Plan guides planning and implementing the storm drainage system improvements through the year 2040 with growth projections consistent with the 2040 General Plan. Previously, the Storm Drainage Master Plan, developed in 2000, served as the City's guide to analyze the existing storm drain system and plan for implementation of improvements. The City's storm drainage collection system service area consists of the city limits and includes street drainage, inlets, gravity pipelines, open channels, one storm water detention basin, and 33 outfalls that discharge in Sulphur Springs Creek, York Creek, or Napa River.

Evaluation of existing storm drainage capacity showed there would be multiple areas of flooding throughout the system in the event of a 10-year, 50-year, and 100-year storm. Improvement projects proposed by the Utility Master Plan to mitigate storm water system capacity issues include implementing an annual storm drain rehabilitation and replacement program with the assumption that approximately 1.25 percent of the system

would be replaced per year until 2040. Storm water infrastructure upgrades would be constructed based on prioritization within the Master Plan and developed as a Capital Improvement Project. The improvements would be financed through City budgeting and collection of project impact fees. As discussed under the Government Constraints section, impact fees in the city do not represent a constraint to housing.

Dry Utilities

PG&E is responsible for supplying electricity and natural gas to the City and surrounding areas. Other dry utilities such as telephone and data services and cable television are serviced by contracted providers within the city, including Xfinity and AT&T.

Circulation System

The City's Circulation Element, updated in 2019 along with the General Plan, identifies the principal components of the City's circulation system and issues related to parking, public transit, and pedestrian and bicycle infrastructure. The Circulation Element also includes standards and guiding principles for implementing transportation improvements.

The City's street network is largely grid based with some streets east of State Route 29 that are not fully connected to the network. State Route 29 (Main Street) is the main street used for traveling north-south throughout the city and is the main route for vehicles traveling between Lake County, northern Sonoma County, and the City of Napa and other destinations further south. It runs northwest to southeast through the city and divides the city in two. Congestion along State Route 29 is a major issue within the city and pushes traffic onto local city streets. Much of the traffic congestion seen in the city is caused by tourists traveling throughout the region. The primary transit option in the city is the Vine bus service, however ridership is low with only 0.9 percent of St. Helena residents commuting via transit. Future improvements to the City's transportation network include improvements aimed at reducing congestion along State Route 29 and enhancing alternative modes of travel, including the addition of pedestrian and bicycle infrastructure.

Environmental Constraints

In 2019, the City certified a FEIR with the 2040 General Plan Update that analyzed all potential environmental impacts associated with the population and development growth proposed under the plan. City Council also adopted CEQA Findings and a Statement of Overriding Considerations identifying public benefits that override the significant and unavoidable impacts of the General Plan, including agricultural preservation, a balanced mix of land uses and sustainable land use pattern, creation of construction jobs, managing effects of regional traffic, and a shift to a multi-modal circulation system. Environmental clearance for future development projects may tier from the General Plan FEIR, thereby expediting the approval process. Mitigation measures set forth in the FEIR include measures to minimize impacts associated with potential flooding, and other environmental constraints.

There are no known conditions that would preclude any of the selected sites from being developed within the planning period. Sites 4 and 7 are located in the Federal Emergency Management Agency (FEMA) flood hazard zone, Zone X, an area of moderate- to low-risk. Development within Zone X would not preclude the properties from development, as future development would be subject to development standards contained within the Saint Helena Municipal Code, which incorporates FEMA standards for construction in flood hazard zones, as well as relevant policies within the City's General Plan which regulate development in flood risk areas. In addition, future development would comply with applicable mitigation measures within the 2040 General Plan EIR, including HYDRO-1 which ensures that no development will impede waters in the floodway, raises base flood levels, or expose housing to undue risk from flooding. The remaining sites are not located within a FEMA flood zone. None of the sites are located within a state of local fire hazard severity zone.

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Appendix A:
Affirmatively Furthering Fair Housing

Public Hearing Draft

April 2023

ST. HELENA
CALIFORNIA
HOUSING ELEMENT
2023 - 2031



AFFH Contents

1. Introduction and Overview A-5

1.1 Approach to Analysis A-5

1.2 Fair Housing Methodology A-6

2. Summary of Fair Housing Issues A-9

2.1 Regional Trends A-9

2.2 Local Trends ..... A-10~~9~~

2.3 Enforcement and Outreach Capacity A-10

3. Segregation and Integration Patterns and Trends A-14

3.1 Race and Ethnicity A-14

3.2 Persons with Disabilities A-15

3.3 Familial Status A-25

3.4 Household Income A-37

3.5 Racially and Ethnically Concentrated Areas of Poverty A-45

3.6 Disparities in Access to Opportunities A-52

3.7 Disproportionate Housing Needs A-74

4. Local Area of Knowledge ..... A-100~~99~~

4.1 Stakeholder Input ..... A-100~~99~~

5. Sites Inventory Analysis ..... A-103~~101~~

5.1 Opportunity Areas ..... A-103~~101~~

5.2 Improved Conditions ..... A-104~~102~~

6. Contributing Factors ..... A-110~~107~~

Tables

Table 1 Domains and List of Indicators for Opportunity Maps A-8

Table 2 Fair Housing Organizations Active in Napa County A-11

Table 3 Racial/Ethnic Dissimilarity Trends (Napa County) A-15

Table 4 Household Type and Tenure (Napa County) A-25

Table 5 Household Type and Tenure (St. Helena) A-27

Table 6 Tenure by Household Type and Presence of Children (St. Helena) A-27

Table 7 Housing Cost Burden of Lower-Income Households (2014-2018) A-85

Table 8 Substandard Housing Units (2019) A-89

Table 9 Overcrowding by Tenure A-91

Table 10 Proposed Sites Inventory Housing Unit Allocation ..... A-104~~102~~

Table 11 Factors that Contribute to Fair Housing Issues ..... A-110~~107~~

Figures

Figure 1 Percent of Total Non-White Population (Napa County) A-17

Figure 2 Percent of Total Non-White Population (St. Helena) A-18

Figure 3 Predominant Populations (St. Helena) A-19

Figure 4 Percent of Population with a Disability (Napa County) A-20

Figure 5 Disability by Type (St. Helena) A-21

Figure 6 Percentage of Population with One or More Disabilities (St. Helena) A-23

Figure 7 Children in Married-Couple Households (Napa County) A-29

Figure 8 Female Headed Households with Children, No Spouse/Partner Present (Napa County) A-30

Figure 9 Population of Adults Living with Spouse/Partner (Napa County) A-31

Figure 10 Population of Adults Living Alone (Napa County) A-32

Figure 11 Children in Married-Couple Households (St. Helena) A-33

Figure 12 Female Headed Households with Children, No Spouse/Partner Present (St. Helena) A-34

Figure 13 Population of Adults Living with Spouse/Partner (St. Helena) A-35

Figure 14 Population of Adults Living Alone (St. Helena) A-36

Figure 15 Median Household Income (2015-2019) A-38

Figure 16 Median Household Income (Napa County) A-41

Figure 17 Low and Moderate Income Population (Napa County) A-42

Figure 18 Median Household Income (St. Helena) A-43

Figure 19 Low to Moderate Income Population (St. Helena) A-44

Figure 20 Areas of High Poverty (Napa County) A-47

Figure 21 Poverty Status (St. Helena) A-48

Figure 22 Neighborhood Segregation (St. Helena) A-49

Figure 23 Racially Concentrated Areas of Affluence (Napa County) A-55

Figure 24 Racially Concentrated Areas of Affluence (St. Helena) A-56

Figure 25 Predominant White Population (Napa County) A-57

Figure 26 Predominant Populations and Median Household Income (St. Helena) A-58
Figure 27 Walkability Index (St. Helena) A-61
Figure 28 TCAC Opportunity Areas – Education Outcomes (Napa County) A-65
Figure 29 TCAC Opportunity Areas – Education Outcomes (St. Helena) A-66
Figure 30 TCAC Opportunity Areas – Economic (Napa County) A-69
Figure 31 TCAC Opportunity Areas – Economic (St. Helena) A-70
Figure 32 Job Proximity Index (St. Helena) A-71
Figure 33 CalEnviroScreen 4.0 Percentile Scores (Napa County) A-77
Figure 34 TCAC Opportunity Areas – Environment (Napa County) A-78
Figure 35 CalEnviroScreen 4.0 Percentile Scores (St. Helena) A-79
Figure 36 TCAC Opportunity Areas – Environment (St. Helena) A-80
Figure 37 Overpayment By Renters (Napa County) A-81
Figure 38 Overpayment By Homeowners (Napa County) A-82
Figure 39 Overpayment By Renters (St. Helena) A-83
Figure 40 Overpayment By Homeowners (St. Helena) A-87
Figure 41 Housing Stock Age (2015-2019) A-89
Figure 42 Overcrowded Households (Napa County) ..... A-94~~93~~
Figure 43 Overcrowded Households (St. Helena) ..... A-95~~94~~
Figure 44 Sensitive Communities (Napa County) ..... A-98~~97~~
Figure 45 Sensitive Communities (St. Helena) ..... A-99~~98~~
Figure 46 Mortgage Applications and Acceptance by Race ..... A-102~~100~~
Figure 47 Location of Sites Inventory in Relation to TCAC/HCD Opportunity Areas ..... A-108~~105~~


1468

1. Introduction

In 2018, the California State Legislature passed Assembly Bill (AB) 686 to expand upon fair housing requirements and protections outlined in the Fair Employment and Housing Act. The law requires all State and local public agencies to facilitate deliberate action to explicitly address, combat, and relieve disparities resulting from past patterns of segregation to foster more inclusive communities. AB 686 created new requirements that apply to all housing elements due for revision on or after January 1, 2021. The passage of AB 686 protects the requirement to affirmatively further fair housing within State law.

AB 686 defined "affirmatively further fair housing (AFFH)" to mean "taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity." AB 686 added an assessment of fair housing to the Housing Element which includes the following components:

- A summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity
- An analysis of segregation patterns and disparities in access to opportunities
- An assessment of contributing factors
- An identification of fair housing goals and actions.[67]

1.1 Approach to Analysis

This AFFH analysis is consistent with the 2021 California Department of Housing and Community Development's Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements (AFFH Guidance Memo) which provides guidance on the preparation of housing elements and ensures statutory requirements are satisfied, pursuant to Government Code Section 65583(c)(10).

This AFFH analysis evaluates fair housing issues on the following topics:

1. Fair Housing Enforcement and Outreach Capacity
2. Integration and Segregation Patterns and Trends
3. Racially and Ethnically Concentrated Areas of Poverty
4. Disparities in Access to Opportunity
5. Disproportionate Housing Needs

[67] *Housing and Community Development (HCD). 2021. https://www.hcd.ca.gov/community-development/affh/index.shtml*

6. Other Relevant Factors, including historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing.

Fair housing priorities goals and actions are also provided specific to St. Helena to address as implementation actions for the Housing Element. The goals and actions address the major contributing factors for the topics above.

1.2 Fair Housing Methodology

The California Government Code Section 65583 (10)(A)(ii) requires cities and counties to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs, including displacement risk.

To conduct this analysis, the City utilized data from a variety of sources, including:

- The Housing and Community Development (HCD) AFFH Data Viewer
- AFFH Segregation Report by ABAG
- Napa Sonoma Collaborative
- Urban Displacement Project (UDP)
- U.S Housing and Urban Development (HUD)
- CalEnviroscreen
- California Tax Credit Allocation Committee (TCAC)
- The Comprehensive Housing Affordability Strategy (CHAS)
- US Census American Community Survey (ACS)
- AllTransit
- Walk Score

Additionally, the analysis includes input from sources of local knowledge, including special needs groups, housing advocacy organizations, housing and services providers, and residents.

1.2.1 Housing and Community Development's AFFH Viewer

The AFFH Data Viewer is a tool developed by HCD that features census block group and tract level data from an expansive collection of sources including ACS, HUD, TCAC, UDP, and CHAS. The Data Viewer tool serves as a resource for local and regional governments and provides the ability to explore spatial data patterns concerning fair housing enforcement, segregation and integration, racially and ethnically concentrated areas of poverty, and disparities in access to opportunities and housing. The Data Viewer is

intended to assist in the creation of policies that alleviate disparities, combat discrimination, and increase access to safe and affordable homes.

1.2.2 AFFH Segregation Report

The University of California, Merced and STIR Labs, on behalf of ABAG, prepared reports for jurisdictions in California studying segregation patterns and current land use policies that correlate with patterns of racial segregation. The report for St. Helena addresses racial and income segregation using the racial isolation index, racial dissimilarity index, and Thiel's H-Index at the neighborhood level within and regional level.

1.2.3 Napa Sonoma Collaborative

The Napa Sonoma Collaborative (NSC) is a collaboration between Napa and Sonoma Counties that aims to address housing challenges within the region. NSC is made up of housing staff from jurisdictions within Napa and Sonoma Counties and is working to raise awareness and increase participation in the Housing Element update process. The collaborative conducted outreach to gather information on fair housing issues within local communities and discuss constraints to affordable housing.

1.2.4 Urban Displacement Project (UDP)

The UDP was developed to track neighborhood change and identify areas that are vulnerable to gentrification and displacement in California. Indicators of gentrification and displacement are measured at the census tract level based on data from the 2015 ACS. UDP indicators examine census tracts to identify areas that qualify as disadvantaged neighborhoods. Additionally, census tracts identified as disadvantaged neighborhoods by UDP's criteria are further analyzed to explore changes in the percentage of college educated residents, non-Hispanic White population, median household income, and median gross rents over time to determine levels of gentrification and displacement risk.

1.2.5 CalEnviroscreen

The California Office of Environmental Health Hazard Assessment developed a screening methodology to identify communities disproportionately burdened by multiple sources of pollution. This tool, called the California Communities Environmental Health Screening Tool (CalEnviroScreen), utilizes existing environmental, health, and socioeconomic data to rank census tracts based on 20 distinct indicators. In general, if a community has a high score for that indicator, it is more impacted by pollution burdens and population vulnerabilities compared to other communities. Designated disadvantaged communities are those with CalEnviroScreen percentile scores of 75 or higher, meaning that they scored within the highest 25 percent of census tracts across California. There are no disadvantaged communities in St. Helena.

1.2.6 California Tax Credit Allocation Committee (TCAC)

HCD and the TCAC created the California Fair Housing Task Force to provide research, evidence based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals.[68] The Task Force created the AFFH Data Viewer, an interactive mapping tool to assess population and housing characteristics related to fair housing and access to opportunity to aid in the development of policy for the promotion of equitable and inclusive communities. The data viewer includes Opportunity Maps made from composite scores of three different domains made up from a set of indicators data shown in Table 1. The Opportunity Maps include a measure or "filter" to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- **Poverty Status.** Census tracts with at least 30 percent of population that earned an income that was below the federal poverty level.
- **Racial Segregation.** Census tracts with a location quotient that is higher than 1.25 for Black, Hispanic, Asians, or all non-White populations in comparison to the county.

Table 1 Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty, Adult Education, employment, Job proximity, median home value
Environmental	CalEnviroScreen 3.0 pollution indicators and values
Education	Math proficiency, reading proficiency, high school graduation rates, student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2020 TCAC/HCD Opportunity Maps, December 2020

1.2.7 AllTransit

AllTransit is an online database that details transit opportunity for communities. The website explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. The AllTransit performance score explores metrics that reveal the social and economic impact of transit, such as connectivity, access to jobs, and frequency of service.

1.2.8 Walk Score

Walk Score provides walkability services and apartment search tools to addresses across the United States, with the mission "to promote walkable neighborhoods." Walk Score measures walkability by assigning a numerical walkability score based on distance to amenities within a 30-minute walk and evaluates

[68] *Office of The State Treasurer (STO). 2021. https://www.treasurer.ca.gov/ctcac/opportunity/2020-tcac-hcd-methodology.pdf*

pedestrian friendliness by analyzing population density and road metrics, including block length and intersection density.

1.2.9 Community Engagement and Outreach

As part of the Housing Element Update, the City implemented a community engagement program, soliciting input from the general public, housing stakeholders, and City decision makers. Results and feedback obtained during the community engagement program have been incorporated into the Housing Element, including this section on affirmatively furthering fair housing practices. Please see Chapter 1 for more details on the City's outreach efforts.

2. Summary of Fair Housing Issues

This summary guides the prioritization of contributing factors to fair housing issues and the creation of goals and actions to address these issues. Fair housing issues are conditions that restrict fair housing choice or access to opportunity in the geographic area of interest. Fair housing choice means realistic housing opportunities exist, can be accessed without discrimination towards protected characteristics such as race, color, religion, sex, disability, etc., and are informed with adequate information regarding options.

2.1 Regional Trends

Impediments to fair housing within Napa County, and the Bay Area as a whole, include the following:

- Residential segregation between White residents and non-White residents has increased in the last decade.
- Areas with higher percentages of non-White residents generally have less access to proficient schools, jobs, and cleaner air and water.
- Median rental prices rose an approximately $483 (unadjusted for inflation) since 2009, from $1,087 to $1,570, an increase of 44.4 percent in a 10-year period.
- The average home value increased from approximately $319,926 to $768,414 in less than 20 years, from 2001 to 2020 (unadjusted for inflation).
- Housing Choice Voucher holders and those with disabilities often find it difficult to find an appropriate housing unit based on located a unit of appropriate size and/or cost.
- Disability, race, and familial status are the most common bases of housing discrimination complaints forwarded to the California Department of Fair Employment and Housing and the Office of Fair Housing and Equal Opportunity.

2.2 Local Trends

Contributing factors identified as impediments to fair housing in St. Helena are discussed in detail below and include descriptions of how each impediment is addressed in this Housing Element.

2.2.1 Concentrations of Lower- and Moderate-Income Earning Populations

HUD defines a Lower and Moderate Income (LMI) area as a census tract or block group where over 51 percent of the population earn an income that is considered lower or moderate relative to the area median income. In St. Helena, residents with low and moderate household incomes are concentrated in the eastern portion of the city. The Housing Element ensures available land to accommodate all income levels on sites located across the city. Efforts to combat this impediment are outlined in Programs H-A, H-B, H-N, H-O, H-R, H-U, H-V, H-W and H-OO, which focus on maintaining an inventory of sites suitable for residential development and prioritize and incentivize housing development for lower- and moderate-income residents in the western portion of the city.

2.2.2 Insufficient Housing Stock for Farmworkers

Farmworker housing is a critical need in Napa County and St. Helena due to the presence of year-round agricultural production. The migratory and sometimes seasonal nature of farm workers pose housing challenges for a community and are seen as an impediment for St. Helena as the City tries to house its entire population. Efforts to combat this impediment are outlined in Programs H-E, H-H, H-I, and H-KK, which work to support regional and City farmworker housing efforts, including creating incentives and fast-tracking development for workforce/farmworker housing.

2.2.3 Lack of Affordable Housing Types

There is a lack of diversity in housing types that restricts development of affordable housing in St. Helena. Local land use and zoning regulations perpetuate this deficiency by limiting the form of housing that can be developed on a particular site. Much of the residentially zoned parcels within the city are zoned low and moderate density residential and are not compatible with the construction of duplexes, triplexes, quadplexes and multifamily housing developments. The City is upzoning a number of parcels as a part of the Housing Element Update to allow higher density residential development. Efforts to combat this impediment are outlined in Programs H-A, H-B, H-E, H-H, H-I, H-J, H-M, H-N, H-P, H-Q, H-V, H-X, H-AA, H-DD, H-EE, H-FF, H-GG, H-LL, H-NN, and H-OO, which focus on maintaining an inventory of sites suitable for residential development, updating municipal code for developing workforce/farmworker housing, ADUs, housing for disabled and homeless persons, and non-traditional housing types, increasing development density, and fast-tracking housing development.

2.3 Enforcement and Outreach Capacity

Fair housing enforcement and outreach capacity is the ability of a local jurisdiction and fair housing agencies to distribute fair housing and tenants' rights information to their community. Enforcement and

outreach capacity also includes the ability to address compliance with fair housing laws, such as investigating complaints, resolving issues, and conducting fair housing testing.

2.3.1 Regional Resources

Several organizations in Napa County provide aid for fair housing issues and outreach. Table 2~~Table 2~~ shows organizations and agencies that collaborate with local governments, including St. Helena to address housing and community needs and provide the following services:

- Housing Need Assessment
- Homelessness Needs
- Market Analysis
- Fair housing testing and complaints
- Fair housing counseling and education
- Tenant/landlord counseling and mediation
- Homeless prevention program
- Rental assistance program
- Rent/deposit grant program
- Home seeking services
- Shared housing counseling placement
- Homebuyers' education learning program

Table 2 Fair Housing Organizations Active in Napa County

Organization	URL	Phone Number
Abode Services	https://www.abodeservices.org/napa-county	(510) 657-7409
Bay Area Legal Aid (BALA)	https://baylegal.org/	(800) 551-554
CA Department of Fair Employment and Housing	https://www.dfeh.ca.gov/	(800) 884-1684
EAH Housing	https://www.eahhousing.org/	
Fair Housing Advocates of Northern California (FHANC)	https://www.fairhousingnorcal.org/	(415) 457-5025
Fair Housing Napa Valley (FHNV)	https://napafairhousing.org/	(707) 224-9720
Napa Continuum of Care	https://homelessnapa.com/	
Napa County Housing and Homeless Services Division	https://www.countyofnapa.org/272/Homeless-Services	(707) 271-7818
Napa Valley Community Housing	https://nvch.org/	(707) 253-6140

North Bay Housing Coalition	https://www.northbayhousingcoalition.org/	(707) 289-7000

Source: City of Napa AI, 2020; Napa Sonoma Collaborative Fair Housing Enforcement, Outreach Capacity and Resources, 2022

2.3.2 Local Resources

The City of St. Helena contracts with the non-profit organization Fair Housing Napa Valley (FHNV), a regional non-profit fair housing agency, to assist residents with fair housing counseling services, connections to rental assistance and homelessness prevention programs, and to conduct fair housing testing. FHNV assists residents and landlords throughout the city, providing mediation, investigation, and referral services. In addition to the fair housing services provided by active organizations, the Napa County Housing Authority administers the Housing Choice Voucher program for St. Helena and other jurisdictions in the county.

The City complies with existing fair housing laws and regulations. The City does~~n't~~ not place more scrutiny or deny projects or individuals of their right to tenancy, residence, or entitlement based on memberships of protected class, in compliance with Government Code section 65008. Implementation of the 6th Cycle Housing Element would bring the City's adopted regulations and policies into compliance with other fair housing regulations such as Program H-F which would bring density bonus provisions into compliance and allow for greater incentives for affordable housing. The City is also proposing updates to their existing Inclusionary Ordinance to promote more housing choices for residents.

2.3.2.1 Ability to Address Complaints

The Department of Justice's Civil Rights Division initiated fair housing testing in 1991. This is a technique used to uncover evidence of discrimination in rental housing. Fair housing testing involves one or more individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, State, and federal fair housing laws. Enforcement actions may be taken when investigations yield evidence of a pattern or practice of illegal housing discrimination. Testing may be initiated following the filing of a specific housing discrimination complaint or, as is the case when testing for disability discrimination, as part of an overall effort to determine whether the design or architectural features of a specific rental facility comply with state and federal accessibility requirements. In Napa County, fair housing testing is used to identify unlawful housing discrimination practices based on the real or perceived race, ethnicity, color, religion, gender identity or expression, national origin, disability, familial status, marital status, age, ancestry, sexual orientation, and source of income of prospective renters. Fair Housing Napa Valley conducts fair housing testing of rental properties to assess how well rental properties are conforming to fair housing laws, assists residents in filing fair housing complaints, provides education and technical assistance to housing providers, and provide conciliation services for tenants and landlords.

The Department of Fair Employment and Housing (DFEH) maintains a record of housing discrimination complaints filed in local jurisdictions. From 2015 - 2019, 256 fair housing complaints originating in Napa County were filed with DFEH. Overall, disability-related discrimination comprised the largest proportion of

cases (56 percent). The next highest basis for discrimination were race and familiar status, comprising nearly 8 percent each. According to the HCD AFFH Data Viewer, no fair housing inquiries for the City of St. Helena were received between 2013 and 2021. Fair housing inquiries are comments or questions related to fair housing received by HUD's Office of Fair Housing and Equal Opportunity (FHEO), not formal discrimination complaints. The lack of inquiries is low for the region, as seen when compared to the cities of Santa Rosa (received 61), Sonoma (received 8), and Napa (received 33).

2.3.3 Findings, Lawsuits, and Enforcement Actions

There are currently no active fair housing lawsuits or enforcement actions in the city. However, historically, low-income and minority populations have struggled to procure affordable housing opportunities in the city. In addition, residents have challenged the City for not doing enough to combat housing segregation issues between the western and eastern portions of the city.

In 2013, the City of St. Helena signed a settlement agreement with Esvin Calderon as well as other residents and fair housing providers who had filed a lawsuit against the City on the basis that the City "promoted or maintained policies, practices, or actions that had the purpose of effect of displacing or excluding Latino residents and low-income residents from the City". According to the settlement the City would comply with a list of requirements that would promote the development of affordable housing units in the city, including depositing $500,000 to the City's Affordable Housing Trust Fund and amending the St. Helena Municipal Code to support and prioritize affordable housing development, and to host fair housing workshops in collaboration with Napa Valley Fair Housing.

In 2016, St. Helena Residents For An Equitable General Plan, the McCorkle East Side Neighborhood Group, and the Protect the St. Helena Vineyard Riverwalk Community Group filed a claim with the City citing that the city is "a segregated city, with an affluent White west and diverse east side where most Hispanics, seniors, and members of other protected groups live largely in a concentrated area near the Napa River."

The City is in the process of adopting a new Zoning Ordinance to be consistent with the 2040 General Plan, which would permit duplexes and triplexes within the MR District (see Program H-N). This would create additional housing choices and affordability levels in the MR Districts on the western side of the city. In addition, several programs, including H-BB, H-EE, and H-XX would implement placemaking strategies to outreach and work with the more diverse and older populations living in the east due to the historic development patterns.

3. Segregation and Integration Patterns and Trends

To inform priorities, policies, and actions, the housing element must include an analysis of integration and segregation, including patterns and trends. Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability in a specific geographic area. Segregation generally means the opposite condition, in which there is a high concentration of the characteristics described above in a specific geographic area. To adequately assess the patterns of integration and segregation, this section identifies trends at the regional scale (Napa County) and at the local scale (St. Helena).

3.1 Race and Ethnicity

The ethnic and racial composition of a community relates to other housing characteristics including household size, locational preference, and economic opportunity. Additionally, race/ethnicity is a known contributor to unfair housing practices. Historical patterns of racial/ethnic segregation were results of governmental policies from the federal to local level that promoted exclusionary actions and disparate treatment of people of color such as redlining, racially restrictive covenants, and mortgage lending practices. The existence of concentrations of minorities living in one location may be an indicator that some minority groups do not have as many housing choices as non-minority residents.

3.1.1 Regional Trends

Regionally, the urbanized areas of Napa County are more diverse, with a minimum of 40 percent of the population consisting of non-White residents, as demonstrated in the geographic depiction of 2014-2018 ACS data shown in Figure 1~~Figure 1~~. Comparatively, populations in the less urbanized and less densely populated areas of Napa County are generally more predominantly White with populations consisting of about 60 percent or greater of White residents.

HUD utilizes the racial/ethnic dissimilarity index as a measure of segregation. The racial/ethnic dissimilarity index represents the extent of which any two racial/ethnic groups differ across a defined geographical area. The index ranges from 0-100, where 0 represents perfect integration between the two racial/ethnic groups and 100 representing perfect segregation. An index value below 40 is generally considered low segregation, a value between 40 and 54 is considered a moderate level of segregation, and a value above 55 is a high level of segregation.[69] Racial/ethnic segregation in Napa County slightly increased between 2010 and 2019. Table 3~~Table 3~~ shows racial/ethnic segregation in Napa County using the dissimilarity index using data from HUD's AFFH mapping tool. Black and Asian/Pacific Islander residents are the most segregated compared to other racial and ethnic groups. Segregation between Black and White residents and between Asian/Pacific Islander and White residents is high, since their racial dissimilarity index scores are above 55 for 2019. Segregation between Non-White and White residents and between Hispanic and White residents is considered low, since their racial dissimilarity index scores are below 40 for 2019. In

[69] *HUD, 2020. https://www.hud.gov/sites/dfiles/FHEO/documents/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf*

Napa County, there has been an increase in segregation across all measured racial/ethnic groups between 2010 and 2019.

Table 3 Racial/Ethnic Dissimilarity Trends (Napa County)

Racial/Ethnic Dissimilarity Index	1990	2000	2010	2019
Non-White/White	19.58	26.18	31.24	36.84
Black/White	56.22	52.61	58.76	67.86
Hispanic/White	21.86	28.94	30.13	35.61
Asian or Pacific Islander/White	37.11	38.97	57.35	64.47

Source: Affirmatively Furthering Fair Housing Mapping Tool – Table 3, Version AFFHT0006, 2022

3.1.2 Local Trends

St. Helena is more diverse compared to rural areas of Napa County, which are predominantly White, and less diverse than the cities of Napa and American Canyon. According to 2015-2019 ACS estimates, White residents comprise the largest racial/ethnic group in St. Helena, followed by Hispanic/Latino residents. The predominant population throughout the entire city is White, as shown in Figure 3~~Figure 3~~. The northwest area of the city has the highest predominance of White residents, although the southeast area of the city is predominantly White as well. The eastern areas of the city have the largest non-White populations, as shown in Figure 3~~Figure 3~~.

3.2 Persons with Disabilities

Persons with disabilities include those with a physical or mental impairment including hearing, vision, mobility, cognitive function. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs as required under federal civil rights law, including equitably provided disability-related services that an individual needs to live in such housing. For example, persons with disabilities who are unable to use stairs or need a zero-step shower may not have actual housing choice without the presence of housing units with these accessibility features.[70]

High spatial segregation of persons with disabilities may indicate fair housing issues related to both physical needs and economic disparities. According to the *2020 Annual Report on People with Disabilities in America*, more than 25 percent of persons with disabilities (including physical, intellectual, and developmental; sensory; and other disability categories) live below the Census Bureau-designated poverty

[70] *HCD 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf*

line, which is 14.5 percentage points higher than people without a disability.[71] Persons with disabilities may be more reliant than persons without disabilities on fixed incomes or access to public transit.

3.2.1.1 Regional Trends

According to 2015-2019 ACS estimates, a total of 16,244 Napa County residents had one or more disabilities, which represents approximately 11.8 percent of the county's total population. Figure 4~~Figure 4~~ shows the percentage of the population living with one or more disabilities throughout Napa County. The western areas of the county, which includes the urban areas of the cities, have higher concentrations of persons living with one or more disabilities compared to the eastern areas of the county. The southeastern area of the City of Napa has the highest concentration of persons living with one or more disabilities in the county.

[71] *The Rehabilitation Research and Training Center on Disability Statistics and Demographics. 2020. https://disabilitycompendium.org/annualreport*

Figure 1:
Percent of Total Non-White Population (Napa County)

City Boundary
County Boundary
(R) Racial Demographics (2018) - Block Group
Percent of Total Non-White Population
≤ 20%
21 - 40%
41 - 60%
61 - 80%
> 81%

ST. HELENA
CALIFORNIA

0 3 6 Miles
N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

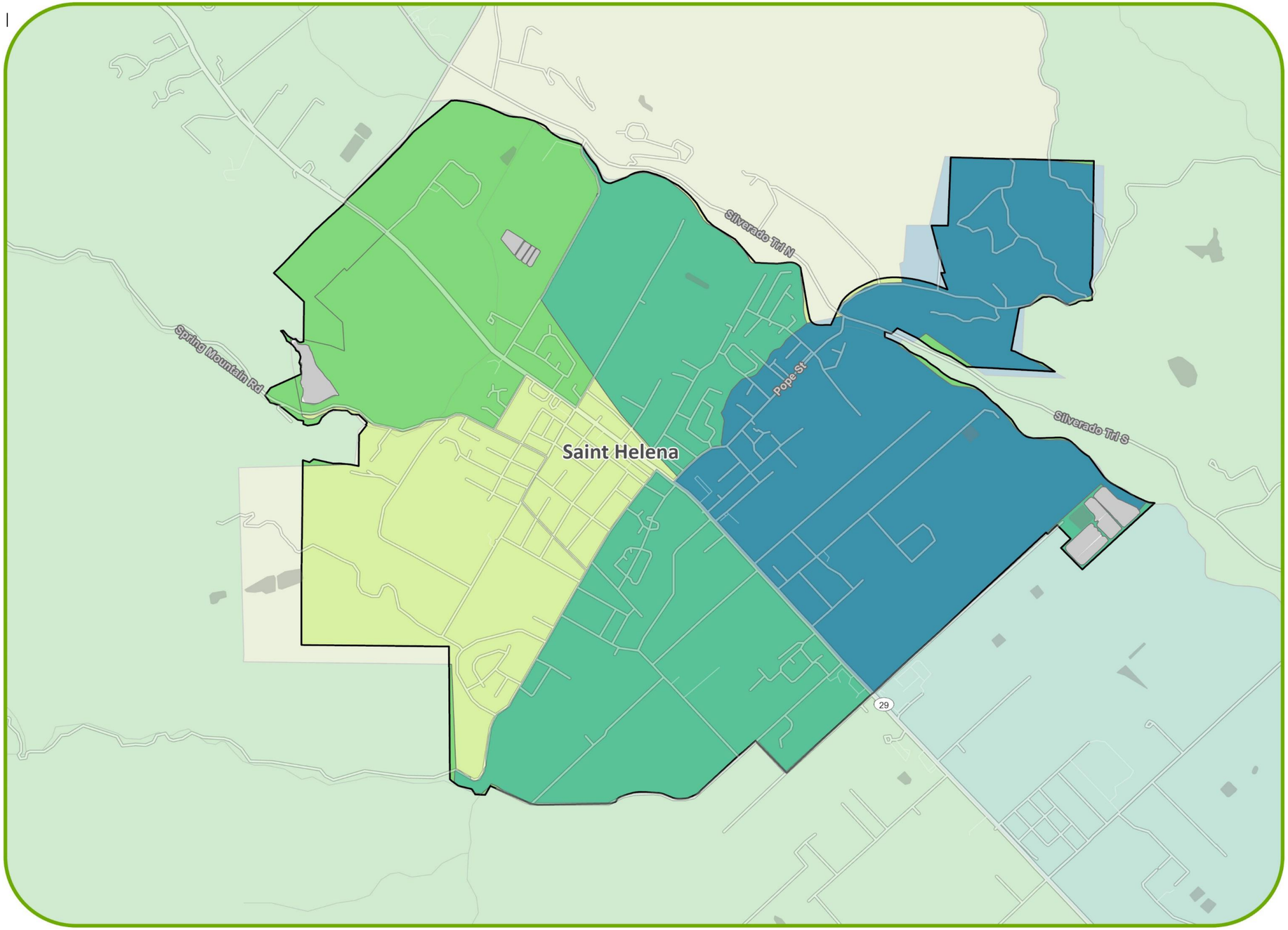


Figure 2:
Percent of Total Non-White Population (St. Helena)

City Boundary
(R) Racial Demographics (2018) - Block Group
Percent of Total Non-White Population
≤ 20%
21 - 40%
41 - 60%
61 - 80%
> 81%

ST. HELENA
CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

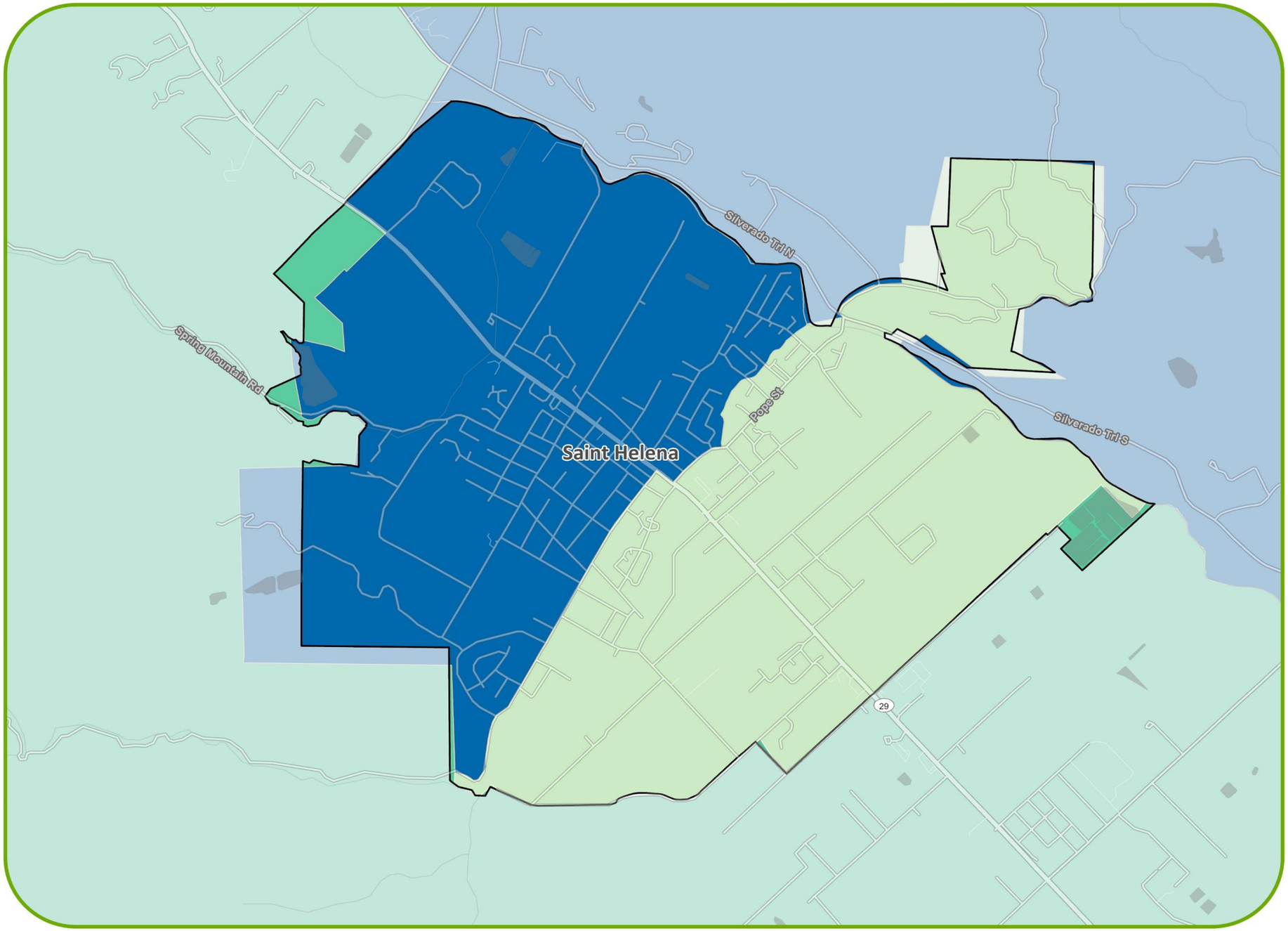


Figure 3:
Predominant Populations (St. Helena)

City Boundary

(R) Predominant Population - White Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - Hispanic Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - Asian Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - African American Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

(R) Predominant Population - Native American Majority Tracts

Dominance Value

- Slim (gap < 10%)
- Sizeable (gap 10% – 50%)
- Predominant (gap > 50%)

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

Figure 4 Percent of Population with a Disability (Napa County)

Source: AFFH Viewer, 2022

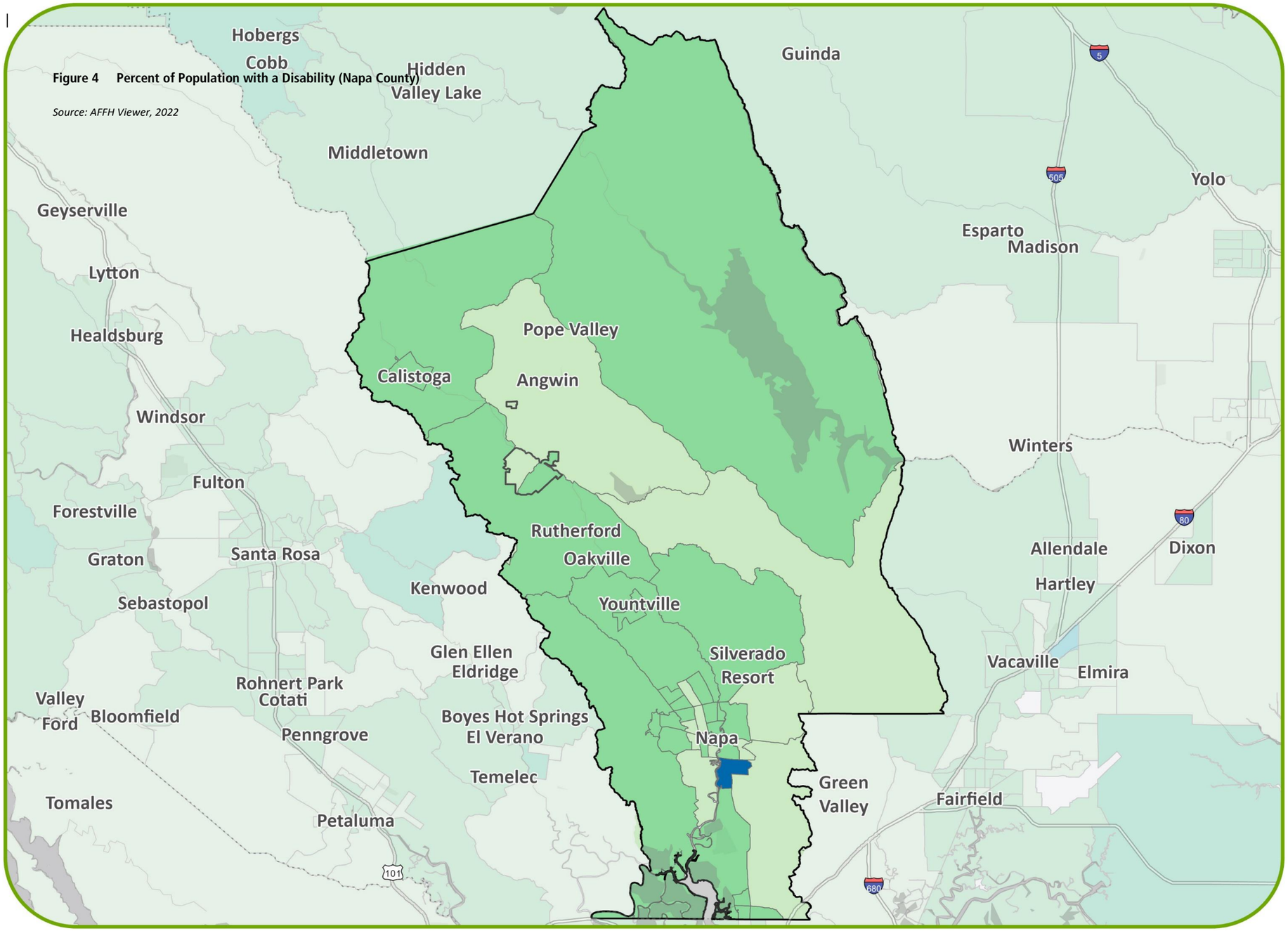


Figure 4: Percent of Population with a Disability (Napa County)

City Boundary
County Boundary
(R) Population with a Disability (ACS, 2015 - 2019) - Tract
Percent of Population with a Disability
< 10%
10% - 20%
20% - 30%
30% - 40%
> 40%

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

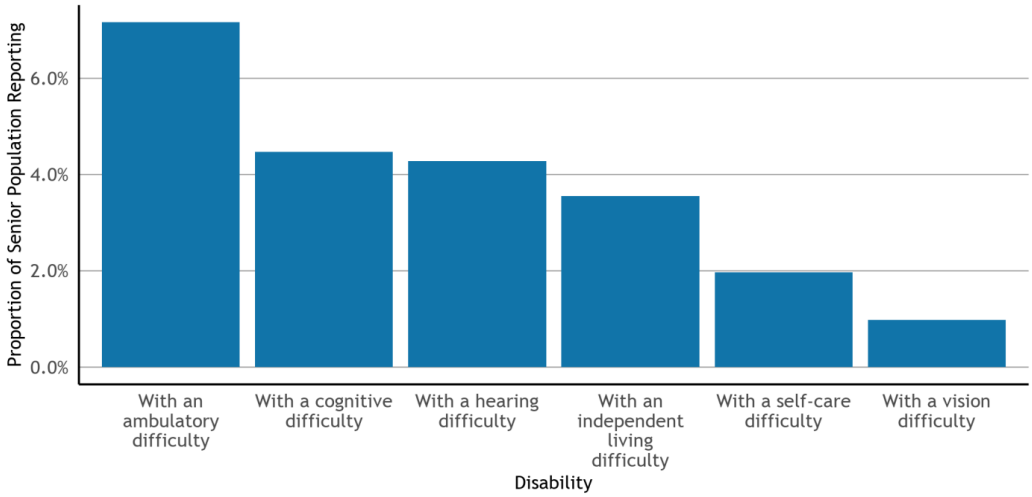
3.2.2 Local Trends

The 2015-2019 ACS estimated a total of 726 residents in St. Helena were living with one or more disabilities, which is approximately 11.9 percent of the total population. Of the 726 individuals living with a one or more disabilities, 466 (64.2 percent) are age 65 or older. The most common type of disability in St. Helena is ambulatory difficulty, defined as those who have serious difficulty walking or climbing stairs, as shown in

Figure 5

~~Figure 5~~. Persons with ambulatory disability have specific housing needs and may require housing that is wheelchair accessible or lacks stairs or steps.

Figure 5 Disability by Type (St. Helena)



Source: U.S. Census Bureau, American Community Survey 5-Year Data (2015-2019), Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.

Figure 6~~Figure 6~~ highlights the percentage of the population living with one or more disabilities in the city by census tract. The southeastern parts of the city, east of Spring Street and Pope Street, have higher concentrations of residents with one or more disabilities (between 10 and 20 percent living with at least one disability).

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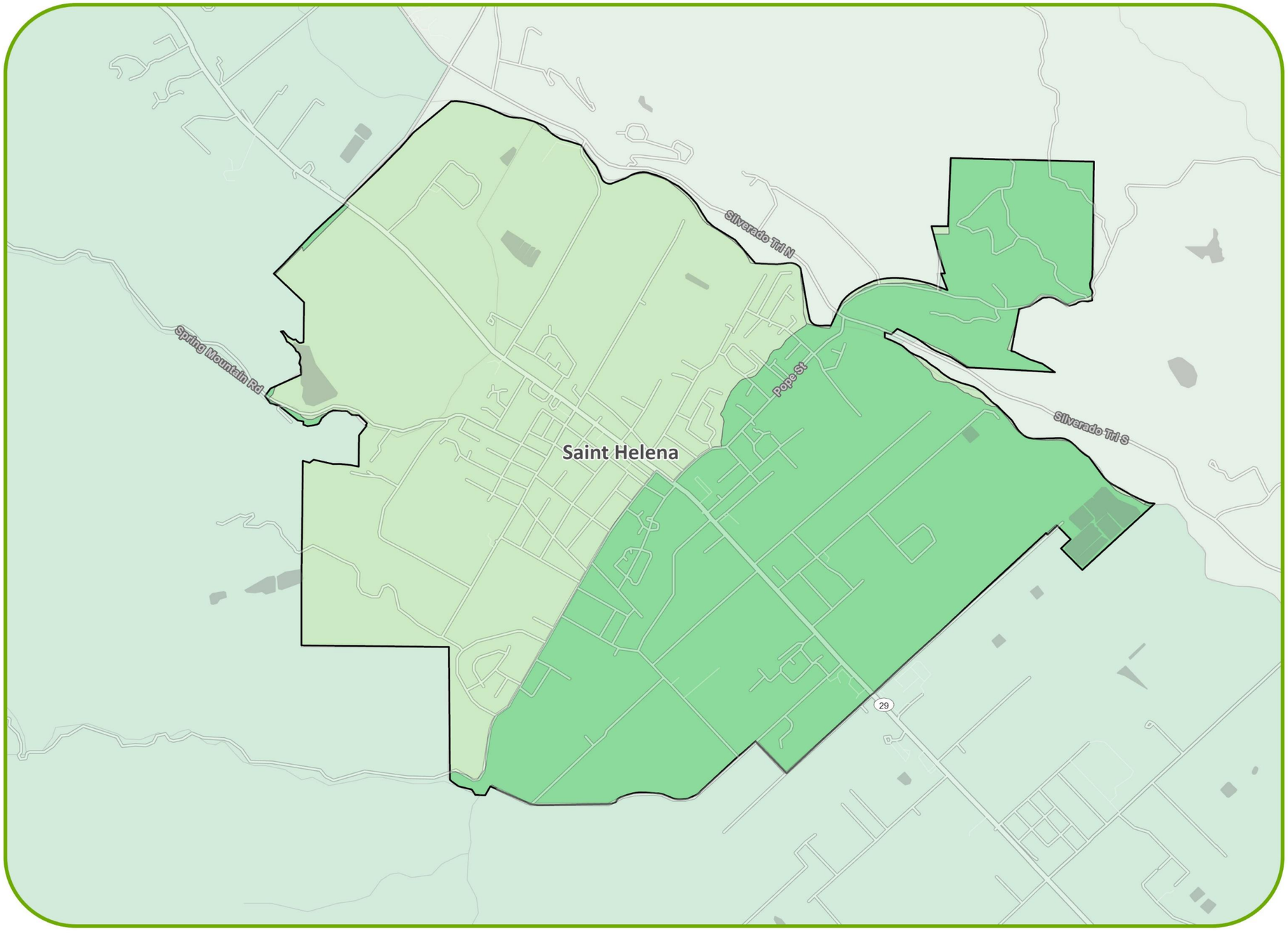


Figure 6: Percentage of Population with One or More Disabilities (St. Helena)

City Boundary

(R) Population with a Disability (ACS, 2015 - 2019) - Tract

Percent of Population with a Disability

- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%
- > 40%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.
Page 897 of 1246

3.3 Familial Status

Familial status refers to families with children under the age of 18, including those with legal custody of a child, pregnant persons, and those in the process of adopting or gaining legal custody. Families with children may face housing discrimination by landlords, including being denied housing due to the presence of children or being subject to special restrictions or fees. Differential treatments such as limiting the number of children in a complex or confining children to a specific location or unit are also fair housing concerns. In a 2016 housing discrimination study, researchers found that compared to households without children, households with children were shown slightly fewer units and were commonly told about units that were slightly larger, and as a result, slightly more expensive to rent.[72] Additionally, female-headed households with children require special consideration and assistance because of generally greater needs for affordable housing and accessible day care, health care, and other supportive services.

3.3.1 Regional Trends

Most households in Napa County are family households, comprising approximately 68 percent of the total 48,705 households in the county. Households with children present comprise 28.1 percent (13,699 households) of the total households or 41.4 percent of all family households in the county. Married couples without children represent 46.9 percent of family households. The majority of family households with children are married couple households with fewer numbers of female and male single parent households. Single-parent households are more often at risk for housing issues because they rely on a single income and may require access to affordable childcare. Table 4~~Table 4~~ shows a breakdown of household type by tenure (owned versus rented) and presence of children in Napa County. Single-parent households are more likely to rent than own, especially female, single-parent households. There are 1,008 single-parent households that own and 2,323 single-parent households that rent in Napa County.

Table 4 Household Type and Tenure (Napa County)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married Couple Family, with Children Present	6,257	20.0%	4,036	23.2%
Single-Parent, Male Householder, no Spouse Present	383	1.2%	577	3.3%
Single Parent, Female Householder, No Spouse Present	700	2.2%	1,746	10.0%
Total Households with Children Present	7,340	23.5%	6,359	36.5%
Total Households	31,276	100%	17,429	100%

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table B25115 Tenure by Household Type (Including Living Alone) and Age of Householder, 2015-2019 Estimates.

[72] *HUD. 2016. https://www.huduser.gov/portal/sites/default/files/pdf/HDSFamiliesFinalReport.pdf.*

Figure 7~~Figure 7~~ shows the percentage of children in married couple households in Napa County. The less urban areas of the county have higher concentrations of children residing in married couple households while the urban areas have a lower percentage of children residing in married couple households. In most areas of the county the majority of children live in married couple households, however the northern half of the county generally has a higher percentage of children living in married couple households compared to the southern half.

Figure 8~~Figure 8~~ shows the estimated percentage of children in households with a female head of household with no spouse or partner. Urban areas of the county, especially areas of the City of Napa and Town of Yountville, have higher concentrations of children in female single-parent households with between 20 and 40 percent of family households headed by a single parent female. The southern area of the City of Napa has the highest concentration of children in households with a female head of household with no spouse or partner, with between 40 and 60 percent of families headed by a single parent female. Less urban areas of the county, outside of incorporated cities, have less than 20 percent of families headed by a single female.

Figure 9~~Figure 9~~ shows the percentage of adults living with a spouse or partner in Napa County. In most areas of the county 40 to 60 percent of adults are living with a spouse/partner. In areas in the southeast portion of the county, and on the west side of the City of Napa, there is a higher concentration of adults living with a spouse/partner, consisting of approximately 60 to 80 percent of adults.

Figure 10~~Figure 10~~ shows the percentage of adults living alone, with less than 20 percent adults living alone in most areas in Napa County. In several of the more urban areas, specifically portions of the City of Napa, Yountville, and St. Helena, there is a higher concentration of adults living alone (greater than 20 percent).

3.3.2 Local Trends

Approximately 58 percent of the total 2,702 households in St. Helena are family households, as shown in Table 5. The majority of families are married couple families with more renters than homeowners. However, more single-parent households own their home than rent. Table 6~~Table 6~~ shows the breakdown of families with children by tenure and household type.

Non-family households are the second most common household type; a total of 42 percent of households fall into this category. These are primarily individuals living alone. Female single parent families make up about 10 percent of both owner-occupied units and rented units. Compared to the entire county, St. Helena has a greater percentage of non-family households, especially those living alone.

Table 5 Household Type and Tenure (St. Helena)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Family Households	920	58	586	53
Married couple family	735	46	408	37
Male householder, no spouse present	29	2	63	6
Female householder, no spouse present	156	10	115	10
Non-family households	670	42	526	47
Living Alone	644	41	395	36
Not Living Alone	26	2	131	12
Total Households	1,590		1,112	

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table S2501 Occupancy Characteristics, 2015-2019 Estimates.

Table 6 Tenure by Household Type and Presence of Children (St. Helena)

Household Type	Owner-Occupied	Percent of Total Owner-Occupied	Renter-Occupied	Percent of Total Renter-Occupied
Married Couple Family, with Children Present	164	10.3%	230	20.7%
Single-Parent, Male Householder, no Spouse Present	17	1.1%	11	0.1%
Single Parent, Female Householder, No Spouse Present	114	7.2%	50	4.5%
Total Households with Children Present	295	18.6%	291	26.2%
Total Households	1,590	100%	1,112	100%

Source: U.S. Bureau of the Census, American Community Survey (ACS), Table B25115 Tenure by Household Type (Including Living Alone) and Age of Householder, 2015-2019 Estimates.

The majority of children in St. Helena live in married couple households; however this percentage is less than in rural areas of Napa County. Figure 11~~Figure 11~~ shows the percentage of children in married couple households in St. Helena is between 60 and 80 percent, while more than 80 percent of children in the surrounding rural areas live in married couple households.

Figure 12~~Figure 12~~ shows the percentage of children in female single-parent households in St. Helena. In the northwest areas of St. Helena, 20 to 40 percent of children live in female single-parent households. In the southeast areas of the city less than 20 percent of children live in female single-parent households.

Figure 13~~Figure 13~~ provides estimates regarding the percent of the adult population living with a spouse in St. Helena. Throughout the city, 40 to 60 percent of adults are living with a spouse. Figure 14~~Figure 14~~

shows the percentage of the adult population living alone in St. Helena. In the western half of the city, 20 to 40 percent of adults live alone while in the eastern half of the city less than 20 percent of adults live alone.

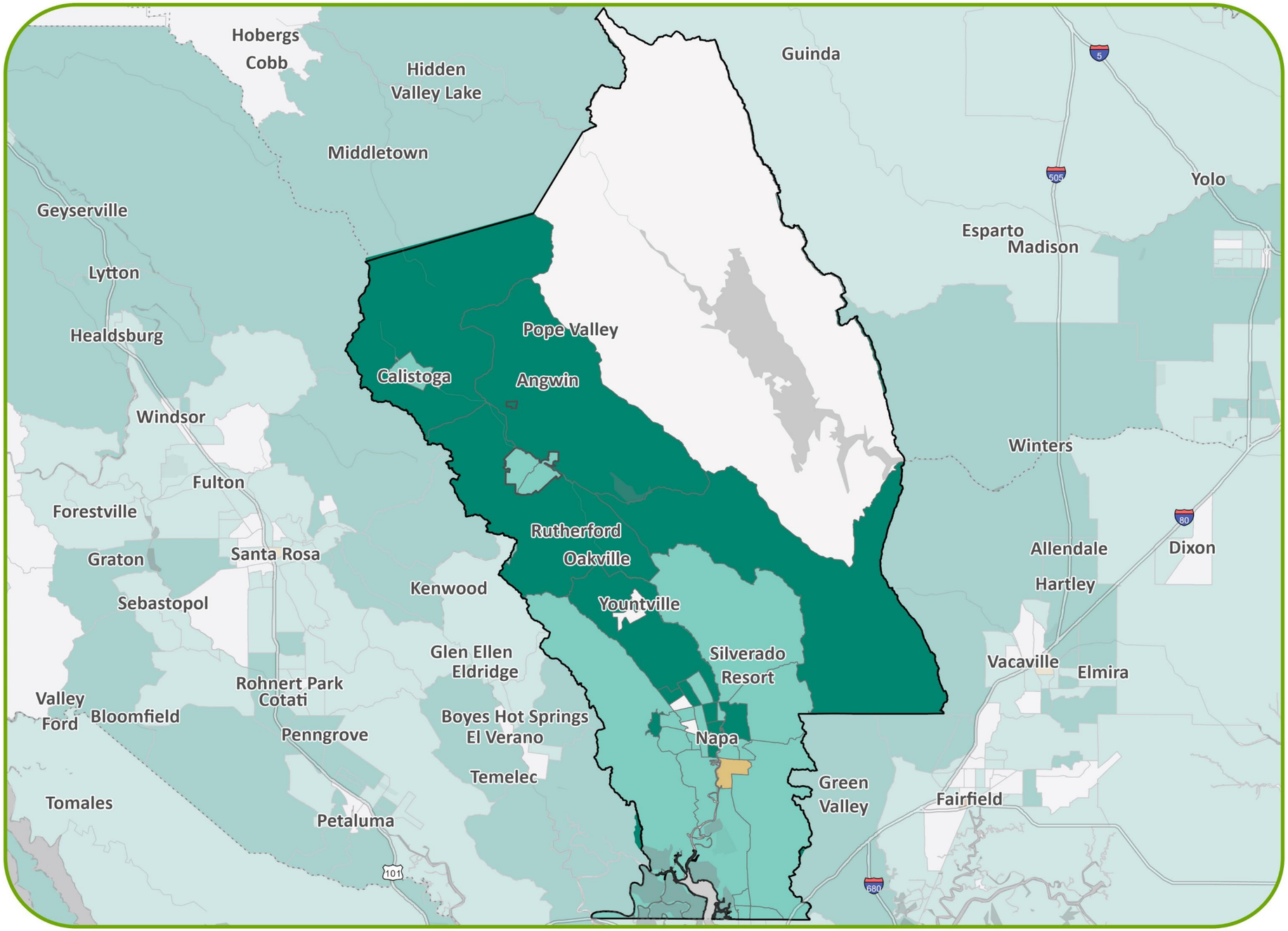


Figure 7: Children in Married-Couple Households (Napa County)

City Boundary
County Boundary
(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract
Percent of Children in Married-Couple Households
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6
Miles
N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

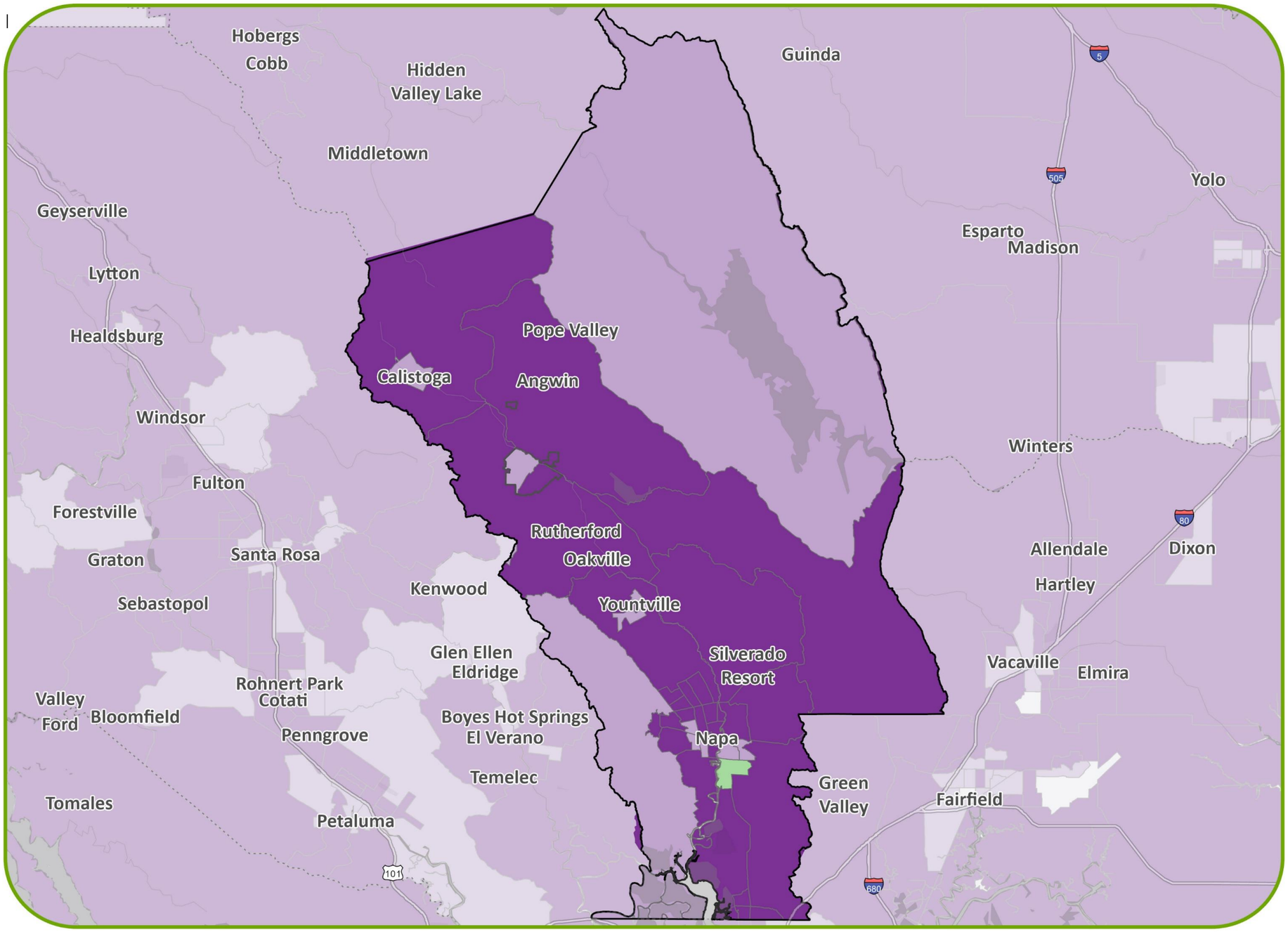


Figure 8: Female Headed Households with Children, No Spouse/Partner Present

City Boundary

County Boundary

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

Percent of Children in Female Householder, No Spouse/ Partner Present Households

- ≤ 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 3 6 Miles

N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

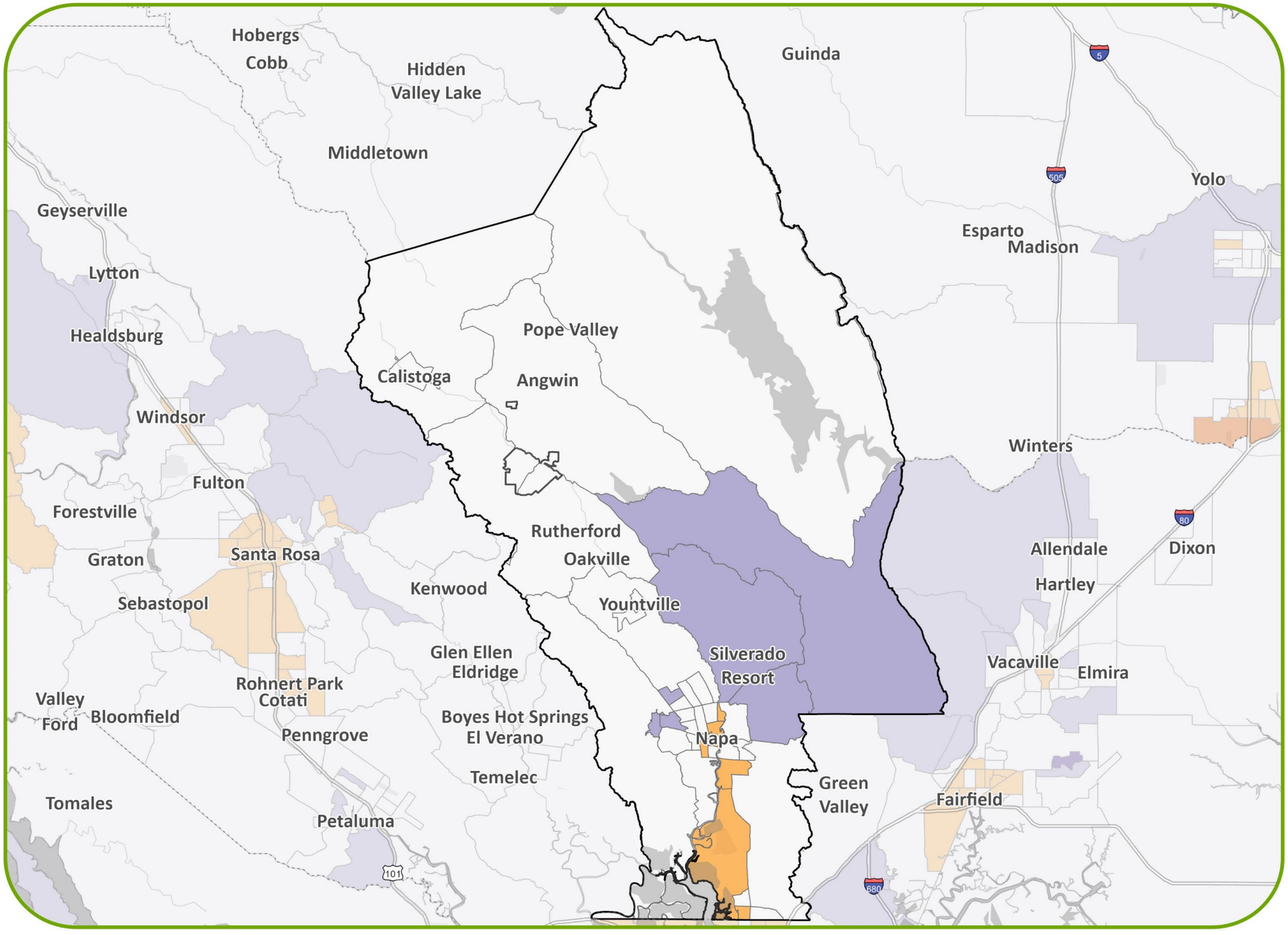


Figure 9: Population of Adults Living with Spouse/ Partner (Napa County)

City Boundary
County Boundary
(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract
Percent of Population 18 Years and Over in Households Living with Spouse
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

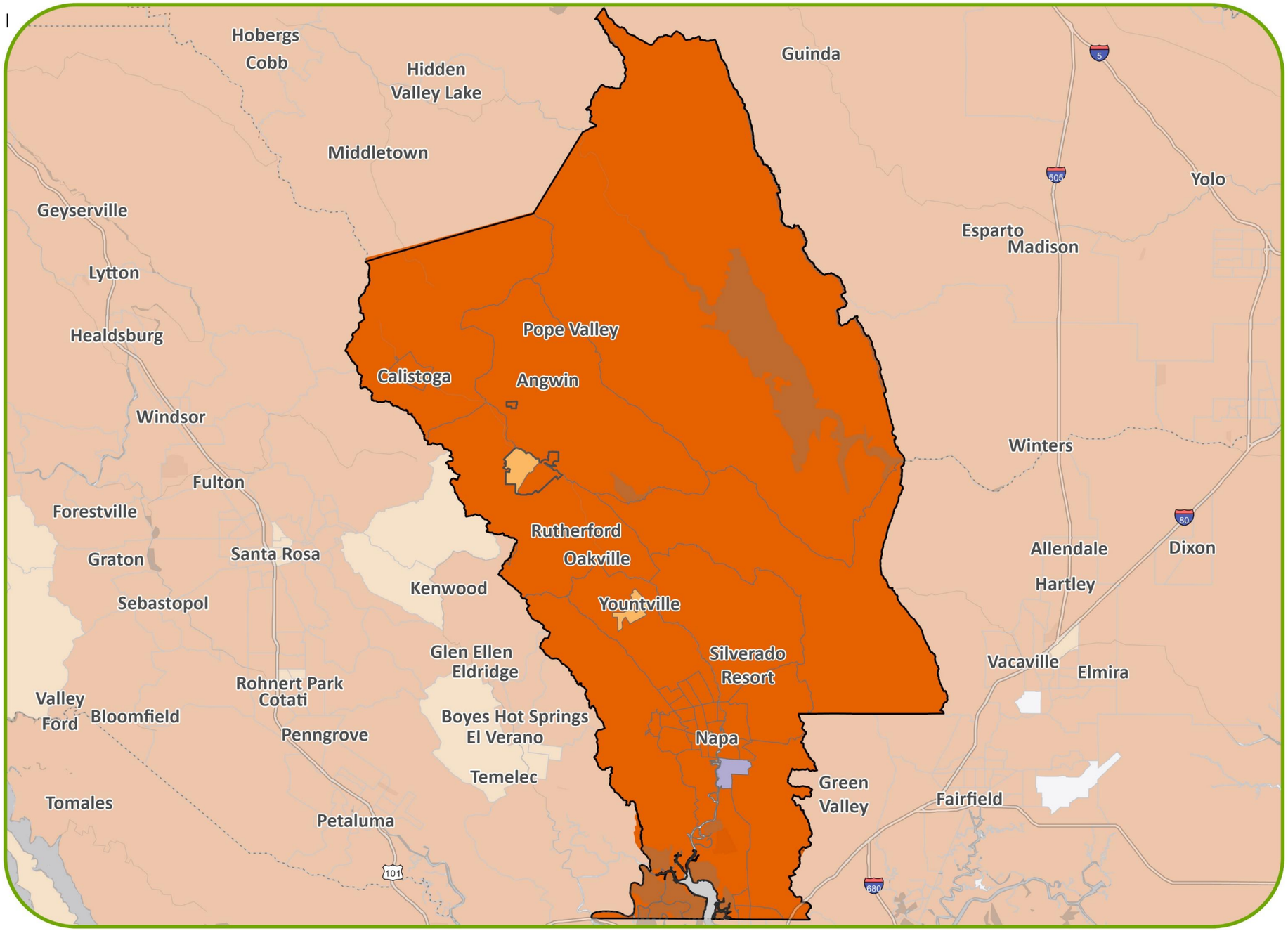


Figure 10: Population of Adults Living Alone (Napa County)

City Boundary

County Boundary

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

Percent of Population 18 Years and Over in Households Living Alone

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 3 6 N

Miles

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

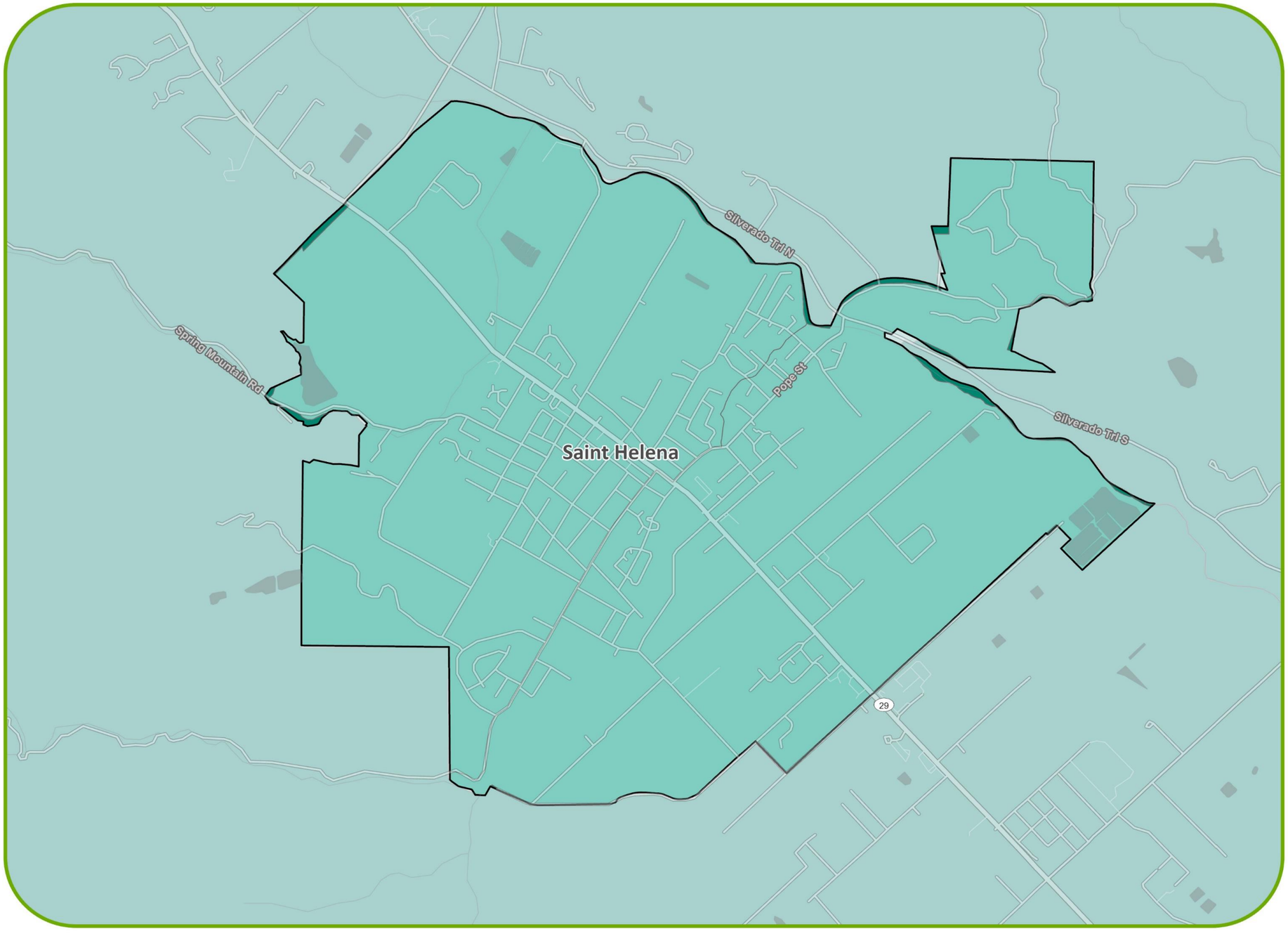


Figure 11: Children in Married-Couple Households (St. Helena)

City Boundary

(R) Percent of Children in Married - Couple Households (ACS, 2015-2019) - Tract

Percent of Children in Married-Couple Households

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

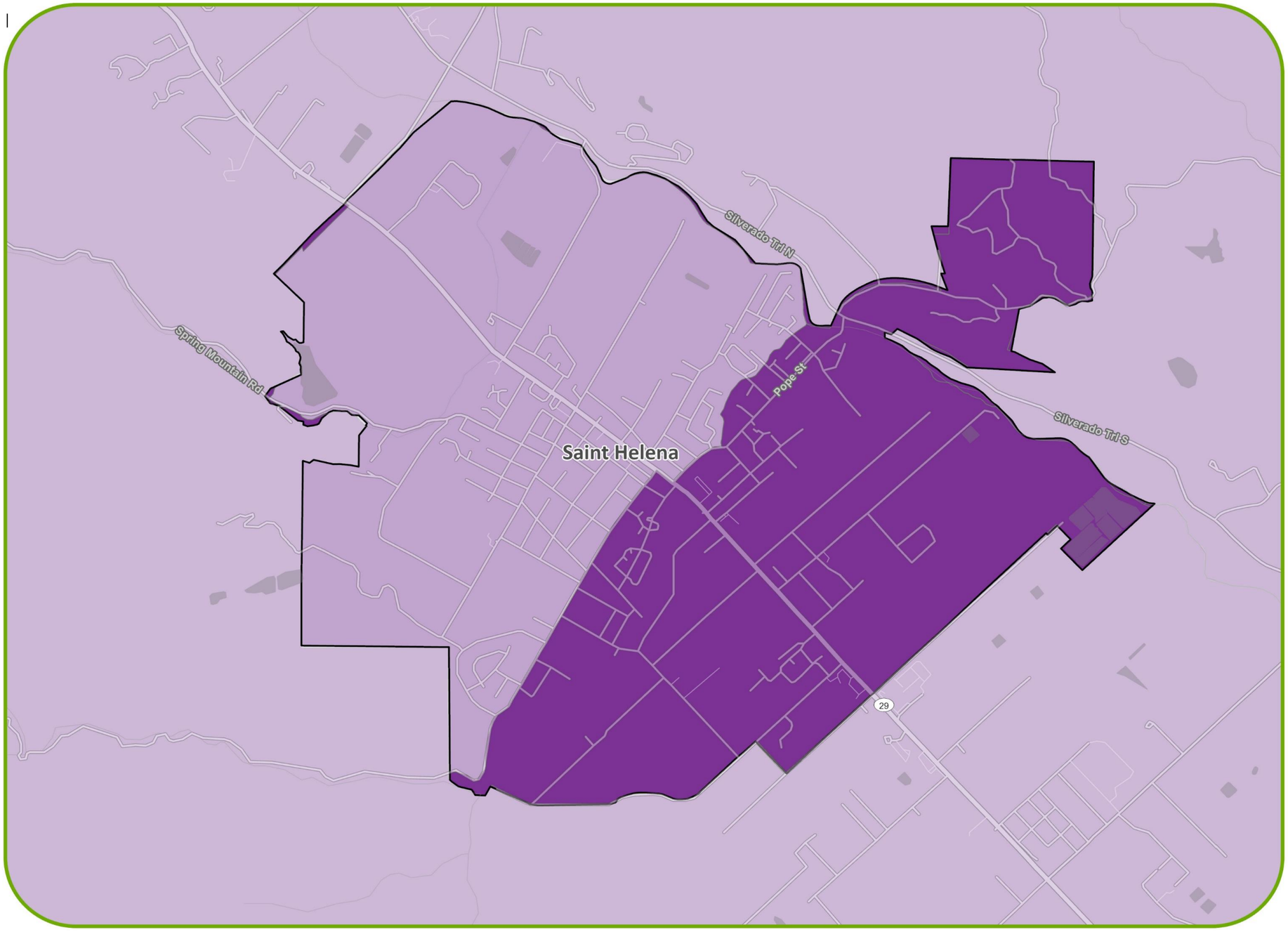


Figure 12: Female Headed Households with Children, No Spouse/ Partner Present (St. Helena)

City Boundary

(R) Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) - Tract

Percent of Children in Female Householder, No Spouse/ Partner Present Households

- ≤ 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.



Figure 13: Population of Adults Living with Spouse/Partner (St. Helena)

City Boundary

(R) Percent of Population 18 Years and Over in Households Living with Spouse (ACS, 2015-2019) - Tract

Percent of Population 18 Years and Over in Households Living with Spouse

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

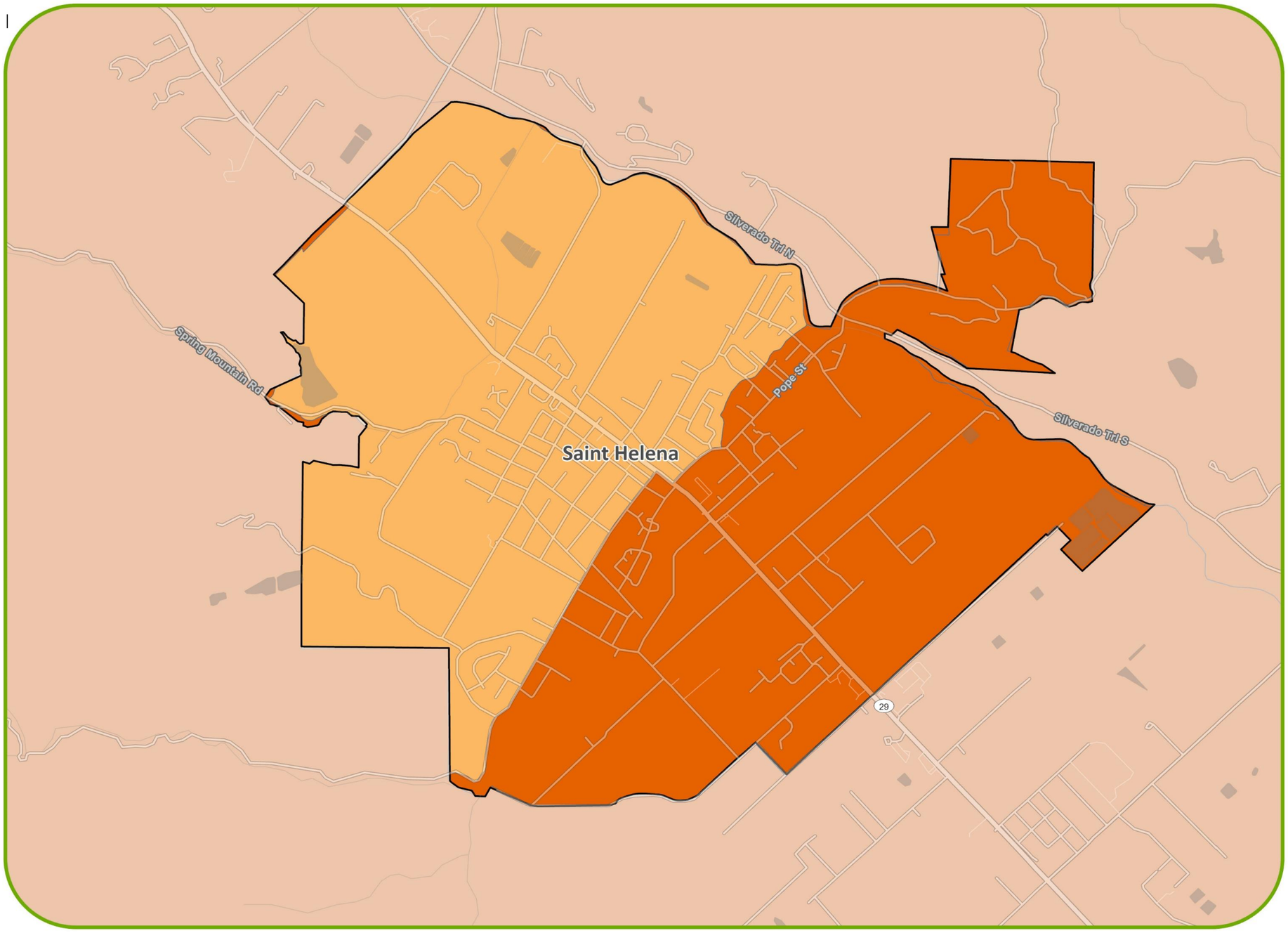


Figure 14: Population of Adults Living Alone (St. Helena)

City Boundary

(R) Percent of Population 18 Years and Over in Households Living Alone (ACS, 2015-2019) - Tract

Percent of Population 18 Years and Over in Households Living Alone

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles

N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

Overall, the northwest portion of the city has a higher proportion of children living in female single-parent households and a higher proportion of adults living alone compared to the southeast portion of the city. The percentages of children living in married couple households and adults living in with a spouse/partner are high throughout the city.

3.4 Household Income

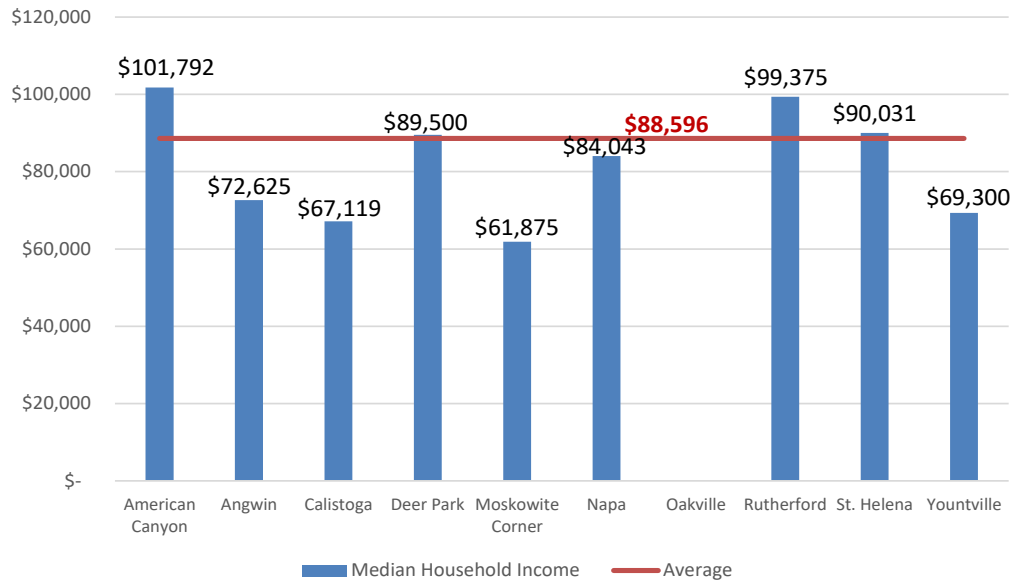
Household income is directly related to the ability to afford housing. Higher income households are more likely to own rather than rent housing. However, as household income decreases, households tend to pay a disproportionate amount of their income for housing and the number of persons occupying unsound and overcrowded housing increases. To achieve fair housing objectives, people in low-income households must have actual choice in housing opportunities – that is, they are able to locate units that are affordable and well maintained in all parts of a jurisdiction and region.

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the area median income).

3.4.1 Regional Trends

The median household income of Napa County is $88,596. LMI areas are concentrated in the more urbanized areas of the county, including the City of Napa, St. Helena, and Calistoga. Rural areas of the county tend to have higher income households. Figure 15~~Figure 15~~ shows the median household income for cities within Napa County.

Figure 15 Median Household Income (2015-2019)



Source: Bureau of the Census, American Community Survey American Community Survey, 2015-2019.

Figure 16~~Figure 16~~ shows median household income by block group using 2015-2019 ACS estimates. Block groups with the lowest median income are the eastern area of St. Helena, the area south of Yountville, and areas within the City of Napa.

LMI populations by census tract for Napa County are displayed in Figure 17~~Figure 17~~. Census tracts within Cities of Napa, St. Helena, and Calistoga have the highest percentages of populations with low to moderate income. These areas are the same areas with the highest percentages of non-White population.

3.4.2 Local Trends

Household incomes in St. Helena tend to be higher than the region as a whole, with a median income of $90,031 compared to the median household income of Napa County ($88,596). St. Helena has a higher median income than many of the surrounding cities, including the cities of Napa, Yountville, and Calistoga, as shown in Figure 15~~Figure 15~~.

Figure 18~~Figure 18~~ provides an overview of median household income by block group in the city. The census blocks with the lowest median income are located on the northeast and east side of St. Helena with median incomes of $47,083 and $51,544, which is less than the state median income of $87,100. Community input identified that many of the property owners in this area are not lower income and are in fact very wealthy. The low-medium income trends in this area of the city may partially be attributed to the three affordable housing developments (Stonebridge Apartments, Woodbridge Village Apartments, and

Hunt's Grove Apartments), Vineyard Valley Mobile Home Park, and a senior living community (Silverado Orchards Retirement Community) all located within these two census blocks. The census block with the highest median income is located in the downtown area in the center of the city with a median income of $158,500. The AFFH Data Viewer has no information on median income of the northwest area of St. Helena.

The LMI populations in St. Helena are concentrated on the east side of the city, as shown in Figure 19~~Figure 19~~. According to HUD estimates, in the eastern area of the city 68 percent of the population are LMI populations. In contrast, on western side of city less than 20 percent of the population is LMI. This pattern closely corresponds with areas of the city that have a greater non-White population concentration, which is also greater on the eastern side of the city.

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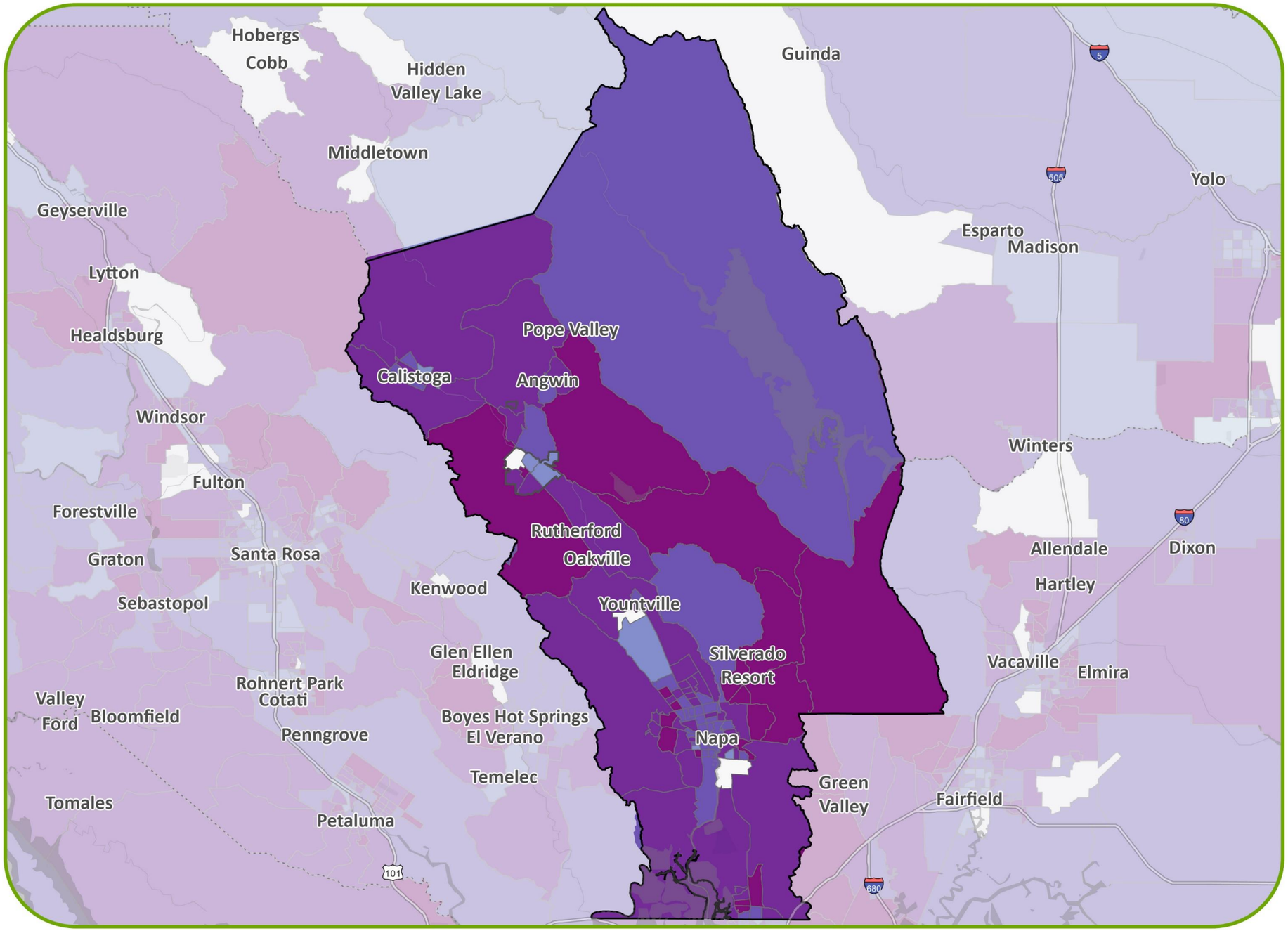


Figure 16: Median Household Income (Napa County)

City Boundary
County Boundary
(R) Median Income (ACS, 2015-2019) - Block Group
Median Income
< $30,000
< $55,000
< $87,100 (HCD 2020 State Median Income)
< $125,000
Greater than $125,000

0 3 6
Miles

N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

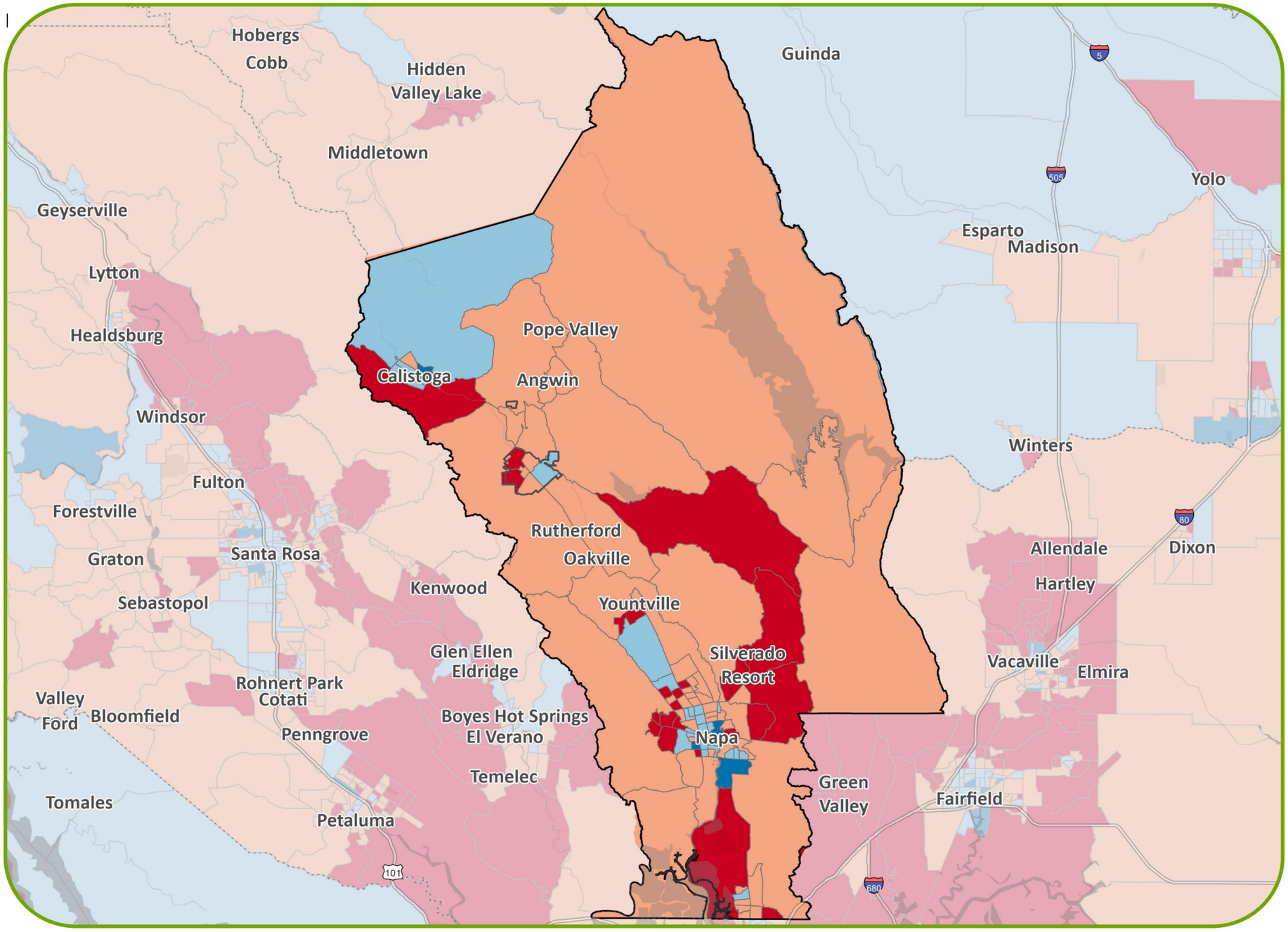


Figure 17:
Low and Moderate Income Population (Napa County)

City Boundary
County Boundary
(A) Low to Moderate Income Population (HUD) - Block Group
Percent of Low-Moderate Income Population
< 25%
25% - 50%
50% - 75%
75% - 100%

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

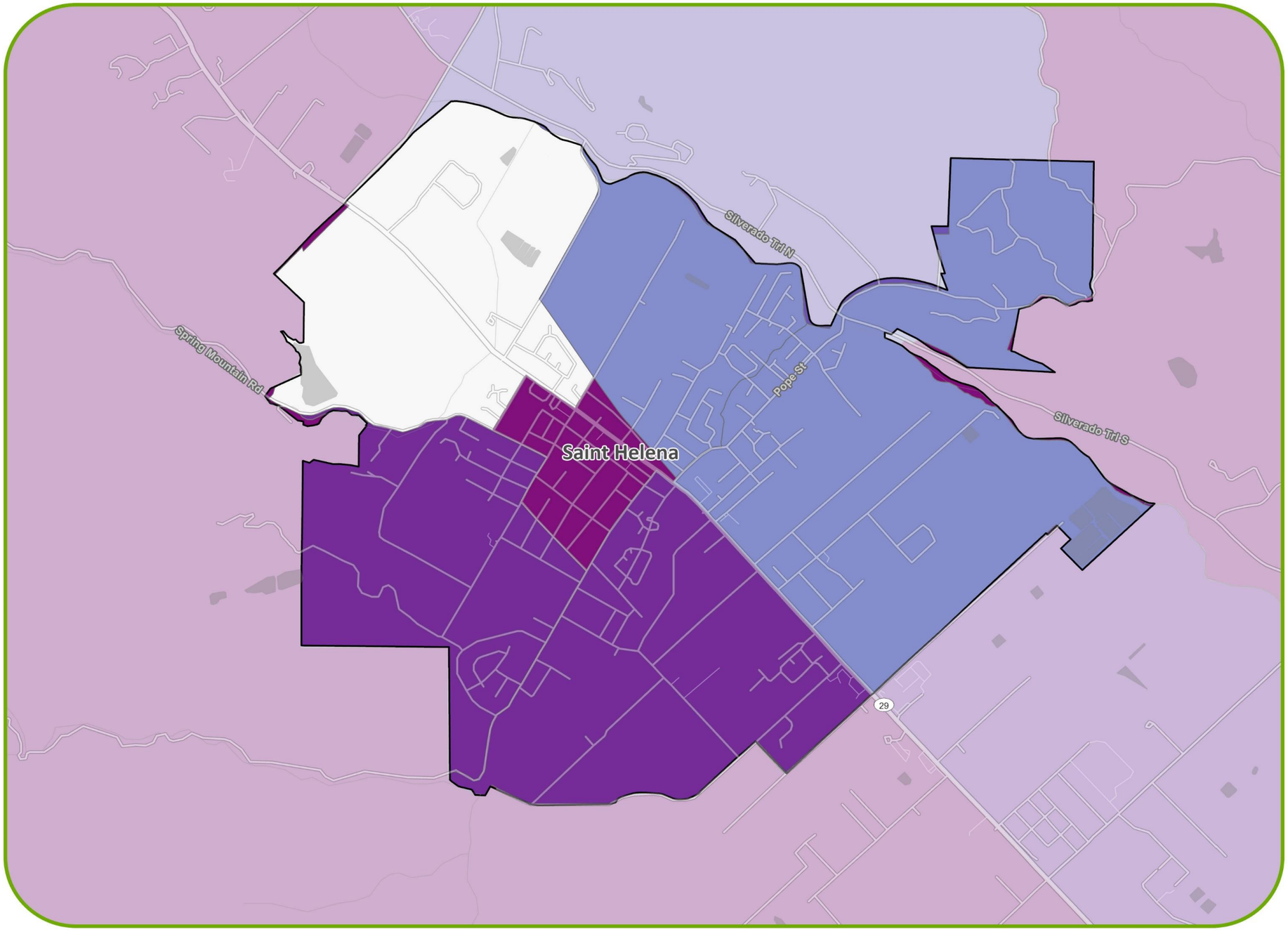


Figure 18: Median Household Income (St. Helena)

City Boundary
(R) Median Income (ACS, 2015-2019) - Block Group
Median Income
< $30,000
< $55,000
< $87,100 (HCD 2020 State Median Income)
< $125,000
Greater than $125,000

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County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

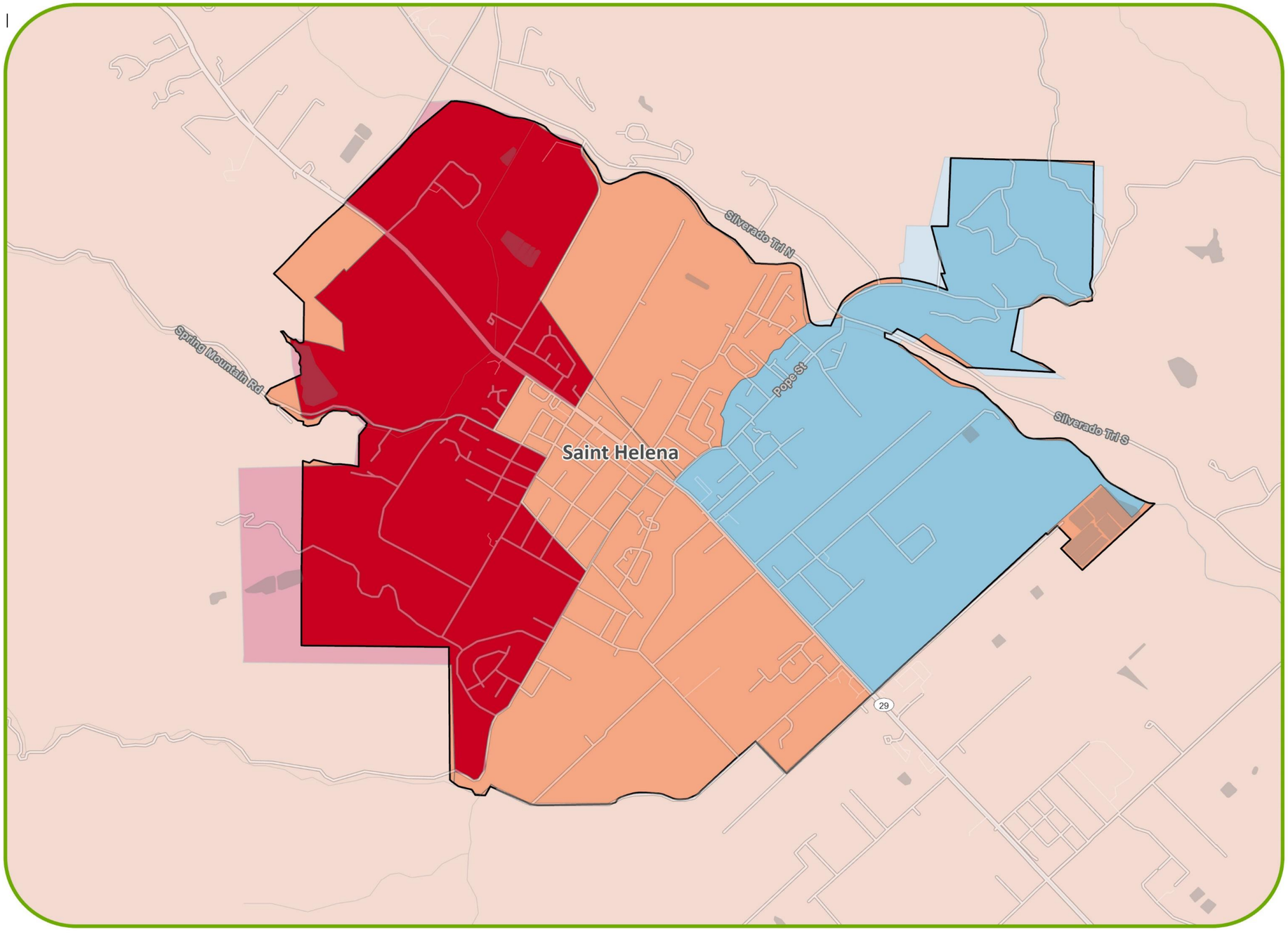


Figure 19:
Low to Moderate Income Population (St. Helena)

City Boundary
(A) Low to Moderate Income Population (HUD) - Block Group
Percent of Low-Moderate Income Population
< 25%
25% - 50%
50% - 75%
75% - 100%

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County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

3.5 Racially and Ethnically Concentrated Areas of Poverty

To identify racially and ethnically concentrated areas of poverty (known as R/ECAPs), HUD developed thresholds based on racial and ethnic concentration and income level. The threshold for racial and ethnic concentration is a non-White population of 50 percent or more within metropolitan or micropolitan areas (in rural areas it is 20 percent). Areas of "extreme poverty" are defined using the poverty test as those with more than 40 percent of the population at or below the poverty line or a poverty rate or three times the average of the metropolitan area, whichever is less. Areas that meet both the racial/ethnic concentration threshold and the "extreme poverty" threshold are considered R/ECAPs.

3.5.1 Poverty and Segregation

3.5.1.1 Regional Trends

There are no R/ECAPs within Napa County, however there is a small area of in the southern portion of the City of Napa that would be considered an area of extreme poverty with more than 40 percent of the population below the poverty line. According to 2015-2019 ACS estimates, approximately 8 percent of the population of Napa County are below the poverty level. Several areas within county have 10 and 20 percent of the population below the poverty line, including areas in the southern region of the county, in and around the Cities of Napa, American Canyon, and St. Helena. Figure 20~~Figure 20~~ shows the poverty status within Napa County.

3.5.1.2 Local Trends

St. Helena does not have any R/ECAPs. According to 2015-2019 ACS estimates, approximately 8 percent of the population of St. Helena are living below the poverty level, consistent with poverty rates of Napa County. The western half of the city has a greater percentage of the population below the poverty line, between 10 and 20 percent. This area also had a higher percentage of children in a female single parent household.

Figure 21~~Figure 21~~ displays the percentage of the population whose income is below the poverty line in St. Helena. The poverty rates in St. Helena have shifted over time. The 2010-2014 ACS estimated the eastern half of the city had a greater percentage of the population below the poverty line, opposite of the trend shown by the 2015-2019 ACS estimates.

Figure 22~~Figure 22~~ shows neighborhood segregation in St. Helena using to data from UC Berkeley's Urban Displacement Project (UDP). According to the UDP the predominant racial/ethnic composition in St. Helena is Latinx-White. ABAG's Segregation Report also analyzed neighborhood segregation in St. Helena between 2010 and 2020 using the racial isolation index, racial dissimilarity index, and Thiel's H-Index. The isolation index showed White residents are the most segregated racial group in the city, followed by Latinx residents. The dissimilarity index showed segregation is greatest between Asian/Pacific Islander and White residents, followed by Latinx and White residents. However, the dissimilarity index is an unreliable measure for Asian/Pacific Islander and Black/African populations in St. Helena because their populations are too

small for accurate calculation. Thiel's H-index for neighborhood level segregation indicated racial segregation between all racial groups within the city is less than in the average Bay Area jurisdiction. Compared to all Bay Area jurisdictions, St. Helena is less diverse, with a smaller percentage of the population consisting of people of color.

ABAG's Segregation Report also analyzed neighborhood level income segregation between 2010 and 2015 in St. Helena using the income group isolation index, income group dissimilarity index, and Thiel's H-index. The isolation index showed above moderate income residents are the most segregated income group in the city followed by very low income residents. Among all income groups, segregation of the moderate income population has changed the most between 2010 and 2015, becoming less segregated. The dissimilarity index showed income segregation is greater in St. Helena than in the average Bay Area jurisdiction between lower income residents and non-lower income residents and between very low income residents and above moderate income residents. Overall, segregation between lower income residents and residents who are not lower income increased between 2010 and 2015. According to Thiel's H-index for neighborhood level income segregation, income segregation in the city is less than the average Bay Area city and remained about the same between 2010 and 2015. Compared to all Bay Area jurisdictions, St. Helena has a similar share of very low income residents, lower share of low and moderate income residents, and a higher share of above moderate income residents.

In summary, ABAG's segregation report found White residents and above moderate income residents are the largest and most segregated racial and income groups in St. Helena.

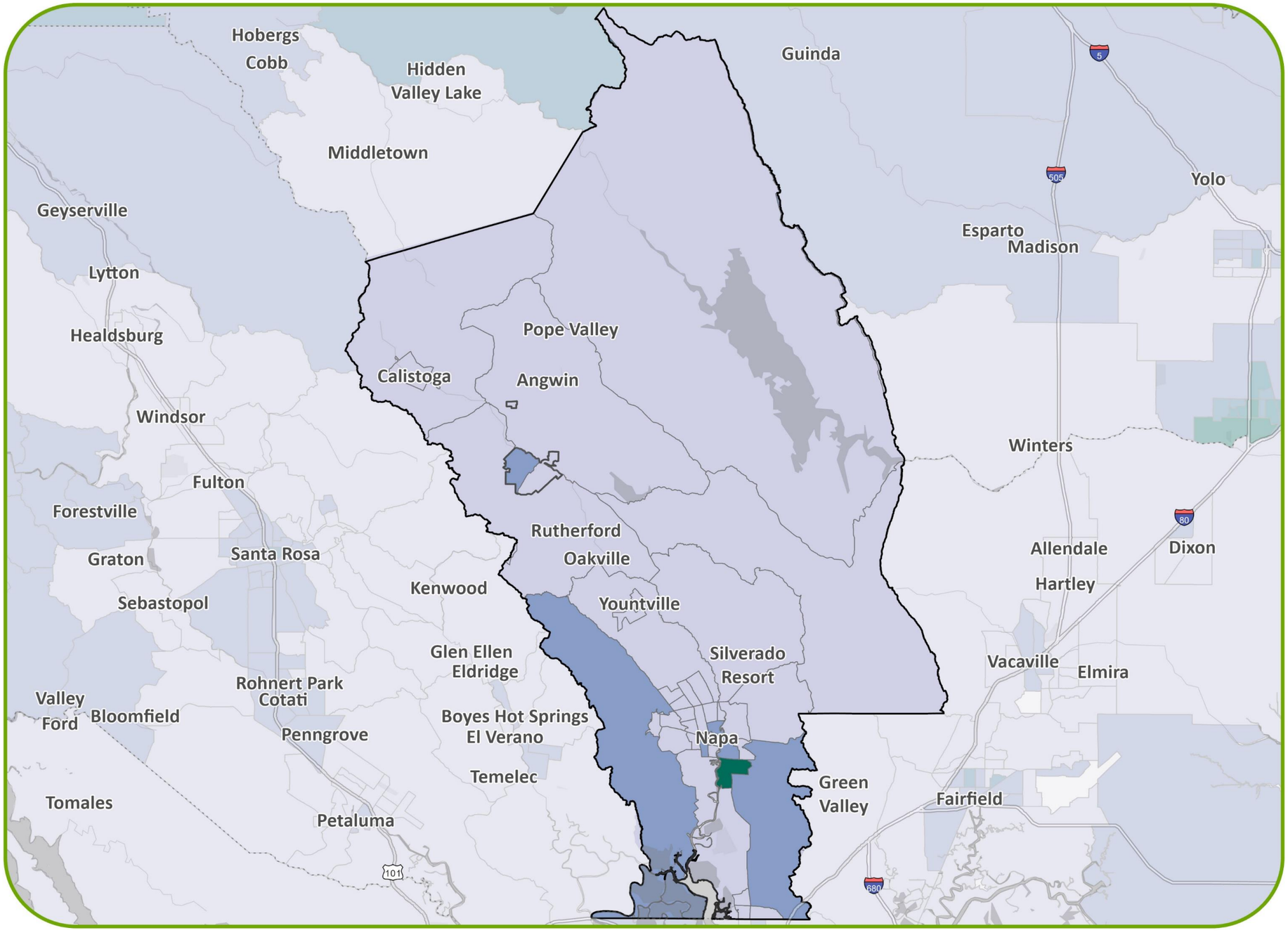


Figure 20:
Areas of High Poverty (Napa County)

City Boundary
County Boundary
(R) Poverty Status (ACS, 2015 - 2019) - Tract
Percent of Population whose income in the past 12 months is below poverty level
< 10%
10% - 20%
20% - 30%
30% - 40%
> 40%

ST. HELENA CALIFORNIA

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County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

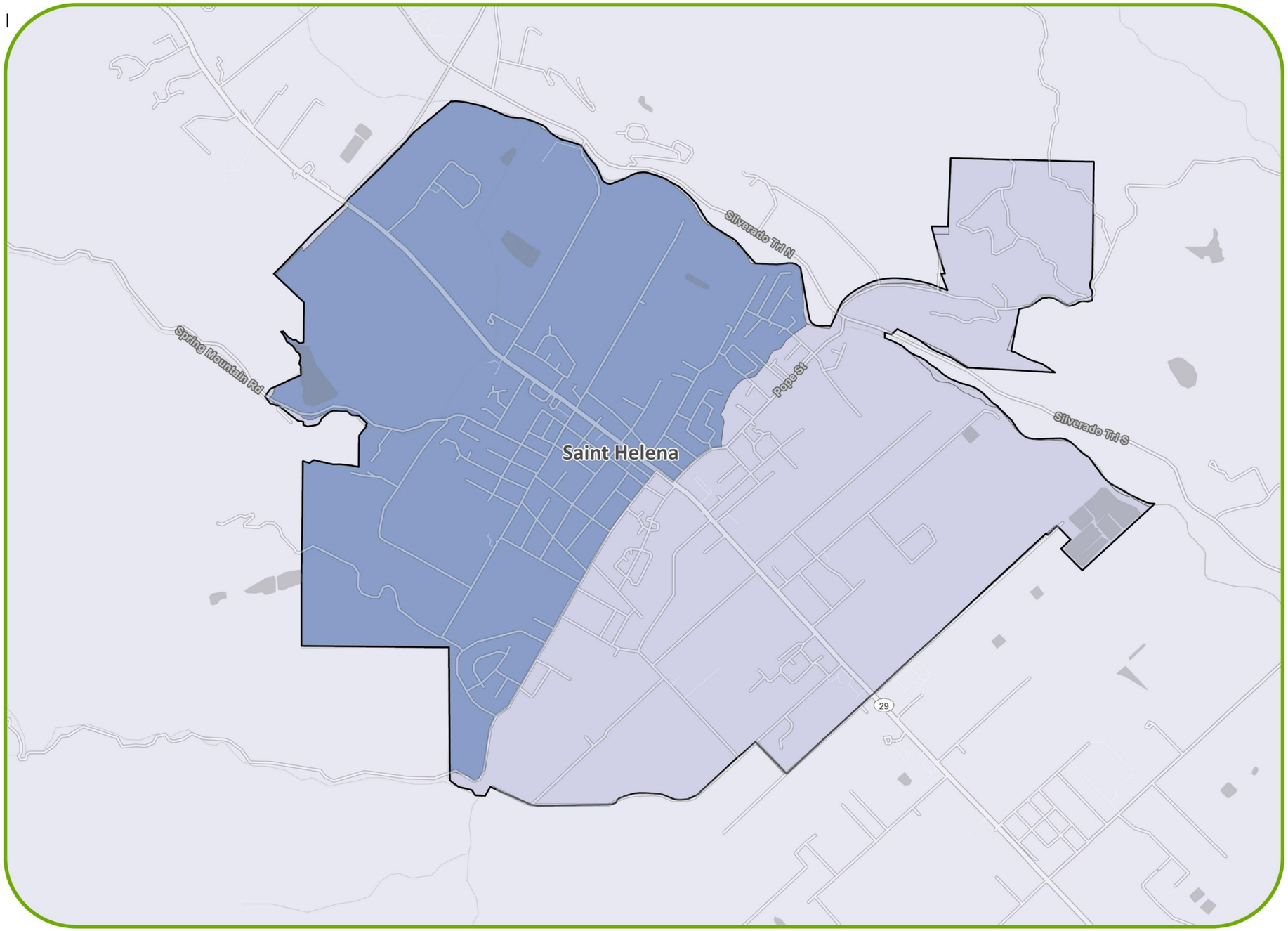


Figure 21:
Poverty Status
(St. Helena)

City Boundary
(R) Poverty Status (ACS, 2015 - 2019) - Tract
Percent of Population whose income in the past 12 months is below poverty level
< 10%
10% - 20%
20% - 30%
30% - 40%
> 40%

ST. HELENA
CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

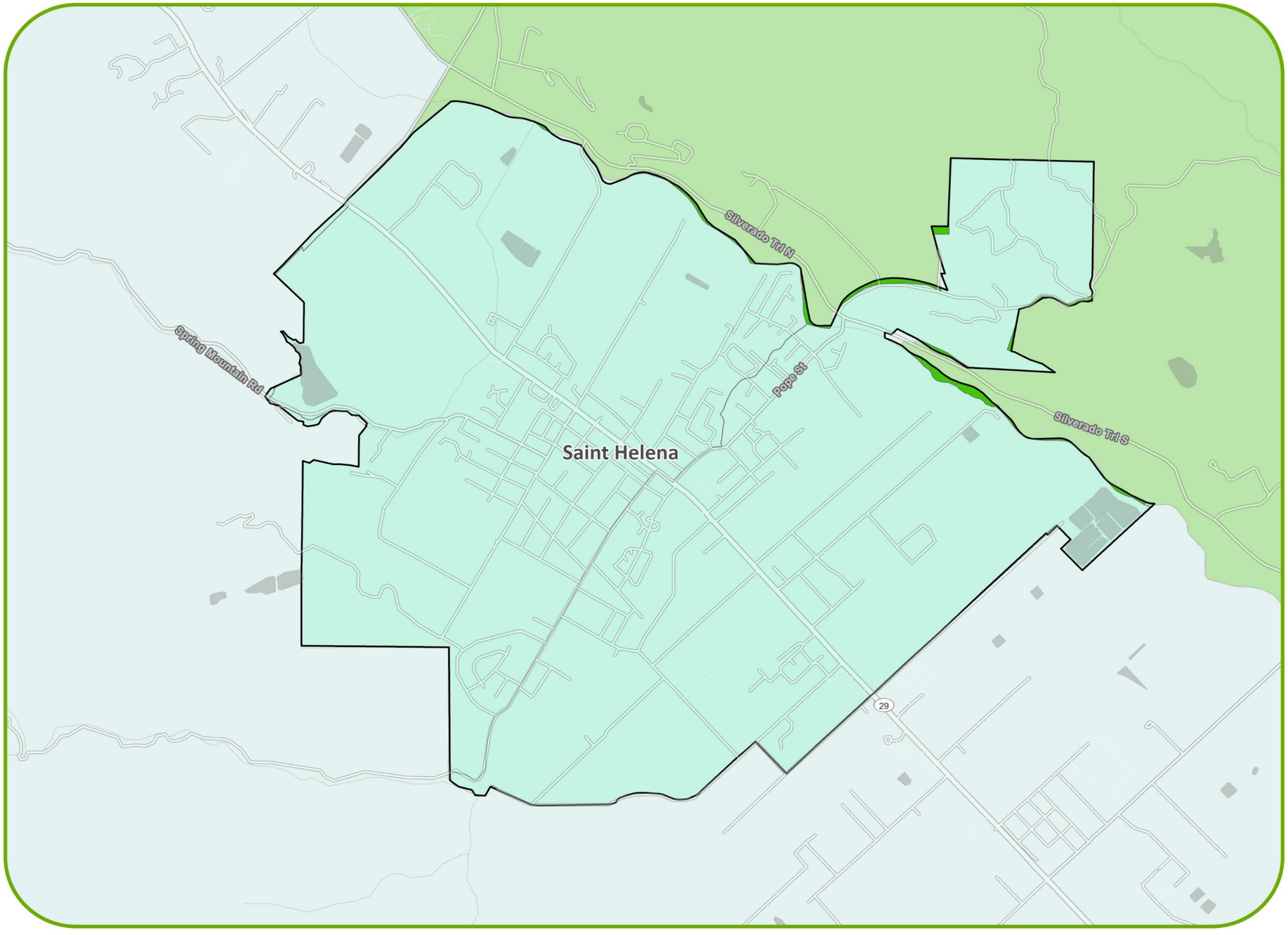


Figure 22: Neighborhood Segregation (St. Helena)

City Boundary
(A) Neighborhood Segregation (UC Berkeley, 2019) - Tract
Latinx-White
3 Group Mix

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.
Page 923 of 1246

3.5.2 Concentrated Areas of Affluence

While racially R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAAs) must also be analyzed. Racially concentrated areas of affluence (RCAAs) are affluent communities that are predominantly White.[73] According to a policy paper published by HUD, White residents are the most racially segregated group in the United States and are typically more affluent than majority non-White communities. In addition to having a higher median income, areas of affluence experience less overcrowding, less housing cost burden on renters, and are generally less susceptible to displacement compared to LMI areas.

RCAAs have not been studied extensively, nor has a standard definition been published by HCD or HUD. HCD has created a metric to identify RCAAs by analyzing the total White population for each census tract and comparing it to the average percentage of total White populations for all census tracts within a given Council of Government (COG) region. This compared value is referred to as the Location Quotient (LQ). For example, a census tract with an LQ of 1.5 has a percentage of total White population that is 1.5 times higher than the average percentage of total White population within the COG region. HCD identifies RCAAs as census tracts with an LQ of more than 1.25 and a median income 1.5 times higher than the COG AMI (or 1.5x the State AMI, whichever is lower).

3.5.3 Regional Trends

There are several RCAAs in Napa County, which are primarily located in more rural areas of the county. Most of the RCAAs are concentrated along the western portion of the county with several RCAAs located within the northwest part of the City of Napa as well as in the rural areas northeast of the City of Napa. shows RCAAs in Napa County.

The population of Napa County is predominantly White, with the highest concentration of White residents residing in rural areas of the county. Figure 23~~Figure 23~~ highlights the predominantly White census tracts in Napa County. Areas with a lower concentration of White residents are generally located within the valley where population density is higher. The more rural areas along the eastern boarder of Napa County have high concentrations of White populations, which corresponds with areas that have the highest median incomes in the county.

3.5.4 Local Trends

There are no RCAAs identified within St. Helena. However, similar to patterns of affluence throughout Napa County, areas of St. Helena with higher median incomes correspond to areas with higher proportions of White residents. The northwestern area of the city has a larger proportion of White residents and a higher median income, while the southeastern area has greater racial/ethnic diversity and a lower median income.

[73] *Goatz, Damanio and Williams, "Racially Concentrated Areas of Affluence: A Preliminary Investigation" https://www.huduser.gov/portal/periodicals/cityscpe/vol21num1/ch4.pdf, (2019).*

The northwestern area of the city has a predominant White population (over 50 percent) and the southeastern area of the city has a large White population and large Hispanic population (approximately 48 percent each). Figure 26Figure 26 shows the overlap of high median income and predominant White population in St. Helena.

In addition to having a higher median income, areas of affluence in St. Helena experience lower percentages of overpayment by homeowners, more positive economic outcomes, and more positive environmental outcomes compared to LMI areas.

3.6 Disparities in Access to Opportunities

According to HCD guidance, land use policies and planning often translate into the ability of residents to access neighborhoods of opportunity, with high-performing schools, greater availability of jobs that afford entry to the middle class, and convenient access to transit and services. The limits on housing choice and access experienced by people within protected classes, such as race, sexual orientation, or disability, have far-reaching impacts on access to job opportunity, quality education, and mental and physical health.[74] Access to opportunity often means both improving the quality of life for residents of low-income communities, as well as supporting mobility and access to 'high resource' neighborhoods. This encompasses education, employment, economic development, safe and decent housing, low rates of violent crime, transportation, and other opportunities, including recreation, food, and healthy environment (air, water, safe neighborhood, safety from environmental hazards, social services, and cultural institutions).

The analysis of place-based characteristics linked to opportunity indicators, quality education, employment, transportation, and healthy environment, seeks to understand the disparity between communities in terms of access to real and potential economic benefits and quality of life.

3.6.1 Transit Access

Reliable access to public transit is crucial, especially for low-income residents and/or persons with disabilities, to provide connections to employment opportunities. Access to employment via public transit can reduce income burden and increase housing mobility, which enables residents to locate housing in more areas.[75] The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice. Persons who depend on public transit may have limited choices regarding places to live.

[74] HCD. 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf
[75] Ong, Paul and Evelyn Blumenberg, "Job Accessibility and Welfare Usage: Evidence from Los Angeles." UCLA Department of Policy Studies, (1998).

3.6.2 Regional Trends

As Napa County is largely rural, residents mainly depend on their personal vehicles for commuting and traveling. Public transit options do exist in Napa County, primarily Vine Transit, a fixed route bus service operated by the Napa Valley Transportation Authority. Vine Transit operates fixed bus route service throughout the county from American Canyon to Calistoga and provides connections to the Vallejo Ferry Terminal, and El Cerrito Del Norte BART station, SolTrans stations in Vallejo and Fairfield, and the Suisun/Fairfield Train Station. Lake Transit Authority connects southern areas of Lake County to northern Napa County, with bus stops in Calistoga, St. Helena, and Deer Park. Additionally, several low cost, on demand shuttle services are available to the public providing fixed route and door-to-door transit within the city limits of their operating city, including the Yountville Trolley, St. Helena Shuttle, Calistoga Shuttle, and American Canyon Transit. Residents and visitors with physical and/or cognitive disabilities may be eligible to participate in VineGo Paratransit Service, a shared ride service providing curb-to-curb transportation. VineGo offers rides within and between cities throughout the county as well as to Kaiser Vallejo Medical Center.

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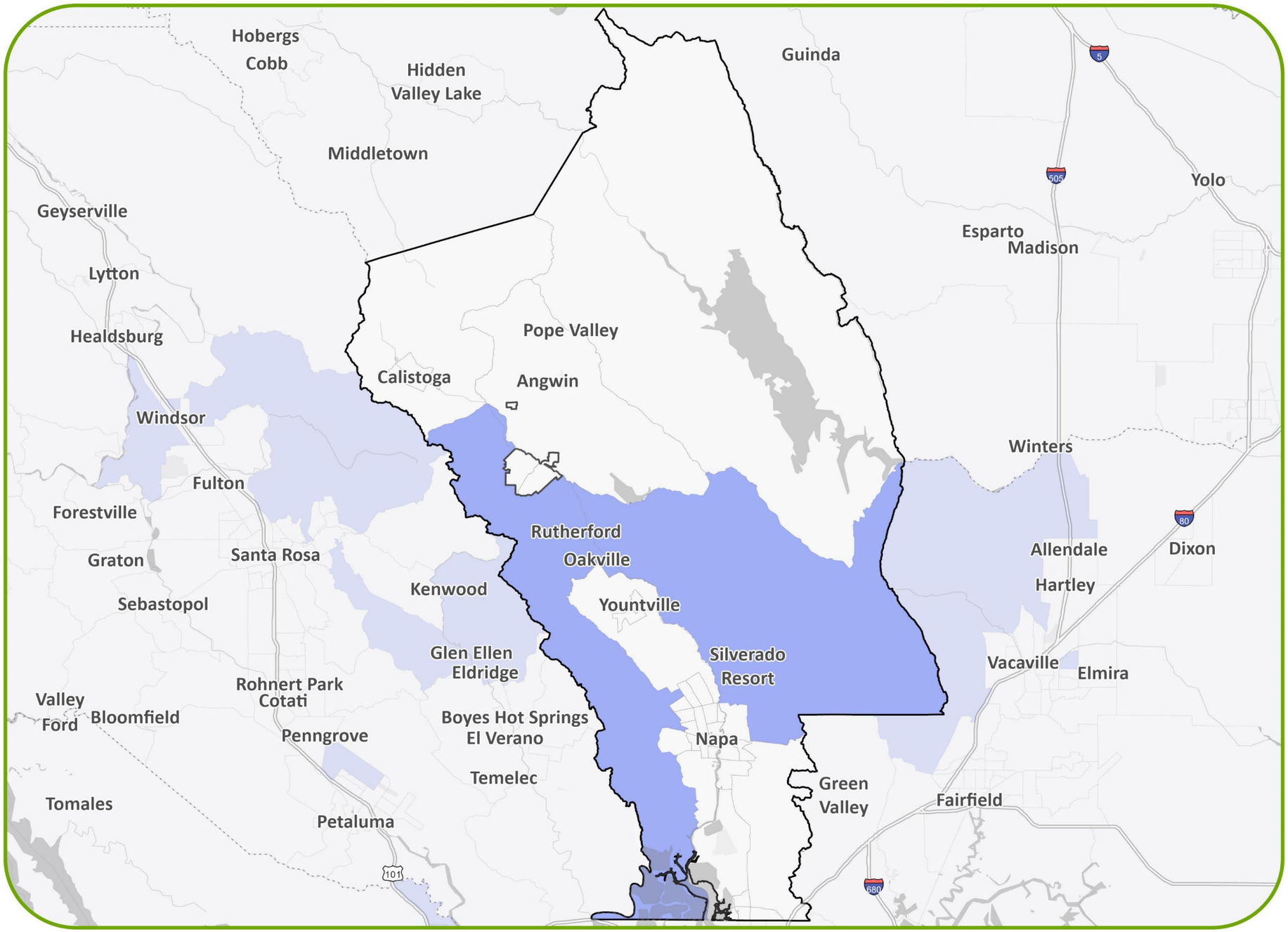


Figure 23: Racially Concentrated Areas of Affluence (Napa County)

City Boundary
County Boundary
(R) Racially Concentrated Areas of Affluence RCAA (ACS, 2015 - 2019) - Tract
0 - Not a RCAA
1 - RCAA

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

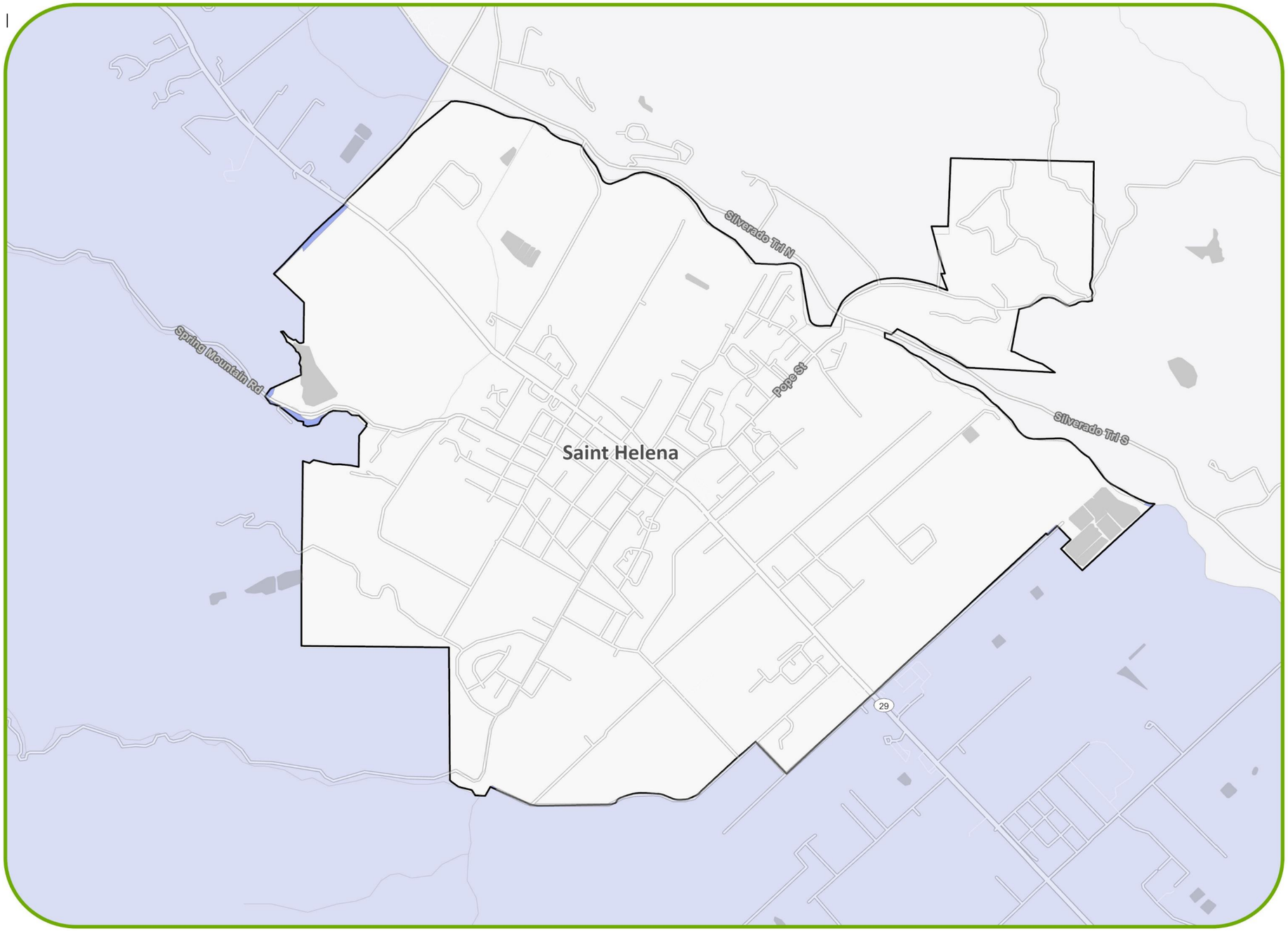


Figure 24: Racially Concentrated Areas of Affluence (St. Helena)

City Boundary
(R) Racially Concentrated Areas of Affluence RCAA (ACS, 2015 - 2019) - Tract
0 - Not a RCAA
1 - RCAA

ST. HELENA CALIFORNIA

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Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

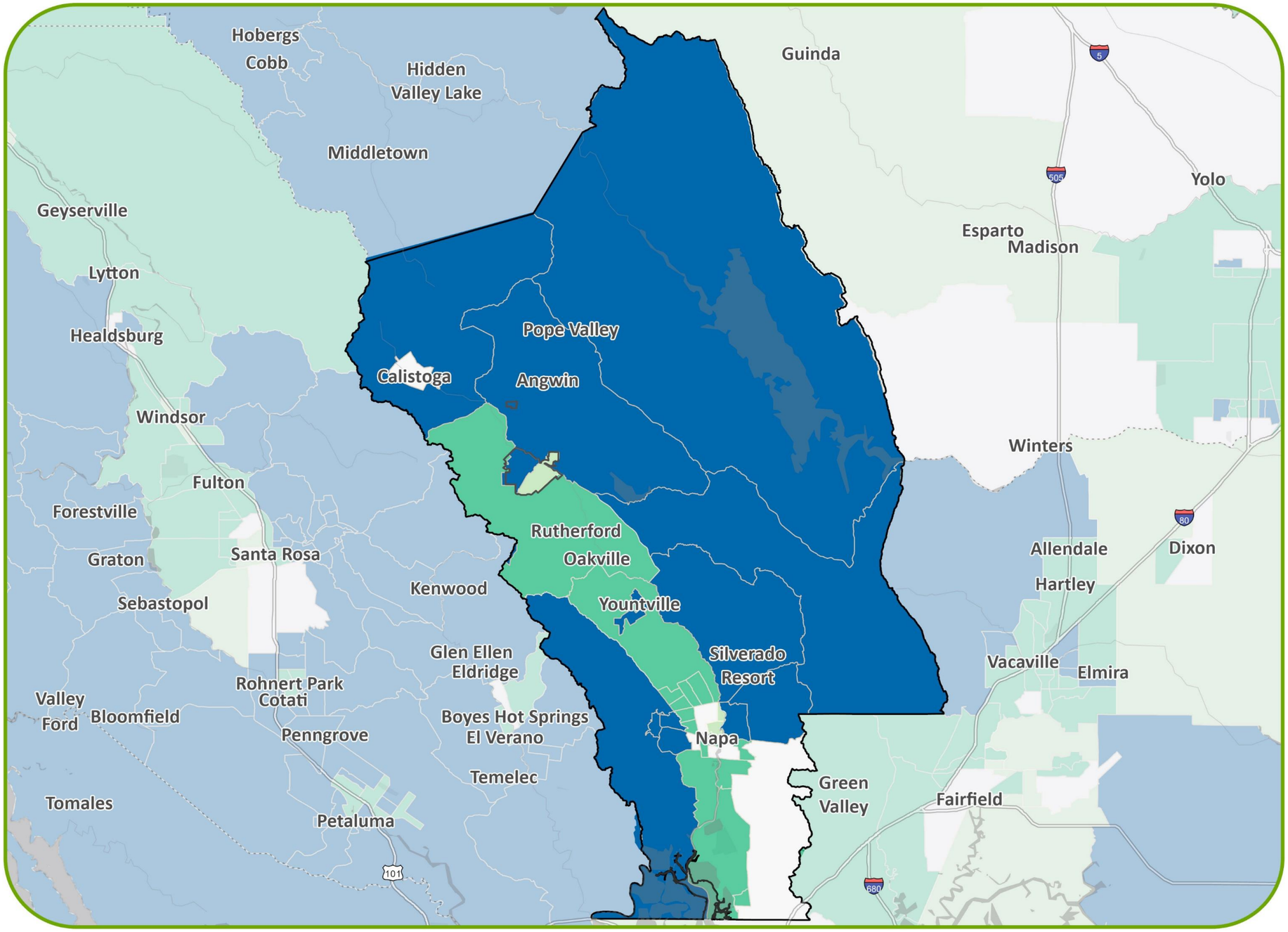


Figure 25: Predominant White Population (Napa County)

City Boundary
County Boundary
(R) Predominant Population - White Majority Tracts
Dominance Value
Slim (gap < 10%)
Sizeable (gap 10% – 50%)
Predominant (gap > 50%)

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County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

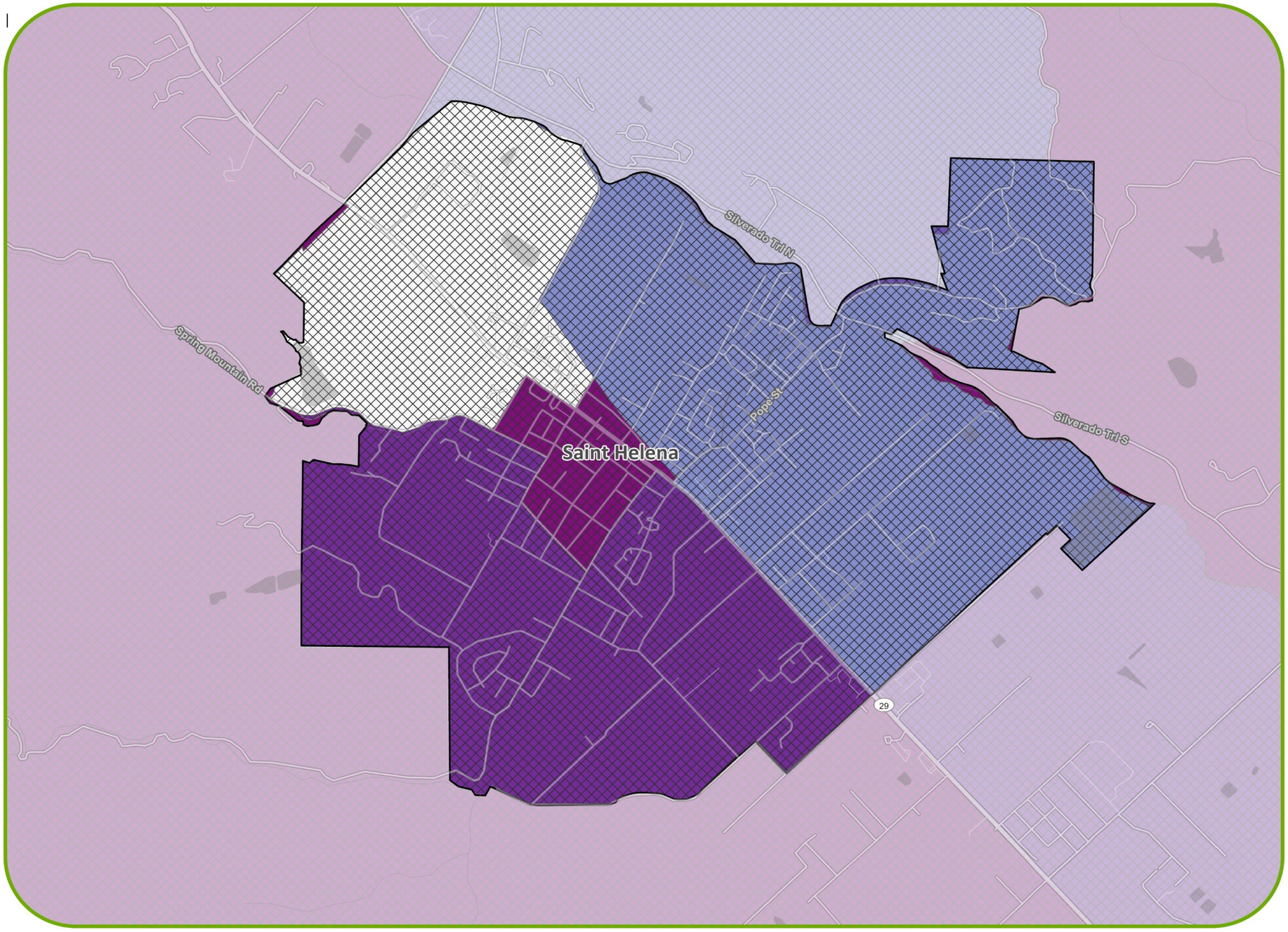


Figure 26: Predominant Populations and Median Household Income (St. Helena)

City Boundary
(R) Predominant Population - White Majority Tracts
White Majority Tract
(R) Predominant Population - Hispanic Majority Tracts
Hispanic Majority Tract
(R) Predominant Population - Asian Majority Tracts
Asian Majority Tract
(R) Median Income (ACS, 2015-2019) - Block Group Median Income
< $30,000
< $55,000
< $87,100 (HCD 2020 State Median Income)
< $125,000
Greater than $125,000

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Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

The Commuter Bike Path (Vine Trail) runs parallel to the Napa Valley Railroad and provides an off-street route walking/biking path for recreation and commuting. Ultimately the Vine Trail will cover 47 miles from Vallejo to Calistoga. Currently 12.5 miles of the path has been completed from Kennedy Park in the City of Napa to Yountville. Sections of the Vine trail have also been completed in American Canyon and Calistoga.

AllTransit is an online database that provides details on transit opportunity throughout the United States, specifically looking at connectivity, access to jobs, and frequency of service. Napa County received an AllTransit performance score of 3.3 which equates to a low combination of trips per week and number of jobs accessible by transit.[76] Approximately 1.5 percent of commuters use public transit in Napa County. The cities of Napa (4.6), Yountville (4.6), and Calistoga (4.0) have the highest scores with a slighter greater combination of number of trips per week, accessible jobs, and available transit routes.

3.6.3 Local Trends

The City of St. Helena has an AllTransit performance score of 2.4 with approximately 1.0 percent of workers who commute using public transit. This score is lower than the County score of 3.3. One Vine Transit bus route passes through St. Helena, providing connections to the City of Calistoga to the north and City of Napa to the south. Additionally, the St. Helena Shuttle Service provides both a fixed route and an on-demand, door-to-door transit service option within the city limits.

Walk Score is a tool that produces a walkability index by assigning a numerical walkability score to cities and neighborhoods. Walkability is measured by analyzing population density, distance to amenities, and road metrics such as block length and intersection density. St. Helena has a walk score of 83, which is considered very walkable, and most errands can be accomplished by foot[77]. St. Helena's walkability score is most negatively affected by the limited number of parks within walking distance from different areas of the city.

The Environmental Protection Agency (EPA) also has a walkability index, which ranks block groups according to their relative walkability. The EPA walkability map, shown in Figure 27~~Figure 27~~, shows that walkability varies across the city. The highest walkability scores are in downtown and along Main Street where most of the commercial areas are concentrated. Further from downtown and in the western and eastern parts of the city, walkability scores are below average.

[76] *https://alltransit.cnt.org/*
[77] *https://www.walkscore.com/*

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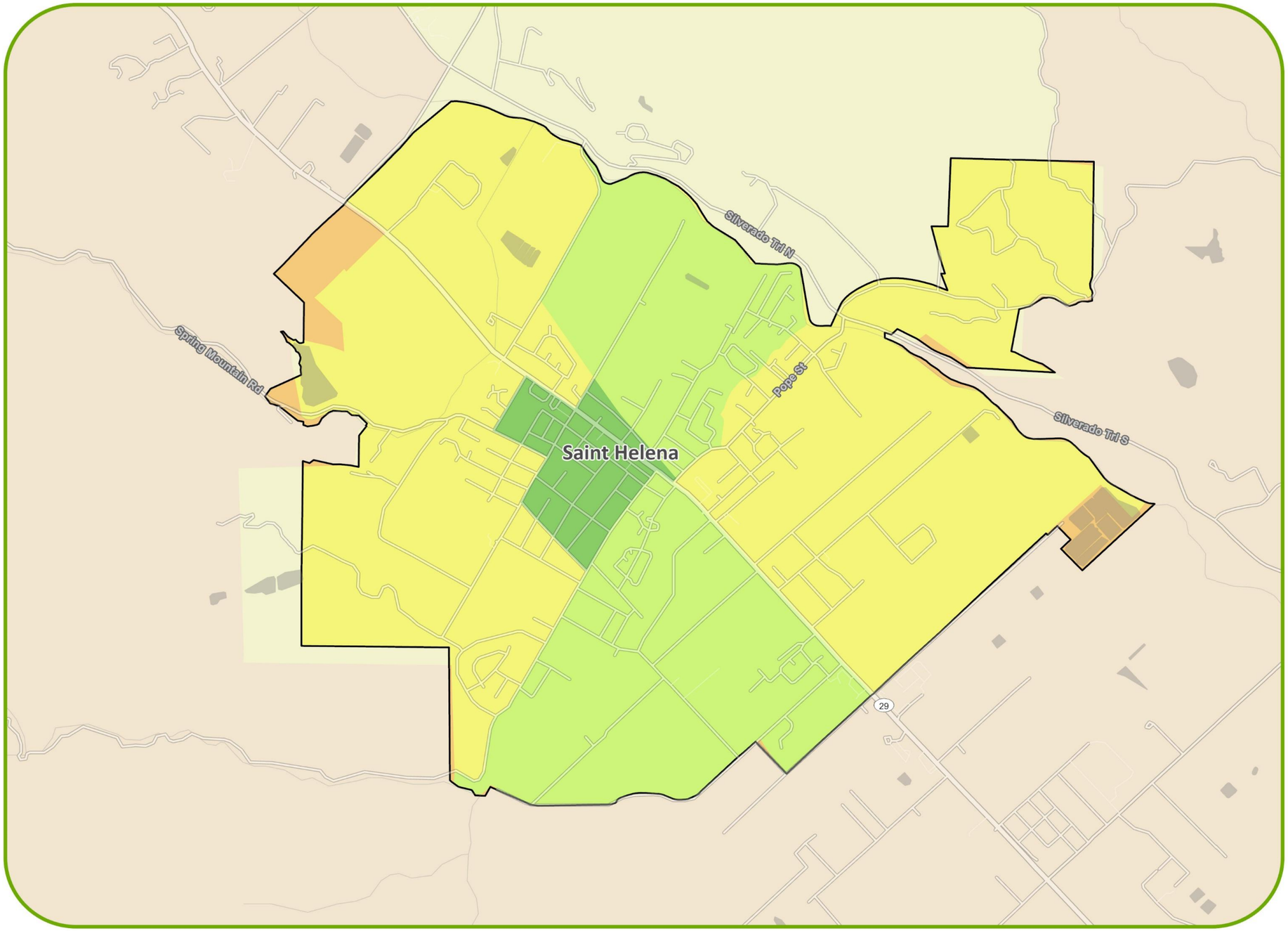


Figure 27:
Walkability Index
(St. Helena)

City Boundary

National Walkability Index

- 1 - 5.75 (Least Walkable)
- 5.76 - 10.50 (Below Average Walkable)
- 10.51 - 15.25 (Above Average Walkable)
- 15.26 - 20 (Most Walkable)

ST. HELENA
CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.
Page 935 of 1246

3.6.4 Access to Quality Education

Economics literature has consistently found about a 10 percent increase in wages/salary with each additional year of education.[78] Educational attainment is directly linked to housing opportunities. TCAC education domain scores, which are used to identify areas of higher or lower education opportunities, incorporate a variety of indicators including math and reading proficiency scores, high school graduation rates and student poverty rates to assess educational outcomes at the census tract level.

3.6.5 Regional Trends

Napa County is served by five school districts: Napa Valley Unified School District, St. Helena Unified School District, Calistoga Joint Unified School District, Howell Mountain School District, and Pope Valley School District. An overview of education outcomes across the Napa County is illustrated in Figure 28~~Figure 28~~ which shows the TCAC Opportunity Areas map. Education outcomes vary throughout the county. Areas in the western portion of the county and portions of the more urban areas have more positive education outcomes compared to eastern portions of the county and southern parts of the City of Napa.

3.6.6 Local Trends

The City of St. Helena is served by the St. Helena Unified School District which is comprised of four schools: a primary school, elementary school, middle school, and high school. Altogether, approximately 1,243 students were enrolled in 2020 from the City St. Helena and the surrounding areas. Approximately 45 percent of students were White and 52 percent were Hispanic/Latino. St. Helena Unified School District reported a high school graduation rate of 92.9 percent in 2020, 90.1 percent in 2019, and 94.1 percent in 2018. The district reported all students who did not receive high school diplomas in 2019 were Long Term English Learners and socio-economically disadvantaged students.[79]

Figure 29~~Figure 29~~Figure 28~~Figure 28~~ shows TCAC scores for education outcomes for St. Helena at the census tract level. St. Helena has better education outcomes than other areas of Napa County. At the city level, the southern and eastern areas of the city have better education outcomes than the western areas.

3.6.7 Economic Outcomes

Housing opportunities are directly related to economic opportunities. Access to high quality employment close to desired and affordable housing results in more housing opportunities and shorter commute times. The analysis for economic opportunities uses TCAC economic indicators, employment participation data

[78] *The Rehabilitation Research and Training Center on Disability Statistics and Demographics. 2020. https://disabilitycompendium.org/annualreport*
[79] *St. Helena Unified School District 2021-22 Local Control and Accountability Plan https://www.sthelenaunified.org/cms/lib/CA50000465/Centricity/Domain/36/LCAP%20Control%20Accountability%20Plan%202021%202022.pdf*

from the ACS, Metropolitan Transportation Commission (MTC) Equity Priority Communities (EPC), and the HUD Jobs Proximity Index.

TCAC economic opportunities are measured by census tract. They consider poverty, adult education, employment, job proximity, and median home values. A higher economic index score reflects more positive economic outcomes. The MTC EPC identifies concentrations of underserved populations in order to direct funding for housing and transportation equity. The HUD Jobs Proximity Index assesses the accessibility to job opportunities at the census block group level.

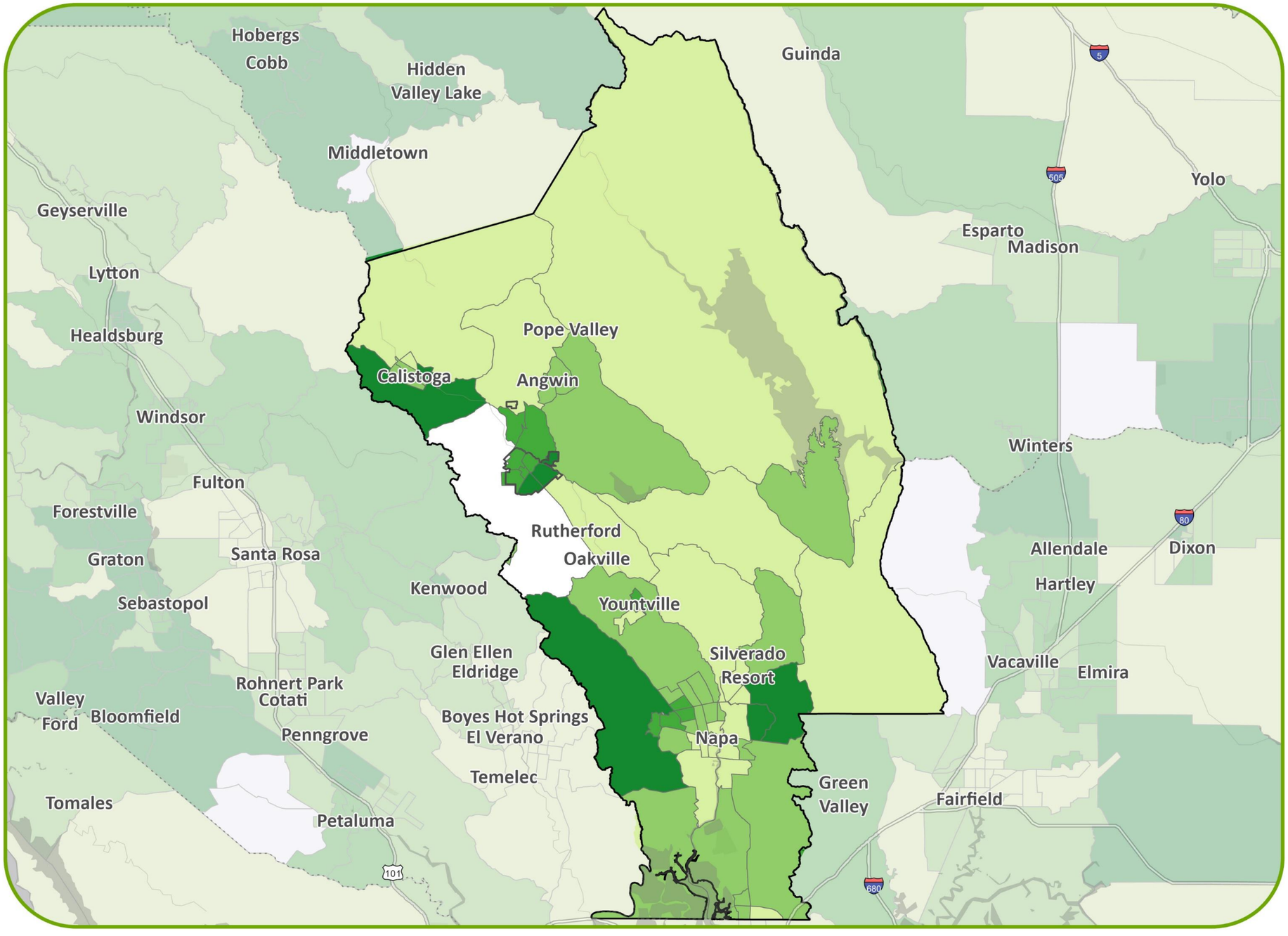


Figure 28:
TCAC Opportunity Areas – Education Outcomes (Napa County)

City Boundary
County Boundary
(R) TCAC Opportunity Areas (2021) - Education Score -Tract
Education Domain Score (by region)
- < 0.25 (Less Positive Education Outcomes)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Education Outcomes)
- No Data

ST. HELENA CALIFORNIA

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County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

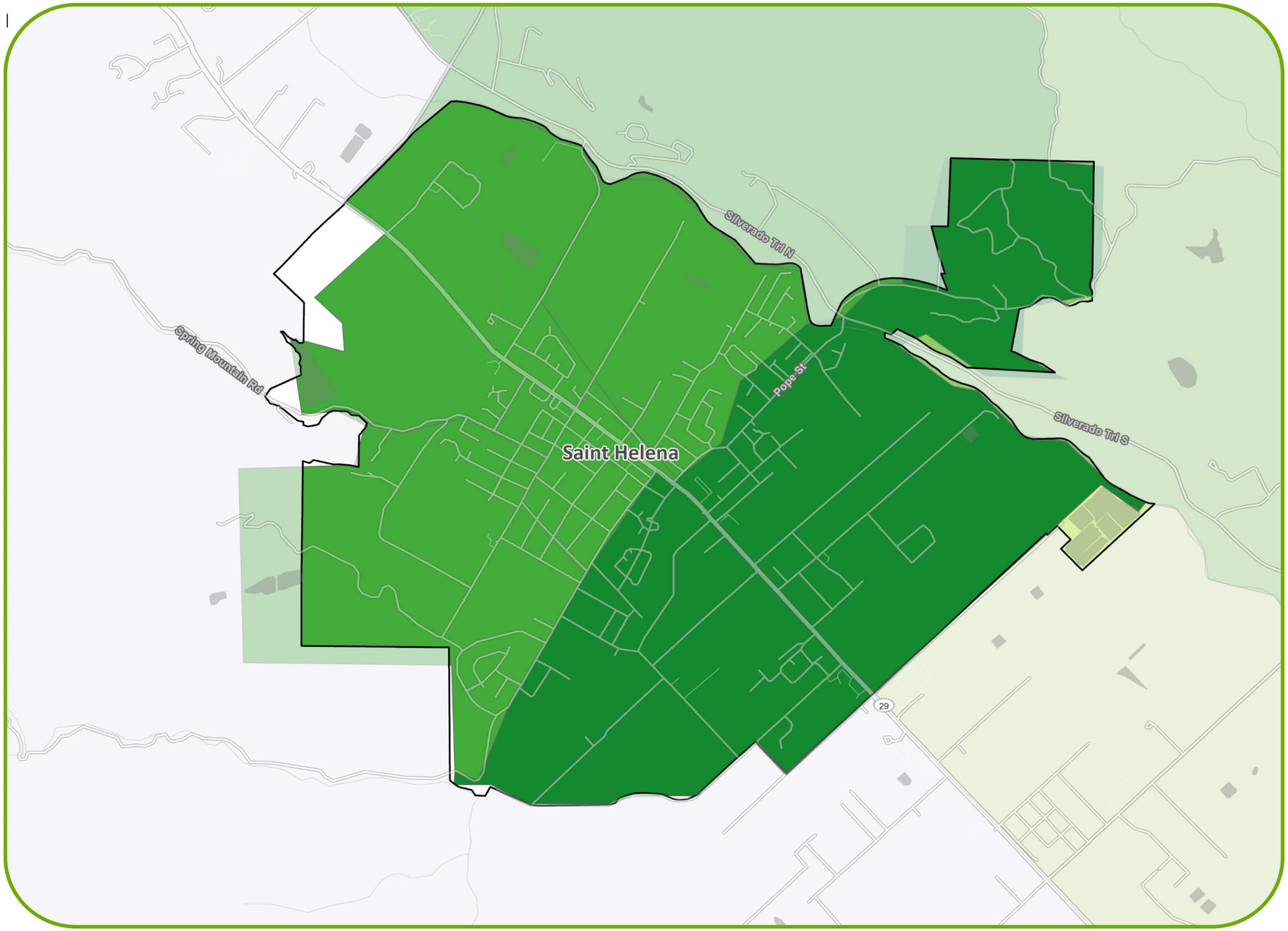


Figure 29:
TCAC Opportunity Areas – Education Outcomes (St. Helena)

3.6.8 Regional Trends

According to the California Employment Development Department, the unemployment rate of Napa County was 3.9 percent in February 2022 (not seasonally adjusted). Top employers in the county include manufacturing (including large- and small-scale wine manufacturing), healthcare, and accommodation and food service. The 2015-2019 ACS estimates reported 74,549 workers in the County of Napa with a labor force participation rate of 65 percent of persons 16 years and older. Approximately 33.7 percent of workers commute 30 or more minutes to work with a countywide mean commute time of 25.6 minutes.

Figure 30~~Figure 30~~ shows the TCAC Opportunity Areas map for economic outcomes across the county. Economic outcomes are varied with more positive outcomes generally located in the western areas of the county and less positive outcomes in the eastern areas of the county. This trend may be attributed to the high concentration of vineyards and wineries in the western and central areas of the county and low population density in eastern areas of the county.

3.6.9 Local Trends

According to the 2015-2019 American Community Survey (ACS), there are 3,159 persons in the labor force in St. Helena with a labor force participation rate of 61 percent. The California Employment Development Department reported the unemployment rate was 3.1 percent in December 2021 (not seasonally adjusted), slightly less than the county. Top industries in the city reflect county trends, with the highest number of workers in manufacturing, healthcare, and accommodation and food service.

Figure 31~~Figure 31~~ shows the TCAC Opportunity Areas map for economic outcomes in St. Helena. Much like the county, economic outcomes are varied across the city. Western areas of the city have more positive economic outcomes and eastern areas have less positive economic outcomes. This pattern of lower economic outcomes in the eastern areas of the city reflects the lower median incomes and greater ethnic diversity that is also experienced in these areas. The eastern areas of the city contain affordable housing developments, a mobile home park, and senior living community which may be contributing to lower median incomes and lower median home values.

ACS 2015-2019 estimates show approximately 22.4 percent of workers commute 30 or more minutes to work and the mean commute time is 19.6 minutes. Figure 32~~Figure 32~~ shows the job proximity index in St. Helena which assesses the accessibility of employment opportunities based on distance, a higher index score corresponds to closer job proximity. Job proximity throughout St. Helena is consistently high (closest proximity), especially when compared to the southern and eastern areas of the county.

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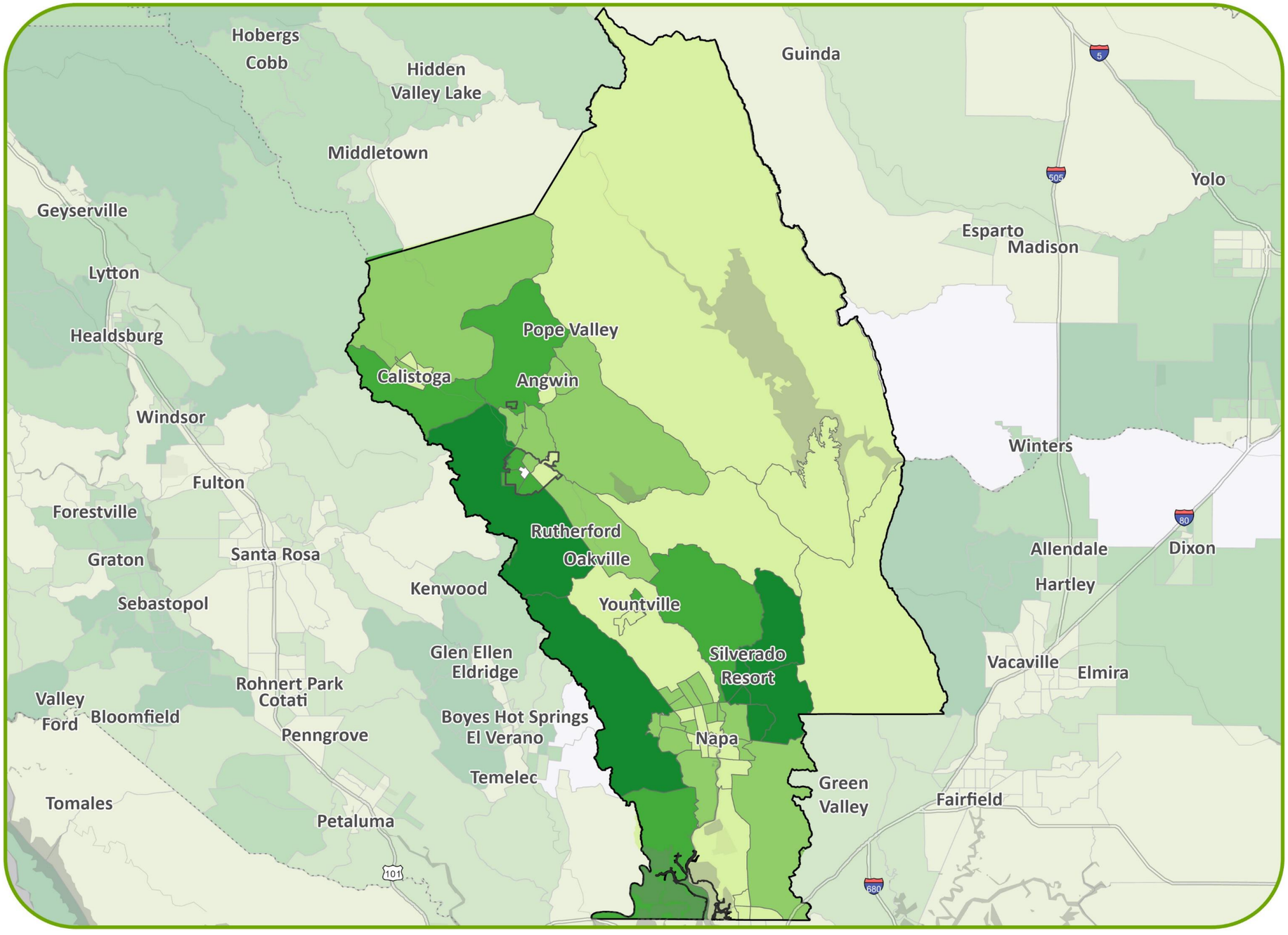


Figure 30:
TCAC Opportunity Areas – Economic (Napa County)

City Boundary
County Boundary
(R) TCAC Opportunity Areas (2021) - Economic Score - Tract
Economic Domain Score (by region)
- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

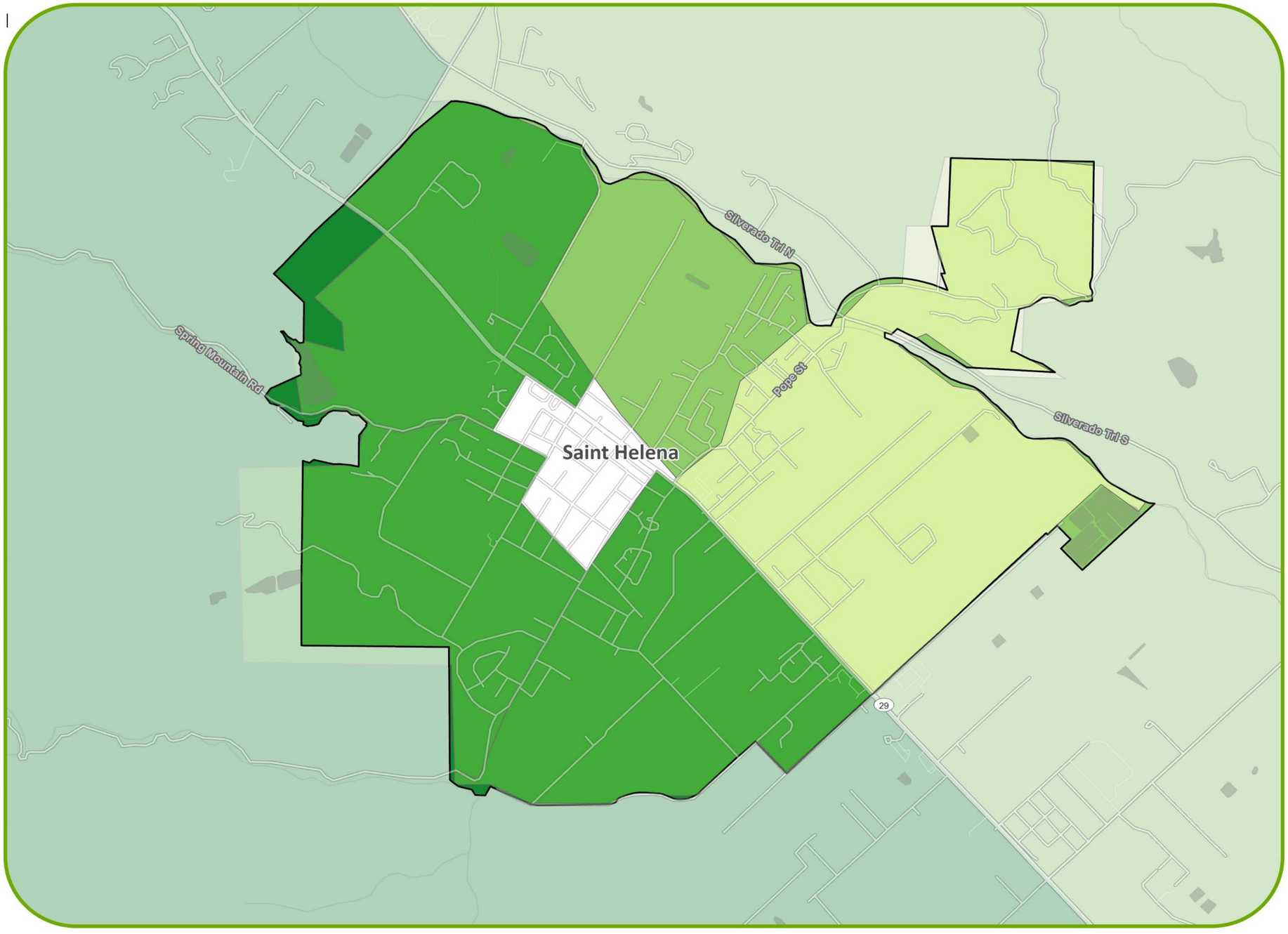


Figure 31:
TCAC Opportunity Areas – Economic (St. Helena)

City Boundary
(R) TCAC Opportunity Areas (2021) - Economic Score - Tract
Economic Domain Score (by region)
- < 0.25 (Less Positive Economic Outcome)
- 0.25 - 0.50
- 0.50 - 0.75
- > 0.75 (More Positive Economic Outcome)
- No Data

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

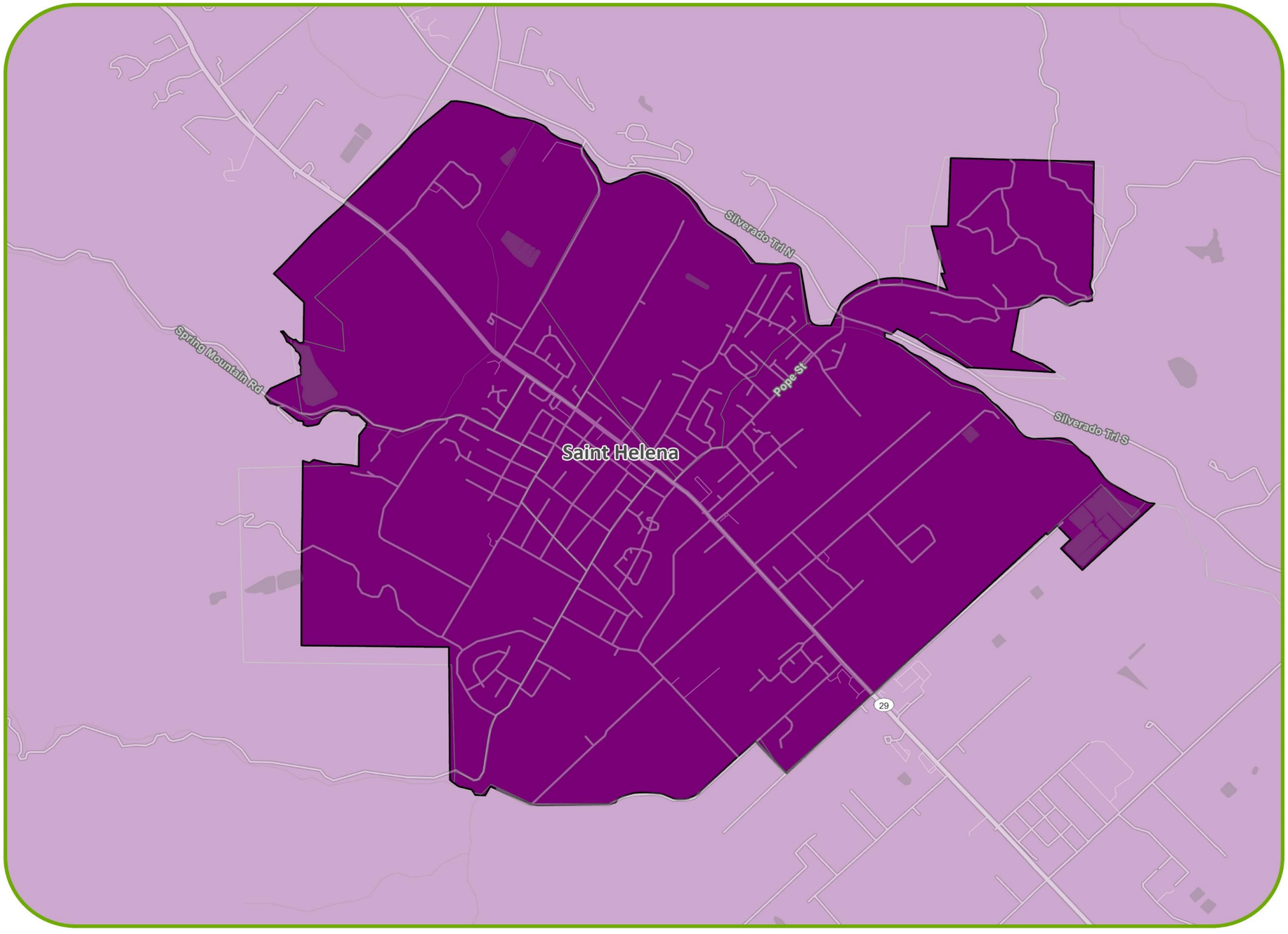


Figure 32:
Job Proximity Index (St. Helena)

City Boundary
(A) Jobs Proximity Index (HUD, 2014 - 2017) - Block Group
Index Score
< 20 (Furthest Proximity)
20 - 40
40 - 60
60 - 80
> 80 (Closest Proximity)

ST. HELENA CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.
Page 945 of 1246

3.6.10 Healthy Environment

Access to a healthy environment is necessary for communities within a city to thrive. Healthy environment analysis considers patterns in the disparities found within individual neighborhoods and protected area groups. These disparities can vary in a number of categories, including air quality, water quality, safe neighborhood, environmental hazards, social services, and cultural institutions. Recent California laws, AB 1550, Senate Bill (SB) 535 and SB 1000 emphasize the importance of environmental justice as a fair housing issue. Environmental Justice, as defined by HUD, means ensuring the environment and human health are protected fairly for all people regardless of race, color, national origin, or income, and consideration the means by which federally assisted projects may have disproportionately adversely affect human health or the environmental on minority and low income populations.[80] The California Office of Environmental Health Hazard Assessment developed the California Communities Environmental Health Screening Tool (CalEnviroScreen) a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called. High scoring census tracts tend to be more burdened by pollution from multiple sources and are most vulnerable to its effects, taking into account their socioeconomic characteristics and underlying health status.

3.6.11 Regional Trends

The CalEnviroScreen map for Napa County identifies the degree to which communities are considered burdened by pollution. Figure 33~~Figure 33~~ below shows the pollution burden for Napa County, representing the potential exposure to pollutants and resulting adverse environmental conditions. The more urban areas on the western side of the county have a higher pollution burden, especially within and to the south of the City of Napa. Figure 34~~Figure 34~~ shows TCAC Opportunity Map for environmental outcomes in the county. Similar to the CalEnviroScreen map, the TCAC Opportunity Map shows that the western areas of the county have less positive environmental outcomes compared to the eastern areas of the county. This may be caused by the mountains flank the valley which block wind flow and trap pollution. Additionally, the western and central areas of the county have a higher concentration of people, traffic, and agriculture which produces greater levels of pollution and pesticides. Eastern areas of the county tend to be forested and are less populated

3.6.12 Local Trends

Pollution Burden in St. Helena is lower than many other areas in the county, as shown in Figure 35~~Figure 35~~. However, the eastern areas of the city have a slightly higher pollution burden (overall score of 40) compared to the rest of the city, with high burdens of pesticides, cleanups, and groundwater threats. The western areas have a slightly lower burden (overall score of 33) with high burdens of pesticides, cleanups, groundwater threats, and solid waste. Pesticide use is considered high throughout the city likely due to pesticide applications on nearby vineyards. There are two cleanup sites located within the city including

[80] *HUD, 2021. https://www.hudexchange.info/programs/environmental-review/environmental-justice/*

one site with an active dry-cleaning business and one site with a manufactured gas plant that was dismantled in 1930. These two cleanup sites are also sources that pose groundwater threats to the city. A third cleanup site is located outside the city limits, southeast of the city, with a food market that has detected high pesticides in the soil beneath the building. A solid waste facility is located in the eastern area of the city which may potentially expose neighboring communities to environmental burdens such as odor, pests, and truck traffic. The southern and eastern areas of the city have a higher pollution burden, which corresponds with areas with higher ethnic diversity, higher populations with a disability, and lower median incomes discussed in the previous sections.

Figure 36Figure 36 shows the TCAC Opportunity map for environmental outcomes in the City of St. Helena. The southern and eastern areas of the city have less positive environmental outcomes compared to the western areas.

3.7 Disproportionate Housing Needs

Disproportionate housing needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. For purposes of this definition, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions

3.7.1 Housing Cost Burden

Housing cost burden is defined as the proportion of a household's total gross income spent on housing costs. Households that spend at least 30 percent of their total gross income on housing costs (rent, mortgage, utilities, and other housing-related costs) are considered cost burdened, and households spending over 50 percent on housing costs are considered severely cost burdened. The higher the housing cost burden, the more likely residents are to live in overcrowded and substandard conditions and are less likely to afford to relocate. Low-income households and persons in protected classes disproportionately experience severe housing problems. Housing problems are households that has one or more of the following problems: lacks a complete kitchen facility, lacks complete plumbing facility, a household that is overcrowded, or a household that is cost burdened.

3.7.2 Regional Trends

Figure 37Figure 37 shows areas of Napa County where renter households overpay for housing (spend more than 30 percent of household income on housing costs). Overpayment by renters is a widespread issue across the county, especially in the more urban areas of the county as well as the northeast and southeast areas of the county. Similar to overpayment by renters, overpayment by homeowners is common throughout the county, highlighting that the costs of housing are too high for both renters and homeowners. Figure 38Figure 38 shows areas of the county where homeowners overpay for housing,

which is most prevalent in the urban areas of the county as well as the northwest and southeast areas of the county.

3.7.3 Local Trends

Housing cost burden among renters is widespread in St. Helena. Figure 39~~Figure 39~~ shows that 40 to 60 percent of renters overpay for housing in all areas of the city. Additionally, data from HUD's Comprehensive Housing Affordability Strategy (CHAS) indicates lower income households are disproportionately overpaying for housing.

Lower-income households experience higher cost burden than moderate income and above households in St. Helena. Approximately 41 percent of extremely low-income households (those earning 30 percent or less of the local area median income (AMI)) are considered severely cost burdened (spend 50 percent or more of their income on housing). Both renters and owners experience cost burden in St. Helena, with higher proportions of lower income households spending greater than 30 percent or 50 percent on housing. Table 7~~Table 7~~ shows housing cost burden of lower income households in St. Helena. Generally, a higher percentage of renters than owners experience cost burden, however, more owners than renters experience severe cost burden.

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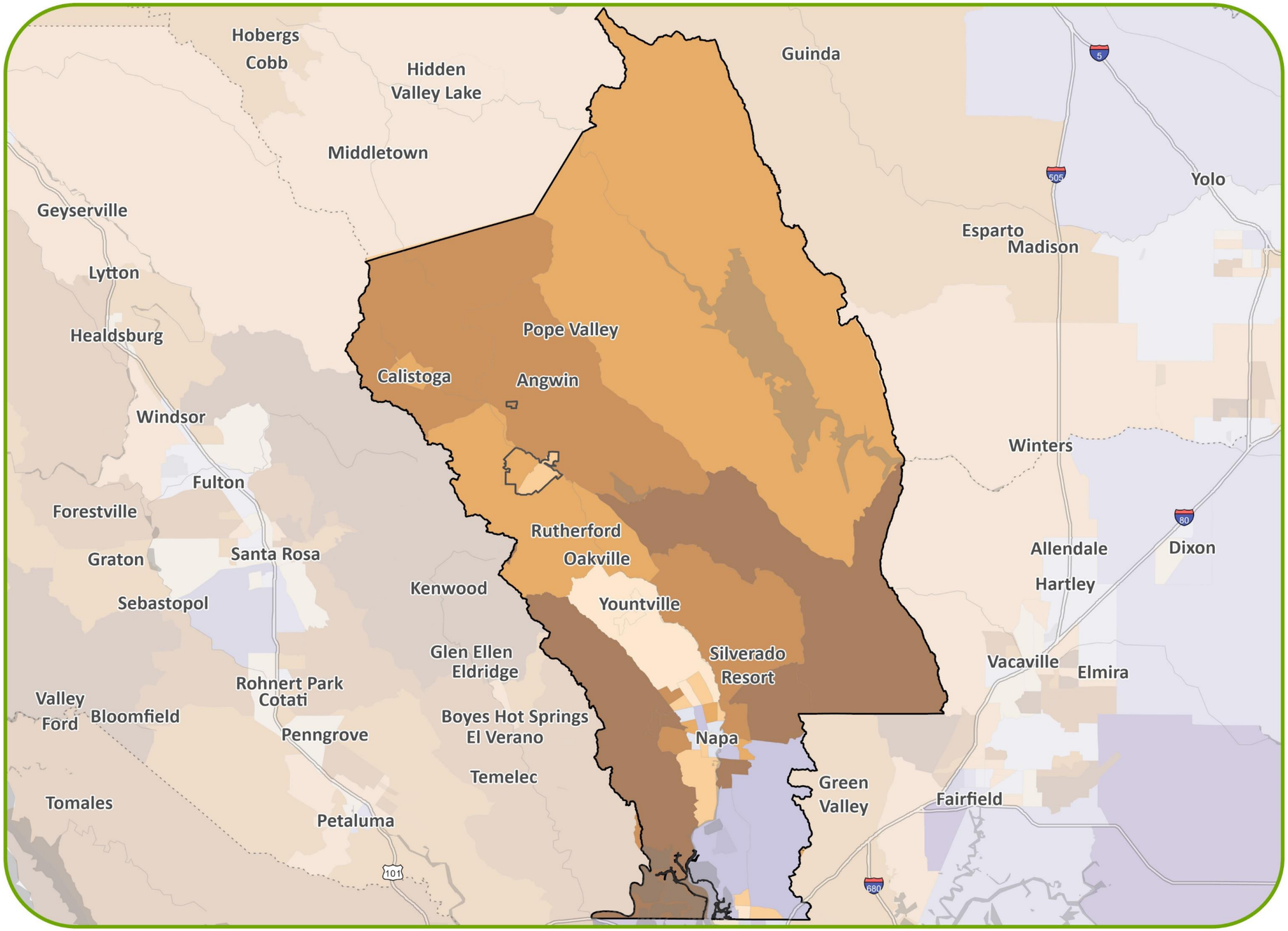


Figure 33: CalEnviroScreen 4.0 Percentile Scores (Napa County)

City Boundary
County Boundary
(A) CalEnviroScreen 4.0, 2021 - Tract
CalEnviroScreen 4.0 Percentile
- 1 - 10% (Lowest Scores)
- 11 - 20%
- 21 - 30%
- 31 - 40%
- 41 - 50%
- 51 - 60%
- 61 - 70%
- 71 - 80%
- 81 - 90%
- 91 - 100% (Highest Scores)

ST. HELENA CALIFORNIA

0 3 6 Miles

N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

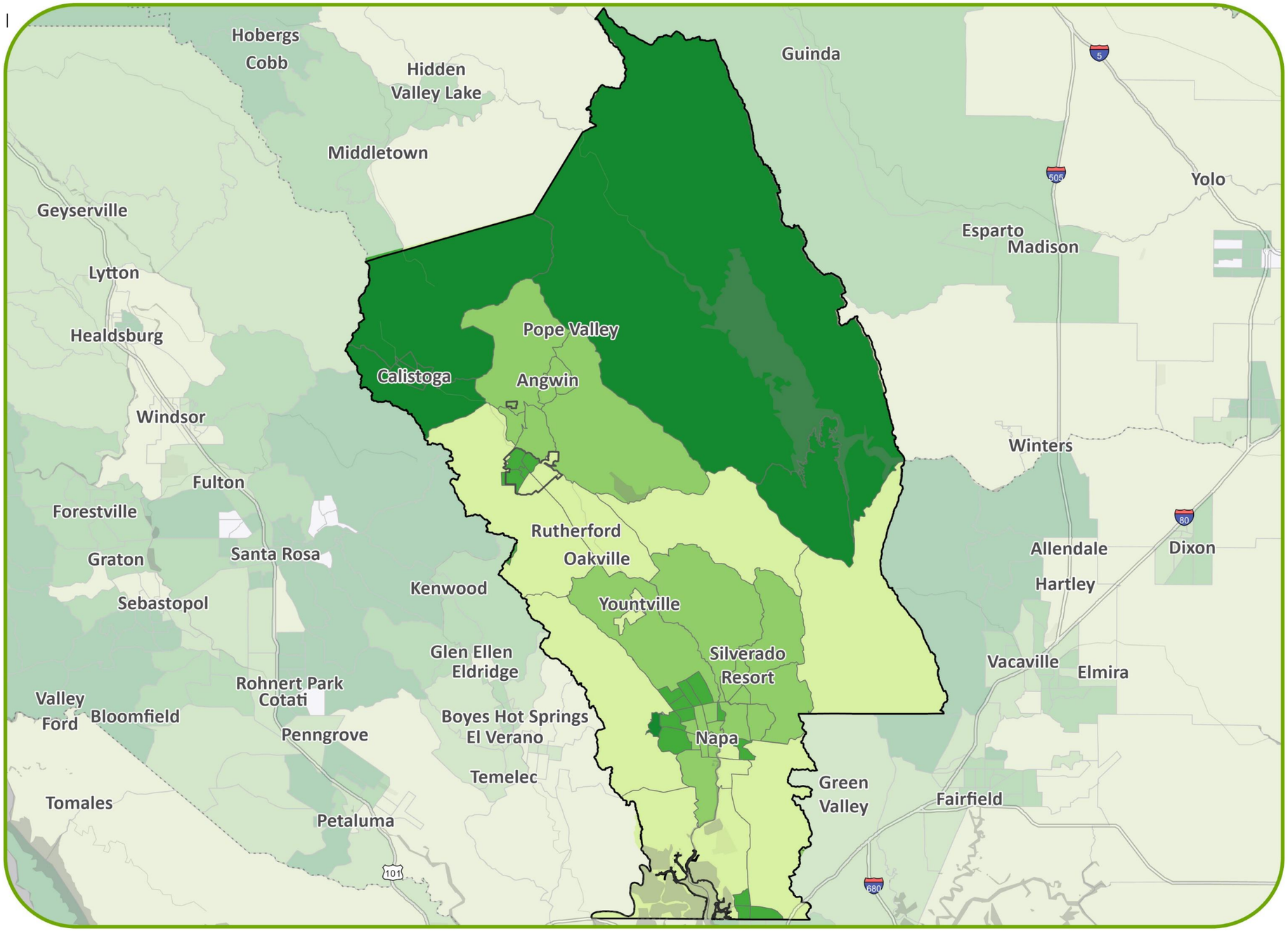


Figure 34:
TCAC Opportunity Areas – Environment (Napa County)

City Boundary
County Boundary
(R) TCAC Opportunity Areas (2021) - Environmental Score -Tract
Environmental Domain Score
< .25 (Less Positive Environmental Outcomes)
.25 - .50
.50 - .75
.75 - 1 (More Positive Environmental Outcomes)
No Data

ST. HELENA CALIFORNIA

0 3 6 Miles

N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

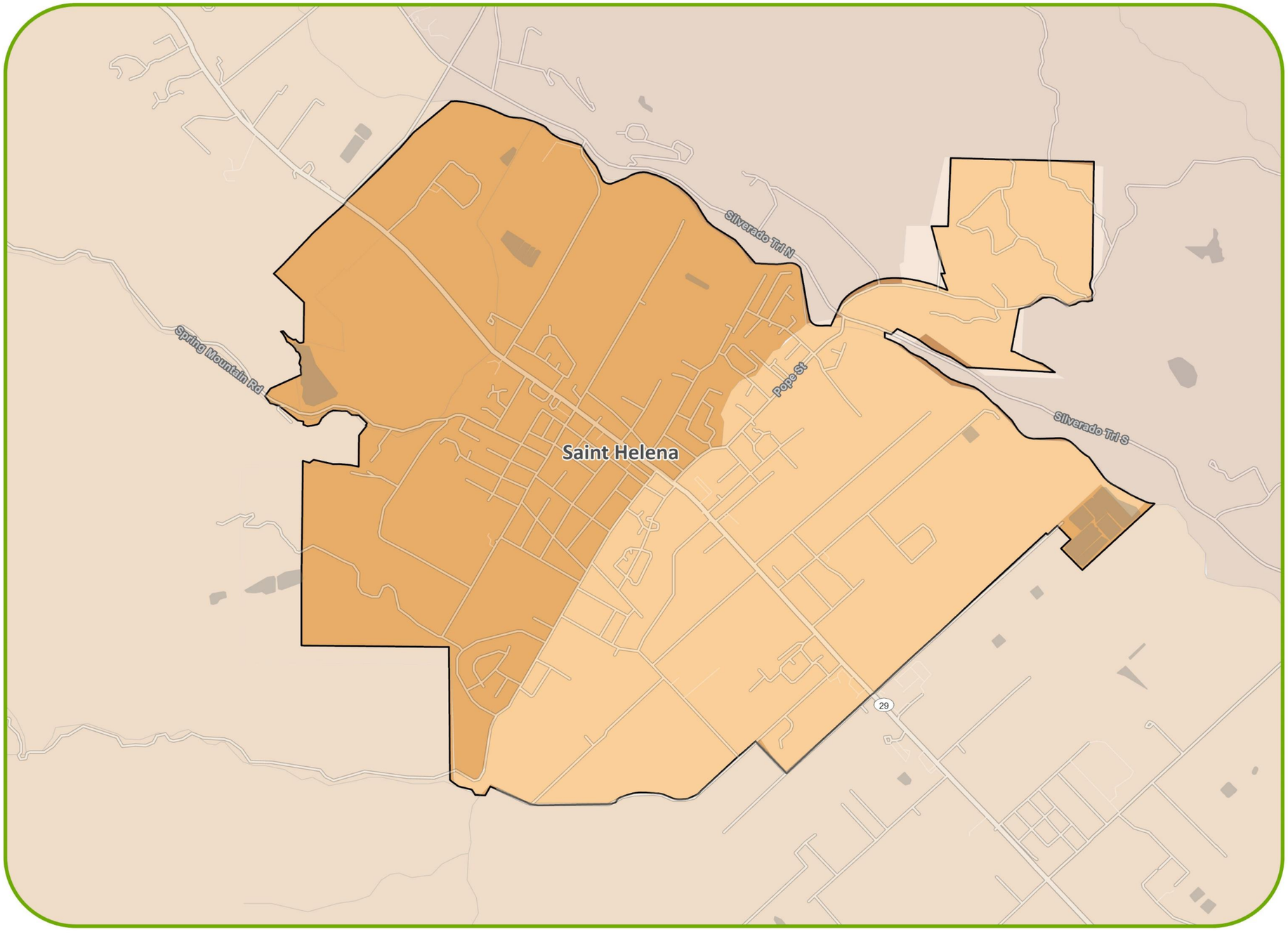


Figure 35: CalEnviroScreen 4.0 Percentile Scores (St. Helena)

City Boundary
(A) CalEnviroScreen 4.0, 2021 - Tract
CalEnviroScreen 4.0 Percentile
1 - 10% (Lowest Scores)
11 - 20%
21 - 30%
31 - 40%
41 - 50%
51 - 60%
61 - 70%
71 - 80%
81 - 90%
91 - 100% (Highest Scores)

ST. HELENA
CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

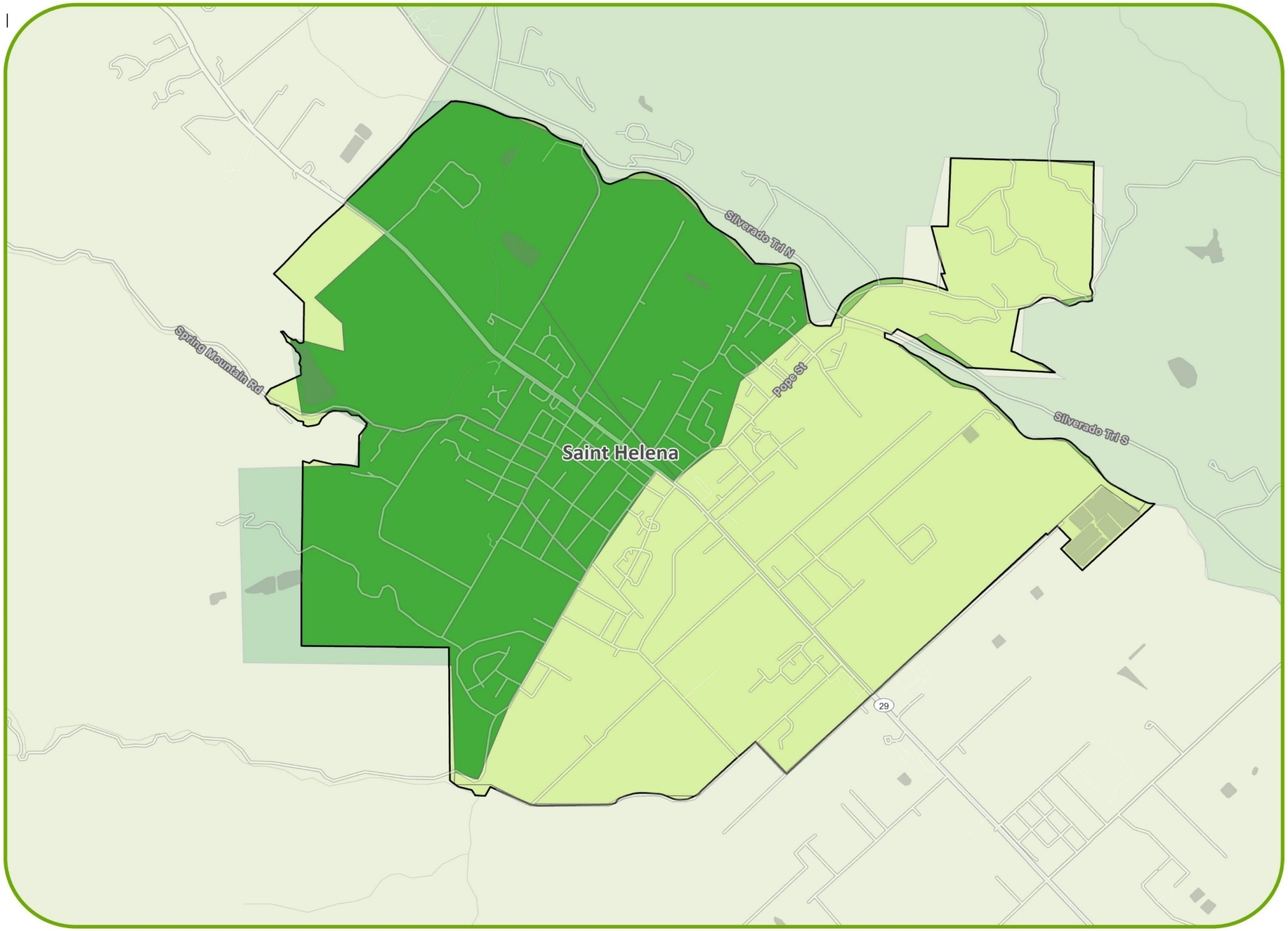


Figure 36:
TCAC Opportunity Areas – Environment (St. Helena)

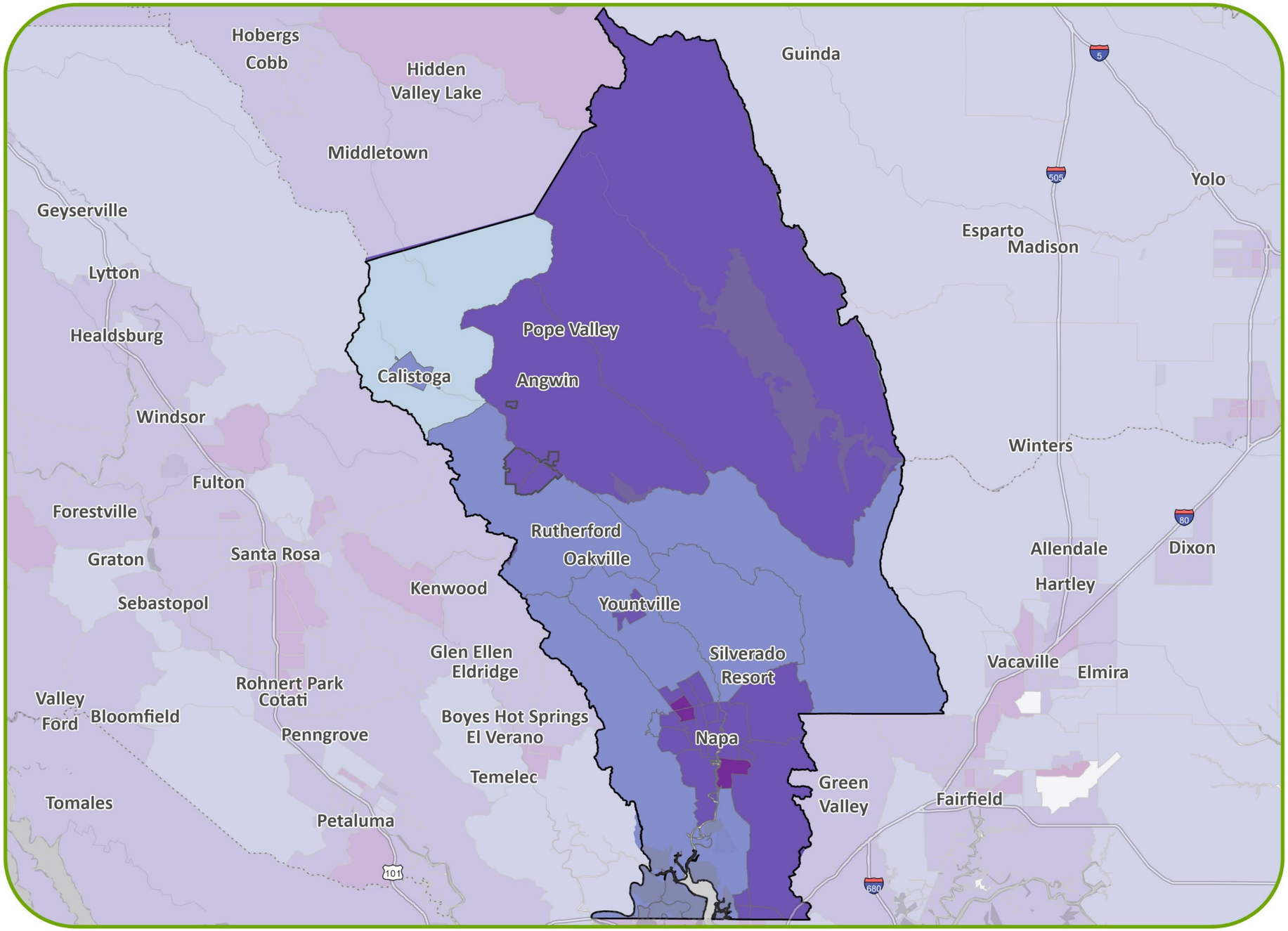


Figure 37: Overpayment By Renters (Napa County)

City Boundary
County Boundary
(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract
Percent of Renter Households for whom Gross Rent (Contract Rent Plus Tenant-Paid Utilities) is 30.0 Percent or More of Household Income
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

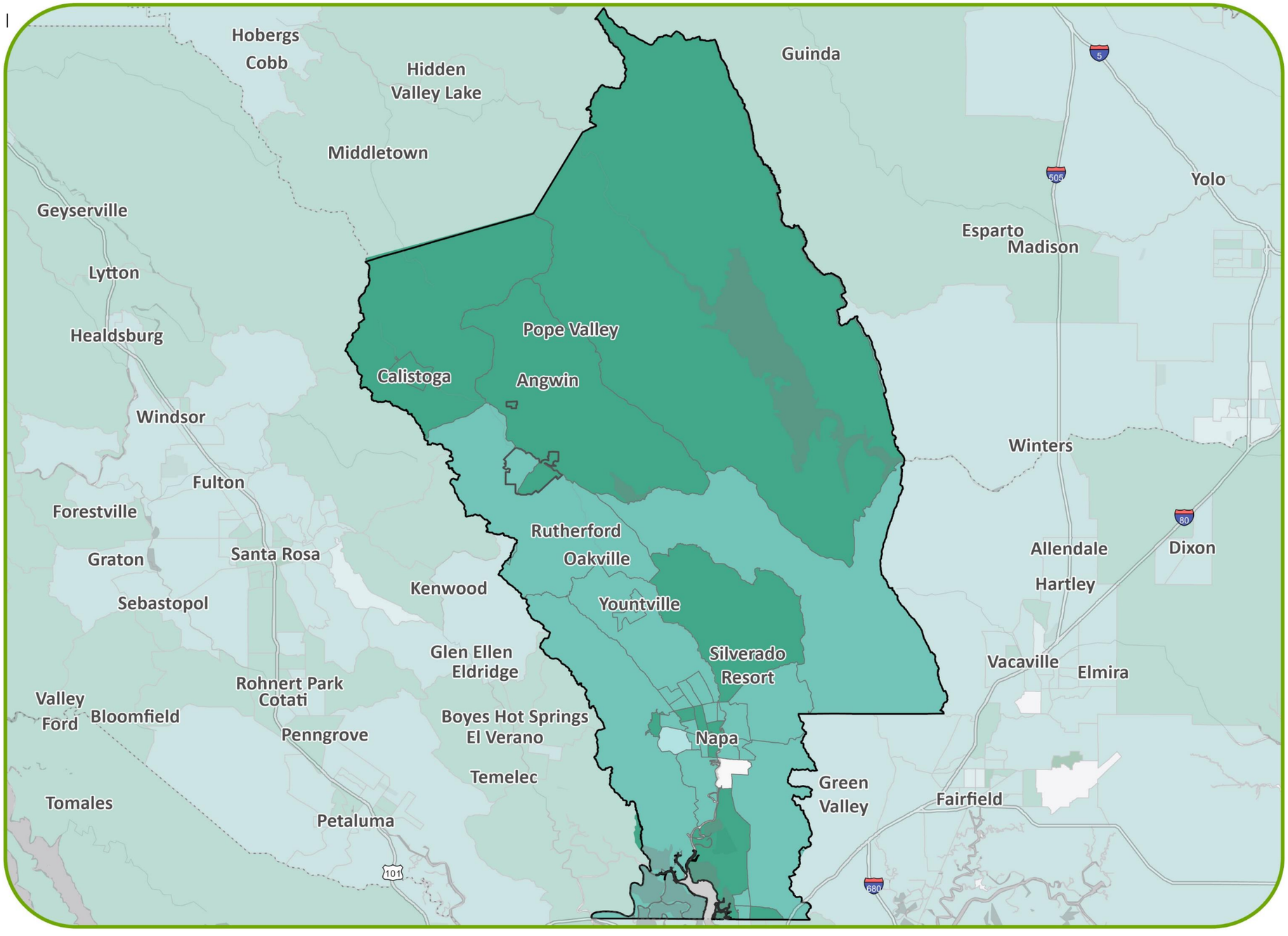


Figure 38: Overpayment By Homeowners (Napa County)

City Boundary
County Boundary
(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract
Percent of Owner Households with Mortgages whose Monthly Owner Costs are 30.0 Percent or More of Household Income
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

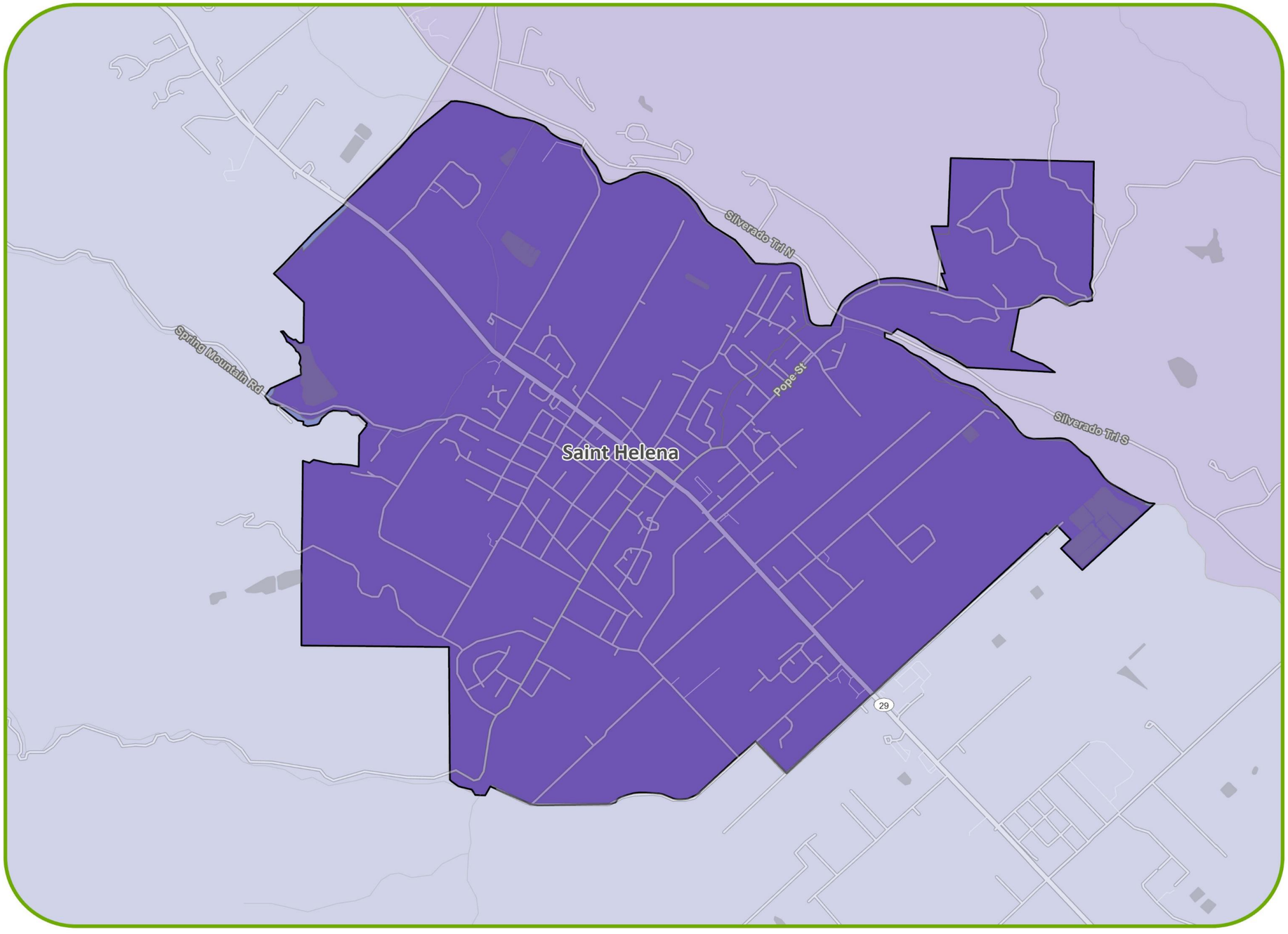


Figure 39: Overpayment By Renters (St. Helena)

City Boundary
(R) Overpayment by Renters (ACS, 2015 - 2019) - Tract
Percent of Renter Households for whom Gross Rent (Contract Rent Plus Tenant-Paid Utilities) is 30.0 Percent or More of Household Income
< 20%
20% - 40%
40% - 60%
60% - 80%
> 80%

ST. HELENA CALIFORNIA

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.
Page 957 of 1246

Table 7 Housing Cost Burden of Lower-Income Households (2014-2018)

Household by Type, Income, and Housing Problem	Renters	Percent	Owners	Percent	Total Households	
Extremely Low-Income (0-30 % AMI)	185		160		345	
With Cost Burden >30%	100	54.1%	105	65.6%	205	59.4%
With Cost Burden >50%	50	27.0%	90	56.3%	140	40.6%
Very Low-Income (0-30 % AMI)	240		105		345	%
With Cost Burden >30%	195	81.3%	70	66.7%	265	76.8%
With Cost Burden >50%	35	14.6%	40	38.1%	75	21.7%
Low-Income (51-80 % AMI)	145		160		305	%
With Cost Burden >30%	100	69.0%	85	53.1%	185	60.7%
With Cost Burden >50%	40	27.6%	60	37.5%	100	32.8%
Moderate & Above Income (>80% AMI)	500		1,105		1,605	%
With Cost Burden >30%	133	26.6%	205	18.6%	338	21.1%
With Cost Burden >50%	8	1.6%	60	5.4%	68	4.2%
Total	1,070	41.2%	1,530	58.8%	2,600	%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018

3.7.4 Substandard Housing

HUD considers housing units to be "standard units" if they are in compliance with local building codes. Substandard housing is housing that poses a risk to the health, safety, or wellbeing of its occupants or neighbors, includes housing that does not have operable indoor plumbing, electricity, or heat. Housing age can be an important indicator of housing condition in a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Typically, housing over 30 years old is more likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs. Some older housing units may have health risks such as lead paint and asbestos. Housing issues such as mold may elevate health conditions such as asthma.

3.7.5 Regional Trends

In Napa County approximately 73 percent of all housing units were built before 1990. These older units potentially require minor repairs and modernization improvements. Figure 41~~Figure 41~~ shows the approximate break down by age of housing units.

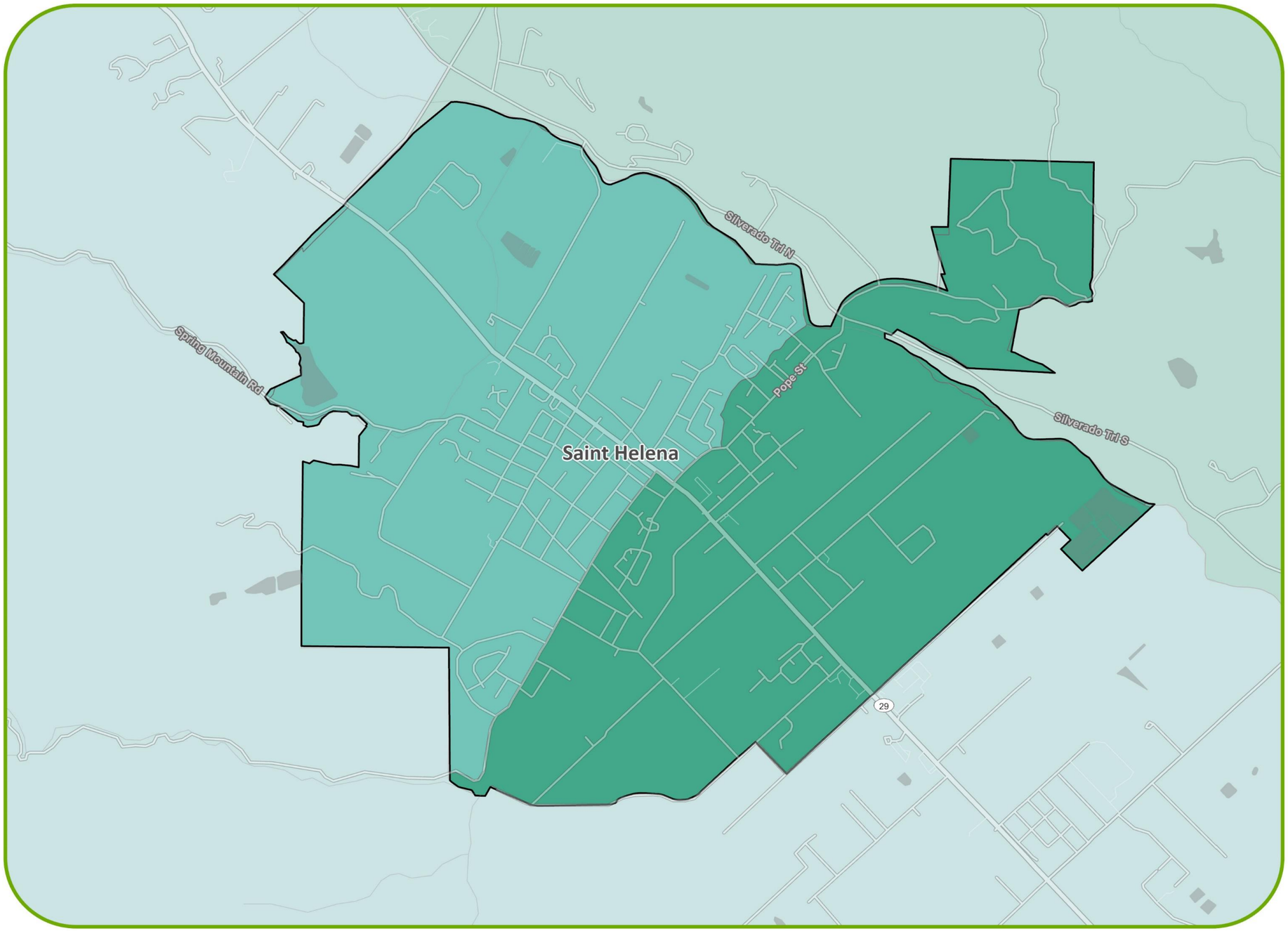


Figure 40: Overpayment By Homeowners (St. Helena)

City Boundary

(R) Overpayment by Home Owners (ACS, 2015 - 2019) - Tract

Percent of Owner Households with Mortgages whose Monthly Owner Costs are 30.0 Percent or More of Household Income

- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

ST. HELENA CALIFORNIA

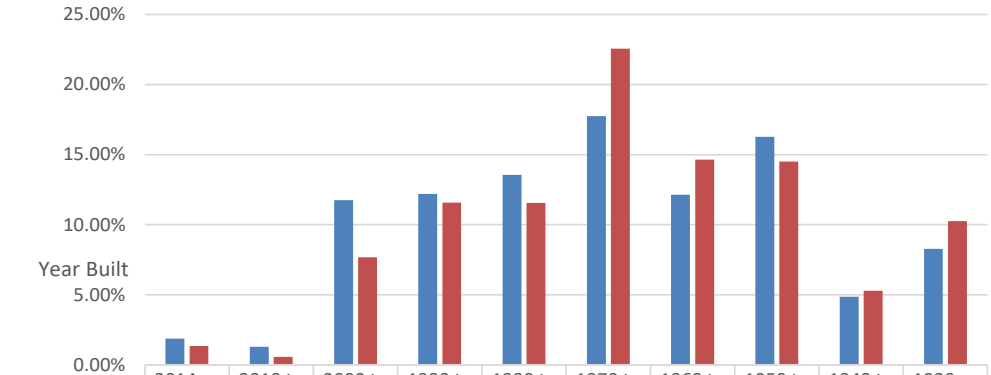
0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

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Agenda Item #5.2.
Page 961 of 1246

Figure 41 Housing Stock Age (2015-2019)



	2014 or later	2010 to 2013	2000 to 2009	1990 to 1999	1980 to 1989	1970 to 1979	1960 to 1969	1950 to 1959	1940 to 1949	1939 or earlier
Napa County	1.87%	1.30%	11.76%	12.20%	13.56%	17.76%	12.13%	16.28%	4.86%	8.28%
St. Helena	1.34%	0.58%	7.67%	11.58%	11.55%	22.56%	14.64%	14.52%	5.29%	10.27%

Source: Bureau of the Census, American Community Survey, 2015-2019

The County of Napa has a total of 881 substandard housing units, approximately 2 percent of the total occupied units in the county. A housing unit is considered substandard if it lacks complete plumbing or kitchen facilities. Of the 881 substandard units, approximately 15 percent lacked complete plumbing facilities and 85 percent lacked complete kitchen facilities. Table 8~~Table 8~~ shows a breakdown of the number of substandard housing units in Napa County and St. Helena. In the past, lack of telephone service was also an indicator of housing conditions. Today, with the widespread availability of cell and internet phone services, many households have chosen not to install land line telephone services, and availability of telephone service is no longer considered an indicator of substandard housing conditions.

Table 8 Substandard Housing Units (2019)

Condition	Napa County		St. Helena	
Lacking complete plumbing facilities	128	0.26%	0	0.00%
Lacking complete kitchen facilities	753	1.55%	83	3.07%
Total	48705		2702	

Source: Bureau of the Census, American Community Survey, 2015-2019.

3.7.6 Local Trends

As shown above in Figure 41~~Figure 41~~, approximately 79 percent of the city's housing stock was built prior to 1990, potentially requiring minor repairs and modernization improvements.

Table 8~~Table 8~~ shows 83 units, about 3 percent of the St. Helena's housing stock, are considered substandard. All identified substandard units lacked complete kitchen facilities.

3.7.7 Homelessness

"Homelessness," as defined by HUD, describes an individual, who is not imprisoned or otherwise detained, who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
  - A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
  - An institution that provides a temporary residence for individuals intended to be institutionalized; or
  - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

Throughout Napa Country, homelessness has become an increasingly important issue. Factors that contribute to the rise in homelessness include a lack of housing affordable available for low- and moderate-income households, increases in the number of persons whose incomes fall below the poverty level, reductions in public subsidies, and lack of support for persons with extreme developmental, physical, and mental disabilities.

3.7.8 Regional Trends

Napa County's 2020 Point-In-Time Count indicated there were 464 persons experiencing homelessness in the county on any given night; mostly in the City of Napa. This is an increase from 322 persons in the 2018 Point-In-Time Count.

3.7.9 Local Trends

The number of homeless persons in St. Helena is unknown as the 2020 Point-In-Time Count does not include a breakdown of the homeless population by jurisdiction. Based on St. Helena's share of the countywide population, 3.9 percent, it is estimated the City's homeless population is approximately 18 persons.

3.7.10 Overcrowding

Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen) and severe overcrowding refers to more than 1.5 persons per room. Large families generally have special housing needs due to lower per capita income, the need for affordable housing, or the need for larger units with three or more bedrooms, resulting in overcrowding.

Some households may not be able to accommodate high-cost burdens for housing and accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding. Household overcrowding is reflective of various living situations such as a housing unit that is inadequately sized to meet a household's needs, the necessity or desire to have extended family members reside in an existing household, or unrelated individuals or families share a single housing unit.

Not only is overcrowding a potential fair housing concern, but it can also potentially strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes. As a result, some landlords or apartment managers may be more hesitant to rent to larger households, thus making access to adequate housing even more difficult. According to local fair housing service providers and property managers, addressing the issue of large households is complex as there are no set of guidelines for determining the maximum capacity for a unit. Fair housing issues may arise from policies aimed to limit overcrowding that have a disparate impact on specific racial or ethnic groups with higher proportion of overcrowding.

3.7.11 Regional Trends

In Napa County, approximately 6 percent of occupied housing units are overcrowded. As shown in Figure 42~~Figure 42~~, overcrowded housing is most prevalent in the cities of Napa and Calistoga. The City of Napa has the highest percentage of overcrowded units. Certain areas within the city have between 14 and 36 percent of households that are overcrowded. Rural areas experience less overcrowding, and some rural areas have no overcrowded or severely overcrowded units.

Table 9~~Table 9~~ shows the percentage of housing units that are overcrowded. Renter-occupied households had a larger proportion of overcrowded households in the county.

Table 9 Overcrowding by Tenure

Jurisdiction	Overcrowded (1+ occupants per room)			Severely Overcrowded (1.5+ occupants per room)		
	Renter	Owner	Total	Renter	Owner	Total
St. Helena	9.26%	1.57%	4.74%	1.44%	1.01%	1.18%
Napa County	11.92%	2.99%	6.18%	3.50%	0.64%	1.66%

Source: Table B25014 Tenure by Occupants Per Room 2015-2019 ACS. Bureau of the Census, American Community Survey, 2015-2019.

3.7.12 Local Trends

Based on 2015-2019 ACS estimates, approximately five percent of households in St. Helena are overcrowded, compared to 6 percent for the county as a whole. As shown in Table 9~~Table 9~~,a higher proportion of renter households are overcrowded than owned households in St. Helena. Figure 43~~Figure 43~~

shows the percent of overcrowded households throughout the city, no concentrated areas overcrowding of households are shown. ACS estimates indicate overcrowding is a more common housing issue for Hispanic/Latino households than White households where approximately 20 percent Hispanic/Latino households in St. Helena are overcrowded compared to three percent of White households.

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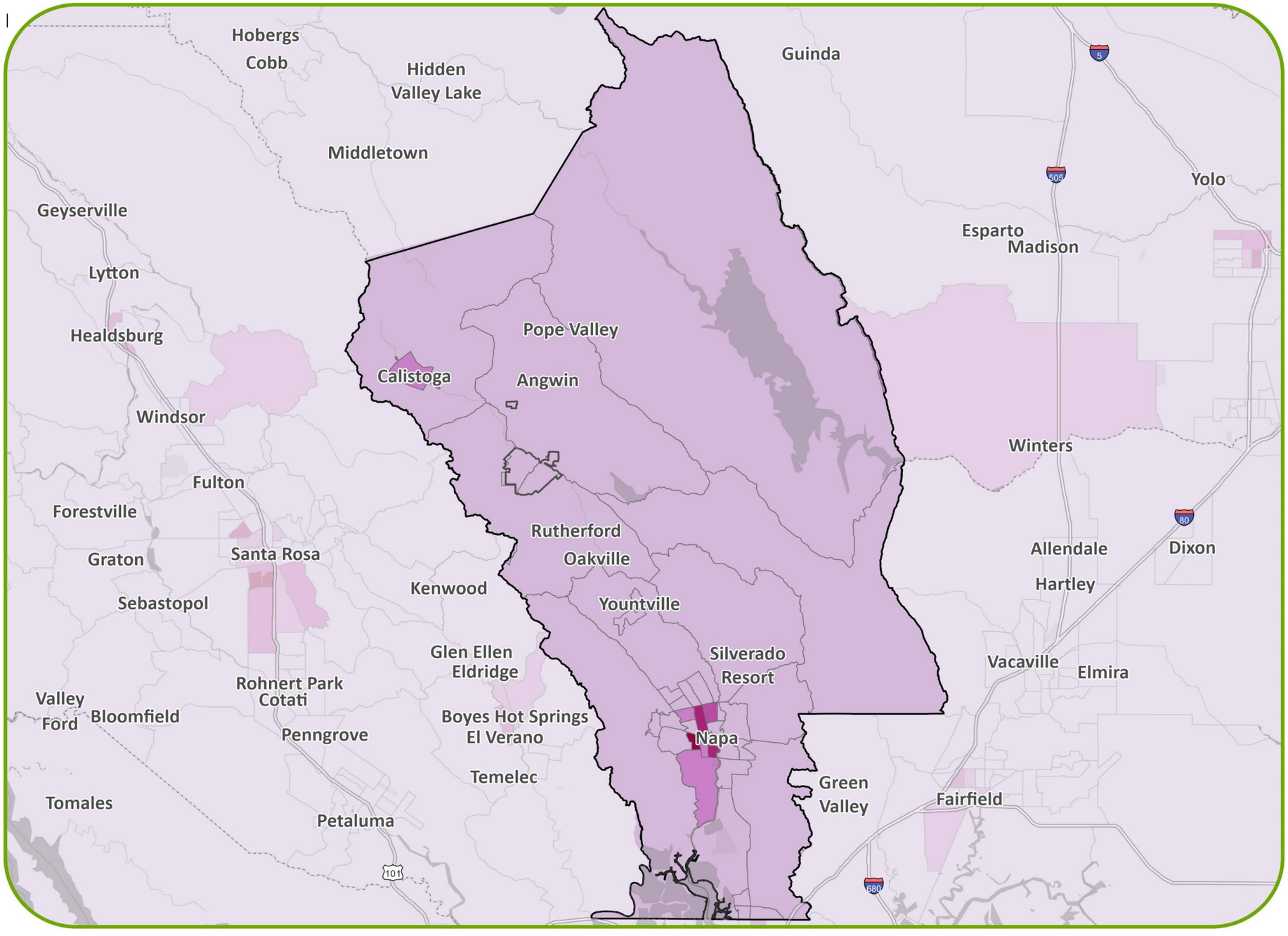


Figure 42: Overcrowded Households (Napa County)

City Boundary
County Boundary
(R) Overcrowded Households (CHHS) - Tract
Percent of Overcrowded Households
≤ 8.2% (Statewide Average)
8.3% - 12%
12.01% - 15%
15.01% - 20%
> 20%

0 3 6 Miles N

County of Napa, Yolo County, California State Parks, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, California Department of Housing and Community Development.

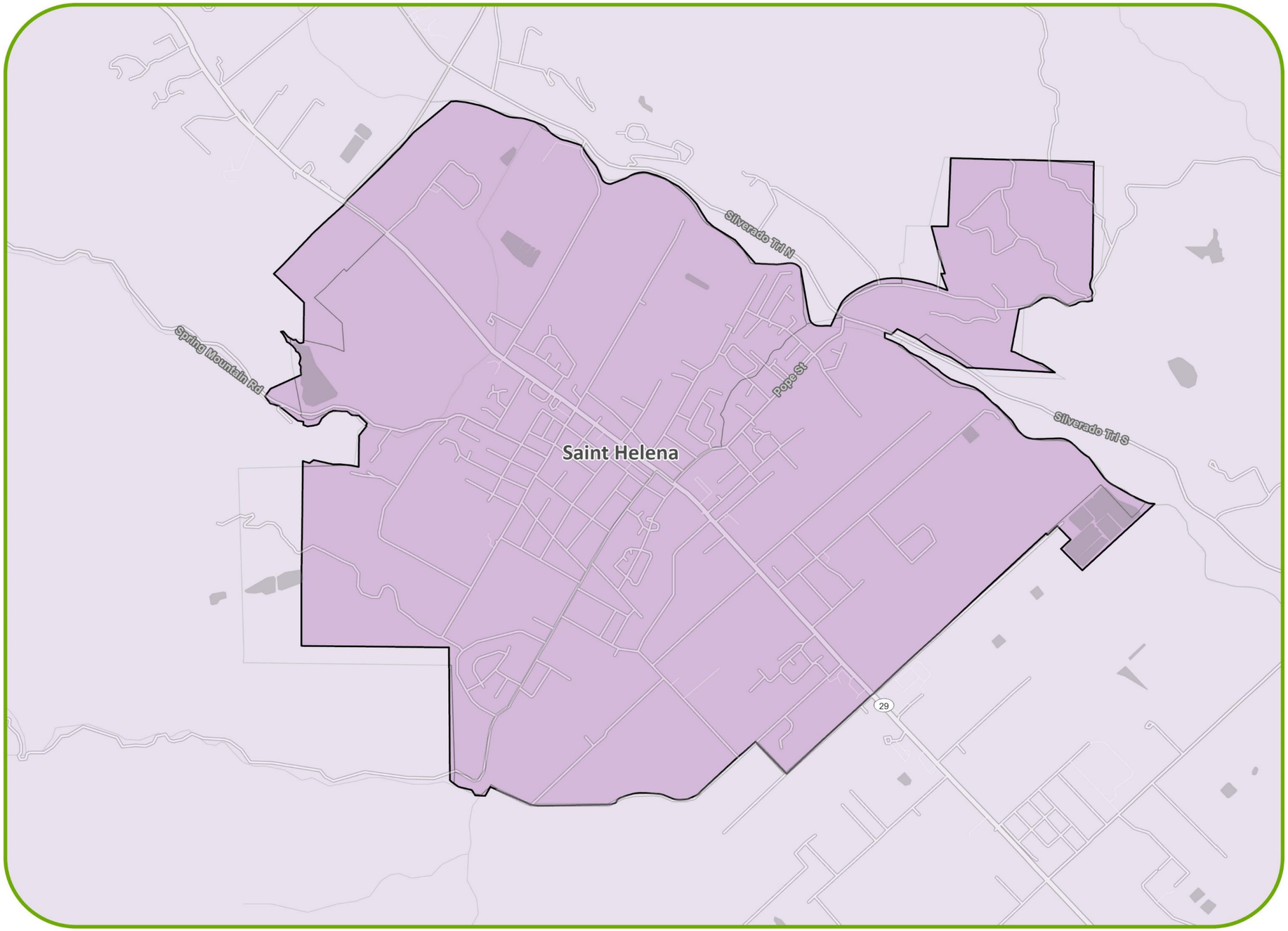


Figure 43: Overcrowded Households (St. Helena)

City Boundary
(R) Overcrowded Households (CHHS) - Tract
Percent of Overcrowded Households
- ≤ 8.2% (Statewide Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%
- > 20%

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

3.7.13 Displacement

Displacement, as defined by HCD, is used to describe any involuntary household move caused by landlord action or market changes. Shifts in neighborhood composition are often framed and perpetuated by established patterns of racial inequity and segregation. Movement of people, public policies, and investments, such as capital improvements and planned transit stops, and flows of private capital can lead to displacement. Displacement is fueled by a combination of rising housing costs, rising income inequality, stagnant wages, and insufficient market-rate housing production. Decades of disinvestment in low-income communities, coupled with investor speculation, can result in a rent gap or a disparity between current rental income of the land, and potentially achievable rental income if the property is converted to its most profitable use. These processes can disproportionally impact people of color, as well as lower income households, persons with disabilities, large households, and persons at-risk or experiencing homelessness.[81]

3.7.14 Regional Trends

The Urban Displacement Project (UDP) is an initiative out of the University of California, Berkeley that conducts data-driven research to better understand gentrification and displacement in order to generate more equitable and inclusive cities. UDP provides data to identify "sensitive communities," communities that are vulnerable to displacement caused by housing costs or with market-based displacement pressures within or near the community. As shown in Figure 44~~Figure 44~~ below, portions of the cities of Napa and Calistoga are identified as sensitive communities by UDP. These communities are also more racially/ethnically diverse and have lower household median income compared to other areas of the county.

3.7.15 Local Trends

UDP did not identify any areas within St. Helena that are considered vulnerable to displacement, as shown in Figure 45~~Figure 45~~. However, research from the University of California Berkeley indicates that 42.0 percent of households in St. Helena live in neighborhoods susceptible to or experiencing displacement.

[81] *HCD. 2021. https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf*

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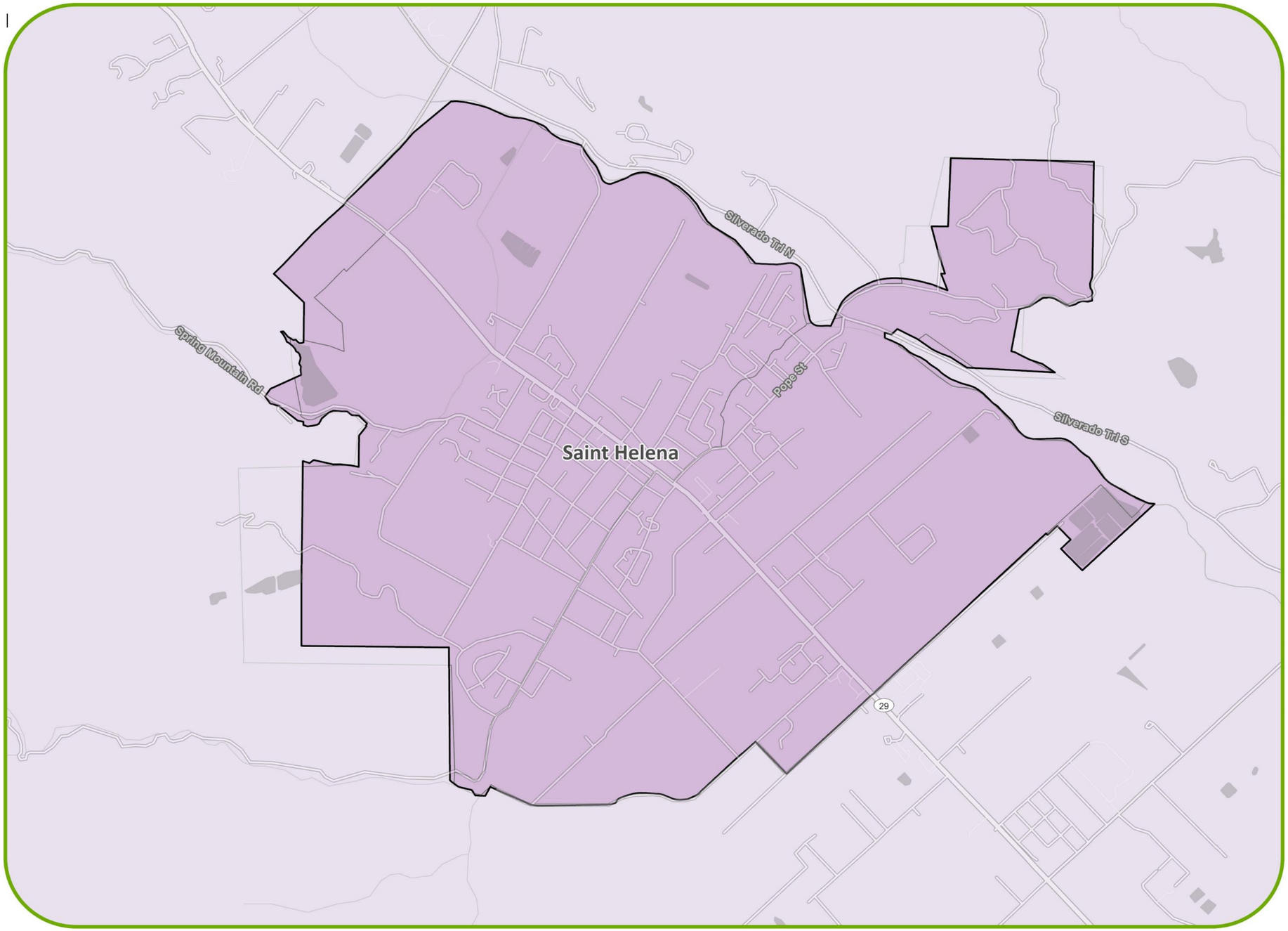


Figure 44: Sensitive Communities (Napa County)

City Boundary
(R) Overcrowded Households (CHHS) - Tract
Percent of Overcrowded Households
- ≤ 8.2% (Statewide Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%
- > 20%

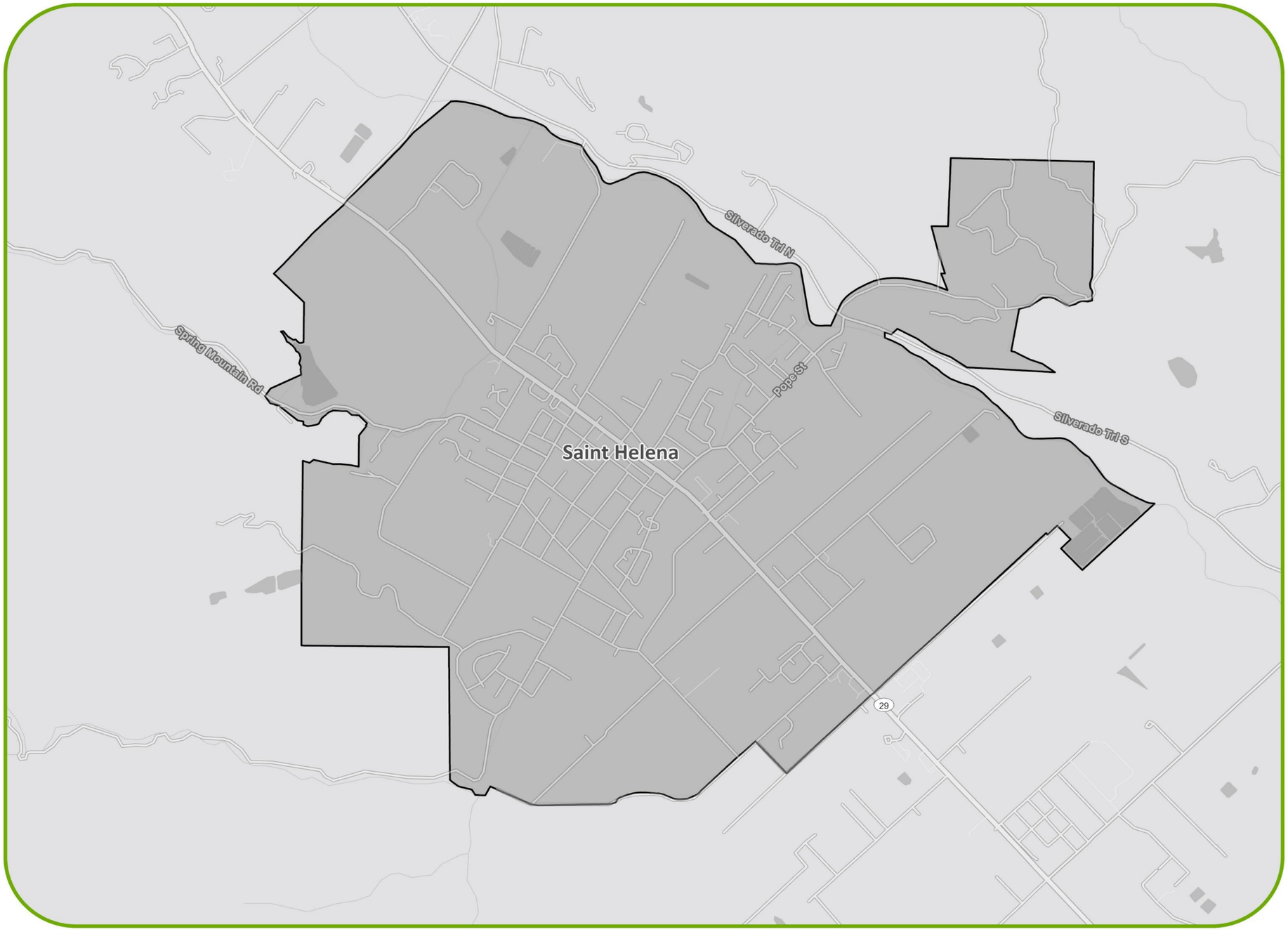


Figure 45: Sensitive Communities (St. Helena)

City Boundary
(A) Sensitive Communities (UCB, Urban Displacement Project)
Vulnerable
Other

0 0.2 0.4 N
Miles

County of Napa, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, US Census Bureau, USDA, California Department of Housing and Community Development.

4. Local Area of Knowledge

The AFFH analysis identified the eastern portion of St. Helena as generally experiencinges more fair housing issues than other areas of the city. Fair housing issues in this area include higher levels of minority populations, low and moderate median income, overpayment of housing, higher median rent, and lower economic and environmental outcomes. The predominant population in this area of the city is White, however it has the highest non-White population of all areas within the city. Additionally, this area has a higher proportion of persons living with a disability compared to other areas. Overall, the eastern portion of the city is a moderate resource area, the same as the rest of the city. Some factors that could play into the trends seen in the data could be the location of existing retirement and older adult living facilities. The population living within these communities are, many time, fixed income and more often single-headed households. In addition, most of the city's high density land use and housing is located in this eastern portion of the city, which tends to be the housing type most affordable to lower income residents and single-parent households. As part of the Housing Element, the City is committing to improving the number of affordable units city-wide. In addition, with the recently adopted General Plan, the city envisions the redevelopment of Main Street within the eastern portion of the city with new, mixed-use development to increase economic opportunities and investments in this area.

4.1 Local Actions and Policy Efforts

In 2018, the City funded the 2018 St. Helena Housing Update Report, a housing analysis study that identified contributing factors to housing challenges in St. Helena. The report identified that residents believe new housing development primarily occurs east of Highway 29, however according to the report the majority of new construction was located west of Highway 29. In addition, the report also identified community opposition as a challenge to housing development in the city, leading to delays and increased project costs. Community members often desire to maintain the rural character of the city and are very concerned with how new development will impact surrounding neighborhoods.[82]

In October of 2020, the City Council adopted the Resolution 2020-105: Affirming that Discrimination and Systemic Racism Constitute A Public Health Crisis Causing Disparities in Mental Wellbeing, Language Access, Housing, Economic Development, Health, and Criminal Justice Experience, and Reaffirming Its Commitment to Advancing Justice, Equity, Diversity, and Inclusion in the City. This resolution commits the City to erasing barriers to opportunities to minority populations, including housing. The Staff Report to City Council for Resolution 2020-105 recommends actions to address racial equity and social justice in the community, including providing Spanish translation for City Council and Planning Commission meetings, provide all City communication in Spanish and reviewing adopted by other cities that promote inclusivity and access to affordable housing.

[82] 2018. St. Helena Housing and Community Report. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3395/staff_report-white_paper.pdf

The City also prepared a Diversity, Equity, and Inclusion Strategy to outline the City's efforts towards diversity, equity and inclusion, and social justice. The strategy includes actions such as creating a Diversity, Equity and Inclusion Committee to discuss topics, including housing and racial justice, and offering live Spanish interpretation for regular and special City Council and Planning Commission meetings. The City continues to provide Spanish interpretation for City Council and Planning Commission meetings.

~~4.1~~4.2 Stakeholder Input

The City held three housing workshops to receive feedback from the community on housing issues and the Housing Element Update (on September 16, 2021, January 20, 2022, and March 16, 2022). During these workshops, participants frequently brought up concerns regarding the lack of affordable housing for lower income households and the "missing middle" as well as the need to support affordable home ownership. AFFH related concerns included the high cost of housing, transportation accessibility, ADU trends (specifically that ADUs tend to be utilized as vacation rentals and not housing).

~~4.1.1~~4.2.1 Other Relevant Factors

Other factors to fair housing issues in St. Helena that have not been previously discussed in this analysis include lack of sufficient housing for farmworkers, availability of affordable units in a range of sizes, access to transportation, access to home ownership. These contributing factors limit the accumulation of wealth and access to housing resources in historically marginalized communities.

~~4.1.2~~4.2.2 Farmworker Housing

An estimated between 6,000 and 9,000 farmworkers are employed Napa County. Sufficient affordable housing options are lacking for farmworkers who are often lower income and have special housing needs, such as seasonal housing. The number of farmworkers employed in St. Helena is unknown, however the city's central location with regard to vineyards and wineries throughout the county would imply a number of farmworkers are employed in proximity to the city.

~~4.1.3~~4.2.3 Access to Transportation

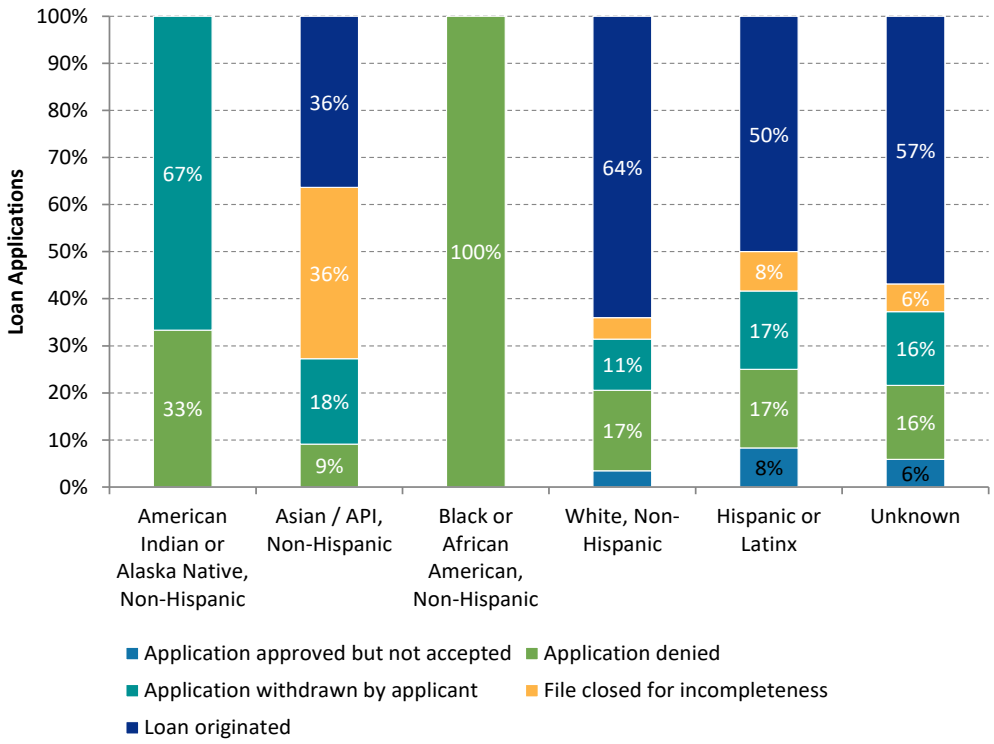
St. Helena's public transportation system is operated by Vine Transit which operates one bus route (Route 10) in the city. Route 10 has four stops in the city, however all four stops are along the main road, State Route 29. Areas of the city located further north or south are more than 0.25 miles from a bus stop. This bus route connects the City of Napa and the City of Calistoga where connections to destinations further north or south can be made. Residents who live or work in St. Helena have limited options for traveling via public transit, potentially limiting their housing options.

~~4.1.4~~4.2.4 Access to Home Ownership

Increasing housing costs has produced a barrier to home ownership for St. Helena residents. As of December 2020, Zillow reported typical home values in St. Helena were estimated at $1,665,790, much higher than the typical home value in Napa County, which is estimated at $768,410. Typical home values reflect the value of homes in the 35th to 65th percentile range. Home values have been consistently on the rise since 2000 (with the exception of the recession). This trend has made it more difficult for residents, especially lower income residents, to afford homes. Affordable housing projects in the city generally consist of rental units, which does not provide opportunities for lower income residents to own homes.

Mortgage application filing and acceptance data from 2018-2019 indicates there are racial/ethnic disparities among homeownership opportunities for residents in Napa County. As shown in Figure 46~~Figure 46~~, 64 percent of White, Non-Hispanic applicants and 50 percent of Hispanic/Latinx had their loan originated, compared to 36 percent of Asian/ API applicants, 0 percent of Black/African American, and 0 percent of American Indian/Alaska Native applicants.

Figure 46 Mortgage Applications and Acceptance by Race



Source: Federal Financial Institutions Examination Council's (FFIEC) Home Mortgage Disclosure Act loan/application register (LAR) files

4.2.5 Opposition to New Development

According to the 2018 St. Helena Housing Update Report, city residents are "deeply concerned with maintaining the rural character of town" and therefore residents~~locals~~ generally oppose housing projects that are perceived to changing neighborhood character. Many previous and ongoing multi-family housing projects have been met with comments and concern from community members regarding environmental impacts, such as increases in water demand and increases in traffic as well as impacts to existing neighborhoods and community character.

4.2.6 Location of New Housing

Some~~Many~~ residents of the city feel the city is segregated between east and west of Main Street, where the west side of the city consists of a greater percentage of White, affluent residents while the east side of the city has a greater percentage of non-White and low-income residents. In addition, residents have stated that the multi-family housing in the city is located in the eastern area. According to the 2018 St. Helena Housing Update Report, the majority of new construction over the last 10 years has been west of Highway 29.[83] The Magnolia Oaks housing development consists of 44 multi-family housing units, 10 of which are affordable to low-income residents. While this project is located just west of Highway 2~~9~~9, ~~it is still on the eastern half of the city.~~other recently multi-family projects have been constructed on the east along McCorkle Avenue. The City is in the process of adopting a new Zoning Ordinance to be consistent with the 2040 General Plan, which would permit duplexes and triplexes within the MR District (see Program H-N). This would create additional housing choices and affordability levels in the MR Districts on the western side of the city. In addition, Programs H-BB, H-EE, and H-XX ~~would~~ would implement placemaking strategies to outreach and work with the more diverse and older populations living in the east due to the historic development patterns.

5. Sites Inventory Analysis

5.1 Opportunity Areas

HCD and TCAC opportunity maps identify areas throughout the state whose characteristics support positive economic (low poverty, high employment, high median household income), educational (reading and math proficiency, high school graduation rates, low student poverty rates), and environmental outcomes (low exposure to pollution). A census tract with a designation of high resource would indicate there are strong educational and economic opportunities, meaning opportunity for current and future residents.

According to the 2022 TCAC Opportunity Map, the entire city is considered an area of moderate resource. ~~Most of the city is considered high and highest resource areas, including the western and southern portions of the city.~~ However, ~~the northern area of the city is designated as moderate resource and~~ the eastern

[83] Erica Skylar. 2018. St. Helena Housing Update Report. https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3395/staff_report-white_paper.pdf

portion of the city is designated as low resource, indicating residents in these areas have low access to positive economic, educational, and environmental outcomes has a higher percentage of non-White residents, lower household median income., higher percentage of cost burden among renters and owners, and less positive economic and environmental outcomes compared to the rest of the city. TheThese demographic And socio-economic patterns 2021 TCAC/HCD Opportunity Map maps influenced the locations of potential lower income sites in the city.

5.2 Improved Conditions

According to the 2022 TCAC Opportunity Map, the entire city is considered an area of moderate resource. Demographic and socio-economic spatial patterns show that census blocks with low- and moderate-income households, greater Hispanic/Latino populations, and higher rates of housing problems are located throughout the eastern half of the city. Approximately 38 percent of the proposed units planned for in the sites inventory (Appendix B) are located in low resource areas of the city. Nine (9) percent are located in moderate resource areas, and 53 percent are located in high and highest resource areas. Sites that accommodate housing unit densities appropriate for lower-income units are scattered around the city. Sites that can accommodate most of the lower income units are located in the western and southern part of the city, which has a higher household median income and more positive economic and environmental outcomes. Approximately 38 percent of the total proposed units and 36 percent of the proposed lower-income units planned for in the sites inventory (Appendix B) are located in the eastern part of the city., with sites accounting for 36 percent of the proposed lower income unitswhich has a higher percentage of low- and moderate-income populations and non-White residents located in low resource areas, 15 percent located in moderate resource areas, and 49 percent located in high and highest resource areas. Table 10 shows the number of housing units proposed in each category of resource area broken down by income category..

Table 10 Proposed Sites Inventory Housing Unit Allocation

Proposed Sites Inventory Housing Unit Allocation

Opportunity Category	Very Low Income	Moderate Income	Above Moderate Income	Total
Low Resource	61	40	8	109
Moderate Resource	31	0	0	31
High Resource	128	44	29	209
Total	228	84	37	349

Figure 47Figure 47 shows the site inventory in relation to the TCAC Opportunity Map. Sites proposed within the eastern area of the city, which is a low resource area, are diverse with a mix of lower income and non-lower income sites. Lower income sites spread across low, moderate, and high resource areasthe city. Site 7 (821 Pope Street) and Site 8 (882 and 886 College Avenue) have 50% lower income units and 50% moderate income units. The rest of the proposed lower income sites are 100% lower income units.

5.2.1 Exacerbated Conditions

The northern and eastern parts of the city contain block groups considered moderate ~~and low~~ resource with a higher concentration of Hispanic/Latino population, higher percent of renter occupied units, higher percentage of overpayment by residents, less positive economic outcomes, and higher pollution burden compared to the moderate and high resource areas of the city. According to California Housing Partnership data, all federal and State subsidized housing within St. Helena is in moderate ~~and low~~ resource areas in the northern and eastern portions of the city. The Sites Inventory does not exacerbate conditions in vulnerable areas of the city by identifying sites that can accommodate lower income units throughout the city. Additionally, one underutilized site was identified that could accommodate above moderate units in the ~~lower resource area~~eastern part of the city, which has a higher percentage of non-White residents and cost burden and lower economic and environmental outcomes.

5.2.2 Racially/Ethnically Concentrated Areas of Poverty and Affluence

There are no racially/ethnically concentrated areas of poverty or affluence identified in St. Helena. However, eastern areas of the city have a larger population of Hispanic/Latino residents as well as LMI populations compared to other areas of the city. In contrast, western areas of the city have higher concentrations of White residents, higher median incomes, and lower concentration of LMI populations. Sites feasible for lower income housing were identified in these affluent areas.

5.2.3 Access to Opportunity

The city is categorized into 2 census tracts~~.~~, both of which are considered moderate resource~~The western tract is considered highest, high, and moderate resource and the eastern tract is a mix of low, moderate, and high resource~~. Housing units in the sites inventory are not disproportionately concentrated in different resource areas, and the sites identified in ~~low resource~~ the eastern areas are scattered on vacant and underutilized parcels to facilitate the development of lower- and above moderate-income units.

5.2.4 Disproportionate Housing Needs

The fair housing assessment found a need for affordable housing for people with disabilities and adequate low-income households. The City incentivizes the development of extremely low-, very low-, low-, and moderate-income housing by reducing development fees and relaxing development standards to incentivize housing development. The City may also assist in acquiring and assembling property, subsidizing on-site and off-site improvements, and assisting in relocation activities as well as clearing and demolition.

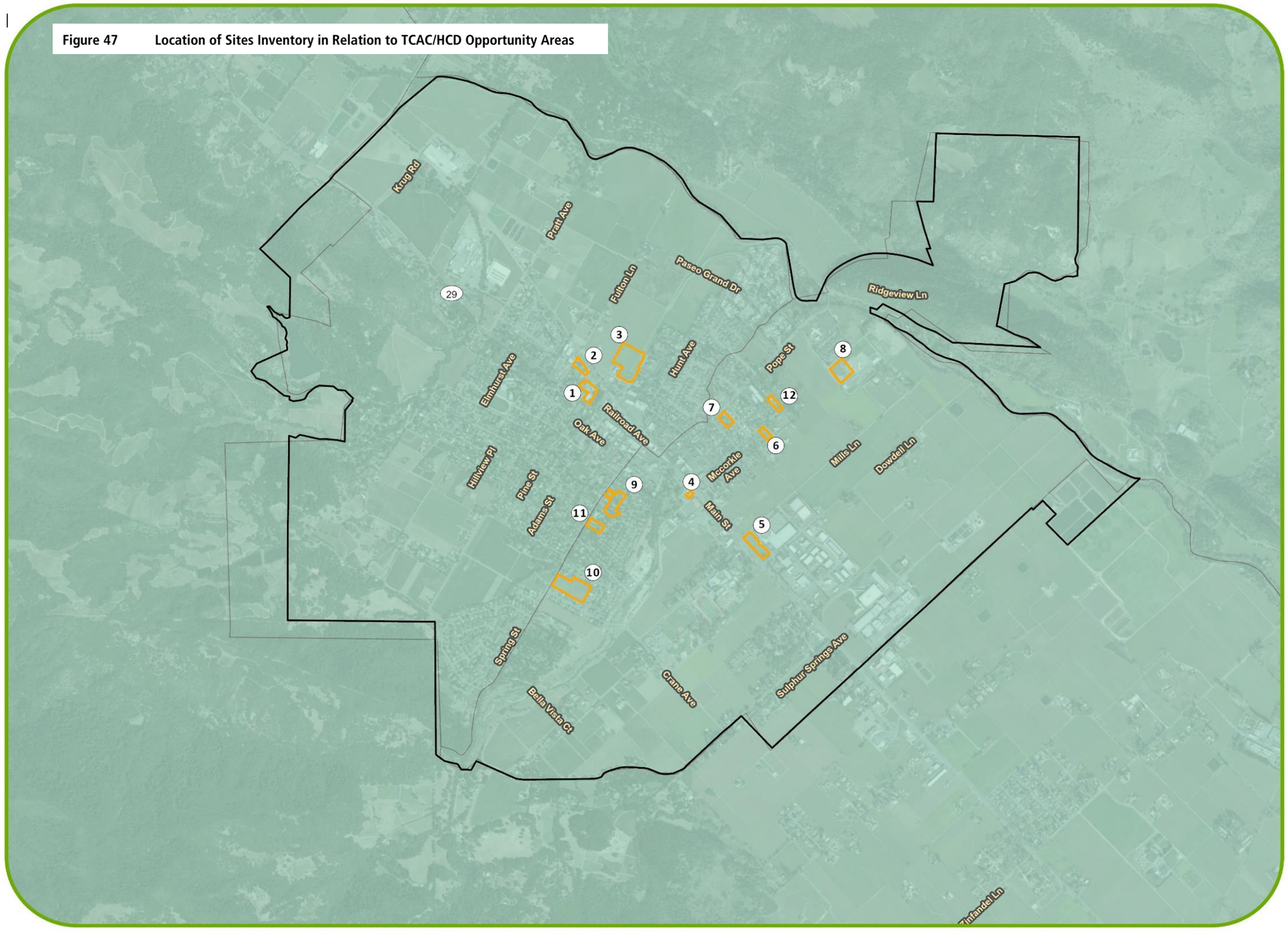
5.2.5 Subsidized Housing

In 2019, approximately 1,105 households received Housing Choice Vouchers in the County of Napa, with 10 households receiving rental assistance and 6 households on the wait list in St. Helena.[84] The AFFH Data Viewer does not have data on Housing Choice Vouchers for St. Helena.

[84] *City of Napa Housing Authority's Annual Report Housing Services Agreement, 2019, https://www.cityofsthelena.org/sites/default/files/fileattachments/planning_resources/page/3395/2018-2019_housing_services_annual_report.pdf*

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Figure 47 Location of Sites Inventory in Relation to TCAC/HCD Opportunity Areas



City Boundary
Selected Sites

TCAC Opportunity Areas (2022)
- Highest Resource
- High Resource
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data

1 - 1480 Main Street
2 - 1572 Railroad Avenue
3 - Adams Street
4 - 905 Main Street
5 - Main Street (between Mills & Dowdell)
6 - 709 McCorkle Avenue
7 - 821 Pope Street
8 - 882 and 886 College Avenue
9 - 1447 and 1515 Spring Street
10 - Spring Street (between Hudson & Valley View)
11 - 1637 Spring Street
12 - 620 McCorkle Avenue

ST. HELENA CALIFORNIA

0 0.2 0.4 Miles N

Imagery provided by Esri and its licensors © 2023. Additional data provided by County of Napa, 2022; CTCAC, 2022.

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Agenda Item #5.2.

6. Contributing Factors

This assessment of fair housing issues identifies factors that contribute to fair housing issues in the City of St. Helena, as shown in Table 10~~Table 10~~.

Table 10 Factors that Contribute to Fair Housing Issues

Identified Fair Housing Issue	Contributing Factor	Meaningful Action
Fair housing enforcement and outreach	· Lack of fair housing requirements and information provided to residents · Outreach and communication of services are limited to English · Limited fair housing testing and enforcement	· Participate in FHNV meetings, at least once annually, to coordinate regional responses to housing discrimination issues (Program H-XX)
Lack of affordable housing and displacement of residents	· Increasing rent and house/property costs · Dominance of single family housing · Land use and zoning laws · Availability of affordable units in a range of housing types	· Diversify and expand the housing stock to accommodate the varied housing needs of different groups (Programs H-E, H-H, H-I, H-J, H-W, H-LL) · Pursue down payment and mortgage assistance resources through the Housing Trust Fund or other resources (such as CalHome) for local funding to assist lower and moderate-income residents (Program H-GG) · Development of affordable housing on City-owned sites (Program H-V) · Provide by right approvals for multi-family housing projects that meet objective design and development standards (Program H-V) · At least once annually, provide an information on accessory dwelling units (ADUs) in the city, and target outreach to residents in the high resource

		southwest of Main Street and northeast of Pratt Street (Program H-Q)
Concentration of lower income and minority households in the southeastern areas of the city	· Land use and zoning laws · Location of existing affordable housing	· Prioritize affordable housing in high resource areas southwest of Main Street and northeast of Pratt Street (Program H-V) · Encourage construction and renting of ADUs in high resource areas to increase supply of variety of housing types in the city (Programs H-I, H-R) · Prioritize CIP in ~~low resource areas~~ the eastern part of the city (Program H-WW) · Revise inclusionary housing ordinance for more lower income units, realistic in-lieu fees, workforce housing, and more on-site housing requirements (Program H-F) · Invest in public infrastructure projects in low and moderate resource areas that improve the quality of life for residents (Program H-WW)
Limited resources for persons with disabilities	· High cost of transportation for persons with disabilities · Lack of ADA compliant sidewalks	· Reduce ridership costs for VineGo paratransit system (Program H-WW) · Work with the County of Napa to carry out the ADA self-Evaluation and transition Plan to remove barriers for persons with disabilities to facilities and programs in Napa County (Program H-WW)

Appendix B: Comments on the Public Review Draft 2023-2031 Housing Element Update

The City received multiple comment letters on the Public Review Draft 2023-2031 Housing Element Update. Comments on the Public Review Draft were received between June 29, 2022, and July 30, 2022. Key changes in response to public input include revisions to various programs and the addition of a new site in the sites inventory.

Response to Comments

In response to these comments, the City has made a number of revisions to the Public Review Draft Housing Element~~draft~~, including:

- 1: Policy Document – Program H-Y: Corrected spelling error and added Voorhees Circle (now program H-Z).
- 1: Policy Document – Policy HE 2.5: Revised language for clarity.
- 1: Policy Document – Program H-C: Urban Limit Line: Deleted program.
- 1: Policy Document – Program H-J: Updated funding sources to include State and Federal programs and grants (now program H-I).
- 1: Policy Document – Program H-M: Zoning to Facilitate Higher Density Housing: Revised for clarity (now program H-N).
- 1: Policy Document – Program H-R: Affordability Requirements for ADU Incentives: Updated text to specify that a regulatory agreement is required (now program H-S).
- 5. Housing Conditions – Key Findings: Added source information for the data presented in the key finding related to Cost Burden
- 5. Housing Conditions – Physical Housing Conditions: Estimated the number of homes in need of rehabilitation.
- 6. Housing Market Conditions – Affordable Home Purchase Prices: Corrected broken references to Table 15.
- 6. Housing Market Conditions – For-Sale Housing: Revised note on Table 15 to clarify that 2021 data was used.

- 11. Housing Resources – Pending and Approved Projects: Revised Table 36 to identify the existing unit at 963 Pope Street as deed restricted.
- 11. Housing Resources – Remaining RHNA: Revised Table 37 to fix incorrect income categorization for 963 Pope Street.
- 11: Housing Resources – Residential Sites Inventory: Added 620 McCorkle (APN 009-502-003) to the available sites inventory.

- 11. Housing Resources – Pending and Approved Projects: Revised Table 36 to identify the existing unit at 963 Pope Street as deed restricted.
- 11. Housing Resources – Remaining RHNA: Revised Table 37 to fix incorrect income categorization for 963 Pope Street.
- 11: Housing Resources – Residential Sites Inventory: Added 620 McCorkle (APN 009-502-003) to the available sites inventory.

July 26, 2022

TO: Members of the City Council and Planning Commission, City of St. Helena

FROM: Jennifer La Liberte, Executive Director

SUBJECT: Housing Element Update, 2023-2031, Public Review Draft

The Board of Directors of Our Town St Helena and I appreciate the opportunity to comment on the draft Housing Element Update (HEU).

General Comments

Pg 1-4 Potential Funding Sources – There does not appear to be consistency among the potential funding sources for the objectives. Some programs list specific potential sources (though the lists should be expanded) and some list only staff time. It appears this could be related to how current programs are funded. Federal, state, county, local, and private funding sources would seem appropriate for each objective that requires development and construction funding. Also, if detailed funding sources are to be included, then US Department of Agriculture Rural Development should be added.

Pg. 1-6 Throughout the document (beginning on page 1-6), much of the cited data is outdated and does not accurately reflect today's market conditions. For example, the HEU states "typical contract rent for an apartment in St. Helena was $1,470 in 2019," and to avoid being cost burdened, a renter would need to earn $59,160. According to the Napa County 2021 Affordable Housing Needs Report (May 2021) produced by the California Housing Partnership, the average asking monthly rent in Napa County is $1,948 and renters need to earn $77,916 to avoid being cost burdened. Since St. Helena tends to be at the top of the market for Napa County, it's safe to assume (and observe) that those figures are even higher. Marcus & Millchap publishes a quarterly Bay Area multi-family market report that identifies mean rents by county by unit type which would be more accurate even if not specific to St Helena. We know that a typical two-bedroom market rate unit in good condition is renting for $2,100-$2,650 plus utilities, and three-bedrooms in very good condition are at approximately $3,000 per month.

Pg.1-11 How were the specific quantified objectives derived under each of the programs and how do they relate to each other? There appears to be significant overlap in

these objectives. Example: farmworker housing and very low-income housing could be the same housing; senior housing could be incorporated into a low-income project. The Quantified Objectives Summary Table on 1-40 page provides the totals but not the logic in how the quantities were broken out.

Pg. 1-17 "The City will explore possible incentives for building attached market rate housing units for rent and for sale" which is great, but it ought not take five years to explore incentives. And what action comes after exploration? Similarly, why will it take four years to study potential modifications to the Zoning Code to facilitate higher density housing, etc., when the City is already updating the Zoning Code and the HE and should be fairly versed in what changes are needed? Is it possible to make incremental changes? For example, an immediate step the City could take is to remove the conditional use permit requirement in multi-family zones to streamline the process for developers.

Page 1-25 Change Murietta to Marietta. Note: Some Voorhees Circle homes that have not changed hands are also at-risk for conversion.

Pp. 2-23 Beginning on page 2-23, Joe is Joe McGrath, Jordan is Jordan Bentley, Mary Stevenson is Mary Stephenson, John is John Sales, Jennifer Le Liberte is Jennifer La Liberte, and Steve is Steve Goldfarb.

Page 2-57 Employment – what did the unemployment rate increase to? Table 3, under 2010 for Napa County, the comma is in the wrong place.

Page 2-82 Vacant units -- It would be useful to state how many people could be housed in these units which comprise 17.4 percent of the housing stock. If the rental vacancy rate is 3.1 percent and ownership vacancy rate is 5.3 percent, what constitutes the delta (17.4 minus 3.1 minus 5.3)?

Page 2-83 Cost burden – for the last paragraph, what is the time period this data represents?

Page 2-84 How does the fact that an overwhelming portion of our existing housing stock is 40 to 80 years old correlate with the City's preservation goals?

Page 2-88 Table 14 – how many of the permitted units from 2015-2019 have been built?

Page 2-96 Home values – how is "typical home value" defined? Zillow is the cited source, which is providing listing prices, not value. Based on current listings in St. Helena, $1.6 million is at the lower end of the range. Local realtors could provide updated

MLS data which would be timelier and more accurate than Zillow. Also, within this section it is not clear whether existing deed-restricted units are included in totals of rent/homeownership units and monthly cost. It could be that these income-qualified units are affecting the total values. Could this be made more explicit?

Page 2-98 Affordable home purchases – some zeroes are at the beginning of the first sentence and middle of the second sentence that don't make sense.

Page 2-99 Table 15 -- The Area Median Income figures are for 2021. HUD has published new figures for 2022, so the footnote to the table should be adjusted accordingly.

Page 2-103 Table 16 – Christine Apartments, 723 Hunt Ave., four units, should be included as a very low and low income; OTSH purchased in June 2021 and recorded 55-year deed restrictions. Also, Grayson Apartments were funded privately through the inclusionary requirements met by 632 McCorkle and references to tax credits, AHP, etc. should be removed. This is an important point because the housing crisis here will not be solved exclusively through non-profits.

Page 2-154 Table 36 – 963 Pope Street, under "Project Description", the existing house is deed restricted and should be noted.

Page 2-155 Table 37 – if the 4 pending or approved units is referring to 963 Pope St, those should be moved to "lower" income.

<u>Policies</u>

HE 2.5 "Allow duplexes in all low-density residential zones" – please clarify whether this allowance is by right and not with a conditional use permit.

HE 4.8 "Give preference to projects providing workforce housing affordable to up to 140 percent of the AMI" – there doesn't appear to be an implementation program associated with this policy. What preference would be given, and would it be at the expense of another affordability level?

<u>Implementation Programs</u>

H-A, H-NN "Concentration of sites for affordable housing" – OTSH supports the City's efforts to ensure affordable housing sites are identified geographically throughout the city. But we caution that land is scarce, and large sites rarely become available that are suitable for multi-unit housing, and, most that do, tend to be located east of Main Street. We support incentivizing affordable housing wherever it can get

built, and don't support the City prioritizing Affordable Housing Trust Fund dollars for affordable projects in the western portion of the city at the expense of projects in the eastern portion.

H-C OTSH believes we should be planning for a more sustainable and less car-dependent future. We should be exploring opportunities to increase infill density and expand height limits and reduce parking requirements. Up and in should be the focus. The block of land from south of White Sulphur Spring Creek to Grayson and west of Highway 29 and east of Crane vineyard is one of the most poorly utilized sections of the City, and we believe a housing task force could explore how to unlock the potential here. Expanding the Urban Limit Line should be the last option as it runs a great risk of negatively impacting what makes this such a great and desirable place to live with vibrant wine and tourism industries.

H-D Water and sewer access should be prioritized for both affordable and missing middle housing. Also, please define "missing middle" in terms of Area Median Income. The water neutrality requirement should be eliminated for any attached affordable and missing middle housing. The City could consider requiring other trade-offs such as no-irrigation landscaping or rain capture systems.

H-J "ADU Workforce Housing Incentive Program" -- broaden the potential funding sources to include grants, state and federal programs. Also, consider working with the County Assessor to allow a property tax reduction on the larger property in exchange for 30-year a deed restriction on an ADU, with proper monitoring to ensure compliance.

H-M OTSH believe the City should immediately remove the Conditional Use Permit requirement on MDR Zoning. At a minimum, it should be removed for any parcel identified in the HE as a Housing Opportunity Site. Discretionary review is the toehold for opposition to these projects and makes developers wary of taking the significant financial risk that is required for this type of development. Also, consider allowing deed restrictions for missing middle projects (as defined by the City) and in exchange grant fee waivers and eliminate the housing impact fee requirement.

H-P We should not incentivize ADUs beyond existing state mandates unless they have a deed restriction and rental occupancy requirements in exchange. While this may be implied it isn't clearly stated.

H-R, H-DD	"Affordability requirements for ADU incentives; reduced fees for affordable housing" – these should include a reference to the mechanism that will restrict affordability (i.e., affordable housing regulatory agreement).
H-S	"Illegal housing units" – these types of policies or programs can be double edged as they often end up displacing households that cannot afford to live in legal units. Consider a companion program that sees to support households displaced by this program.
H-U	Under Objectives – "Support the development of 3 multi-unit housing projects….support the development of five infill projects…." What does "support" mean? As written it implies a maximum the City will "support" during the planning period.
H-??	Under Goal 3, Conservation of Existing Housing – consider adding an implementation program: "The City will work to obtain CDBG or other available funds to create an 'Affordable Housing Conservation Fund' so units can be acquired quickly when they hit the market and preserved at affordable levels."
H-Z	"Vacation Rentals" – the City should consider prohibiting vacation rentals in certain zoning districts if it hasn't already.
H-FF	"Affordable Homeownership" – the City should work with the County's Proximity Housing Program to provide down payment assistance to St. Helena first-time home buyers. If the County is amenable to working with the City to create a funding set-aside for St. Helena, the City could then market the program or work with others to do so.
H-II	"Housing Coordinator" – this is an immediate need, and a specified time frame is encouraged rather than "ongoing". It would be preferable to do this as a City of St Helena position, but a shared position is better than none. OTSH would prefer the City consider a Housing / Economic Development FTE rather than a lower level, part-time Housing Coordinator. Also, meeting with partner jurisdictions twice during the 13-year planning cycle does not appear to be sufficient.

Proposed Sites

Site maps	It would be helpful to add a north arrow to the aerials.

Page 2-162 The last sentence should read, "However, the future property owner intends to develop 36 to 50 units."

Page 2-170 Table 50, Site 5 – change 50 to 36-50 (if possible).

Housing Opportunity Sites

Adams Street What is the rationale for the size and placement of the Opportunity Site on the Adams Street property?

709 McCorkle This site was recently purchased and is intended to function as an estate compound. It has a low to zero probability of being developed for affordable housing.

741 McCorkle This house was recently renovated with significant capital improvements and is unlikely to be further developed in the next HE cycle.

1637 Spring This site has recently been purchased for the intent of turning it into employee housing.

Proposed site We encourage the City to add 620 McCorkle Avenue (APN 009-502-003-000) as a "key housing site". This 0.76-acre site is zoned MDR and is currently on the market. Including it as a key housing site would eliminate the requirement for a conditional use permit and be consistent with the goal to remove barriers to development of multi-unit housing.

Conclusion

OTSH commends the City for its work on this document. Realizing that the HEU is a mandated document that needs to follow strict guidelines, we hope the City will also create an implementation plan that identifies measures, cost analysis, staff and funding resources, and time frames for meeting the goals contained herein.

Aaron Hecock

From: LAURA KEIR <lkeir@me.com>
Sent: Tuesday, July 19, 2022 11:09 AM
To: Aaron Hecock
Subject: [External] Land designation

Hi
It appears numerous parcels sent to the state to meet our quota fir homes are not currently available for sale? Are they going to be for sale? And we are not aware? Or, emanate domain enforcement would be necessary?
I firmly disagree with the high to med density development of Valley View Hudson vineyard property being developed as traffic on the road is already more than a residential area should have to handle between cut threw traffic to avoid Hwy 29 to the school traffic it's impossible to safely get out of your driveway or even ride a bike!
Spring Street is narrow and I notice in addition three sites are designated as possible development.
The government/ Bay Area need to either agree to continue our exempt status. Recognize us as a primary agricultural area or the Napa Vally will be destroyed!

Laura
Sent from my iPhone

City of St Helena, City Hall
Received

JUL 13 2022

1480 Main St.
St Helena, CA 94574

Housing Element for Public Comment
Aaron Hecock, Senior Planner, City of St. Helena
ahecock@cityofsthelena.org

July 10, 2022

Dear Mr. Hecock,

As concerned St. Helena residents, we have read the Housing Element Update and plan to attend the public forum.

We support the city's efforts to identify appropriate sites for potential development to provide additional housing that is badly needed. Yet after reading about proposed rezoning and adding more density, we remain vigilant in pointing out situations where multi-unit projects would negatively impact neighborhoods.

We have shared with several City officials the situation we face after the recent purchase of the parcels at 1521 and 1541 Elmhurst. The owner, Jennifer Mozzetti, and her friend John Bowman, a self-described developer from Napa, have disrupted this peaceful neighborhood with their alleged plans to develop the parcel at 1541 Elmhurst into a multi-unit site with the "cooperation of the City." They initially claimed, as a result of their purchase of the two parcels, they "owned" the Elmhurst Alley from the property at 1521 extending to the end of the alley.

The city, through correspondence from Eric Janzen on 5/17/22 and several other emails, assured us that the Elmhurst Alley was listed by the County Assessors as a public right of way and is not owned by Ms. Mozzetti.

Elmhurst Alley is a single lane, dead-end alley that extends off busy Spring Mountain Road. It provides access to the vehicles of 5 single family homes in addition to the mail truck, delivery trucks and home health care vehicles that service those homes. The tightness of this alley already poses safety questions for Emergency and Fire Department vehicles.

Any development of the property at 1541 Elmhurst from its current single-family residence to a multi-unit would be unwise and unsafe expanding the number of alley users. (Garbage day finds the street with as many as 15 garbage cans as it is!) Certainly, the goal of adding multi-unit housing in St Helena is a laudable one, but to drop a new multi-unit project in an already dense neighborhood with limited access from a single-lane, blind alley, would be ill-conceived.

Our specific questions are these we hope you can answer:

1.The Housing Element mentions an inventory of possible sites, not yet public, that might be used to develop more housing.
Is the parcel at 1541 Elmhurst currently on this site list or being considered?

2. Can individuals, seeking to develop multi-unit housing on their own properties apply to be included on this site list?

If the answer is "yes" to either question, we kindly request a site visit, in person, by a member of the Planning Commission, so that the impact of adding more housing and residents on Elmhurst Alley will be obvious.

Sincerely yours,

Dayna Van Kleeck
1800 Spring Mountain Court

Henry Kistler, M.D.
1781 Spring Mountain Road

Susan Taylor Kistler
1781 Spring Mountain Road

Brenda Hill
1777 Spring Mountain Road

Jim Lampkin
1777 Spring Mountain Road

Terence Ford
1806 Spring Mountain Court

Kathryn Ford
1806 Spring Mountain Court

Polina De-Levi
1809 Spring Mountain Court

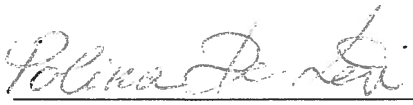
Vladymer De-Levi
1809 Spring Mountain Court

Brenda Hill
1777 Spring Mountain Road

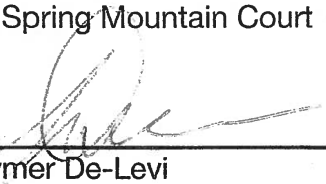
Jim Lampkin
1777 Spring Mountain Road

Terence Ford
1806 Spring Mountain Court

Kathryn Ford
1806 Spring Mountain Court



Polina De-Levi
1809 Spring Mountain Court



Vladymer De-Levi
1809 Spring Mountain Court

Aaron Hecock

From: Nancy Dervin <nancydervin@hotmail.com>
Sent: Friday, July 1, 2022 3:13 PM
To: housingelements@hcd.ca.gov
Cc: office@mintierharnish.com; CityCouncil; Aaron Hecock
Subject: Re: [External] Public Review Draft Housing Element Available Now!

Dear HCD,

I am concerned about the City of St. Helena putting forth a Housing Element Draft that contains at least one property that the City has repeatedly been told is absolutely not available which is 601 Pope Street. There are other properties on the Draft that are also potentially not available but this one site is positively not available.

We have a huge housing shortage problem, like most communities. Knowingly including unavailable sites is unethical as well as contrary to the purpose of identifying housing opportunity sites.

What should be or can be done about this?

Sincerely,
Nancy Dervin
St. Helena, CA

From: St. Helena Housing Element <jim@mintierharnish.ccsend.com> on behalf of St. Helena Housing Element <office@mintierharnish.com>
Sent: Thursday, June 30, 2022 10:31 AM
To: nancydervin@hotmail.com <nancydervin@hotmail.com>
Subject: Public Review Draft Housing Element Available Now!



CITY OF ST. HELENA

Aaron Hecock

From: Mary Wilson <boecoup@gmail.com>
Sent: Wednesday, July 13, 2022 12:54 PM
To: Aaron Hecock
Subject: [External] Housing sites

I wanted to comment on the list of potential sites for housing that was in the St Helena Star. I've taken the time to look at each of the addresses mentioned. With the exception of one, I found all of them viable locations. My one exception is the vineyard location on Spring St.
One of the things that makes St Helena unique are the vineyards still scattered within the city. They are a part of our heritage, displaying the agriculture that has made this valley the world class jewel that it is. Please allow this one to remain as it is.

Respectfully, Mary Wilson

Sent from my iPad

Mary Wilson
1426 Kearney St.
St. Helena, Ca. 94574

707-529-4406

Aaron Hecock

From: Joe McGrath <joe.mcgrath65@gmail.com>
Sent: Thursday, July 14, 2022 12:12 PM
To: Aaron Hecock
Cc: Mary Stephenson; Maya DeRosa; Eric Hall; Lester Hardy; Jennifer La Liberte; Jordan Bentley; Joe Mcgrath
Subject: [External] Re: [External] A Potential New Opportunity Site

Aaron:

Thanks.
Speaking as a private citizen and neighboring property owner (and concurring with Mary as an OTSH Board member), I would also advocate that this lot [620 McCorkle - APN 009-502-003-000] be added to **this** HE cycle as a "Housing Opportunity Site".

In light of the recent multi-family developments on that street I would recommend however that it remain MDR, otherwise it may cause too much opposition with residents on the south side of McCorkle.
The goal would be to eliminate conditional use requirements which become, as you know, major entanglements in entitlement.

However, as MDR it should be explicitly listed under **17.40.020 Permitted Uses (N):**

N. Multiple-family dwellings, apartments, and dwelling groups at a density up to the maximum allowed by the medium density residential district shall be allowed as a permitted use on the following MR zoned parcels, which are identified as "Key Housing Sites" in Table 42 of the city's 2015-2023 housing element, and are identified as follows by street address and assessor's parcel number (APN): 567 Pope St. APN 009-070-002; 591 McCorkle Ave. APN 009-070-003; 1817 Spring St. APN 009-322-009; Sulphur Springs Ave. APN 009-362-015; Spring St. APN 009-441-023 and 009-552-002; 576 Pope St. APN 009-552-003; 1105 Pope St. APN 009-090-003. (Ord. 17-2 § 6 (part); Ord. 16-8 § 1; Ord. 15-2 § 7 (part): Ord. 12-2 § 6: Ord. 07-5 § 2 (part): Ord. 05-4 § 1 (part): Ord. 03-4 § 11: prior code § 27.51)

Please confirm that the above constitutes "public comment".

Thx,

Joe

Aaron Hecock

From: Joe McGrath <joe.mcgrath65@gmail.com>
Sent: Monday, July 18, 2022 4:41 PM
To: Aaron Hecock; Maya DeRosa
Subject: [External] HE Draft Input

Aaron/Maya:

Here are some additional comments/inputs re: Housing Element. Please do not take them as criticism of your hard work. The Housing Element can be a valuable tool to accomplish our municipal housing objectives if we shape it correctly.

Thanks,

Joe

General Comments:

* Current planning meetings should be held in person with a zoom option. It should no longer be acceptable that public meetings are held entirely by Zoom. It also should not be acceptable that participants to Zoom meetings have no idea how many other participants are present, and, if participants "opt-in" to identify themselves, are identified.

* The document and the process are too long, too bureaucratic, and not specific enough with respect to immediate and effective actions and policy changes that will alter the climate in any meaningful way to have a real near-term impact on affordable or missing middle housing.

* The document itself is outdated with may reference to data as far back as 2019 representing "current" data. We lived in a far different world than in 2019.

* A major flaw in the Housing Element process for Above Moderate or Market Rate units. Our State Legislators did not comprehend second home or vacation communities.
So meeting the HE RHNA objective for Above Moderate by enabling, say, the Hunter Project is nonsensical if say 50% of the SFHs ultimately become vacation homes.
Having these types of development consume constrained water, sewer and other valuable resources can impinge on more critical housing needs.

Specific Section / Page Comments:

Page 1-11:

H-C We should be planning for a more sustainable and less car-dependent future. We should be exploring opportunities to increase infill density and explore expanding height limits, and reduce parking requirements. Up and In should be the focus. The block of land from south of White Sulphur Spring Creek to Grayson and West of Highway 29 and east of Crane vineyard is one of the most poorly utilized sections of the City. We should unleash a task force to see if we can unlock

potential here. Expanding the Urban Limit Line should be our last option, and runs great risk of negatively impacting what makes this such a great and desirable place to live with a vibrant wine industry and tourism economy.

Page 1-12:

H-D. Water and sewer access should be prioritized for both affordable and missing middle. Also please define "missing middle" in terms of AMI %. 200%? Water Neutrality Requirement should also be eliminated for any attached affordable and missing middle. Mandate no-irrigation landscaping instead. All new buildings in CA are highly water efficient by California Building Code. It is better that we have new stock than old stock re: environmental sustainability (similar to newer car fleet vs. older regarding emissions).

Page 1-17:

H-M. It should not take 4 more years following 3 years working on the Housing Element to understand what Zoning Ordinances need to be changed to enable housing.

1) Start with removing the Conditional Use Permit requirement in some manner on MDR Zoning. At minimum, it should be reduced for any parcel identified in Housing Element as Housing Opportunity Site (not just Key Housing Opportunity Site") . It is imperative to reduce or eliminate "discretionary" review. Discretionary review is the toehold for opposition on these projects. It is also a toehold for CEQA opposition.
2) Define "Missing Middle" in terms of AMI. 200%?
3) Tradeoff off 2:1 (or some such ratio) of affordability requirements on private developers for below moderate units for moderate to missing middle (200%) cutoff units. Ie a developer can meet "affordable" designation if he/she builds (2) deed-restricted moderate to missing middle (80-200%AMI?) units for every (1) required < moderate unit (<80% AMI unit).
4) Eliminate Water Neutrality requirements for above. This is just one more hurdle.
5) Eliminate Housing Impact Fees for above. By very nature these projects are having a POSITIVE housing impact.
6) Reduce overall permit fee structure for above. (on page 2-142 it calculates 12.3% of multi-family costs on Permits & Fees. This is right after it the HE states that governmental constraints are not a factor?)

Pg 1-15:
H-J. What can we do to entice existing ADUs into a deed-restricted affordable? How about a tradeoff on property tax relief on that unit for 30-yr deed-restriction and rental occupancy rate compliance??

Pg 1-19:
H-P. We should not further incent ADUS beyond existing state mandates unless they have deed-restriction and rental occupancy requirements in exchange.

Pg 1-29:
H-II. What are the accountabilities of the Housing Coordinator? Why would we not do this under existing Departments?

Pg 1-34:
H-UU. We should be considering "no-irrigation" landscaping (at least after plants take hold).
We should eliminate the Water Neutrality Requirement on any deed-restricted affordable < 200% AMI. This is a cumbersome and complex and expensive requirement to comply with. New attached buildings under CBC are highly water efficient and perform well below 65 GPD per capita. Nix the irrigated landscaping as a tradeoff.

Pg 2-38:

HE1.B. This document indicates that because units have been built in last cycle that Growth management System was not an obstacle. This is untrue. 632 McCorkle was "lucky" in that we straddled two years and literally consumed (8) of the (9) available allocation. Had this been a 10 unit project, it is not clear what the City would have done. Had there

been another similar project, it is unclear what the city would have done. Uncertainty is the enemy of Investment and the friend of Risk.

Pg 2-103

Table 16 - Grayson Apartment 2 units funding source were **not** Tax Credits, nor AHP, nor RHCP, nor City funded. These two units were **funded privately** through inclusionary requirements on 632 McCorkle. This is an important point, because we will not solve the housing crisis here exclusively through non-profits.

Pg 2-125:

Saying that Building Codes and Zoning Ordinances are not a "governmental constraint" to development is an entirely untrue statement and somewhat offensive coming from a government agency. While I would not argue that enhancements in the California Building Code are in most cases warranted, they have most definitely affected housing costs and housing production and have contributed to the shortage of affordable housing stock. Enhancements to CBC in ADA, Seismic, Fire, and Environmental requirements have played a significant role in the increase in housing costs. This must be acknowledged. As for Fire Code, nearly all of the costs in the building code are for suppression systems to extinguish a fire that starts inside the building. Most homes in CA are destroyed by fire from outside the building.. The CBC however is very clear and the requirements do not have broad interpretation, so while costly to comply with, is not a great impediment.

Zoning Ordinances however and discretionary reviews are something entirely different. Developers do not like uncertainty. If a Zoning Ordinance can be interpreted differently by different people - that is problematic. And if the outcome of a Design Review Meeting may be different based on the makeup of a Commission that is problematic. Developers do not like uncertainty. This is why discretionary reviews are highly problematic. To bring a complete application to Design Review Submission - let's say 8-12 units - could easily require an investment of $250K. Surveys, Civil Plans, Arch Plans, Elec Plans, Plumbing Plans, Mechanical Plans, etc. This all with the possibility of project Denial.

Lastly. CEQA is a major governmental constraint and should be acknowledged as such. CEQA should have no role in infill projects within ULL unless special circumstances warrant.

2-132:

We should articulate what Design Review is "not". For projects that are entitled, Design Review has no function in determining whether a project can be built or not to its entitlement. It would be much preferable to establish objective design guidelines that should be followed for multi-family rather than subject applications to a highly subjective process.

2-138:
Parking requirements for 2 Bedrooms within the ULL should be reduced to 1.5 spaces for <200% AMI.

Housing Opportunity Sites Input

For the sites listed, the probability that any given site gets developed in the next HE cycle range between 0% and 95% (Phelps Site). Most sites identified have a low probability (< 10%?) chance of being developed.

709 McCorkle: This site has recently been purchased and is intended to function as an estate compound.

741 McCorkle: This house has been recently renovated with significant capital improvements, and is unlikely to be further developed in this HE cycle.

1637 Spring Street: This site has recently been purchased for the intent of turning it into employee housing. My understanding is that the current plan is to convert 1 BRs into 2 BRs through garage conversion.

620 McCorkle: Per prior inputs, this site should be added to the Housing Opportunity Site and Key Housing Opportunity Site list.

Saint Helena Housing Coalition, Inc.

PO Box 988
Saint Helena, CA 94574

July 13, 2022

Mr. Aaron Hecock, AICP Senior Planner
City of Saint Helena
1572 Railroad Avenue
Saint Helena, Ca 94574

RE: 2023-2031 Housing Element Draft
VIA: Email

Dear Mr. Hecock:

First of all ,we would like to thank you for the this very through and professional work product. It is obvious that much research and attention to detail has been taken.

A question. Under the Water Section it is stated that "although the maximum amount of (Bell Canyon) water that is available to the City is 992 acre-feet". Why?

In Section 11. Housing Resources -Future Housing Needs we note the following:

> The City must ensure the availability of residential sites at adequate densities and appropriate development standards to accommodate these units by income category.(Emphasis added).

Based upon our work in attempting to find suitable land for new "affordable" Essential worker housing our experience, in part, differs from the report's conclusions:

Regarding the City owned Adams Street parcel considerable thought should be given to identifying the Eastern most portion of the parcel, not the Western end for "affordable" housing. SHHC submitted as preliminary site plan so indicating. Thus, leaving the West end for a potential city hall location or other civic functions. To us, it does not make sense to place any type of affordable" housing at the West end.

Site 4: 905 Main Street. When SHHC made inquiries, we were informed that the owner expressed that this for-sale price of this parcel would exceed $1,000,000. Given the suggested density of five units that would make the land cost per unit $200,000. For most "affordable" housing the land cost should be nearer to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible.

Site 7: 81 Pope Street. Zillow estimates that the current price for this property is approximately $2,000,000. Again, that would work out to a land cost of $100,000 per unit of the projected 20 "affordable Units (to say nothing of the cost of demolishing the existing structure). . For most "affordable" housing the land cost should be near to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible.

Site 9: 1447 and 1515 Spring Street. The Zillow estimated sales price for each of the existing residences at $1.6mm to $1.75mm, totally $3.35mm in value. For the estimated 24 units that works out to a land cost of $139,583.00 per unit. For most "affordable" housing the land cost should be near to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible.

Site 10: Spring Street between Hudson Avenue & Valley View. From my notes during the public comment portion, I believe it was Joe McGrath who said that this property had recently been sold and lease-back on a long-term basis. Based upon that it would appear this parcel is not currently available.

Site 11: 601 Pope Street. This property owner declined SHHC's to acquire this parcel under a long-term lease. We offered $200,000 per year for a sixty-five-year lease and their response was "oh, we just like the way it looks".

Site 12: 1637 Spring Street. As recently as this spring this property owner expressed No interest, and the direct quote was "let them try and develop it."

Therefore, Mr. Hecock, unless that City is prepared to use Eminent Domain as in Kelo v. New London, it appears that the identified sites does not fulfill the "must" requirement of available sites to satisfy Saint Helena's 2023-2031 RHNA requirements.

Respectfully submitted:

Rick Crebs

Rick Crebs, CEO
rick@sthelenahc.org
707-580-0418

Saint Helena Housing Coalition, Inc.

PO Box 988
Saint Helena, CA 94574

July 25, 2022
Mr. Aaron Hecock, AICP Senior Planner
City of Saint Helena
1572 Railroad Avenue
Saint Helena, Ca 94574

RE: 2023-2031 Housing Element Draft
VIA: Email

Dear Mr. Hecock:

Again, we would like to thank you for leading this sixth Housing Element 2023-2031 document incredibly rich document full of quite important and relevant data.

However, we have some considerable concerns over facts stated and conclusions reach:

Issue #1:
In this report you state "The Housing Element ***must*** also identify ***adequate*** residential sites ***available*** for a variety of housing types for all income levels; provide assistance in developing ***adequate*** housing to meet the needs of low- and moderate-income households; address governmental constraints on the maintenance, improvement, and development of housing; conserve and improve the condition of the existing stock of affordable housing; and promote housing opportunities for all persons". (Aaron Hecock-Report to the City Council & Planning Commission Meeting -21 July 2022, page 4) (Emphasis added).

Response #1A:
Not being lawyers we referred to recognized authorities on the words contained in the above Issue #1.

Merriam-Webster Dictionary:
Ensure – "We define **ensure** as "to make sure, certain, or safe" and one sense of insure, "to make ***certain*** especially by taking necessary measures and precautions," is quite similar. But insure has the additional meaning "to provide or obtain insurance on or for," which is not shared by **ensure."**

> **Certain** – Ascertained; precise; identified; definitive; clearly known; unambiguous; or in law, capable of being identified or made known, without liability or to mistake or ambiguity, from data already given."

Realistic- means "based upon what is real rather than on what is wanted or hoped for"

> **Real –** means "having objective independent existence; not artificial, fraudulent, or illusory; being precisely what the name means; occurring or existing in actuality"

Black's Legal Dictionary:
Adequate means "Sufficient; proportionate; equally sufficient; equal to what is required; suitable to the case or occasion; satisfactory"
Availability Means "This phrase, among mercantile men, is a term well understood to be anything which can readily be converted into money; but it is not necessarily or primarily money."

Ready means **"**Prepared for what one is about to do or experience; equipped or supplied with what is needed for some act or event; *prepared for immediate movement or action"*(Emphasis added)

Demonstrate means "to prove indubitably"

Indubitable Proof "Evidence of which is not only found creditable but is of such weight and directness as to make out the facts alleged beyond a doubt."

Must "This word, like the word 'shall' is primarily of mandatory effect."

Based upon the above definitions SHHC is perplexed as to how the Housing Element can, in good conscience, or on any legal basis include 601 Pope Street or 1837 Spring Street as both owners have stated that they are not interested.

I just spoke to the owner who has been a dear friend of our families for 37 years and she stated ,"No one contacted me and further had no interest in allowing their back acreage to be developed into 'affordable' housing."?

Response #1B:
During the public comment section of the July 21m, 2022 2023-31 Zoom Housing Element, Rick Crebs, from SHHC, raised the issue of financial feasibility of Sites #4, 905 Main Street is stating "When SHHC made inquiries, we were informed that the owner expressed that this for-sale price of this parcel would exceed $1,000,000. Given the suggested density of five units that would make the land cost per unit $200,000. For most "affordable" housing the land cost should be nearer to $50,000 per unit to qualify for the necessary grants and/or financing thus making this parcel financially unfeasible".

Similar financial analysis was also offered on Site #7 821 Pope Street, (land costs of $100,000 per unit); Site #9 1447 & 1515 Spring Street, (land costs of $139,583 per unit).

Based upon that information provided during the Housing element Zoom meeting of Thursday, July 21, 2022, a question was directed by a city council member to the city's staff relative to the property valuations statements raised by Rick Crebs of SHHC on valuations attributed to Zillow. The response was questioned of the authenticity of the Zillow valuations. This seems odd in that the Housing Element report refers to Zillow eight (8) times as the authority on real estate valuations.

It was further stated that grants or low interest loans would off set the high land costs.

Please allow SHHC to provide a current financial analysis as present in SHHC's Offer to Develop 88 Units (using 2.3 acres at the East end of the Adams Street city owned parcel).

Use of Grants: Adams Street as an example:

Total Construction Costs $43,116,112 or average of $489,956 per unit (Leased, not sold land)

Funding necessary to complete this project: (Projected)

City/County	$2,000,000	(4.4%)
Other Grants	$32,337,084	(75.0%)*
Mortgage or Bond	$ 7,054,364	(16.40%)
Total	**$43,116,112**	**100% (rounded)**

*The largest grants that SHHC has been able to discover are from the California Department of Housing Affordable Housing Sustainable Communities (AHSC) grants which currently has a maximum grant amount of

$35mm, so the Adams Street project comes close to it. This information is supplied to illustrate the extreme difficulty present in realistically financing the Saint Helena community to provide the "Must" in the RHNA requirement.

Issue #2:

In this report you state "The issue of owner consent to being included on the housing opportunity sites list has come up on several occasions. Being listed as a housing opportunity site in no way terminates or otherwise affects existing uses on-site. Furthermore, there are currently no legislative or other means to compel a private property owner in this process, meaning we cannot force or otherwise require that they build housing. That said, owner consent is not a requirement for inclusion in the housing opportunity sites inventory (Government Code 65583.2). The inventory is to show that there are suitable sites to meet the City's RHNA and the programs are there to help housing developers to make that happen. Designating sites as suitable for housing falls within the City's authority to regulate land uses. If the Housing Element were to designate an already developed site."

Response to #2:
Mr. Hecock, it is true that California government Code does not include language requiring "owners Consent". but, by the same logic, it does not exclude requiring the "owners' consent." This, it would seem that your comment is non-responsive. Further, Code 65583.2 refers to Government code 65583 which, in part, states "(3) An inventory of land suitable and available for residential development, including vacant sites and sites having ***realistic*** and ***demonstrated*** potential for development during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing. (Emphasis added).

Further, in referring to the word definitions provided above, that the proposed Saint Helena Housing 2023-2031 Document on a factually basis fails to meet with any degree of accuracy of the meanings of the authenticated meaning of the words; **Adequate**, **Available**, **Demonstratable**, **Ensure**, and **Must.**

In closing, such vagueness in the prior Housing Element Reports may have been tolerated in the past. However, our town is critically deficient in sufficient "affordable" housing for all AMI's. The fact that so many are required to commute to work in the Upper Valley each day clearly contributes to unnecessary Green Housing Gas (GHG) emissions to say nothing of the cost to commute which further contributes multiple well vetted studies that conclude that the majority of those renting are cost burdened. Many in the 50-60% of household income!

Lastly, the lack of a strategy to affirmatively address Saint Helena's housing crisis is to deny, or turn its back, on its pledge to work towards a policy of Diversity, Equity, and Inclusion.

Our town can no longer rely upon the old "Three Card Monty Trick" in addressing the statutory issues the Housing Element requires.

SHHC's First Suggestion:
The city should consider removing Sites 4 (905 Mains Street, Ste 7 (821 Pope Street, Ste 9 1447 & b1515 Springs Street as being financially unrealistic due to associated land costs and instead revise the Adams Street parcel from 30 unit of Lower Income to the recommendations in the following graph:

Table 50 Summary of Housing Units (Extracted)

	Lower Income	Moderate Income	Above Moderate Income	Total

Pending Projects	0	**4**	**88**	**92**
ADU Trends	0	0	72	72
Recommended Changes		**Site Inventory**		
Site 3 (Adams Street)	**-22**	**9**	**76**	**63**
Site 4 (905 Mains Street)	**0**	**0**	**-5**	**-5**
Site 7 (821 Pope Street	**-10**	**-10**	0	**-20**
Site 9 (1447 & 1515 Spring Street)	**-24**	0	**-24**	**-48**
Totals	**-56**	**-1**	**47**	**-10**
Remaining Sites (Consolidated)		**Site Inventory**		
Sites 1, 2, 5, 6, 8, 10, 11,12	152	87	244	483
Color Code -Purple-Doubtful				
Red - Subtractions				
Green -Additions				

The results reached is close to a net neutral on units for each category of AMI housing. And the inclusion of 88 units plus 50 for the OTSG/Phelps's project equates to a realistic 54% of Saint Helena's 2023-31 RHNA required allocation.

SHHC's Second Suggestion:

While draconian, the only true solution SHHC sees to the significant challenges in achieving the forthcoming coming 2023-31 RHNA Site locations allocations is for the city to firmly state that it will undertake, if necessary, Eminent Domain proceeding as in the Kelvo v. New London U.S. Supreme Court Decision.

In closing, it is time to discard the Housing Element word games from the past and boldly put forth only those Opportunity Sites that are ***certain*** and ***available***.

Respectfully submitted:

Rick Crebs

Rick Crebs, CEO
rick@sthelenahc.org
707-580-0418

Ccs: Anil Comelo, City Manager
Maya DeRosa, Director of Planning
Geoff Ellsworth, Mayor
Paul Dohring, Esq. Vice Mayor
Lester hardy, Esq., City Council Member
Eric Hall, City Council Member
Anna Chouteau, City Council Member

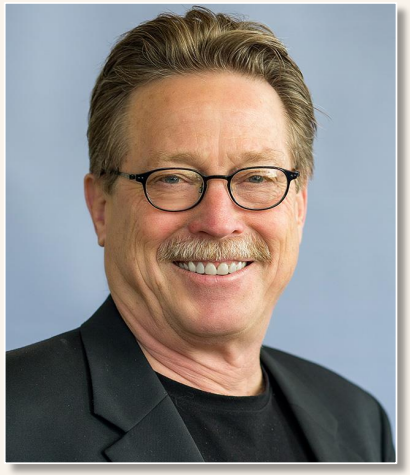


Housing Element Public Hearing Draft

City of St. Helena

Planning Commission Hearing
May 2, 2023

Introductions



Jim Harnish, JD
Project Manager



Ryan Lester
Deputy Project Manager



Ryan Russell
Senior Planner

mintierharnish
Planning Tomorrow Today®

rincon

Meeting Purpose

Agenda:

- Project Overview
- Summary of HCD Comments on the Draft Housing Element
- Summary of HCD Comments on the Revised Draft Housing Element
- Discussion and Potential Action

Project Overview

What does a Housing Element Do?

- Provides an assessment of both current and future housing needs
- Identifies opportunities and constraints on housing production
- Establishes goals, policies, and programs to meet housing needs
- Updates City practices and regulations to reflect new State laws

Why are we Updating the Element?

- Updates are required by State law
- To achieve compliance, the California Department of Housing and Community Development (HCD) must certify the Element
  - HCD Review Timeline:
    - Mandatory 90-day review: September-December 2022
    - Mandatory 60-day review of revised draft: February-April 2023
- HCD provides detailed comments following each review
- All HCD comments must be addressed to achieve certification

Why are we Updating the Element?

- Without a compliant Housing Element:
  - The City would be ineligible for several Federal and State housing, community development, and infrastructure funding and grant programs
- Consequences for not updating the Housing Element:
  - The General Plan could be deemed inadequate and therefore invalid
  - A noncompliant or invalid General Plan creates the potential for the City to be sued when making land use decisions
  - HCD can pursue legal action against “bad actors”

Engagement Efforts

- Planning Commission/City Council Study Sessions
  - March 23, 2021: Housing Element Overview
  - February 22, 2022: Sites Inventory and Potential Housing Opportunity Sites
  - July 21, 2022: Public Review Draft Housing Element
- Community Workshops (3)
  - September 16, 2021: Housing Element Overview
  - January 20, 2022: Sites Inventory and Potential Housing Opportunity Sites
  - March 16, 2022: Affirmatively Furthering Fair Housing
- Focus Group Meetings (4)

Regional Housing Needs Allocation (RHNA)

- 6th Cycle RHNA: 256 units, divided into four income levels as follows:
  - Very Low Income: 104 units (41 percent)
  - Low Income: 59 units (23 percent)
  - Moderate Income: 26 units (10 percent)
  - Above Moderate Income: 67 units (26 percent)
- Due to new state law (SB 166: No Net Loss) jurisdictions should provide capacity of 15-30 percent beyond the RHNA

Summary of Capacity to Meet the RHNA

	Lower Income	Moderate Income	Above Moderate Income	Total
Pending Projects	4	1	88	93
ADU Trends	0	0	72	72
Site Inventory				
Vacant and Underutilized Sites Inventory	203	69	35	307
Total	**207**	**70**	**195**	**472**
St. Helena RHNA plus 20% Buffer	192	31	79	302
Surplus	**15**	**39**	**116**	**170**



Summary of Comments on the Draft Housing Element

Comments on the Draft Element

Following the 90-day review (September-December), HCD required:

A. An analysis of 5th cycle actions related to housing for residents with special housing needs

B. Additional data an analysis on several subsections of the housing needs and analyses

C. Greater specificity and more detailed actions in implementation programs

D. Additional information on how public input was required

Significant Changes based on Comments

- Expanded fair housing analysis and response to public input
- Provided additional information to support feasibility assumptions related to nonvacant and City-owned sites
- Reorganized the Governmental Constraints section and added required analyses
- Revised programs, including:
  - Updated all programs to include specific timing and accelerated timing of Program related to place-based density increases (SB 9), ADU workforce housing incentives, and removal of the growth management system
  - Added incentives to encourage development of non-vacant and City-owned sites, and through SB 9 lot splits



Summary of Comments on the Revised Draft Housing Element

Comments on the Revised Draft Element

Following the 60-day review (February-April), HCD required:

1. Further data and analysis on sites in the inventory and fair housing issues
2. Expanded evaluation of constraints related to land use controls and parking requirements
3. Specific program language related to replacement housing units, City-owned sites, and permanent supportive housing
4. Additional information on how public input was required

Significant Changes based on Comments

- Expanded information on lower-income sites, non-vacant sites, infrastructure and realistic capacity calculations
- Expanded analysis of height and lot coverage requirements
- Added required language to programs related to: housing for persons with disabilities, replacement housing units requirements, City-owned sites, and permanent supportive housing
- Reviewed all programs and added fair housing actions, place-based strategies, and measurable goals (metrics) and timelines (milestones)

Significant New Commitments

Significant new commitments include:

- Providing additional density bonuses and modifications to development standards (beyond State law) to special needs housing projects proposed on the western half of the city (Program E)
- Holding two multi-lingual engagement events on the western half of the city to provide information on ADU development and incentives (Program H-I)
- Completely restricting condominium conversions on the eastern half of the city (Program H-X)

Significant New Commitments

- Restricting conversion of units occupied by lower- and moderate-income households in the southeast quadrant of the city to vacation rentals (Program H-AA)
- Collecting information on resources available to prospective homebuyers, and facilitating up to two multi-lingual engagement events targeting the eastern portion of the city (Program H-GG)

Discussion and Potential Action

Discussion and Potential Action

1. Questions?
2. Potential Action:
   - *Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment to update the Housing Element of the General Plan for the period of 2023-2031 and adopt an Addendum to the General Plan Environmental Impact Report.*

PLANNING COMMISSION REPORT

Planning Commission Meeting of May 2, 2023

FILE NUMBER: GPA 2023-002

SUBJECT: Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment (GPA 2023-002) to update the Public Health, Safety, and Noise Element of the General Plan and adopt an Addendum to the General Plan Environmental Impact Report.

PREPARED BY: Aaron Hecock, Senior Planner

REVIEWED BY: Maya DeRosa, Community Development Director

APPROVED BY: Maya DeRosa, Community Development Director

BACKGROUND

California State law requires that local governments prepare and adopt a General Plan, which is a blueprint for meeting the community's long-term vision for the future. The Public Health, Safety and Noise Element (known as the Safety Element) is one of the nine State- mandated elements of the General Plan. While the City's Public Health, Safety, and Noise Element was revised and adopted in June 2019 as part of a comprehensive update to the City's General Plan, recent State of California legislation requires that Safety Elements be reviewed and updated as necessary alongside the 2023 – 2031 Housing Element update. This legislation (summarized below) requires that the Safety Element include the following:

1. Senate Bill 99 (2019). Residential Emergency Evacuation Routes. Senate Bill 99 requires all cities and counties, upon the next revision of the housing element on or after January 1, 2020, to update the safety element to include information identifying residential developments in any hazard area that do not have at least two emergency evacuation routes.
2. Senate Bill 1241 (2012). State Responsibility Areas and Very High Fire Severity Zones. This bill requires review and update of the safety element, upon the next revision of the housing element on or after January 1, 2014, to address the risk of fire in state responsibility areas and very high fire hazard severity zones.

3. Senate Bill 1035 (2018). New Information on Flood, Fire, or Climate Hazards. Senate Bill 1035 requires cities and counties to update their safety element during a housing element or local hazard mitigation plan update cycle, but not less than once every eight years, if new information on flood hazards, fire hazards, or climate adaptation or resilience is available that was not available during the previous revision of the safety element.
4. Senate Bill 379 (2015). Climate Change Adaptation. Senate Bill 379 requires all cities and counties to include climate adaptation and resiliency strategies in the safety elements of their general plans beginning January 1, 2017. The bill requires the safety element update to include a set of goals, policies, objectives, and implementation measures based on a vulnerability assessment.

A 30-day public review and comment period for the Safety Element Update was held from September 9, 2022 through October 10, 2022. The City of St. Helena Planning Commission and City Council held a duly noticed joint public hearing to receive and provide feedback on the Draft Safety Element on September 27, 2022. Minor revisions were incorporated as appropriate into the draft document based on the limited feedback received. As discussed in more detail below, an underlined/strikethrough version of the document has been attached to this report which shows additions and deletions to the draft document.

PROJECT DESCRIPTION

California Environmental Quality Act (CEQA)

In considering the potential environmental impacts of the Safety Element update, the City determined that the Final Environmental Impact Report (EIR) certified for the 2040 General Plan update (2040 General Plan update Final EIR, State Clearinghouse Number 2010042001) is of continuing informational value. The City also determined that the potential environmental impacts (both direct and indirect impacts) of the Safety Element update are within the scope of the previously certified Final EIR and that none of the conditions requiring subsequent or supplemental environmental review under California Environmental Quality Act (CEQA) Guidelines Section 15162 exist. Based on the information and analysis provided in the attached EIR Addendum, the City determined that only minor or technical changes to the previously certified Final EIR are necessary and that that preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

Safety Element Purpose

The Safety Element presents a framework for minimizing risks posed by environmental and human-caused hazards that may impact St. Helena residents' health and welfare. The Safety Element aims to protect St. Helena residents, workers, and visitors from negative exposure to flooding, fires, hazardous materials, air pollution, geologic and seismic hazards, disaster response, and climate change hazards. The attached update does not constitute a new document, it is a required update to the existing Chapter 9 of the City's General Plan. An underlined/strikethrough version of the document has been attached to this report which shows additions to the document underlined and deletions in ~~strikethrough~~ so that the reader can easily identify what was added and what was

removed from the adopted version of the document. As detailed in the attached updated document, the Public Health, Safety, and Noise Element includes the following sections:

- 9.2 Public Health, Safety, and Noise in St. Helena. Summarizes key issues related to the public health and safety of St. Helena residents, workers, and visitors (p. 9-3).
- 9.3 Key Findings. Identifies key findings based on an existing conditions analysis (p. 9-32).
- 9.4 Goals. Defines overarching goals to guide policies and implementing actions (p. 9-36).
- 9.5 Policies and Implementing Actions. Identifies policies and implementing actions to minimize hazards and risks to life and property (p. 9-37).

In alignment with the recently adopted state legislation noted above, this update of the City's Public Health, Safety, and Noise Element does the following:

- Includes information and a figure identifying residential developments in any hazard area that do not have at least two emergency evacuation routes;
- Identifies policies and implementing actions that minimize evacuation challenges for vulnerable residential development;
- Identifies evacuation routes and evacuation locations;
- Updates information on flood hazard and fire hazards;
- Identifies measures and policies, consistent with state legislation, that proactively mitigate wildfire risk by addressing areas within the wildland urban interface in and surrounding the City;
- In conformance with CAL FIRE's recommendations includes up-to-date wildfire maps, historical information, and information on current wildfire mitigation efforts;
- Includes a Climate Change Hazards and Vulnerability Assessment Appendix that details projected climate change impacts on the City's vulnerable community members;
- Includes climate adaptation and resiliency strategies targeted at vulnerable populations, built assets, services, and natural and managed resources in the City.

As a result of this new analysis, new programs have been added to the Safety Element to comply with State law and ensure that local policies align with State goals to address climate hazards and hazard mitigation planning. These programs are reflected in the updated Public Health, Safety, and Noise Element found in attached to this report. The following are examples of the types of programs found in the update:

<u>Wildfire</u>

- PS4.L Develop and disseminate education and outreach materials to landlords, businesses, and residents regarding retrofits and home-hardening measures that align with recommendations from CAL FIRE's Wildfire Home Retrofit Guide.
- PS4.I Coordinate with Napa County Communities Firewise Foundation, the St. Helena Fire Safe Council, and neighboring jurisdictions to implement wildfire

mitigation projects proposed in the Napa County Community Wildfire Protection Plan.

Disaster Planning

- PS6.J Develop and maintain evacuation options for vulnerable populations such as young children, older adults, outdoor workers, individuals that are linguistically isolated, visitors, and individuals with access and functional needs.
- PS6.L Designate and publish in Zonehaven safety zones and/or shelter-in-place locations as potential places of refuge when evacuation routes or evacuation shelters are inaccessible.

Climate Change Hazards

- PS7.G Coordinate with PG&E and Napa County Office of Emergency Services to establish backup power and emergency grid shutdown protocols that protect the City's vulnerable populations.
- PS7.J Develop and disseminate guidelines and outreach materials on tree and plants species that are drought-tolerant and wildfire resistant to city residents and businesses.

As noted above, Senate Bill 1035 requires St. Helena and all California cities and counties to update their Safety Element with new information on flood hazards, fire hazard, and climate adaptation and resilience in conjunction with the Housing Element update cycle. In accordance with California Government Code Section 65302(g), St. Helena is required to complete a Climate Change Vulnerability Assessment in conjunction with the update to its Safety Element. The Climate Change Vulnerability Assessment is attached to this report and is a new Appendix (Appendix B) to the General Plan (Appendix A is the City's Historic Resources Master List).

STAFF RECOMMENDATION

Staff recommends that the Planning Commission adopt a resolution recommending that the St. Helena City Council:

1. Find that the EIR Addendum for the Public Health, Safety and Noise Element Update to the City of St. Helena 2040 General Plan is adequate and complete in compliance with the California Environmental Quality Act; and

2. Adopt an Amendment to the General Plan (GPA 2023-002) updating the Public Health, Safety and Noise Element and incorporating it into the 2040 General Plan.

ATTACHMENTS

SE Resolution
09 Public Health, Safety and Noise_2023
St.Helena Climate and Vulnerability Assessment_Appendix B_2023
Housing and Safety Elements EIR Addendum_Final April 2023

09 Public Health, Safety and Noise_2023_redline
Noise Tables_redline

CITY OF ST. HELENA PLANNING COMMISSION

RESOLUTION NO.

A RESOLUTION OF THE CITY OF ST. HELENA PLANNING COMMISSION RECOMMENDING THAT THE ST. HELENA CITY COUNCIL ADOPT A GENERAL PLAN AMENDMENT (GPA 2023-002) TO UPDATE THE PUBLIC HEALTH, SAFETY, AND NOISE ELEMENT OF THE GENERAL PLAN AND ADOPT AN ADDENDUM TO THE GENERAL PLAN ENVIRONMENTAL IMPACT REPORT

Recitals

1. The St. Helena City Council adopted the St. Helena General Plan Update 2040 on May 14, 2019.
2. The 2040 General Plan is a comprehensive, long-term general plan for the physical development of the City of St. Helena and establishes an overall framework and set of goals for city development.
3. The Public Health, Safety, and Noise Element, known as the Safety Element, is a required element of the General Plan per Government Code §65302(g).
4. Amendments to Government Code §65302(g) since General Plan adoption require additional content in Safety Elements to address climate change resilience, evacuation planning, and increased risks of wildfire and flooding.
5. The City of St. Helena Planning Commission and City Council held a duly noticed joint public hearing to receive and provide feedback on the Draft Safety Element on September 27, 2022.
6. The Planning Commission has reviewed the Environmental Impact Report (EIR) Addendum for the Housing and Safety Element Update to the City of St. Helena 2040 General Plan and found it adequate and complete in compliance with the California Environmental Quality Act (CEQA).
7. A public notice was published in the Napa Valley Register in compliance with state and local law.
8. The Planning Commission of the City of St. Helena, State of California, considered the Draft Safety Element, General Plan EIR Addendum, staff report, and all testimony, written and spoken, at a duly noticed public hearing on May 2, 2023.

Resolution

A. In making the findings in this Resolution, the Planning Commission relied upon and hereby incorporates by reference all of the documents referenced in this Resolution and the associated staff reports, City files for this matter, correspondence, presentations and other materials.

B. Now, therefore, the City of St. Helena Planning Commission resolves as follows, based on substantial evidence in the record:

1. The foregoing recitals are true and correct and are incorporated by reference into this action.

2. The St. Helena Planning Commission recommends that the City Council adopt a General Plan Amendment (GPA 2023-002) to update the Public Health, Safety and Noise Element of the General Plan and adopt an Addendum to the General Plan Environmental Impact Report.

I HEREBY CERTIFY that the foregoing was duly and regularly approved by the Planning Commission of the City of St. Helena at a regular meeting of said Planning Commission held on May 2, 2023 by the following roll call vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

APPROVED:

John Ponte
Chair, Planning Commission

ATTEST:

Maya DeRosa, AICP
Community Development Director



chapter nine

public health, safety, and noise

9 public health, safety, and noise



The Public Health, Safety and Noise element identifies goals, policies, and implementing actions to minimize risks to life and property associated with natural hazards.

1 introduction
2 land use and growth management
3 economic sustainability
4 public facilities and services
5 circulation
6 historic resources
7 community design
8 open space and conservation
9 public health, safety, and noise
10 climate change
11 housing
12 parks and recreation
13 arts, culture, and entertainment

9.1 Purpose of the Element

The Public Health, Safety, and Noise Element presents a framework for minimizing risks posed by environmental and human-caused hazards that may impact St. Helena residents' health and welfare. The Public Health, Safety, and Noise Element aims to protect St. Helena residents, workers, and visitors from negative exposure to flooding, fires, hazardous materials, air pollution, geologic, seismic, and climate change hazards.

The Public Health, Safety, and Noise Element includes the following sections.

- **9.2 Public Health, Safety, and Noise in St. Helena.** Summarizes key issues related to the public health and safety of St. Helena residents, workers, and visitors (p. 9-3).
- **9.3 Key Findings.** Identifies key findings based on an existing conditions analysis (p. 9-32).
- **9.4 Goals.** Defines overarching goals to guide policies and implementing actions (p. 9-36).
- **9.5 Policies and Implementing Actions.** Identifies policies and implementing actions to minimize hazards and risks to life and property (p. 9-37).

9.2 Public Health, Safety, and Noise in St. Helena

St. Helena is surrounded by natural beauty, hillsides, vineyards, and waterways. While these natural features are great assets for the community, they can present risks due to flood, fire, geologic, seismic and climate change. In addition, human-caused risks, such as hazardous materials, air pollution, and unhealthy noise levels can also pose risks to community health and safety. Effective planning to prepare for and mitigate the adverse effects of these natural and human-caused risks can help ensure that St. Helena maintains a high level of safety for its residents, workers, and visitors. Following is a discussion of the steps St. Helena takes to prepare for these risks, the potential impacts the various risks could have on St. Helena and ways for the City to minimize or prepare for these potential impacts.

PUBLIC SAFETY SERVICES

Identification of public safety services in the Public Health, Safety, and Noise Element is important because these services are critical to the property and life savings effort required during an emergency and must be identified to comply with Government Code 65302. The Napa County Fire Department and the City of St. Helena Fire Department provide fire and emergency services for St. Helena. The City is served by the following fire stations that have the capability to respond to medical emergencies, rescues, structural fire, and wildfire: Napa County Station #26, located at 3535 Saint Helena Highway in Calistoga, the Napa County Station #12, located at 7401 Solano Ave in Yountville, the Napa County Volunteer Station #15, located at 1989 Highway 29 in Rutherford, the Napa County Volunteer Station #21, located at 680 Sanitarium Road, and the St. Helena Fire Station, located at 1480 Main St in St. Helena. Additional public safety services are provided by the St. Helena Police Department. The St. Helena Police Department is located at 1480 Main Street in St. Helena.

EMERGENCY PREPAREDNESS

The State of California requires all municipal governments to prepare and plan for potential emergencies including natural and human caused events. St. Helena seeks to ensure the safety of its residents, services, infrastructure, businesses, and buildings during an emergency scenario.

Emergency preparedness efforts in St. Helena include:

- Implementation of risk reductions measures identified in the Napa County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP).
- Implementation of emergency operation protocols as included in Napa County Emergency Operations Plan.
- Continued coordination of evacuation management planning through Zonehaven, in conjunction with the Napa County Sheriff Department, Napa County Office of Emergency Services, CAL FIRE, and neighboring jurisdictions.
- Education and training of residents on emergency response management and preparedness as part of the Napa Valley Community Emergency Response (CERT) program.
- Upgrades to structures and infrastructure to comply with building and fire codes.
- Maintaining a cooling center at the St Helena Library (1492 Library Lane) during extreme heat events.

The City is actively engaged in local and regional emergency planning efforts. St. Helena is a participating jurisdiction of the Napa County MJHMP, which includes a hazard mitigation assessment and mitigation actions for Napa County and participating jurisdictions. Additionally, the City is involved in the development and regular updates to the Napa County Operational Area Emergency Operations Plan, which describes emergency operation planning processes and protocols for Napa County jurisdictions These efforts combine with an actively engaged and educated public to support emergency preparedness for the City.

CRITICAL FACILITIES

Critical facilities are structures and institutions necessary for a community to respond to and recover from emergencies. Identification of them is important because critical facilities must continue to operate during and following a disaster to reduce the severity of impacts and accelerate recovery. They are essential to the health and welfare of residents and are relied upon to recover following hazard events. Such facilities have been identified in the Napa County MJHMP and several are located in St. Helena or in close proximity to the City. They include police stations, fire stations, hospitals, elder care facilities, schools, regional emergency services, critical water facilities, and governmental buildings.

Additionally, facilities such as natural gas pipelines and the transportation system are identified as critical infrastructure, which enable buildings, residences, and the transport of good and services to remain functional. These critical facilities are identified in Figure 9.1.

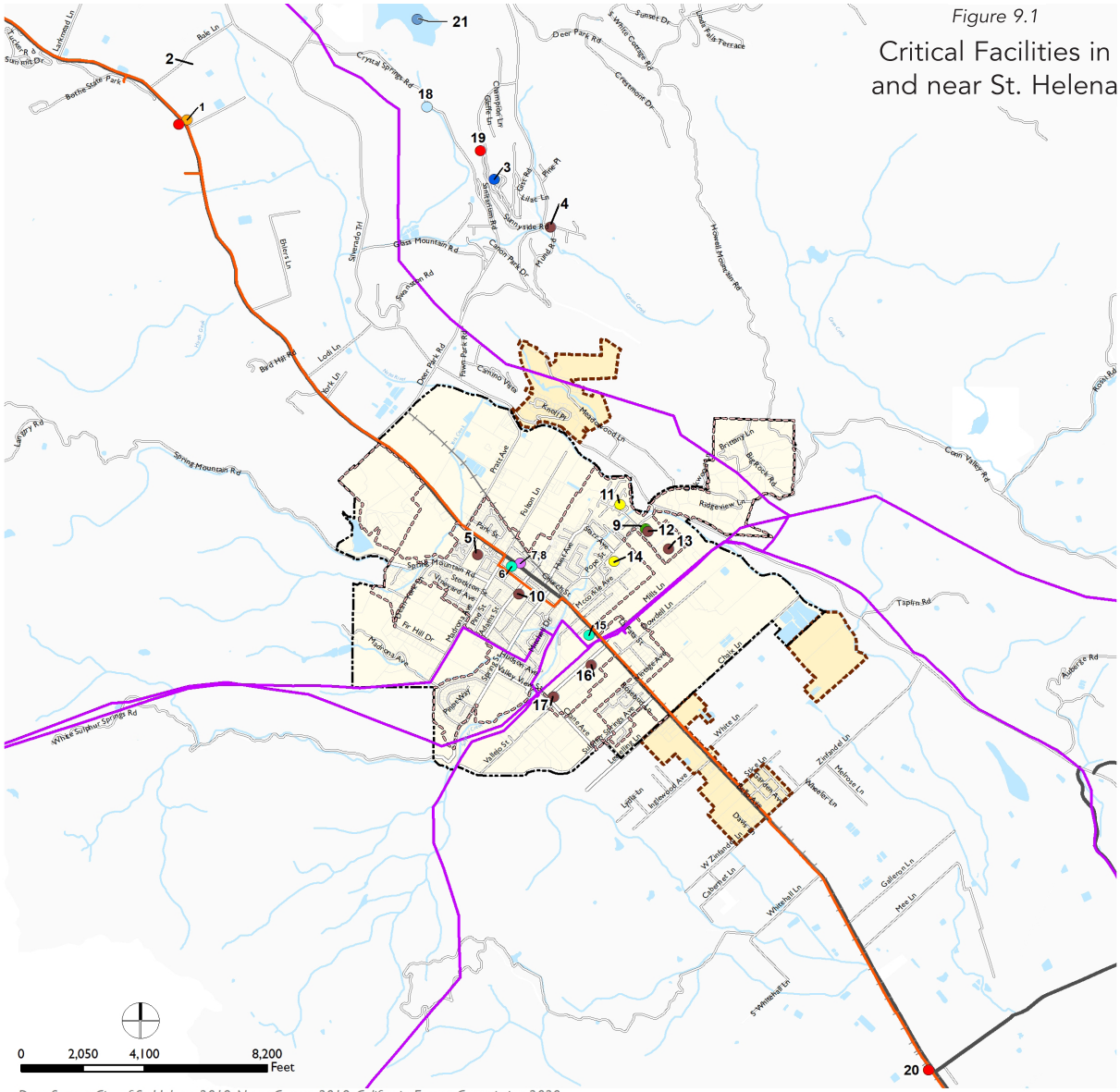
EMERGENCY EVACUATION & ISOLATED ST. HELENA NEIGHBORHOODS

Evacuation routes are used to move residents out of impacted areas before or during a disaster or hazard event. St. Helena's major evacuation routes include State Route 29 and the Silverado Trail, which lies east of and directly parallel to State Route 29. In addition to identification of these major routes, St. Helena is required by Government Code Section 65302 (g)(5) (as amended by Senate Bill 99) to update the Public Health, Safety, and Noise Element to include information identifying residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation access roads. Identifying residential developments without access to two emergency evacuation access roads allows the City to identify opportunities to improve evacuation capacity and connectivity for vulnerable neighborhoods. Figure 9.2 identifies residential neighborhoods that have a single access road for entry and exit (i.e., roads that connect to a collector or arterial road by only a single route).

There are currently two neighborhoods in the City that have been identified as having only a single access road. The neighborhood identified off College Avenue is partially located in the 500-Year flood zone, Bell Canyon Dam failure inundation area, and the high and medium liquefaction susceptibility area. The neighborhood identified off Vineyard Avenue is within the medium liquefaction susceptibility area. These neighborhoods are most vulnerable during evacuation scenarios and pose significant logistical challenges. As a result, policy and implementing actions have been developed to minimize evacuation challenges for these specific neighborhoods.

Figure 9.1

Critical Facilities in and near St. Helena



Data Source: City of St. Helena, 2018; Napa County, 2018; California Energy Commission 2020.

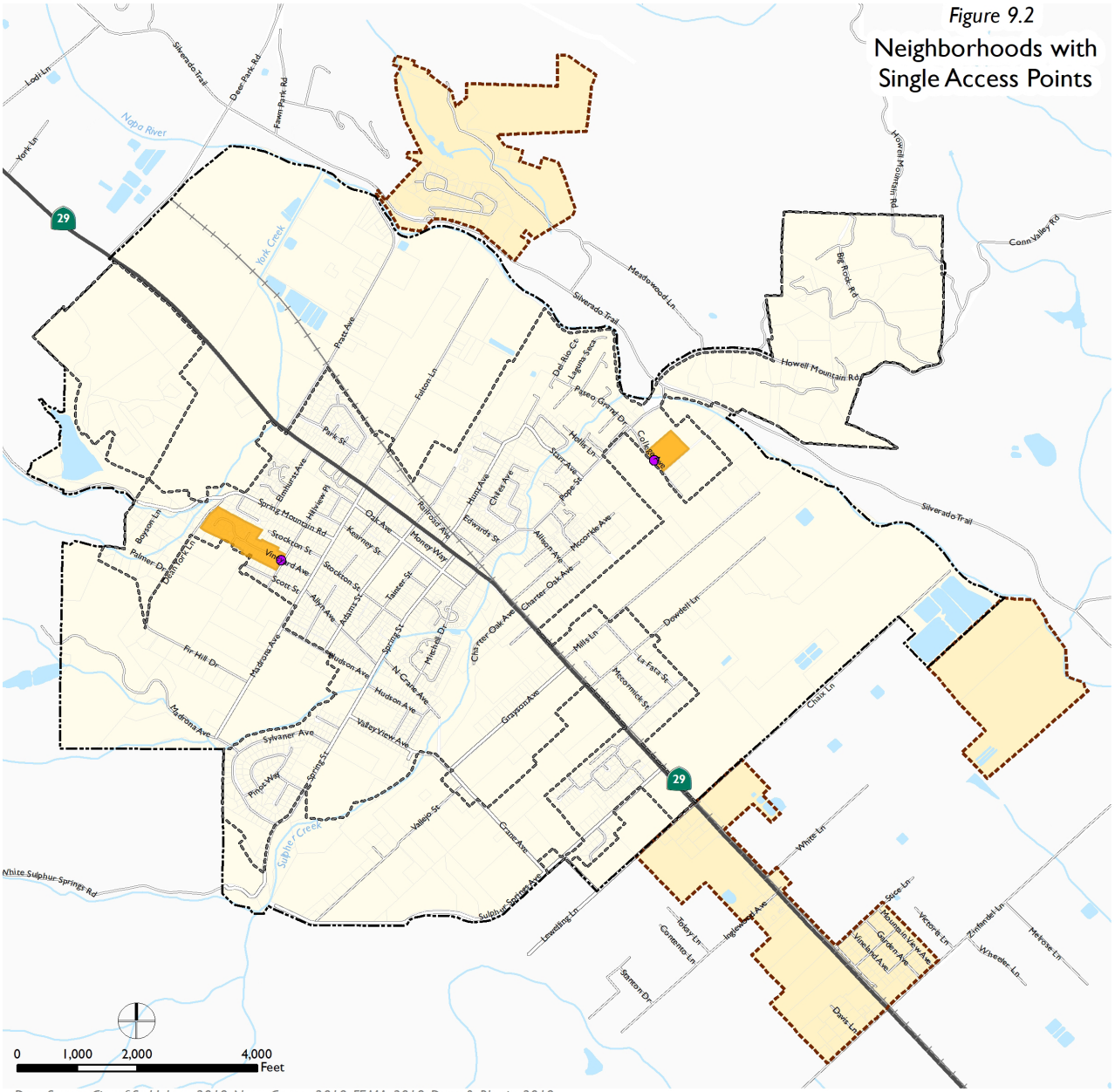
Critical Facilties

- City Hall
- Elder Care Facilities
- Emergency Command Center
- Fire Station
- Health Care Facility
- Hospital
- Police Station
- Dam
- School
- Water Treatment
- Natural Gas Pipeline
- Transmission Line
- Railroads
- Water Features
- Urban Limit Line
- Study Areas
- City of St. Helena

1 - CAL FIRE St Helena Emergency Command Center
2 - Napa County Station 26
3 - Adventist Health St Helena
4 - Foothill Adventist Elementary School
5 - Robert Lewis Stevenson Intemediate School
6 - OLE Health St Helena
7 - Police Station
8 - City of St Helena Fire Department
9 - St Helena City Hall
10 - St Helena Elementary School
11 - Vineyard Valley Mobile Home Park
12 - Napa Valley College - St Helena
13 - St Helena Montessori School
14 - Silverado Orchards Retirement Apartments
15 - Community Health Clinic Ole
16 - Saint Helena High School
17 - St Helena Primary School
18 - St Helena Water Treatment Plant
19 - Napa County Volunteer Station #21
20 - Napa County Volunteer Station #15
21 - Bell Canyon Dam

Figure 9.2

Neighborhoods with Single Access Points



Data Source: City of St. Helena, 2018; Napa County, 2018; FEMA, 2018; Dyett & Bhatia, 2018

- Single Entry/Exit Residential Neighborhood
- Single Entry and Exit Access Point
- Railroads
- Water Features
- Urban Limit Line
- Study Areas
- City of St. Helena



Low-lying portions of Napa Valley are prone to flooding.

FLOODING

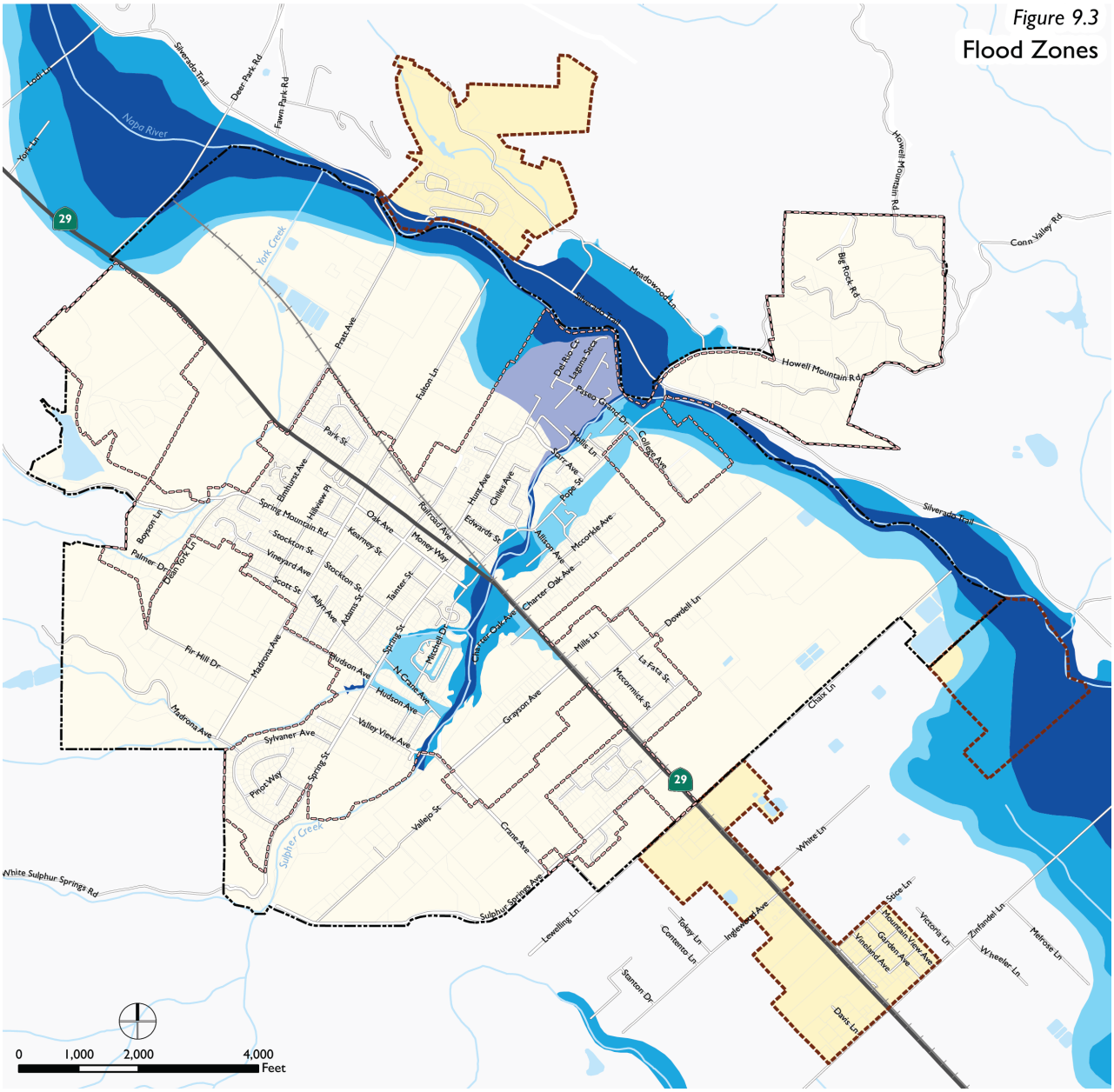
The Napa River and some of its tributaries are prone to flooding, which poses a risk for people and structures in adjacent parts of the Napa Valley. The Napa River flows are largely influenced by precipitation. The peak flows generally occur in January, February, and March. Some of the worst flooding in the immediate area of St. Helena has occurred in December and April, especially in and around the Vineyard Valley Mobile Home Park, which is near the confluence of Sulphur Creek and the Napa River. The area experienced significant flooding in 1986, 1995, 1997, and 2005 with extensive property loss.

Flood hazards also exist in the York Creek and Sulphur Creek Watersheds in St. Helena. During the 2005 New Year's Eve storm event, flooding from York Creek significantly impacted residential and industrial properties, including buildings located on the properties of Beringer Winery and the Culinary Institute. The Beringer water treatment plant flooded and ponds overflowed into the creek. In addition, the creek flooded vineyards on both sides of its corridor, downstream of State Route 29 to the Napa River.

Flood hazards in the Sulphur Creek watershed are due primarily to channel bed aggradation in the lower reach where gravel mining was historically conducted. Sulphur Creek continues to supply and deposit substantial amounts of sediment in this reach. Consequently, the increased volume of sediment currently stored in the channel decreases the volume available for floodwater, potentially causing an increased flood hazard locally and within the City of St. Helena. Further study needs to be done of the Sulphur Creek area in order to prevent future flooding and to protect habitat for steelhead and salmon.

Recently, the City collaborated with the Napa County Board of Supervisors and the Napa County Flood Control District to study the Napa River's hydraulics between Deer Park Road and Pope Street. The resulting study identified the need for an extension of the 100-year floodplain beyond the areas previously identified by the Federal Emergency Management Agency (FEMA). Figure 9.3 identifies areas that fall within the City's 100-year (one percent) and 500-year (0.2 percent) floodplain; as identified by the Federal Emergency Management Agency (FEMA) in 2018. Figure 9.4 includes areas in and around St. Helena that would be inundated in the case of dam failure.

Figure 9.3
Flood Zones

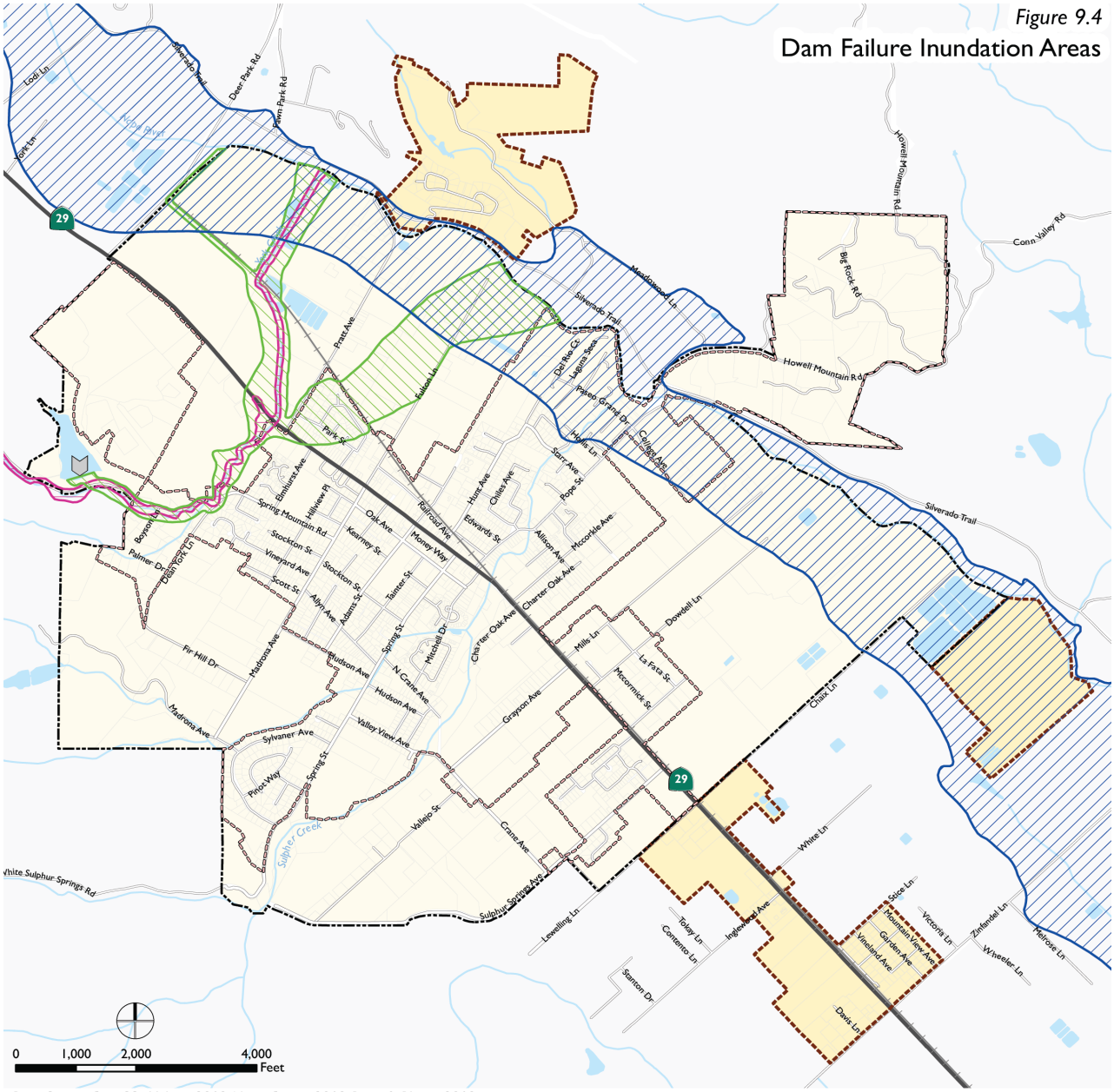


Data Source: City of St. Helena, 2018; Napa County, 2018; FEMA, 2018; Dyett & Bhatia, 2018

- Floodway
- 100-Year Flood Zone (1% Annual Chance Flood Hazard)
- 500-Year Flood Zone (0.2% Annual Chance Flood Hazard)
- Reduced Risk Areas due to Levee
- Railroads
- Water Features
- Urban Limit Line
- Study Areas
- City of St. Helena

Figure 9.4

Dam Failure Inundation Areas



Data Source: City of St. Helena, 2018; Napa County, 2018; Dyett & Bhatia, 2018

St. Helena Lower Dam

Dam Inundation Areas

- Bell Canyon Dam
- St Helena Lower Dam
- St Helena Upper Dam

- Railroads
- Water Features
- Urban Limit Line
- Study Areas
- City of St. Helena

COMPREHENSIVE FLOOD CONTROL AND RIVER RESTORATION

In 2011, the City completed a Comprehensive Flood Control and River Restoration Project north of the Pope Street bridge and on the west side of the Napa River. The purpose of this project was to protect residential property in the floodplain from the 100-year storm events and restoring the Napa River and its surrounding habitat. The project is designed to reduce flood risk to protect approximately 470 homes, including the Vineyard Valley Mobile Home Park and the Hunt's Grove Apartment Complex, that were located in a FEMA-designated flood zone prior to completion of the project. The project site was about 36 acres. The project planning began in 2000, with actual construction starting in May 2009. Phase I of the project consisted of construction of a levee, along with a storm drain bypass and other related infrastructure improvements. Phase II, the final phase of the project, included construction of a floodwall that is roughly eight feet high where it is anchored to the levee. The floodwall gradually reduces in height as it continues south along the Napa River to the confluence of the river and Sulphur Creek. It then turns to the west and continues along Sulphur Creek, terminating at Paseo Grand Avenue. The wall is about three and a half feet high at its terminus. The total project cost was about $32 million, with the cost of construction at about $9.1 million.

To balance the removal of land from the floodplain, the area known as "lower terrace B" was cut down significantly and widened to accommodate the large flood flows. In Phase II, this terrace was cut down to the level of the Napa River and is designed to carry significant amounts of flood water, should it become necessary.

The second half of this $9.1 million project is the continuation of the flood wall around Vineyard Valley and habitat restoration in the "upper terrace B." The habitat restoration was a critical element of the overall plan and included the installation 40,000 plantings and anchoring fallen trees into the terrace. This project also included maintenance conducted according to a maintenance plan, irrigation, and development of a pedestrian interpretive trail.

St. Helena has developed an Operations and Maintenance Manual for the Comprehensive Flood Control and River Restoration Project, which describes the extent of the project and outlines operation and maintenance activities that the City and Napa County Flood Control District will work together to manage. The

manual describes project features, routine monitoring and maintenance activities, pump station operation, emergency operations, surveillance, personnel training, utility coordination and design.

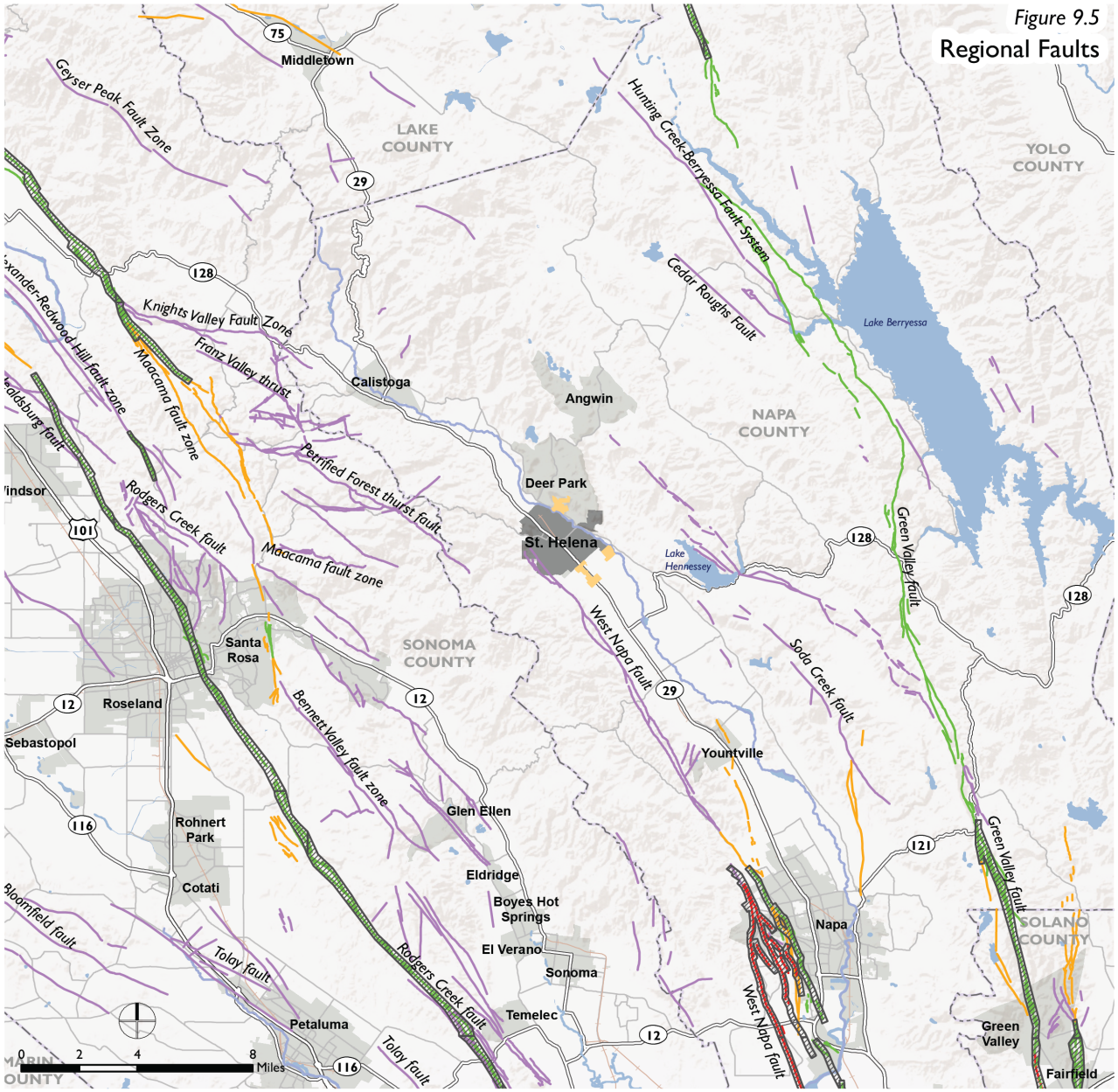
GEOLOGIC AND SEISMIC HAZARDS

Although St. Helena is located in a seismically active region, there are no known active faults located in the city *(see Figure 9.5)*. Faults are commonly considered to be active or likely to have another earthquake sometime in the future, if they have moved one or more times in the past 10,000 years. The California Geological Survey, the primary source of geologic information used for decision-making by California's government agencies, designates Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults in the state and provides maps for use in planning and controlling new or renewed construction so as to minimize associated risks. According to the most recent maps the nearest active faults to St. Helena are the West Napa Fault, located 14 miles to the south, and the Rodgers Creek Fault, located 13 miles to the west. Additionally, a number of unnamed, relatively small, older faults are located at the base of the Sonoma and Vaca mountains along the margins of the Napa Valley; however, based on available information, displacement of these faults occurred more than 10,000 years ago and as such these faults are not considered active.

Overall, the fault rupture hazard for the city is considered to be low, and the primary geologic hazards of concern are those that could result from excessive shaking effects stemming from earthquakes elsewhere in the region. For instance, a large earthquake event in the area could result in liquefaction in the city's low-lying areas *(see Figure 9.6)*, and landslides and debris flow in areas with sloped, hilly terrain (*see Figure 9.7*). Development in the city's upland areas has often required the removal of trees and vegetation, leaving some hillsides susceptible to erosion and landslides during heavy rains. Actions available to the City to protect areas of the community at greatest risk and minimize the risks of injury and property damage include restricting development in the hillside areas and requiring prompt re-vegetation on slopes prone to instability. The use of best management practices during construction can also limit erosion and the risk of landslides. Employing earthquake engineering strategies in the design of buildings and structures, such as installation of earthquake drains or use of low mobility grouting and dynamic compaction during construction, can limit risks associated with liquefaction.

In August 2014, a 6.0 earthquake struck the Napa Valley, with the epicenter of the quake approximately 6 miles southwest of the City of Napa. While damage from the quake was substantial in Napa, particularly in Napa's downtown area, St. Helena experienced very little to no measurable damage.

Figure 9.5
Regional Faults



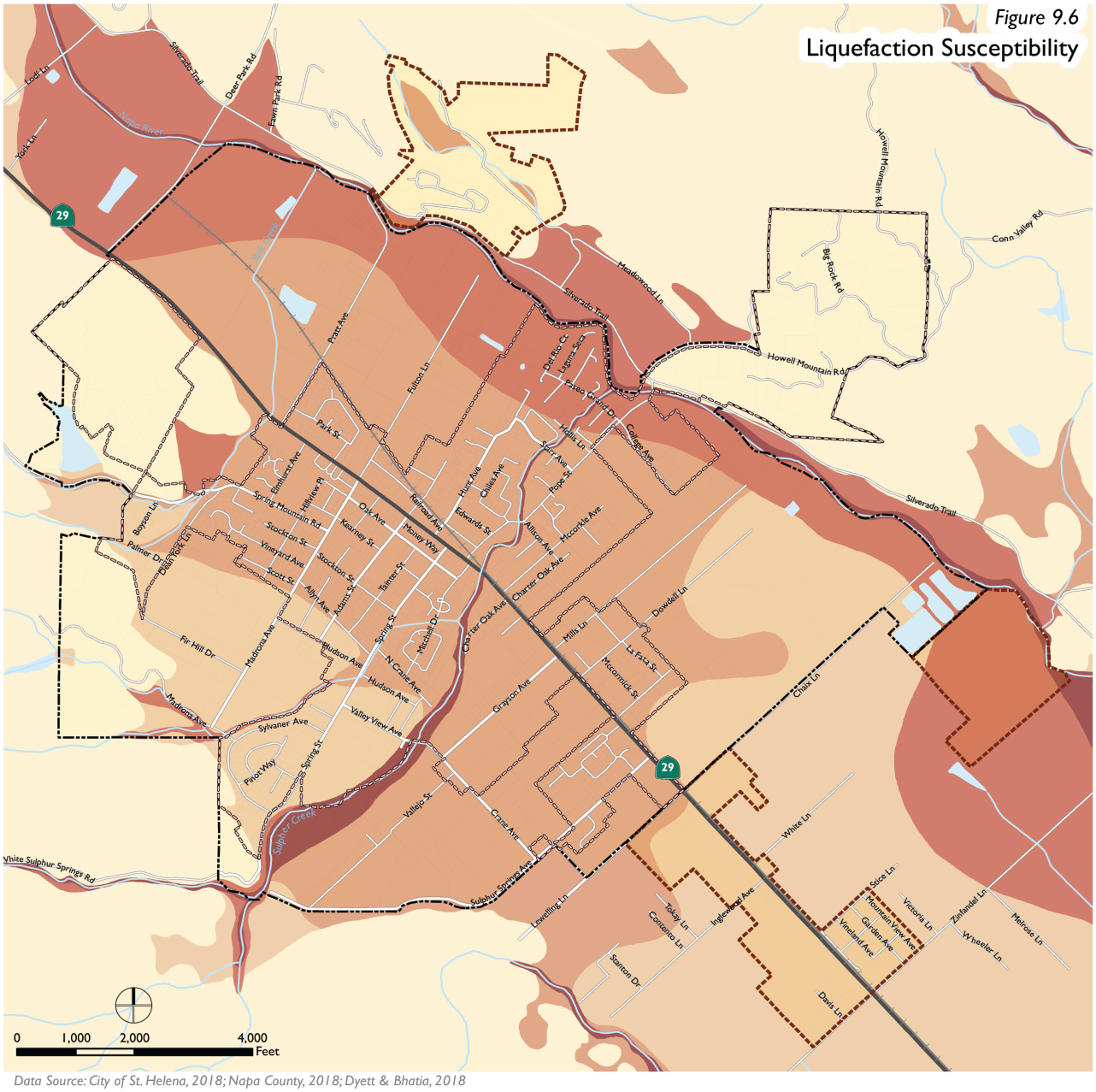
Data Source: City of St. Helena, 2018; Napa County, 2018; USGS and CGS, Quarternary Fault and Fold Database for the U.S., 2006; Dyett & Bhatia, 2018

Geologic Features
- Historic (<150 years)
- Latest Quaternary (<15,000 years)
- Late Quaternary (<130,000 years)
- Undifferentiated Quaternary (<1.6 million years)
- Alquist Priolo Fault Zones

- County Boundary
- Waterbodies
- City of St. Helena
- Study Areas
- Urban Areas
- Freeway/Major Highway
- Major/Minor Roads
- Railroads

Figure 9.6

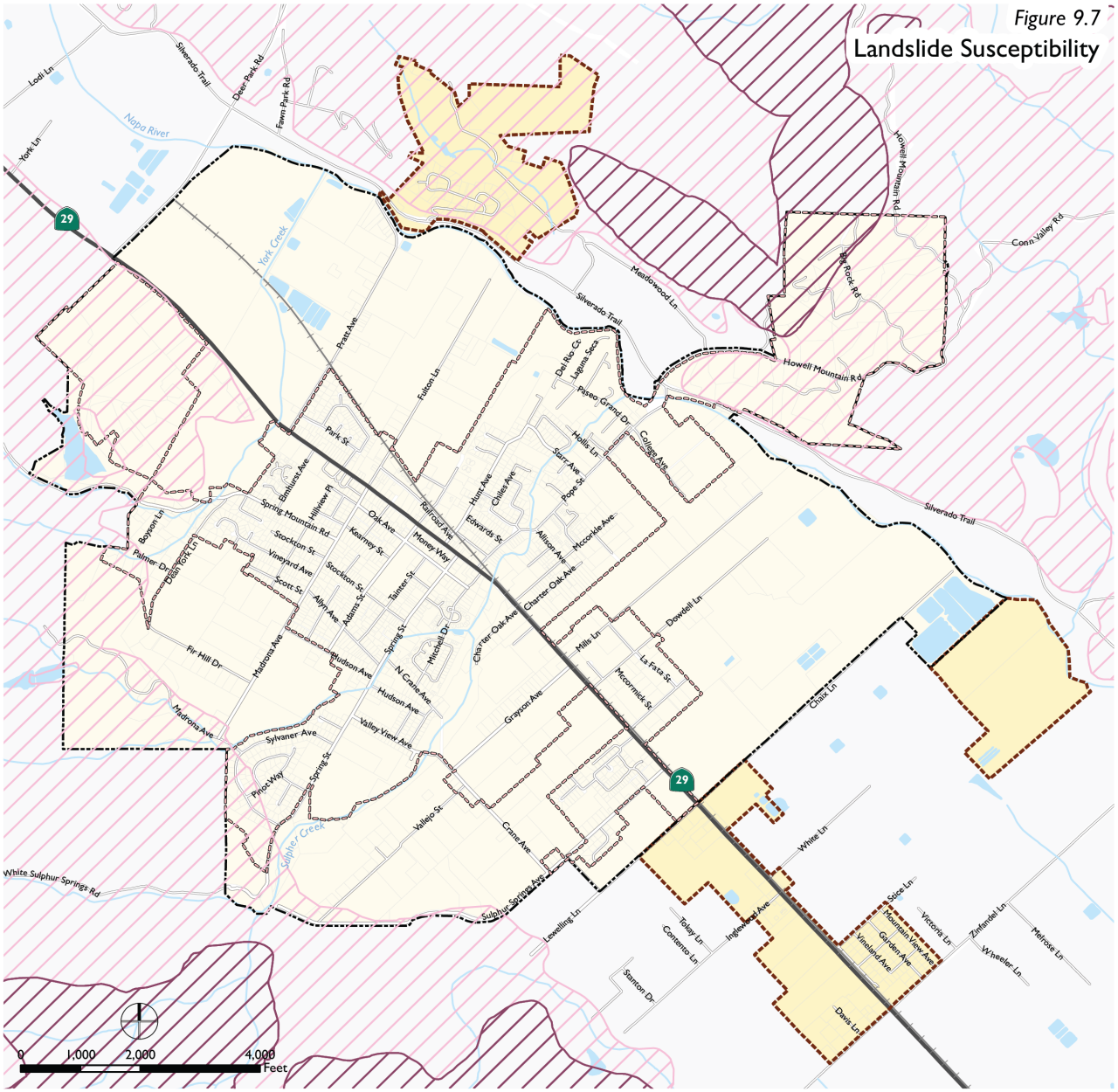
Liquefaction Susceptibility



Data Source: City of St. Helena, 2018; Napa County, 2018; Dyett & Bhatia, 2018

- Very High
- High
- Medium
- Low
- Very Low
- Water
- Railroads
- Urban Limit Line
- Study Areas
- City of St. Helena

Figure 9.7
Landslide Susceptibility



Data Source: USGS, provided by Assocation of Bay Area Governments (ABAG) Resilience Program; 1997, City of St. Helena, 2018; Napa County, 2018; Dyett & Bhatia, 2018

Existing Landslide Distribution
- Mostly Landslide
- Few Landslides

- Railroads
- Water Features
- Urban Limit Line
- Study Areas
- City of St. Helena

Mostly Landslides - Consists of mapped landslides, intervening areas typically narrower than 1500 feet, and narrow borders around landslides; defined by drawing envelopes around groups of mapped landslides.

Few Landslides - contains few, if any, large mapped landslides, but locally contains scattered small landslides and questionably identified larger landslides; defined by drawing envelopes around areas free of mapped landslides.



Air pollution from auto exhaust and dust, can pose health hazards among sensitive populations.

AIR POLLUTION AND HAZARDOUS MATERIALS

Mitigating the public health and safety risks caused by air pollution and hazardous materials will inevitably require changing human behavior. Air pollution resulting from auto exhaust, tobacco smoke, and fugitive dust creates unhealthy air conditions for residents and can pose a particular threat to sensitive populations, such as children and older adults. Implementing measures to reduce auto trips, tobacco smoke exposure, and construction-related fugitive dust can help St. Helena reduce residents' contact with air pollution. Compact development patterns, facilities to encourage walking and biking, and incentives to reduce automobile trips are just a handful of ways that St. Helena can help improve local air quality.

The Bay Area Air Quality Management District (BAAQMD) is the public agency responsible for regulating stationary sources of air pollution in Napa County and the San Francisco Bay Area. BAAQMD monitors air quality in the nine-county Bay Area and reports annually on pollutant concentrations for comparison to State and federal health-based ambient air quality standards. Data indicates that in the Bay Area, as throughout the state, the transportation sector and mobile sources of emissions are the most significant sources of air pollution. Senate Bill (SB) 375, approved by the Governor on September 30, 2008, seeks to reduce greenhouse gas emissions—and, consequently, other pollutants—from mobile sources by

integrating land use and transportation planning at the regional level. *(For a more detailed discussion of SB 375 and related opportunities see the Climate Change Element.)*

Hazardous materials used by local businesses are often transported on the City's roadways and found present in smaller quantities in private homes in the form of solvents, cleaning fluids, and other substances. Implementing policies to improve the safe use, transport, and disposal of these materials can be instrumental in avoiding environmental contamination and human health impacts.

NOISE

Noise is a sound which is unhealthy or unwanted. It can be a human-caused public health hazard which includes excessive, intrusive, or objectionable noises that disrupt daily life. Noise has been tied to physiological effects ranging from hearing loss, high blood pressure, and sleep disturbance, to communication interference and general interruption and annoyance of normal daily activities. Definitions of acoustical terms used in this discussion are listed in Table 9.1.

Land uses have different levels of compatibility relative to noise, and the State of California mandates that general plans include noise level compatibility standards for the development of land as a function of a range of noise exposure values (see Table 9.2). Table 9-3 identifies interior noise standards.

The ambient noise environment throughout much of St. Helena is extremely quiet in comparison to typical urbanized settings, especially in the evenings and at nighttime. With the exception of Main Street (State Route 29) and major collector roadways, the noise environment can be characterized as being that of a quiet rural setting. Residential areas are generally shielded from traffic noise on highways, arterials, and collectors and register very low background sound levels.

TABLE 9.1: Definition of Acoustical Terms

Term	Definition
Decibel, dB	A unit describing the amplitude of sound. Equal to 10 times the logarithm to the base 10 of the ratio of two like quantities.
Sound Pressure Level (SPL)	10 times the logarithm to the base 10 of the ratio between the square of the sound pressure to the square of the reference sound pressure of 20 µPascals. Sound pressure level is the quantity that is directly measured by a sound level meter and expressed in decibels (dB).
Frequency, Hz	The number of complete pressure fluctuations per second above and below atmospheric pressure is expressed in Hertz (Hz). Normal human hearing is approximately between 20 Hz and 20,000 Hz.
A-Weighted Sound Level, dBA	The SPL in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes low frequency components of sound in a manner similar to the frequency response of the human ear and correlates well with subjective response to sound.
Noise	Unwanted or unhealthful sound.
Equivalent Noise Level, LAeq	The average A-weighted sound level during the measurement period. The A-weighted equivalent continuous sound level.
LAmax, LAmin	The maximum and minimum A-weighted sound level during the measurement period with the sound meter using fast-time-weighting.
LA01, LA10, LA50, LA90	The A-weighted sound levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day/Night Noise Level, Ldn	The average A-weighted sound level during a 24-hour day, obtained after the addition of 10 decibels to levels measured at night between 10:00 pm and 7:00 am.
Total Sound	The composite of sound from all sources near and far.
Ambient Sound	The sound level measured in the absence of an intrusive or extraneous noise.
Intrusive Noise	That noise from a source of specific origin which intrudes above or within the existing background sound level. The degree of intrusiveness of a sound depends upon its amplitude, duration, frequency, time of occurrence, and tonal or informational content as in contrast to the prevailing background sound level which exists in the absence of the intrusive noise.
Background Sound Level	The LA90 of the ambient sound. It represents the ever present lower sound level due to distant sources which are individually indistinguishable, and in the absence of the Intrusive or Extraneous Noise.
Extraneous Noise	Specific or distinguishable intermittent sound from nearby sources such as mechanical devices, leaf blowers, pumps, vehicles, horns, sirens, barking, talking, shouting, birds, wind and other similar individual sources, which don't normally exist on a continuous or regular basis.
Intermittent Noise	A noncontinuous sound consisting of a number of clearly distinguishable sound events of varying frequency and/or intensity.

TABLE 9.2: Noise Land Use Compatibility Guidelines

Land Use Category	Completely Compatible[1]	Tentatively Compatible[2]	Normally Incompatible[3]	Completely Incompatible[4]
Residential	< 55 dBA	55-60 dBA	60-75 dBA	> 75 dBA
Commercial/ Office	< 65 dBA	65-75 dBA	75-80 dBA	> 80 dBA
Industrial/ Agricultural	< 70 dBA	70-80 dBA	80-85 dBA	> 85 dBA
School, libraries, churches, hospitals	< 65 dBA	65-70 dBA	70-80 dBA	> 80 dBA
Playground, neighborhood park	< 67 dBA	67-70 dBA	70-75 dBA	> 75 dBA

1. Completely Compatible – Specified land use is satisfactory, based on the assumption that any buildings involved are or normal conventional construction.
2. Tentatively Compatible – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems of air conditioning will normally suffice.
3. Normally Incompatible – New construction and development should generally be discourage. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must b made and needed noise insulation features included in the design.
4. Clearly Incompatible – New construction or development should generally not be undertaken.

TABLE 9.3: Maximum Interior Noise Level Criteria of Intermittent Noise for Public Use Facilities

Land Use	Maximum Intermittent Noise Level LAmax	Basis for Criterion
Concert Hall	25	Intrusion of noise may spoil artistic effect
Theater	30	Intrusion of noise may spoil artistic effect
School Auditorium	35	Minimize intrusion into artistic performance
School Classroom	55	Speech communication-20 ft.-raised voice
School Laboratory	60	Speech communication-6 ft.-normal voice
Church/Sanctuaries	45	Speech communication-50 ft.-raised voice
Library	55	Speech communication-3 ft.-normal voice

Source: Adapted from Table 2 in "Night Insulation Problems in Buildings," Paul S. Veneklasen & Associates, 1973; Noise Element of the Napa County General Plan, 1982.

9 public health, safety, and noise



Human-caused public health hazards include excessive, intrusive or objectionable ambient noises that disrupt daily life.

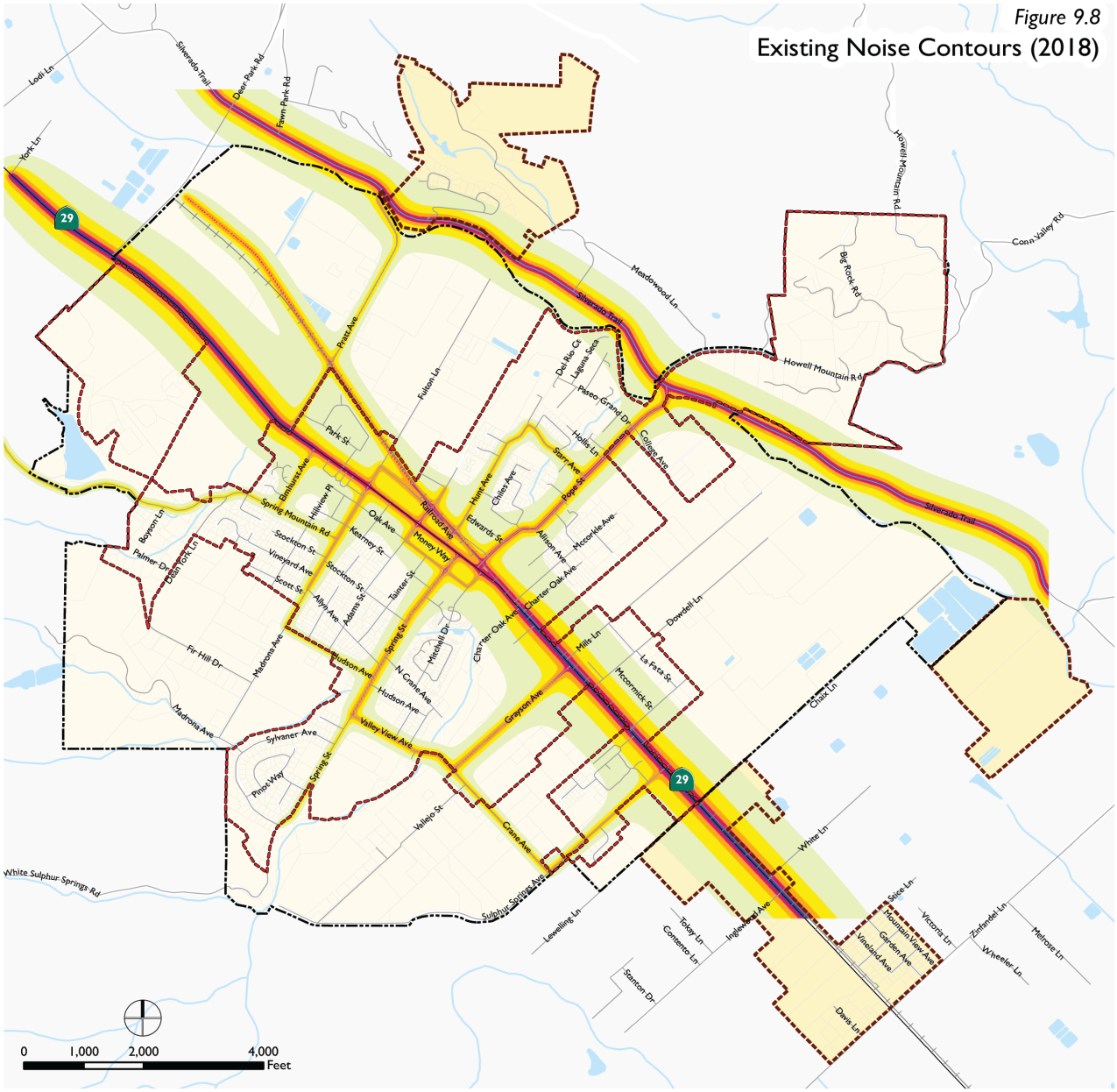
Sleep disturbance and the annoyance of sound not only depend on the absolute sound level of a noise source but are related to the magnitude of the noise above that of background sound levels. This means that in particularly quiet rural environments, the control of extraneous, intrusive, and annoying noise sources is important to maintaining the public health and a quality living sound environment expected by the community. Typically, a change in noise levels of less than 3 dBA is not discernable to the general population. Increases in average noise levels from 3 to 5 dBA are clearly discernable to most people. Increases in average noise levels over the background ambient of more than 5 dBA are considered to constitute an adverse environmental impact health and quality of life.

Vehicular traffic on Highway 29 and collector streets is the primary source of noise in the community. Other non-stationary sources which are intermittent and generally inconsequential to the noise environment include flyover commercial aircraft at high altitudes, and small general aviation and helicopter flyovers. The Wine Train travels to St. Helena each day and emits a loud horn at crossings, along with the low frequency rumble of the diesel engines. Typical stationary noise sources in St. Helena include agricultural and industrial activities. Agricultural activities result in noise from wind machines, tractors, and sulphur blowers which are employed in the spring in the early hours of the morning. The St. Helena Fire Department has sirens at two locations which sound on average twenty times annually, with approximately half of them occurring during nighttime hours. Noise contours as of 2018 are seen in Figure 9.8.

Noise concerns in St. Helena are principally linked to land use compatibility. Concerns relate to adverse noise effects from new commercial development on surrounding noise-sensitive uses such as residences and schools, and also to adverse noise effects from agricultural activities within the city limit. Right-to-farm provisions necessitate accommodating agricultural uses while also seeking to minimize conflicts. To address these concerns and to promote a compatible noise environment throughout the city, Table 9.4 establishes limits on intrusive noise and regulates the amount of noise a specific sound source can emit relative to the typically low residential background sound levels. This standard is specific to residential areas within St. Helena. Additionally, by generally promoting good neighbor practices and facilitating open communication between agricultural, commercial, and residential uses the City can help to foster a healthy noise environment. Noise contours projected for 2040 for highway traffic are shown in Figure 9.9. The physical distances of noise contours from the roadway centerline to be used in determining land use compatibility are listed in Table 3.11-11 of the EIR.

Figure 9.8

Existing Noise Contours (2018)



Data Source: Charles M. Salter Associates, Inc, 2018; City of St. Helena, 2018; Napa County,2018; Dyett & Bhatia, 2018

- DNL 55 - 60 dB
- DNL 60 - 65 dB
- DNL 65 - 70 dB
- DNL 70 - 75 dB
- DNL 75 - 80 dB
- Urban Limit Line
- Study Areas
- City of St. Helena

TABLE 9.4: Standard and Adjustments for Determining Noise Impact of Intrusive Noise for Residential Receptors

STANDARD

The LAeq of an intrusive noise shall not exceed the following values:

- 7 am – 7 pm (daytime) 45 dBA
- 7 pm – 10 pm (evening) 40 dBA
- 10 pm – 7 am (nighttime) 35 dBA

Or shall not exceed LA90 + 5 dBA whichever is greater. The background sound level LA90 must be measured in the absence of the intrusive noise at the appropriate time of noise impact.

The intrusive noise shall be measures in absence of extraneous noise.

Acoustical terms defined in Table 9.1 shall be considered as part of this standard.

The maximum noise level LAmax of any intrusive noise shall not exceed the LAeq limits by more than 10 dBA.

The limits for intrusive noise are to be corrected as indicated below.

These noise limits apply to the nearest residential property line or at the nearest affected location on the receiver's property.

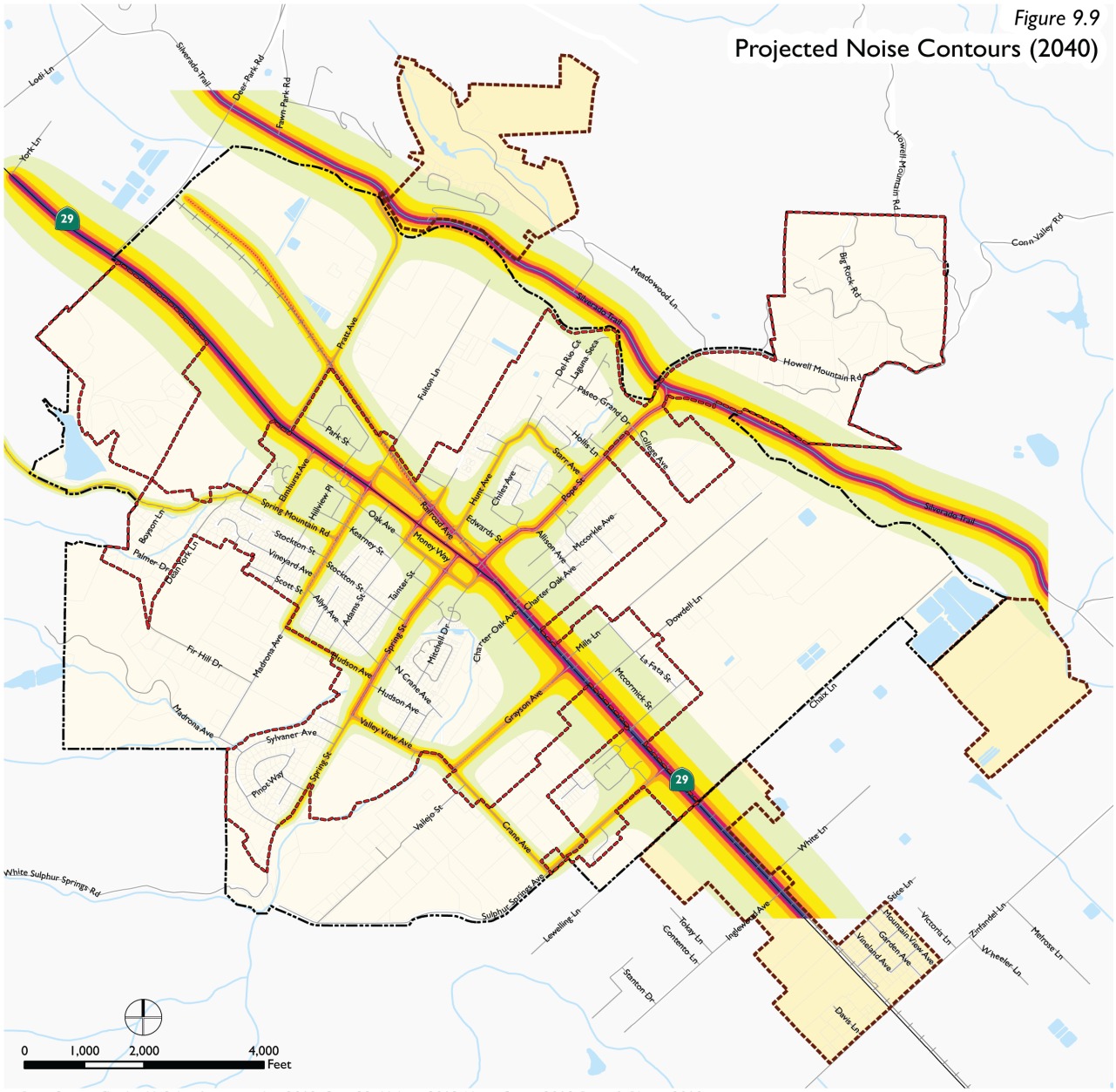
CORRECTIONS FOR INTRUSIVE NOISE

Type of Correction	Circumstances of Correction	Correction[1]
Seasonal	Summer or year round operation	0 dBA
	December through March only	+ 5 dBA
Tone or Impulse	No tonal or impulse character	0 dBA
Characteristics	Tonal character[2] present in noise	- 5 dBA
	Impulsive[3], repetitious or modulating[4] signal	- 5 dBA[5]

Notes:
1 Correction to be applied to the Standard's limits for intrusive noise.
2 Tonality exists when the 1/3 octave noise level of the tone is 5 dB greater than the average level of the two adjacent 1/3 octave frequency bands.
3 Transient sound having a peak level of short duration typically less than 100 msec.
4 Either in amplitude, frequency or duration including compressor "hammering" noise.
5 In addition to correction for tonality.

Figure 9.9

Projected Noise Contours (2040)



Data Source: Charles M. Salter Associates, Inc, 2018; City of St. Helena, 2018; Napa County,2018; Dyett & Bhatia, 2018

- DNL 55 - 60 dB
- DNL 60 - 65 dB
- DNL 65 - 70 dB
- DBL 70 - 75 dB
- DNL 75 - 80 dB
- Urban Limit Line
- Study Areas
- City of St. Helena



St. Helena's fire and police departments respond to structural fires, wildfires and other disasters.

FIRE

Key human-caused public health and safety hazards affecting St. Helena include structural fires, vegetation fires, and other disasters that require advanced planning. Overall, in the urbanized portion of St. Helena within the city limit, the risk of vegetation fire is moderate to low; however, areas of the city in the hilly terrain along the western perimeter of the city and east of the Napa River are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as moderate, high or very high fire hazard severity zones, according to CAL FIRE 2020 data (see Figure 9.10). St. Helena does not have any critical facilities, as seen in Figure 9.1, located within a fire hazard severity zone.

As described in the Public Safety Services section, fire services are provided to residents by Napa County Fire Department and the City of St. Helena Fire Department. Fires occurring in the heavily-wooded hillside areas can be difficult for firefighting efforts due to slope, topography, and availability of fuels. Fire burns more intensely up slopes and securing a fire on steep terrain is challenging for firefighting efforts. Traffic congestion on City streets, including State Route 29, a two-lane highway, can provide limited ingress and egress for emergency vehicles that must gain access to the fire. Furthermore, traffic congestion can pose major challenges to St. Helena's collaboration with neighboring municipalities and agencies that seek to establish and implement regionally coordinated disaster planning for police, fire, and emergency medical services. The City can

work with local, regional, and state agencies to address key traffic-related concerns on State Route 29 and County roads to ensure that adequate levels of fire protection are maintained, particularly on hillsides and in fire-prone areas, and to support regional collaboration for disaster preparedness.

In 2021, the Napa Communities Firewise Foundation led the development of the Napa County Community Wildfire Protection Plan in collaboration with Napa County agencies, PG&E, CAL FIRE and local jurisdictions. The Plan seeks to reduce wildfire risk in Napa County, including areas surrounding St. Helena, through a variety of proposed wildfire mitigation projects.

Napa County has experienced many historical fires in the past several decades. Historical fires in or adjacent to St. Helena since 1950 are summarized seen below in Table 3.

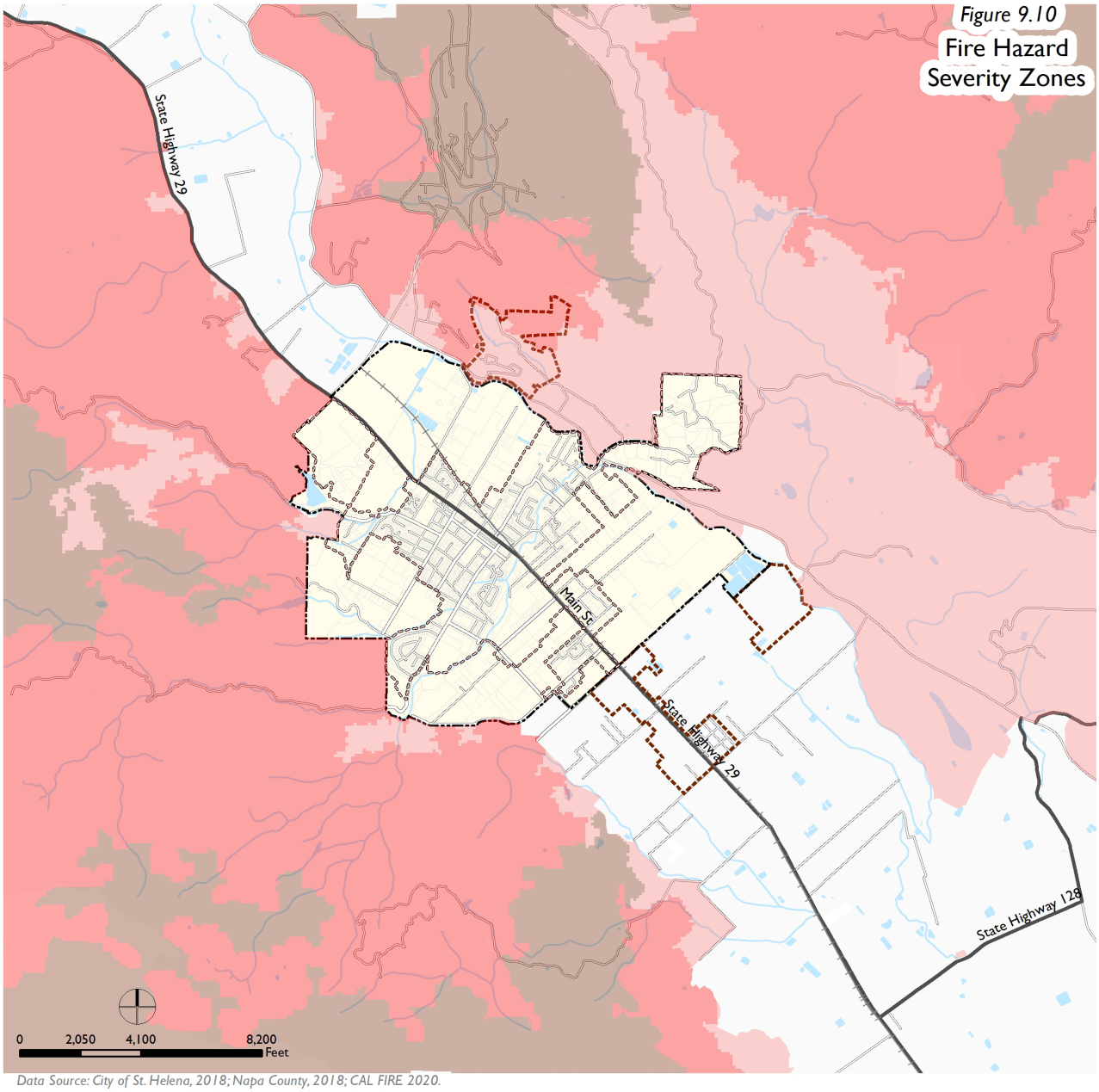
Peak water supply and water availability are crucial for fighting wildfires. Peak load water supply refers to the sum total of water required for fire flow, operational daily consumption, and emergency storages. With new developments, the City will need to increase its peak load water supply reserves. Policies PS4.G and PS4.H seek to address water supply demand concerns.

TABLE 9.5: Historic Fires in or adjacent to St. Helena (1950–2021)

Name	Year	Acres Burned
Roadside #14	1964	231
Atlas Peak	1981	33606
Howell Mountain Fire	1983	2354
Silverado	2003	69
Deer	2008	233
Hillcrest	2016	17
Tubbs	2017	36702
Atlas	2017	51625
Nuns	2017	55798
Glass	2020	67484
LNU Lightning Hennessey	2020	305651
Spring	2021	1
Pope	2022	4

Source: CAL FIRE 2021

Figure 9.10
Fire Hazard Severity Zones



Data Source: City of St. Helena, 2018; Napa County, 2018; CAL FIRE 2020.

Fire Hazard Severity Zones
- Moderate
- High
- Very High

- Railroads
- Water Features
- Urban Limit Line
- Study Areas
- City of St. Helena

CLIMATE CHANGE HAZARDS

The St. Helena Climate Vulnerability Assessment, found in Appendix B, includes an evaluation of how climate change may impact vulnerable community members as well as critical services, facilities and infrastructure in the City. Key findings from the assessment are summarized below.

Climate change is a global phenomenon that can impact local health, natural resources, infrastructure, emergency response, and many other aspects of society through changes in climate conditions. In St. Helena, climate conditions and associated natural hazards are expected to change in the following ways:

- **Increasing temperatures:** Average maximum temperatures in St. Helena are expected to rise between 3.3°F and 4.4°F by 2050, and between 4.2°F and 7.2°F by 2100.
- **Extreme heat:** Extreme heat days occur when the maximum temperature is above 100.4°F. The annual number of extreme heat days is projected to increase by as much as 31 days per year by 2100.
- **Increasing intensity of precipitation events and longer dry periods:** It is projected that by the end of the century the largest precipitation events in the Bay Area region will increase in volume (inches of rain per day) between 6% and 37%.
- **Wildfire:** There will be increased wildfire probability due to variable and decreasing precipitation and increasing temperatures.

Climate change will disproportionately impact certain populations in St. Helena. The following vulnerable populations have been identified in St. Helena:

- **Young Children:** St. Helena has one of the highest concentrations of children in Napa County (St. Helena General Plan 2019). Children are particularly at risk to climate hazards because they are dependent on others for care, are vulnerable to injury or sickness, and may not understand or are not capable of taking the measures needed to protect against or evacuate from climate hazards.
- **Older Adults:** Silverado Orchards Retirement Community and Vineyard Valley Mobile Home Park are two particularly vulnerable facilities in the City, as they are home to a substantial population of elderly individuals.

- **Outdoor Workers:** Extreme heat and smoke events pose disproportionate health risks to the city's outdoor workers who are employed in viticulture, agriculture, construction, and other outdoor occupations
- **Individuals that are Linguistically Isolated:** Individuals that are linguistically isolated have no to limited English proficiency. Linguistically isolated households may not understand important safety, public health, or evacuation orders and communications when conducted exclusively in English during a hazard event, which may compromise the ability of residents to remain safe and healthy. They may not have access to resources available to help recover from climate related impacts if resources are only available in English.
- **Visitors:** St. Helena is surrounded by an expanse of vineyards and agricultural lands. The City is a popular tourist destination in Napa County. Visitors are at risk during climate hazard events as they may not receive adequate warning and may not have knowledge regarding access to emergency services.

All residents of St. Helena rely on various infrastructure and services such as water systems, electricity, natural gas, and roads. These systems and assets are vulnerable to the impacts of climate change, which puts the wellbeing of residents at risk. Those with pre-existing and chronic health conditions that rely on services and systems, are particularly vulnerable in situations where hazard events impact access to electricity, food, water supplies, healthcare, sanitary resources, transportation, and communication platforms. Impacts to St. Helena from climate change are wide ranging and expected to include the following:

- Extreme heat can cause heat-related illnesses such as heat stress, heat stroke, and dehydration and may exacerbation of existing respiratory and cardiovascular conditions. Those who do not have access to cooling, who have high outdoor exposure, and those who have health conditions or physiological conditions are particularly at risk. Extreme heat may trigger a power safety shutoff to decrease wildfire risk and/or manage high demand.
- Drought can impact the reliability of affordable water services for city residents which may cause individuals to become dehydrated and/or experience costs burdens associated with increased water rates. Prolonged droughts may limit the water supply for fire suppression efforts. Drought can also negatively impact wildlife dependent on local water resources. It can lead to declining quality and yield of vineyards located in St. Helena.

- Wildfires can cause individuals to be injured from smoke inhalation or burns. People may also have their belongings or homes destroyed or damaged during a wildfire event. Residential and commercial buildings, critical facilities, and critical infrastructure can be damaged from a wildfire. Wildfires may move through open spaces, threatening local wildlife. In order to mitigate further risk, a power safety shutoff may be initiated during a wildfire which would impact electricity services in the city.
- Floods can cause individuals to be injured from high velocity or high-volume floodwaters. People may have their belongings or homes destroyed or damaged from floodwater inundation. Flooding can cause structural damage to residential and commercial buildings, critical facilities, and critical infrastructure. High volumes of floodwater may cause stormwater systems to get overwhelmed and impaired.

Implementation of policies and programs included in this Public Health, Safety, and Noise Element that improve the community's adaptive capacity, including addressing some of the underlying contributing factors, will reduce the negative impacts that climate change could have on vulnerable populations, critical services, facilities, and infrastructure.

CONCEPTS, TRENDS AND IDEAS

Hazard Mitigation Planning



FEMA oversees hazard mitigation plans.

Hazard mitigation is defined by the Federal Emergency Management Agency (FEMA) as "sustained action taken to reduce or eliminate long-term risk to people and their property from hazards." The goal of hazard mitigation is to ensure long-term resilience against natural and human-caused hazards.

Mitigation Plans form the foundation for a community's long-term strategy to reduce disaster losses and break the cycle of disaster damage, reconstruction and repeated damage.

As a condition for receiving certain types of non-emergency disaster assistance, State, Tribal, and local governments are required to develop a hazard mitigation plan. The Napa County Multi-Jurisdictional Hazard Mitigation Plan was written in cooperation with the cities of St. Helena, Calistoga, American Canyon, Yountville, and local special districts, and was developed in accordance with the Disaster Mitigation Act of 2000 (DMA 2000) and followed FEMA's 2011 Local Hazard Mitigation Plan guidance. The Napa County MJHMP identified and profiled hazards, assessed facilities and populations at risk, and sets forth goals, mitigation strategies and mitigation action items for flooding, earthquakes, wildfire, severe weather, drought, climate change, slope failure, dam failure, agricultural disaster, and pandemic disease. Working together, local communities and jurisdictions in Napa County can reduce the long-term risks associated with natural and human-caused hazards. Consistent with that effort, the Public Health, Safety and Noise Element is St. Helena's primary policy tool for ensuring local action and St. Helena's involvement in implementing regional hazard mitigation strategies. For more information about the Napa County MJHMP, visit https://mitigatehazards.com/napa-county-mjhmp/documents/.

9.3 Key Findings

There are several challenges and opportunities facing St. Helena related to public health, safety, and noise. The following key findings are based upon comprehensive existing conditions analysis and community input.

Flooding

- Flooding in Napa County generally occurs within the low-lying Napa Valley floor. Between 1961 and 1997, flooding resulted in approximately $540 million in property damages. St. Helena experienced major flood events in 1986, 1995, and 2005 that caused an estimated combined total of $95.6 million in damages in the city. Most flooding occurred in the vicinity of Vineyard Valley from Fulton Lane to Pope Street.
- The flood history of York Creek suggests that the creek bed is not of adequate size to convey larger storm events. During the 2005 New Year's Eve storm event, flooding from York Creek significantly impacted residential and industrial properties. The Beringer water treatment plant flooded and ponds overflowed into the creek. In addition, the creek flooded vineyards on both sides of its corridor, downstream of State Route 29 to the Napa River.
- Until 2002, an aggregate mining operation, now discontinued, removed approximately 40,000 to 50,000 cubic yards of material from Sulphur Creek annually. Further study is needed to determine how aggregate buildup at Sulphur Creek may affect flooding issues in the area.
- Completed in June 2011, the City of St. Helena Comprehensive Flood Control and Environmental Restoration Project provides a minimum 100-year level of flood protection within the project and surrounding area of St. Helena. Design of the project was done on the basis of a Napa River Flood Model Study from Zinfandel Lane to Lodi Lane completed jointly by the City of St. Helena and the Napa County Flood Control and Water Conservation District with Measure A funding. The individual elements of the project include floodplain terracing, shoreline restoration, a new levee, floodwall and bank stabilization, and storm-water management features including a detention basin and pumping facility. The project protects hundreds of homes and is projected to save millions of dollars in flood insurance claims.
- Portions of St. Helena's residential, commercial and winery industrial areas are located within or near the 100-year floodplain. Requiring infrastructure

and drainage plans to minimize risk in these areas, in compliance with State and federal requirements, at a minimum, can promote the safety of residents and businesses. Moreover, restricting new development within the FEMA-designated floodplain and prohibiting development in the floodway can minimize additional flood hazards and the need for further mitigation measures.

Seismic and Geologic Activity

- St. Helena is located in a seismically-active region, with seismic activity primarily related to movements in the San Andreas Fault Zone (SAFZ). Although there are a number of active faults in the region, there are no known active faults in St. Helena.
- Local earthquake hazard mapping suggests that a magnitude 7.9 or greater earthquake on the San Andreas Fault, or a 6.5 magnitude event on the West Napa Fault, could result in strong shaking in the city. As a result, St. Helena's susceptibility to liquefaction ranges from low in the upland areas west of downtown, to very high along the Napa River. United States Geological Survey (USGS) maps indicate that slope stability and landslide issues exist in St. Helena's upland areas, and a major earthquake event could result in significant debris flow. As noted previously, the recent August 2014 earthquake had a magnitude of 6.0, which resulted in no measurable soil liquefaction within the City of St. Helena.
- By limiting the type and scale of new development in hillside areas, or areas subject to liquefaction, the City can limit the potential for property damage and loss of life as a result of major seismic activity. In addition, complying with the Universal Building Code (UBC) and adopting other standards for building safety along with emergency response disaster planning will help minimize the impacts of seismic and geologic disasters.

Air Pollution and Hazardous Materials

- The greatest source of greenhouse gas emissions in the City of St. Helena is the Transportation sector, which comprises 59 percent of total emissions according to a 2018 inventory compiled for the General Plan update. The transportation sector is also the largest generator of air pollution emissions in the County, with mobile sources – automobiles and trucks – providing the greatest level of emissions. A 2007 Bay Area Air Quality Management District (BAAQMD) GHG inventory indicated that approximately 56 percent of GHG

emissions in Napa County resulted from mobile source emissions. Mobile emissions are a significant source of other pollutants, as well, including carbon monoxide and particulate matter.

- The development of a Climate Change Element for the St. Helena General Plan is an important step forward in contributing to the effort to improve regional and local air quality. Napa County's Communitywide Climate Action Plan and the Climate Change Element provide a strategic policy framework to reduce greenhouse gas emissions and reduce air pollution derived from its multiple sources.
- CalEnviroScreen have shown that people living in agricultural areas of California have higher amounts of pesticides in their bodies than other people, which can result in adverse health outcomes. Based on data compiled by the Office of Environmental Health Hazard Assessment (OEHHA), census tracts in St. Helena are in the top quartile in terms of pounds of pesticide per square mile in the state for the years 2012-2014. The Napa County Agricultural Commissioner is responsible for ensuring the safe use of pesticides in all settings in the county. The County runs a Pesticide Use Enforcement program to educate pesticide users of their legal responsibilities and conduct inspections and investigations to ensure the safety of workers, the public, and the environment. Compliance and enforcement activities are complemented with extensive training and outreach to help growers and employees ensure safe handling and use of pesticides.

Noise

- The primary source of noise in the community stems from motor vehicle traffic and commercial activity, particularly in areas near major roads, such as State Route 29. Mitigating traffic noise can be difficult, particularly the noise generated along State Route 29 throughout the day and night. However, the City can adopt noise standards to address more infrequent noise sources, such as those related to off-hours delivery, and commercial loading and unloading.
- While there are few industrial noise sources in St. Helena, passing trains and aircraft generate intrusive noise periodically in the community.
- Agricultural operations generate noise on a seasonal basis; however, local right-to-farm policies limit the City's power to regulate noise impacts. Encouraging the regular communication of planned agricultural activities to

surrounding residents can help address potential conflicts relating to noise compatibility. In addition, adopting noise compatibility standards for sensitive land uses can help to minimize the impacts of intrusive noise sources.

Fire and Emergency Response

- St. Helena's full time fire department, supported by six full time and 19 part time firefighter staff member (hired in Fall 2021), provides fire protection services for wildland and structural fires within the city limits and in unincorporated areas of Napa County. Although service levels within the city are generally adequate, the heavily-wooded and frequently dry hillside areas could create significant challenges for firefighters.
- By limiting the type and scale of new development in hillside areas, and requiring sufficient road widths and turning radii to accommodate emergency response vehicles, the City can limit the potential for property damage and loss of life due to fires.
- Traffic congestion can adversely impact emergency response time in St. Helena, particularly when emergency vehicles must cross State Route 29. The City can work with emergency response providers to create solutions that address traffic-related emergency response challenges.
- The City of St. Helena Fire Department and Napa County Fire Department provide fire services to St. Helena.
- In Napa County, wildfires have grown in frequency and intensity over the past two decades. There have been several fires in or adjacent to St. Helena since 1950.
- Water availability and peak water supply are extremely important for fighting fires and preparing for disaster events. St. Helena can ensure adequate water availability by pursuing water supplies from additional sources.



Emergency response is an important part of protecting residents and businesses.

Climate Change Hazards

- Climate change is projected to increase the frequency and/or intensity of various natural hazards in the coming decades.
- St. Helena will experience increasing average maximum temperatures, increasing intensity of precipitation events, and longer dry periods.
- St. Helena is vulnerable to growing impacts from extreme heat and wildfire.
- As climate change occurs, communities and assets will be affected to varying degrees based on level of sensitivity to a particular hazard.
- The City's most vulnerable populations include young children, older adults, outdoor workers, individuals that are linguistically isolated, and visitors.
- Vulnerable critical services and infrastructure include water systems, natural gas, and roads.
- Extreme heat, drought, wildfire, and flooding will have impacts to critical facilities, services, and infrastructure that are vulnerable and located in hazard zones.
- Wildlife may suffer from loss of habitat and decreased availability of food and water sources due to increased severity and frequency of extreme heat, drought, wildfire, and floods.

9.4 Goals

The goals of the Public Health, Safety and Noise Element are:

Maintain High Levels of Public Health and Safety.
St. Helena is committed to maintaining high standards of public health and safety through anticipation of and preparation for potential natural and human-caused hazards.

Effectively Coordinate Responses to Emergencies and Natural Disasters.
St. Helena is dedicated to protecting residents, businesses, and the environment through efficient local emergency response efforts, public education, and effective coordination with regional, State, and federal agencies.

topic area
1 AIR QUALITY



9.5 Policies and Implementing Actions

A range of policies and implementing actions are outlined below and organized into the following topic areas:

1. **Air Quality;**
2. **Noise;**
3. **Seismic and Geologic Hazards;**
4. **Fire and Hazardous Materials;**
5. **Flood Hazards;**
6. **Disaster Planning; and**
7. **Climate Change Hazards**

The following policies and actions mandate, encourage, or allow certain initiatives to be pursued throughout the duration of the General Plan. Together, they serve as strategic directions for City staff and partners, highlighting where time and resources should be focused.

Policies and actions are set to protect the community against flood hazards.

topic area
1 AIR QUALITY

Policies

PS1.1 Achieve and maintain clean, healthy air for the residents of St. Helena to preserve environmental quality and community health.

PS1.2 Support regional efforts to achieve and maintain state ambient concentration standards to protect public health, reduce adverse industrial plant effects, and enhance the visual environment. In particular, provide local support for implementation of policies and measures set forth in the Napa Valley Countywide Transportation Plan.

PS1.3 Encourage effective regulation of those sources of air pollution, both inside and outside of St. Helena, which affect air quality, by implementing as many of the recommendations of the Napa Valley Countywide Transportation Plan as are cost-effective, equitable and feasible.

PS1.4 Promote an optimized land use development pattern that minimizes cumulative air quality impacts from proposed developments consistent with statewide air quality standards and local affordable housing and economic development goals.

Implementing Actions

PS1.A Minimize local adverse air quality impacts related to construction by requiring dust abatement procedures for local projects as required by existing laws and regulations.

PS1.B Review project proposals for their potential to generate hazardous air pollutants.

PS1.C Develop guidelines for locating new sensitive uses, including residences, schools, and childcare facilities, away from air stationary pollutant sources consistent with existing air quality laws and regulations. The guidelines can include measures to mitigate air emissions from existing stationary sources, as well as to design buildings to prevent exposure.

PS1.D Encourage and support cost-effective regional efforts to use alternative modes of transportation.



Air quality can be improved by implementing the Napa County Congestion Management Plan.

topic area
1 AIR QUALITY

PS1.E If sufficient user interest is demonstrated, consider a citywide network to help commuters arrange carpools, including online coordination capabilities and designated areas for parking and pick-up.

PS1.F Subject to modifications that reflect local conditions, costs, and variations, consider adopting the thresholds of significance contained in the Bay Area Air Quality Management District's (BAAQMD) Guidelines for Assessing the Impacts of Projects and Plans for determining the significance of project impacts under the California Environmental Quality Act.

PS1.G Continue to implement an ordinance to restrict exposure to environmental tobacco smoke in new and existing multi-unit dwellings, public events, and outdoor areas, such as parks and playgrounds.

PS1.H Adopt a voluntary, cost-effective, employer-based transportation demand management (TDM) program for St. Helena businesses in compliance with the BAAQMD's 2017 Clean Air Plan (CAP). Components of a TDM program should include measures to reduce the use of single-occupancy vehicles for work-related commuting, such as carpool/vanpool matching services and employer-sponsored transit passes., to the extent sufficient user interest is demonstrated.

PS1.I The potential for sources of odors that do not comply with national or state standards from restaurants, auto body shops, or waste treatment facilities shall be considered when evaluating proposed residential projects and projects with sensitive recipients.

topic area
2 NOISE

Policies

PS2.1 Preserve the current low levels of noise in St. Helena to maintain the City's rural atmosphere consistent with accepted national or international standards for noise protection.

PS2.2 Maintain a citywide environment that balances various City objectives while minimizing the impact of highway, railroad, and industrial noise. The City should manage both indoor and outdoor noise levels to protect health and safety. A combination of noise standards and existing noise levels should be used to determine impacts and mitigation measures.

PS2.3 Minimize potential noise impact conflicts between land uses by regulating land uses that are non-compliant with adopted noise ordinances. Encourage noise-generating uses to reduce their impacts while promoting land use patterns that avoid conflicts. Employ the City's noise standards, and noise contour maps to determine the compatibility of land uses.

PS2.4 Require a reduction and/or control of the use of machinery, mechanical systems and other noise-making equipment and sources in and near residential areas where the noise impacts are non-compliant with local noise ordinances.

PS2.5 An increase in average noise levels of 5 dBA or greater is considered to be significant and to constitute a noise impact by the noise source in question for the purpose of environmental analyses.

Implementing Actions

PS2.A Consider the environmental impact of transportation-related noise and other noise sources in the review of any new projects and approval of subdivision plans and requests for changes in the zoning ordinance.

PS2.B Consider the Land Use Compatibility Standards presented in the State of California's General Plan guidelines when siting new uses, subject to local variation based on local conditions and needs. These standards identify the acceptability of a project based on levels of noise exposure.

PS2.C Require an acoustical study, prepared by a qualified acoustical consultant for:

- All proposed projects that are likely to be non-compliant with adopted City standards.

PS2.D Consider requiring a noise study when new developments are built in close proximity to noise sources, such as State Route 29 and the railroad tracks. These developments should consider the exterior and interior noise environment.

PS2.E Require construction operations to use noise suppression devices and techniques and limit noisy construction activities per the City's noise ordinance.

PS2.F Consider amending the City's noise ordinance to regulate intrusive noise sources, such as the use of machinery and equipment, landscaping and property maintenance devices, animals, and idling buses or trucks in or near residential receptors or uses sensitive to noise.



Noise can be mitigated by minimizing conflicts between land uses by regulating incompatible land uses.

topic area
2 NOISE

Policies

PS3.1 Minimize risk of injury, loss of life and property damage from seismically-induced and other known geologic hazards.

PS3.2 Restrict the intensity of development and the level of landform alteration in the hillside areas where the potential for slope failure is significant based on existing seismic standards.

PS3.3 The required soils and geologic reports for new development shall include geotechnical analysis for construction in areas with potential geological hazards and/or for purposes of environmental analysis. The analysis shall investigate all potential geo-hazard issues for the site where there is substantial evidence of a potential risk.

PS3.4 Geologic reports for new development shall describe hazards and include mitigation measures to reduce risks to acceptable levels. Where appropriate, an engineer's or geologist's certification may be required stating that risks have been mitigated to an acceptable level.

topic area
3 SEISMIC AND GEOLOGIC HAZARDS

Implementing Actions

PS3.A Require a soils and geologic report to be submitted for new construction prior to the issuance of grading and building permits and the submission of final maps in seismically hazardous areas.

PS3.B Prohibit any development—including any land alteration, grading for roads, and structural development—in areas of seismically hazardous slope instability or other geo- logic concerns until mitigating measures are taken to limit potential damage to levels of acceptable risk.

PS3.C Require prompt re-vegetation of development areas on slopes prone to seismically hazardous instability. Use native and drought-tolerant plant species for landscaping on slopes where excess watering might induce seismically hazardous landslides and/or erosion.

PS3.D The City shall rely upon the most current and comprehensive geological hazard mapping available in the evaluation of potential seismic hazards associated with proposed new development.

PS3.E All development and construction proposals shall be reviewed by the City to ensure conformance to applicable building standards. Reasonable recommendations of the geotechnical analysis shall be implemented.

topic area
4 FIRE AND HAZARDOUS MATERIALS

Policies

PS4.1 Use the Zoning Code to define a reasonable transitional zone around industrial areas to protect the health and safety of residential neighborhoods.



PS4.2 Limit development in areas of High and Very High wildfire hazard as defined and mapped by the California Department of Forestry and Fire Prevention (CAL FIRE) in order to prevent the loss of lives, injuries, and property damage due to wildfires, unless development is permitted by local approval under the CAL FIRE regulations.

PS4.3 To the extent feasible and cost effective, protect residents, employees, and visitors from wildfires.

PS4.4 To the extent feasible and cost effective, protect St. Helena residents from health and safety impacts related to the use, storage, manufacture, and transport of hazardous materials.



The transitional zone around industrial areas protects the health and safety of residential neighborhoods.

PS4.5 Encourage new uses that do not rely extensively on the use of hazardous materials.

PS4.6 Facilitate communication and education about fire safety, non-point source pollution, household hazardous waste disposal, and recycling opportunities.

PS4.7 To the extent feasible and cost effective, ensure that all streets and roads comply with best practices and standards in terms of width, turning radius, and grade in order to facilitate access by City firefighting apparatus, and to provide alternative emergency routes of ingress and egress.

topic area
4 FIRE AND HAZARDOUS MATERIALS

Implementing Actions

PS4.A Designate areas in St. Helena that are prone to fire hazards and make this information available to the community.

PS4.B Continue to require implementation of best practices in fire resistance for all new and remodeled structures in fire-prone areas, including fire fuel removal, creation of defensible space for firefighters, construction with fire-resistant building materials, and installation of automatic sprinkler systems. Study the need to designate a Wildland-Urban Interface Fire Area within St. Helena to provide protection in additional areas.

PS4.C Require all structures in high wildfire hazard areas to maintain a clearance of flammable vegetation away from structures and to use fire-resistant ground covers. The minimum clearance distance should be 100 feet in the Wildland-Urban Interface areas.

PS4.D Require all new development to meet the minimum fire flow rates specified by the City's Fire Code.

PS4.E Require all new development plans to be approved by the Fire Department prior to the issuance of building permits, grading permits, or final map approval.

PS4.F Develop a program to inform and educate the community about potential risks, resources, and roles and responsibilities for addressing fire safety in St. Helena. Inform residents of homes adjacent to public lands of their responsibility to provide fire breaks and defensible space adjacent to their homes.

PS4.G Investigate additional water supply sources to ensure the provision of adequate water availability to meet future peak fire, emergency, and domestic demands.

PS4.H Permit new development only within areas that have adequate water pressure.

topic area
4 FIRE AND HAZARDOUS MATERIALS

PS4.I Coordinate with the Napa County Communities Firewise Foundation, the St. Helena Fire Safe Council, and neighboring jurisdictions to implement wildfire mitigation projects proposed in the Napa County Community Wildfire Protection Plan.

PS4.J Consider incorporating wildfire risk reduction measures, including load clearing and brush management into plans, operations and maintenance procedures for public access roads, parks, trails, open space, critical infrastructure, and critical roads.

PS4.K Provide educational materials to encourage businesses and residents to adopt drought tolerant and fire-resistant landscaping practices.

PS4.L Develop and disseminate education and outreach materials to landlords, businesses, and residents regarding retrofits and home-hardening measures that align with recommendations from CAL FIRE's Wildfire Home Retrofit Guide. Identify funding resources to support home retrofit and hardening projects.

PS4.M Partner with the St. Helena Fire Safe Council, the Napa Communities Firewise Foundation, and CAL FIRE to conduct educational workshops for landowners on defensible space, vegetation management, and home-hardening techniques based upon the most up-to-date science and State management guidelines to reduce wildfire hazards.

PS4.N Update standards in the zoning code to be consistent with the most recent SRA Fire Safe Regulations: title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (SRA Fire Safe Regulations) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations).

PS4.O Minimize risks to existing development in areas at highest risk to wildfire by identifying existing non-conforming development and revise to meet contemporary fire safe standards. Address road standards and vegetative hazard, and require all development to meet or exceed CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 requirements (SRA Fire Safe Regulations).

PS4.P Coordinate with CAL FIRE and Napa County Fire Department to incorporate best practices around wildfire risk reduction and vegetation management into maintenance planning of parks and open spaces.

topic area
4 FIRE AND HAZARDOUS MATERIALS

PS4.Q Coordinate with CAL FIRE, Napa County Firewise Foundation, and Napa County Fire Department to identify funding sources and develop incentives to assist landowners in dead tree removal.

PS4.R Require fire protection plans for new development in areas of the City that are located adjacent to CAL FIRE hazard severity zones.

PS4. S Review all new development proposals for their potential to introduce the production, use, storage, and/or transport of hazardous materials, and require reasonable controls on such materials.

PS4.T Develop a Hazardous Materials Response Plan that includes guidelines, protocols, and strategies to respond to a local hazardous materials spill.

PS4.U Continue to require compliance with federal, State, and local regulations for the safe production, transport, handling, use, and disposal of hazardous materials that may cause air, water, or soil contamination. Require buffers for operations which handle substantial amounts of hazardous materials. When siting new facilities or expanding existing facilities, require buffer zones between hazardous materials facilities and residential uses, parkland, trails, and open space facilities.

PS4.V Develop and launch a citywide education campaign to encourage the use of green products in order to reduce non-point source pollution. Target efforts towards the reduction of household chemical use and hazardous waste disposal.

PS4.W Require environmental assessments during the planning for development in areas previously used for agricultural, commercial, or industrial uses. Remediation of identified contamination that may result in health risks to construction workers and future owners and users shall be required prior to approval of construction, demolition, and grading permits for development.

PS5.X Work with the Napa County Agricultural Commissioner and other responsible agencies to identify and enforce mechanisms to control residual pesticides and pesticide runoff to prevent significant risk to water quality, vegetation, wildlife, and humans.

topic area
4 FIRE AND HAZARDOUS MATERIALS

PS4.Y Develop a program to inform and educate the community about potential risks, resources, and roles and responsibilities for addressing fire safety in St. Helena. Inform residents of homes adjacent to public lands of their responsibility to provide fire breaks adjacent to their homes.

PS4.Z Review all new development proposals for their potential to introduce the production, use, storage and/or transport of hazardous materials, and require reasonable controls on such materials.

PS4.AA Develop a Hazardous Materials Response Plan that includes guidelines, protocols, and strategies to respond to a local hazardous materials spill.

PS4.AB Strengthen regulations for the safe production, transport, handling, use and disposal of hazardous materials that may cause air, water, or soil contamination. Require buffers for operations which handle substantial amounts of hazardous materials. When siting new facilities or expanding existing facilities, require buffer zones between hazardous materials facilities and residential uses, parkland, trails, and open space facilities.

PS4.AC Develop and launch a citywide education campaign to encourage the use of green products in order to reduce non-point source pollution. Target efforts towards the reduction of household chemical use and hazardous waste disposal.

topic area
5 FLOOD HAZARDS

Policies

PS5.1 Minimize the risk to people, property and the environment caused by flooding hazards. Site new development to minimize potential damage from a 100-year flood. Consider changes in precipitation associated with climate change in the design of new development to avoid potential flood damages. Continue to require that any new development is constructed to FEMA standards. Prohibit the siting of uses within Flood Hazard Areas inconsistent with FEMA standards that could result in health and safety hazards, including those due to the release of chemicals or other substances as a result of inundation or erosion. Ensure that any new flood protection projects comply with federal and State standards.

PS5.2 Ensure that new development or existing lots of record within the 100-year floodplain are properly graded, sited, and constructed to mitigate flood effects and do not cause increases or expansion of the flood area that increase flood risk.

PS5.3 Within the 100-year floodplain, encourage open space uses, such as parks or natural areas.

PS5.4 Ensure that construction of flood barriers does not adversely affect natural floodplains, stream channels and natural barriers that help accommodate or channel flood waters.

PS5.5 Prohibit new development within areas designated as Floodway in the current FEMA Flood Insurance Study (FIS) and Flood Insurance Rate Map (FIRM). (*Also see the Public Facilities and Services Element, Topic Area 3*)

PS5.6 Coordinate with the Napa County Flood Control and Water Conservation District and other responsible agencies to maintain protocols and funding for the regular inspection and maintenance of flood control facilities in the city, including levees, floodwalls, floodplain terracing, stormwater detention ponds, and pumping facilities.

PS5.7 Require that development within Special Flood Hazard Areas prepare and implement infrastructure and drainage plans compliant with State and federal requirements in order to minimize risk in these areas.

topic area
5 FLOOD HAZARDS

PS5.8 Locate, when feasible and cost-effective, new essential public facilities outside of Special Flood Hazard Areas, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities. *(Also see the Public Facilities and Services Element, Topic Area 3)*

Implementing Actions

PS5.A Coordinate with the Napa County Flood Control District to ensure that stream channels are routinely cleared of vegetation and debris which could impede stormwater flows, while protecting riparian habitat.

PS5.B Require developers with land adjacent to the Napa River to construct or contribute a fair share toward the construction of necessary flood control improvements.

PS5.C Strengthen and enforce regulations that prohibit the dumping of litter, fill, and waste materials into creeks and waterways. Educate the public about flooding and health hazards associated with these activities.

PS5.D Require that best design practices are implemented for sewer and water lines in areas subject to flooding or are sited to avoid contamination and flooding when pipelines break.

PS5.E Prohibit the introduction of urban development in FEMA-designated Floodway zones.

PS5.F Review Municipal Code Chapter 15.52, Flood Damage Prevention, to ensure that regulations reflect best practices. Periodically update the City's flood hazard regulations in accordance with FEMA/NFIP regulations.

PS5.G Implement the requirements of FEMA relating to construction in Special Flood Hazards Areas as illustrated on Flood Insurance Rate Maps.

PS5.H Implement low impact development practices for new development and redevelopment projects to reduce stormwater peak flow rates and volumes from smaller, more frequently occurring storm events.





Coordination with the County Flood Control District will ensure that stream channels are routinely cleared of vegetation and debris.

topic area
6 DISASTER PLANNING

Policies

PS6.1 Ensure that City emergency procedures are adequate in the event of potential natural or man-made disasters and that applicable operations and maintenance manuals are followed.

PS6.2 Ensure the swift and safe evacuation of residents, employees, and visitors in the event of a disaster event or other emergency.

PS6.3 Alleviate evacuation challenges associated with single access residential neighborhoods.

Implementing Actions

PS6.A Maintain and periodically update the City's Emergency Response Plan.

PS6.B Conduct periodic emergency response exercises to test the effectiveness of City emergency response procedures.

PS6.C Continue to collaborate with regional agencies and neighboring jurisdictions to develop and implement a regional emergency coordination plan and agreement for police, fire, and emergency medical services.

PS6.D Maintain emergency roadways and improve them as necessary and appropriate to ensure ongoing serviceability.

PS6.E Maintain reliable communication pathways with the public to ensure a safe and streamlined evacuation.

PS6.F Engage with the Napa Valley Transportation Authority, Caltrans, California Highway Patrol, adjacent cities, and Napa County to identify regional evacuation solutions that address major evacuation routes.

PS6.G Conduct outreach with residents in single access road neighborhoods to enforce home hardening and defensive space standards and conduct emergency preparedness and response trainings.

PS6.H Coordinate with Napa County Sheriff Department, Caltrans, Napa County Emergency Response Team (CERT), St. Helena Fire Safe Council, homeowner associations, and neighborhoods to facilitate the use of Zonehaven for evacuation coordination.

PS6.I Develop and employ evacuation alternatives and/or alternative emergency access routes in neighborhoods that have single ingress/egress.

topic area
6 DISASTER PLANNING

PS6.J Develop and maintain evacuation options for vulnerable populations such as young children, older adults, outdoor workers, individuals that are linguistically isolated, visitors, and individuals with access and functional needs.

PS6.K Designate and publicize evacuation routes and evacuation shelters through Zonehaven.

PS6.L Designate and publish in Zonehaven safety zones and/or shelter-in-place locations as potential places of refuge when evacuation routes or evacuation shelter are inaccessible.

PS6.M Assist local and small businesses in planning for business continuity and emergency preparedness.

PS6.N Prioritize the City's essential facilities when conducting post-disaster building evaluations.

topic area
7 CLIMATE CHANGE HAZARDS

Policies

PS7.1 Protect the City's vulnerable population from the impacts of climate change.

PS7.2 Support greater resilience, redundancy, and reliability of local and regional infrastructure and services.

PS7.3 Protect and restore climate-vulnerable ecosystems, natural resources, and managed resources.

PS7.4 Increase local economic resilience and business continuity.

Implementing Actions

PS7.A Conduct an assessment on the effectiveness of current City cooling center operations to evaluate current amenities and resources available to ensure the needs of vulnerable populations are met during extreme climate events, such as high heat days and bad air quality days. Ensure the City's cooling center has adequate backup power sources and battery storage to mitigate service disruptions.

PS7.B Update the St. Helena building code to require cost-effective and reasonable weatherization and consideration of extreme heat for new developments.

PS7.C Explore opportunities to provide funding assistance to households and populations that are in greatest need of weatherization to address extreme heat, extreme storm, and air quality concerns.

PS7.D Consider climate change impacts and vulnerabilities during the infrastructure planning process. Identify projects as part of capital improvement programs that consider climate adaptation priorities.

PS7.E Invest in cost-effective, feasible renewable back-up power sources and storage options to increase energy resilience at critical facilities during extreme heat events, wildfires, extreme precipitation events, or other scenarios that may trigger a power safety shutoff or outage.

topic area
7 CLIMATE CHANGE HAZARDS

PS7.F Expand the use of drought-tolerant green infrastructure, including street trees, and landscaped areas where feasible and cost-effective, as part of cooling strategies in public and private spaces.

PS7.G Coordinate with PG&E and Napa County Office of Emergency Services to establish backup power and emergency grid shutdown protocols that protect the City's vulnerable populations.

PS7.H Evaluate critical facilities to assess the feasibility and cost-effectiveness of retrofitting to increase long-term resilience to climate change hazards including extreme heat, extreme precipitation events, and wildfire.

PS7.I Partner with St. Helena Chamber of Commerce and Visit Napa Valley to pilot and implement a local business resilience initiative to build small business resilience capacity by increasing the awareness of and preparedness for business continuity risks in the face of climate change. Provide resources to help local business manage risk and enhance resilience, and conduct outreach campaigns to engage business, governmental, and community leaders to preparedness for economic resilience.

PS7.J Develop and disseminate guidelines and outreach materials on tree and plants species that are drought-tolerant and wildfire resistant to city residents and businesses.

PS7.K Partner with local researchers (such as, California State University-Sonoma) to make accessible localized viticulture climate adaptation strategies that address impacts of extreme heat, drought, wildfire, and extreme precipitation events to vineyards in and around the city.

PS7.L In recognition of the increase in severity and frequency of floods and wildfires, essential public facilities should be sited in areas that are least prone to hazard impacts, when feasible and cost-effective.

PS7.M Partner with the St. Helena Chamber of Commerce and St. Helena Welcome Center to develop emergency public health and evacuation communication strategies for visitors and tourists.



Safety Element Update

Climate Change Hazards and Vulnerability Assessment

prepared by

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Table of Contents

1 Introduction 1
2 Approach 2
3 Climate Hazards 3
3.1 Temperature 3
3.2 Precipitation 5
3.3 Wildfire 6
4 Vulnerable Populations 7
5 Conclusion 9
6 References 10

Figures

Figure 1 Annual Average Maximum Temperature 4
Figure 2 Extreme Heat Days 4
Figure 3 Figure Annual Precipitation 5

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1 Introduction

Climate change is driven by the human contribution of certain gases like carbon dioxide and methane into the atmosphere. These gases, commonly known as greenhouse gases or GHGs, absorb and re-emit heat that has been discharged from the Earth's surface. This works to trap heat near the earth's surface, increasing the natural greenhouse effect. Greenhouse gases from human activities have been collecting in the atmosphere since the 1800's and are warming the climate more and more every year. This rise in average temperatures across the globe affects precipitation patterns, temperature, and ocean water levels. The Intergovernmental Panel on Climate Change (IPCC) has concluded that global climate change will impart adverse effects on the Earth's natural systems, resources, and populations.

St. Helena is, and will continue to be, affected by the impacts of climate change in the form of increased extreme heat days, increased average temperature, stronger storms, more severe floods, deeper droughts, and more frequent and larger wildfires. Specific impacts on the community of St. Helena will vary based on social, economic, and physical characteristics. This report assesses the projected impacts climate change will have on St. Helena.

2 Approach

Senate Bill 1035 (2018) requires St. Helena and all California cities and counties to update their safety element with new information on flood hazards, fire hazard, and climate adaptation and resilience in conjunction with the housing element or local hazard mitigation plan update cycle, which occur every 8 years and 5 years, respectively. In accordance with California Government Code Section 65302(g) (as updated by SB 379), St. Helena is required to complete a Climate Change Vulnerability Assessment in conjunction with the update to its safety element. The update to the safety element must consist of the following components:

1. A vulnerability assessment that identifies the risks climate change poses to the local jurisdiction and the geographic areas at risk from climate change.
2. Set of adaptation and resilience goals, policies, and objectives based on the information specified in the vulnerability assessment.
3. Set of feasible implementation measures designed to carry out the goals, policies, and objectives identified in the adaptation objectives.

The IPCC, a United Nations subgroup responsible with global advancement and communication of climate change understandings, has established several scenarios used to describe possible future GHG emissions and associated warming. Two of these are commonly used to compare possible futures and have been selected for this assessment.

- The Representative Concentration Pathway (RCP) 4.5 represents a “medium emissions” scenario in which emissions peak around 2040 and then decline at the end of the century. This scenario assumes global agreement and implementation of GHG reduction strategies.
- The RCP 8.5 represents a “high emissions” scenario in which emissions continue to rise throughout the 21st century (Intergovernmental Panel on Climate Change [IPCC] 2021).

This assessment relies on Cal-Adapt, an interactive online tool that is aligned with the IPCCs emissions scenarios, to present localized climate change projections and impacts. The tool was developed and is maintained by the University of California Berkeley with oversight from the California Energy Commission (CEC). These climate projections provide an understanding of possible future conditions for temperature, precipitation, and wildfire in St. Helena. California’s Fourth Climate Change Assessment San Francisco Bay Area Regional Report, released by the State in 2018, and the 2020 Napa County Multi-Jurisdictional Hazard Mitigation Plan are also used to determine projected climate impacts in St. Helena and Napa County. These projections will allow St. Helena to prioritize policies and actions that increase resilience and the ability for the community to adapt and prepare for the effects of climate change.

3 Climate Hazards

3.1 Temperature

Observations over the past century indicate that temperature has increased across the San Francisco Bay Area region, which includes Napa County. According to California's Fourth Climate Change Assessment San Francisco Bay Area Regional Report the region's average annual maximum temperature has increased by 1.7 degrees Fahrenheit from 1950-2005 (CEC 2019). As a result of these findings, warming is expected to increase in St. Helena in the coming decades as evidenced under the two GHG emission scenarios:

- Under RCP 4.5, future model-average temperature values are projected to increase by 3.3°F by mid-century (2040-2069) and 4.2°F by end of century (2070-2100) (CEC 2021). The average hottest day of the year is expected to increase by 3.9-6.4°F by the end of the century, depending on location in the San Francisco Bay Area Region (CEC 2019).
- Under RCP 8.5, future model-average temperature values are projected to increase by 4.4°F by mid-century and 7.2°F by end of century (CEC 2021). The average hottest day of the year is projected to increase by 6.3-10°F by the end of the century, depending on location in the San Francisco Bay Area Region (CEC 2019).

Additionally, the intensity and frequency of extreme heat days is expected to increase. In St. Helena an extreme heat day is when the maximum temperature exceeds 100.4°F. Historically, between 1961-1990, the city experienced four extreme heat days per year on average.

- Under RCP 4.5, by the end of the century, extreme heat days are expected to increase to 17 days per year.
- Under RCP 8.5, extreme heat days are expected to increase to 31 days per year (CEC 2021).

Changes in average maximum temperature and extreme heat days are presented in Figure 1 and Figure 2, respectively. In both figures, the purple lines show high emissions scenario (RCP 8.5), the blue line shows the medium emissions scenario (RCP 4.5), the grey lines show the current trend (observed). The shaded areas indicate the range for the emissions scenario to account for uncertainty in future projections and variability between climate models. For example, the blue shaded areas represent the range of data for the medium emissions scenario (RCP 4.5) (CEC 2021). Because these scenarios are driven by global GHG emissions and regional climate change caused by global emissions, the scenarios applicable to St Helena and the San Francisco Bay Region will likely vary based primarily on regional, national, and global actions to reduce such emissions and adapt to such climate changes.

Figure 1 Annual Average Maximum Temperature

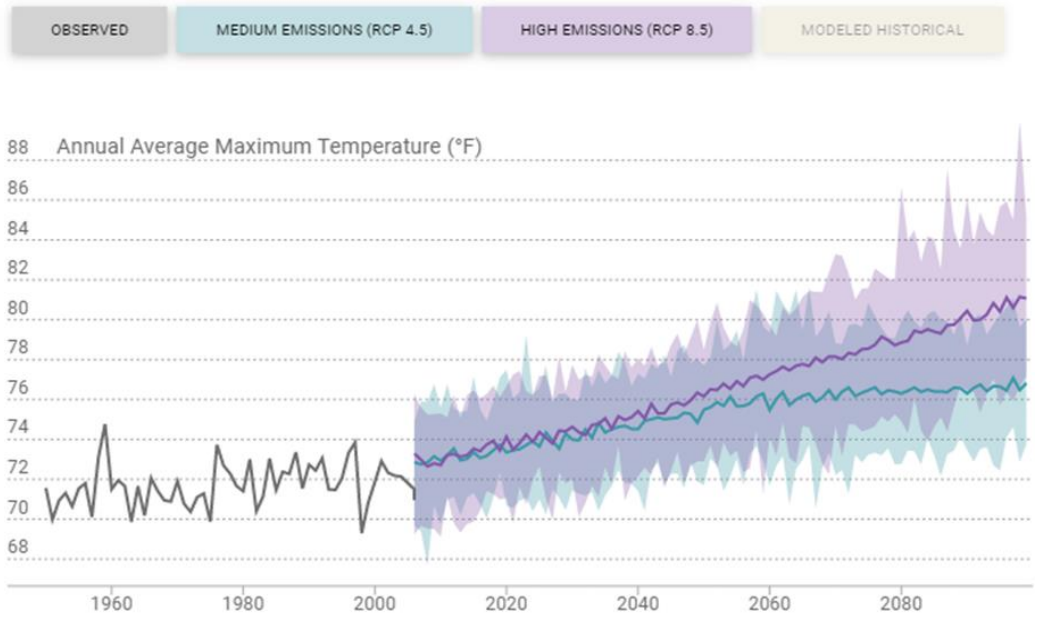
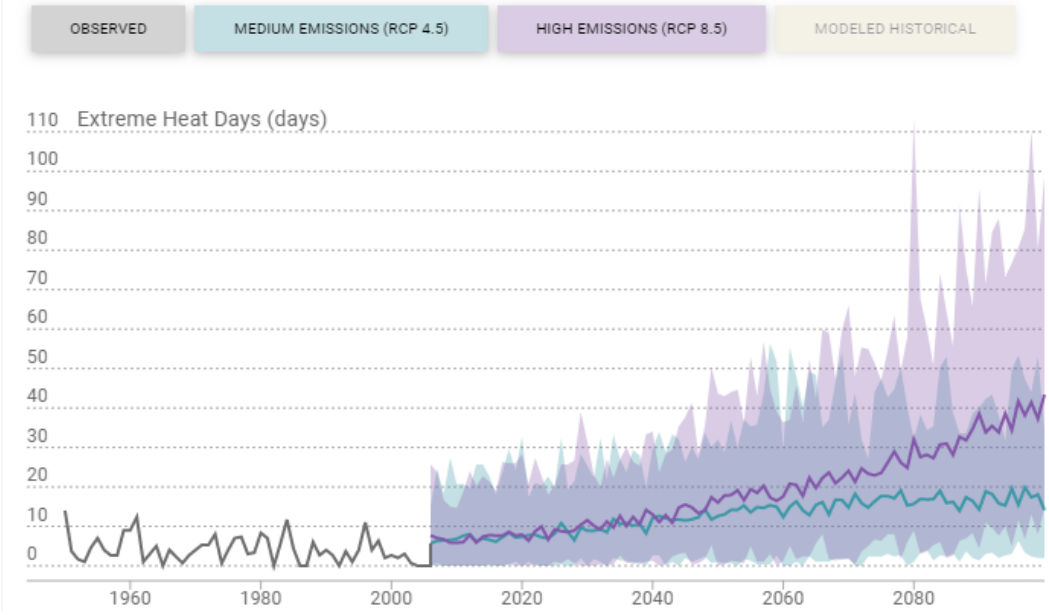


Figure 2 Extreme Heat Days

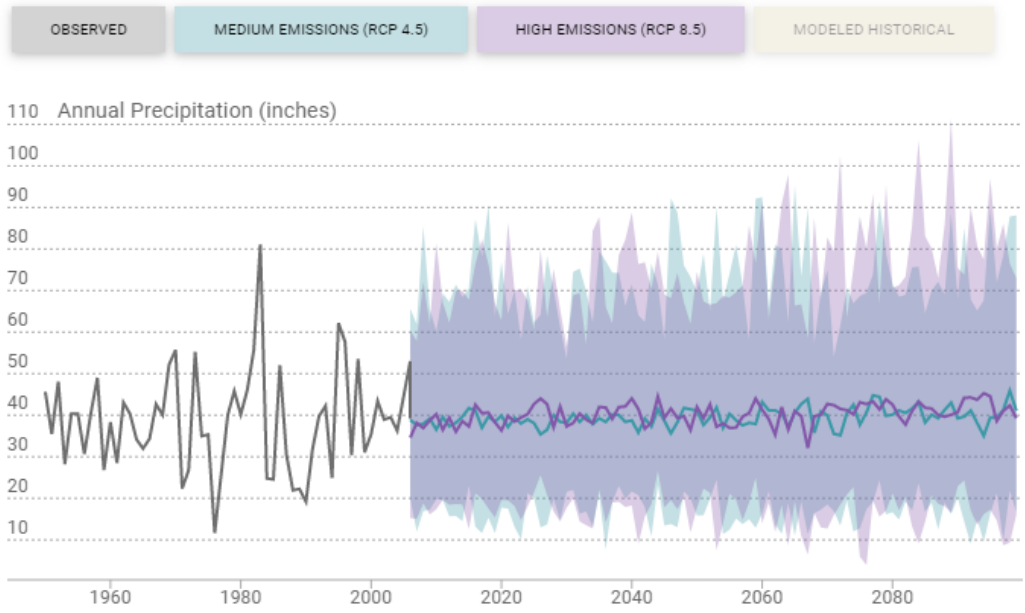


3.2 Precipitation

Historically, precipitation over the San Francisco Bay Area region is highly variable from year to year. In this region, and in most of California, large, discrete storms generate a significant portion of the region's total precipitation. Generally, model projections suggest that potential changes in average precipitation in the coming decades will be trivial in comparison to the region's historic natural variability (see Figure 3). However, both wet and dry periods are expected to become more extreme and frequent, leading to overall increased variability in the region and in California. Climate models project that by the end of the century the largest precipitation events in the Bay Area region will increase in volume (inches of rain per day) between 6% to 21% under RCP 4.5 and 37% under RCP 8.5 (CEC 2019). Increased heavy precipitation events can pose particular risk to St. Helena's low-lying residential areas near the Napa River, which are prone to flooding (Napa County Multi-jurisdictional Hazard Mitigation Plan [MJHMP] 2020).

Climate projections suggest that with overall temperatures increasing through the century, irrespective of whether average precipitation increases or decreases, there will likely be longer and more extreme droughts in the state. Changes in precipitation are shown in Figure 3. The purple line shows the high emissions scenario (RCP 8.5), the blue line shows the medium emissions scenario (RCP 4.5), the grey line shows the current trend (observed). The shaded areas indicate the range for the emissions scenario. For example, the blue shaded areas represent the range of data for the medium emissions scenario (RCP 4.5) (CEC 2021). However, such changes in precipitation in St. Helena are likely to vary primarily based on global, national, and regional activities to reduce or adapt to such changes.

Figure 3 Figure Annual Precipitation



3.3 Wildfire

Climate change is projected to exacerbate wildfire risk by creating hotter and dryer landscapes, notably, due to increased variability in precipitation. In the San Francisco Bay Area Region, wildfire risk is influenced by a multitude of compounding factors that include its mostly warm and dry Mediterranean-type climate, continuing expansion of the wildland urban interface, drought events, periodic episodes of offshore Diablo winds, historical fire suppression, human activities, topographical factors, and the type and spatial distribution of vegetation (CEC 2019).

Napa County's unique topography is marked by a narrow valley with surrounding and intermixed hilly, wooded landscapes that are at high risks to wildfires, according to the Napa County Multi-Jurisdictional Hazard Mitigation Plan. St. Helena lies in the center of Napa Valley and is surrounded on the east and west by CAL FIRE designated State Responsibility Area (SRA) and Local Responsibility Area (LRA) very high fire hazard severity zones. SRAs are lands in which CAL FIRE has financial and legal responsibility for wildfire protection and where CAL FIRE administers fire hazard classification and building standard regulations. LRAs are lands in cities, unincorporated areas with low wildfire risk, cultivated agricultural area, lands that not do not meet the criteria for SRA or Federal Responsibility Areas (FRA), and fire-prone lands that are owned by a federal agency.

Many cities in Napa Valley, including St. Helena, have areas that are within the Wildland Urban Interface (WUI). Land and developments in the WUI are susceptible to property damage as a result of wildfire events. Wildfires pose a significant threat to St. Helena's vineyards and winery properties. California's 6th largest wildfire on record, the Lake Napa Unit (LNU) Lighting Complex, scorched Napa County along with five other surrounding counties in August 2020. Residents in St. Helena and the surrounding area were evacuated as fires drew nearer and air quality levels rose to unhealthy levels. In this event, dry vegetation, decreases in precipitation, and high temperatures were contributing factors in the rate of wildfire spread and the total acreage burned.

Findings from modeling studies suggest that overall, there will be increased fire probability in the Bay Area, due to variable and decreasing precipitation and increasing temperatures. However, over time, urban and rural areas may see reduced fire risk as high-density human development increases and vegetation land are subject to human-initiated defensible space and wildfire hazard mitigation activities and projects.

Wildfire often generates secondary hazards that can greatly impact public health and community safety. For example, wildfires can trigger smoke events that can travel long distances and negatively impacts public health in the region. Wildfire smoke can cause health impacts, from mild eye burning to irritated air ways, heat stroke and even cardiac issues. Wildfire smoke disproportionately impacts children, elderly, people with chronic diseases, pregnant people, and outdoor workers (Napa County MJHMP 2020).

4 Vulnerable Populations

While all people in a community will experience climate change, some may be more affected than others. For example, older adults and young children may be more at-risk to heat illness during an extreme heat event. Sensitivity to climate hazards can be influenced by several factors, including: differences in individual health, age, and ability; institutional bias or exclusion from political and decision-making power; inequities in infrastructure and access to health care, economic opportunity, education and other services; and inequities in environmental and living conditions. Vulnerabilities within a community can inhibit that community's adaptive capacity or their ability to cope with climate change impacts. Development and implementation of programs and projects that improve the community's adaptive capacity, including addressing some of the underlying contributing factors will reduce the negative impacts that climate change could have on vulnerable populations.

Climate change may disproportionately impact certain populations in St. Helena, depending on the interaction of climate change with other variables, such as availability of social services; hazard mitigation programs; emergency preparation and assistance; and climate adaptation programs. The following vulnerable populations have been identified in St. Helena based on the Healthy Places Index mapping tool:

- **Young Children.** St. Helena has one of the highest concentrations of children in Napa County (St. Helena General Plan 2019). Children are particularly at risk to climate hazards because they are dependent on others for care, are vulnerable to injury or sickness, and may not understand or are not capable of taking the measures needed to protect against or evacuate from climate hazards.
- **Older Adults.** Silverado Orchards Retirement Community and Vineyard Valley Mobile Home Park are two particularly vulnerable facilities in the city, as they are home to a substantial population of elderly individuals.
- **Outdoor Workers.** Extreme heat and smoke events pose disproportionate health risks to the city's outdoor workers who are employed in viticulture, agriculture, construction, and other outdoor occupations
- **Individuals that are Linguistically Isolated.** Individuals that are linguistically isolated have no to limited English proficiency. Linguistically isolated households may not understand important safety, public health, or evacuation orders and communications when conducted exclusively in English during a hazard event, which may compromise the ability of residents to remain safe and healthy.
- **Visitors.** St. Helena is surrounded by an expanse of vineyards and agricultural lands. The city is a popular tourist destination in Napa County. Visitors are at risk during climate hazard events as they may not receive warning and may not have knowledge regarding access to emergency services.

All residents of St. Helena rely on various infrastructure and services such as water systems, electricity, natural gas, and roads. These systems and assets are vulnerable to the impacts of climate change, which puts the wellbeing of residents at risk. Those with pre-existing and chronic health conditions that rely on services and systems, are particularly vulnerable in situations where hazard events impact access to electricity, food, water supplies, healthcare, sanitary resources,

transportation, and communication platforms. To help reduce negative impacts on vulnerable populations and increase adaptive capacity, it is vital that strategies and policies are implemented to ensure continuity of systems and services in the event of climate hazard events.

5 Conclusion

The Climate Change Vulnerability Assessment provides a brief summary of the climate conditions projected to occur in St. Helena and the populations most vulnerable to climate change impacts. Although climate change is one of the more pressing challenges that St. Helena faces, it presents an opportunity to address the overarching City of St. Helena General Plan goal to address both the needs of current and future generations, provided that the General Plan is consistent with and recognizes global, national, and regional efforts that primarily address and adapt to the causes of climate change, including GHG emissions. The assessment provides a foundation for the City to begin to understand vulnerabilities to climate change in the community and to take actions that serve to increase community resilience.

The update to the Public Health, Safety, and Noise Element will include goals, policies and programs that will better prepare the community for the effects of climate change, based on the information provided in this Climate Change Vulnerability Assessment and best practice. The City's General Plan (2019) and Napa County's Multi-Jurisdictional Hazard Mitigation Plan (2020) include policies and mitigation actions that address climate change related to drought, wildfire, and flood risk. As discussed in this assessment, additional consideration may be needed to prepare for extreme heat and increased temperatures as well as the unique needs of vulnerable populations. The updated Public Health, Safety, and Noise Element will include new policies to increase resilience for vulnerable populations. There may also be opportunities to augment the existing policies relating to drought, wildfire, and flood risk to better increase resilience.

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City of St. Helena 2023 General Plan Update

Addendum

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April 2023

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City of St. Helena 2023 General Plan Update

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Table of Contents

Acronyms and Abbreviations iii

Executive Summary 1

1 Introduction 3
- 1.1 Project Title 3
- 1.2 Lead Agency Name and Address 3
- 1.3 Contact Person and Phone Number 3
- 1.4 Project Location 3
- 1.5 Project Description 6
- 1.6 Environmental Review 7
- 1.7 Discretionary Action 7
- 1.8 Prior Environmental Document(s) 8
- 1.9 Location of Prior Environmental Document(s) 8

2 Project Context 9
- 2.1 St. Helena General Plan 9
  - 2.1.1 Housing Element 10
  - 2.1.2 Public Health, Safety, and Noise Element 14
  - 2.1.3 2040 General Plan EIR 15

3 Overview of CEQA Guidelines Section 15164 17

4 Environmental Effects & Determination 19
- 4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR 19
- 4.2 Determination 19

5 Addendum Methodology 21
- 5.1 2040 General Plan Consistency 21
- 5.2 Accommodation of the RHNA 21
- 5.3 Consistency with Horizon Year 2040 Projections 22
- 5.4 Preliminary Environmental Considerations 23

6 Addendum Evaluation 25
- 6.1 Aesthetics 25
- 6.2 Agricultural Resources 29
- 6.3 Air Quality 33
- 6.4 Biological Resources 39
- 6.5 Cultural, Historic, and Tribal Cultural Resources 43
- 6.6 Energy, Greenhouse Gases, and Climate Change 47
- 6.7 Geology, Soils, and Seismicity 51
- 6.8 Hazards and Hazardous Materials 55
- 6.9 Hydrology and Water Quality 59
- 6.10 Land Use, Population, and Housing 65
- 6.11 Noise 69
- 6.12 Public Services and Recreation 73
- 6.13 Transportation and Traffic 77

6.14 Utilities and Service Systems 81
7 Summary of Findings 85
8 References 86
Bibliography 86

Tables

Table 1 City of St. Helena Regional Housing Needs Allocation....12
Table 2 Summary of Areas of Potential Impact under the 2040 General Plan Update EIR....15
Table 3 Housing Unit Yield per Site Category 22

Figures

Figure 1 Regional Location....4
Figure 2 Project Area 5
Figure 3 Housing Element Sites Inventory Locations – Vacant and Underutilized (Nonvacant) Sites....13

Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADU	Accessory dwelling unit
BAAQMD	Bay Area Air Quality Management District
BMP	Best management practices
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
DPM	Diesel Particulate Matter
EIR	Environmental impact report
GHG	Greenhouse Gas
HRA	Health risk assessment
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas & Electric
PM	Particulate matter
ROG	Reactive organic gas
SB	Senate Bill
SHMC	Saint Helena Municipal Code
VMT	Vehicle Miles Traveled
VOC	Volatile organic compounds

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Executive Summary

The proposed project consists of a comprehensive update to the Housing Element of the City of St. Helena General Plan. State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The project would update the City of St. Helena Housing Element as part of the 6th cycle of updates. For St. Helena, the planning period runs from January 31, 2023 through January 31, 2031. The Housing Element update identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under state law (California Government Code Section 65583). It analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The proposed project also includes revisions to the Public Health, Safety, and Noise Elements to be consistent with California law regulating evacuation routes and climate change vulnerability.

The Housing Element update establishes objectives, policies, and programs to assist the City of St. Helena in achieving state-mandated housing goals. The City's implementation of these policies and programs includes amendments to the Public Health, Safety, and Noise Element of the General Plan and the rezoning of several sites in the inventory of potential sites for meeting the city's Regional Housing Needs Allocation (RHNA) obligation. No formal land use changes or physical development is proposed at this time and future changes would require environmental evaluation as potential impacts are location-specific and cannot be assessed in a meaningful way until a project site and development proposal are identified.

Pursuant to Government Code section 65583(c)(1), these actions will be accomplished within three years of the City of St Helena's adoption of the Housing Element update. As required by Government Code Section 65583(c)(8), the Housing Element update provides a timeline for processing each of the amendments to the General Plan, Zoning Ordinance and other land use documents which implement the Housing Element update.

In considering the potential environmental impacts of the Housing Element update, the City determined that the Final Environmental Impact Report (EIR) certified for the 2040 General Plan update (2040 General Plan update Final EIR, State Clearinghouse Number 2010042001) is of continuing informational value. The City also determined that the potential environmental impacts (both direct and indirect impacts) of the Housing Element update are within the scope of the previously certified Final EIR and that none of the conditions requiring subsequent or supplemental environmental review under California Environmental Quality Act (CEQA) Guidelines Section 15162 exist. Based on the information and analysis provided below, the City determined that only minor or technical changes to the previously certified Final EIR are necessary and that that preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

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1 Introduction

This document is an Environmental Impact Report Addendum that analyzes the City of St. Helena's (City's) proposed Housing Element update and Public Health, Safety, and Noise Element update Project (hereafter also referred to as the "General Plan update," "proposed project," or "project").

1.1 Project Title

City of St. Helena General Plan Update

1.2 Lead Agency Name and Address

City of St. Helena
Department of Planning
1088 College Avenue
St. Helena, California 94574

1.3 Contact Person and Phone Number

Maya DeRosa, Community Development Director
(707) 967-2783 x 530

1.4 Project Location

The Housing Element update planning boundaries (Plan Area) coincide with the St. Helena city limits. The area encompasses approximately 5 square miles of land in the western portion of Napa County. The city is located northwest of the City of Yountville and southeast of the City of Calistoga, surrounded by unincorporated areas of the County. State Route 29 and 121 provide regional access to the city from the north and south. Figure 1 shows the regional location of the Plan Area, and Figure 2 shows the Plan Area's boundaries in its immediate location. In addition, the project identifies 11 vacant and underutilized sites within the city that can accommodate new housing or rezone. The vacant and underutilized sites to be studied for housing opportunities are shown broadly in Figure 3 and correspond to the list provided in the Housing Resources chapter of the needs assessment of the Housing Element update. Not all parcels have street addresses at this time. With most of the City developed and preservation of open space a priority, all draft vacant and opportunity sites are on currently underdeveloped, underutilized, or vacant lots.

Figure 1 Regional Location

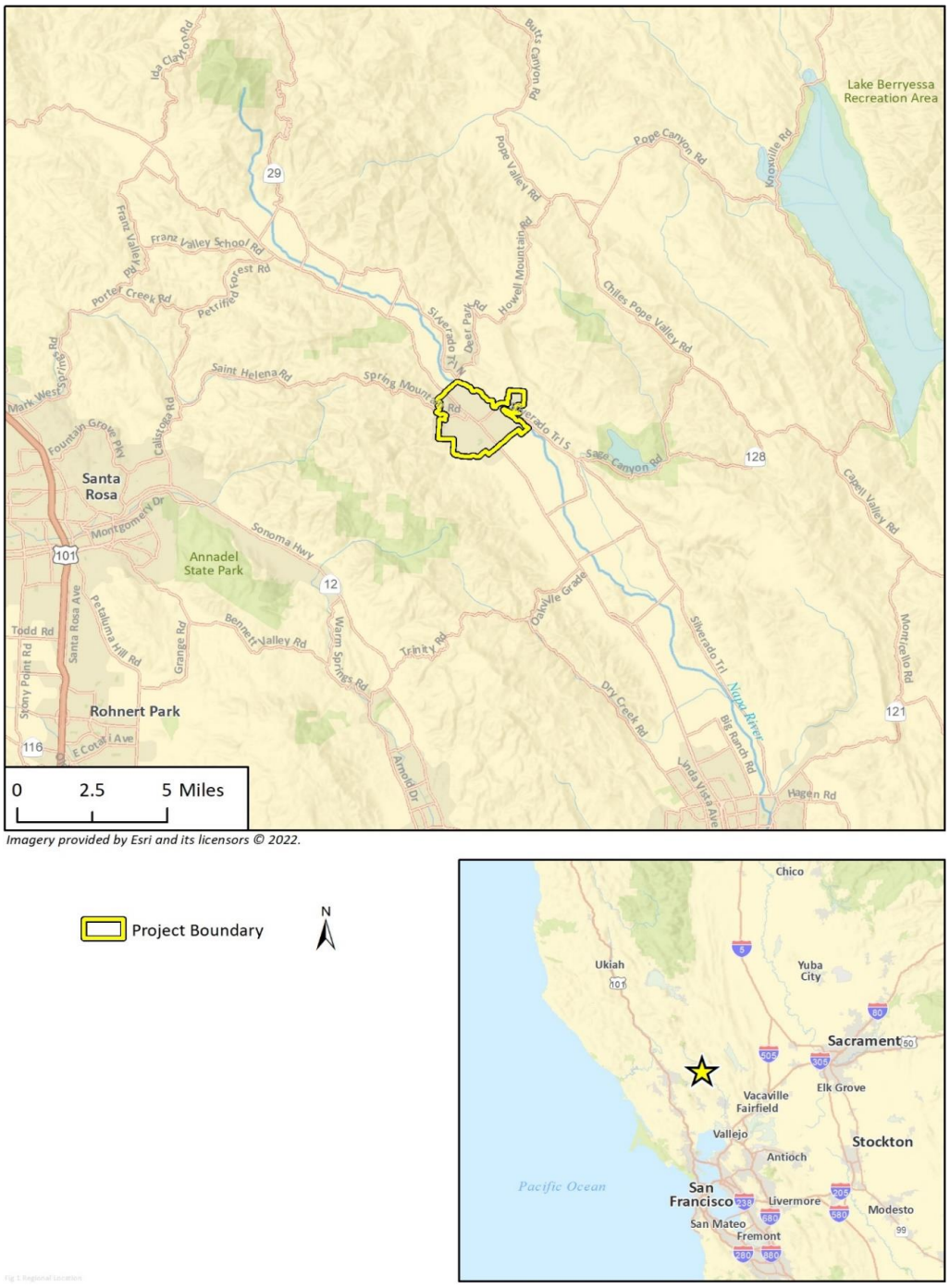
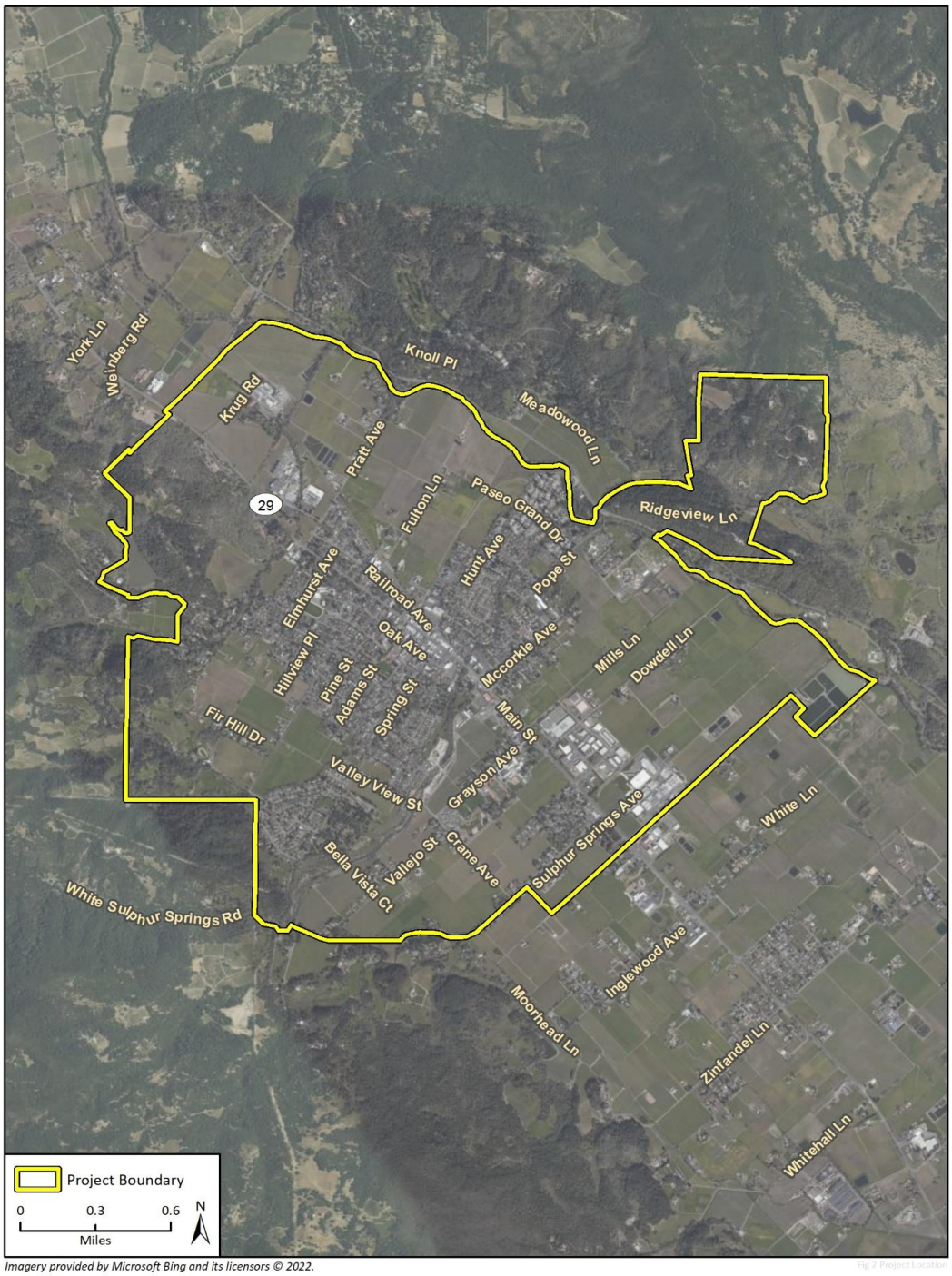


Figure 2 Project Area



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1.5 Project Description

The project consists of a comprehensive update to the Housing Element of the St. Helena General Plan and update to the existing Public Health, Safety, and Noise Element of the General Plan. These elements are a part of the St. Helena General Plan, which is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over approximately 20 years (i.e., 2040). The General Plan was subject to a comprehensive update as well; it underwent extensive environmental review in the form of an EIR, which was certified in 2019. The EIR for the St. Helena 2040 General Plan includes discussion of alternatives and growth inducing impacts (direct and indirect impacts) associated with urban development in the city.

State law requires that housing elements be updated every eight years (California Government Code Sections 65580 to 65589.8). The Housing Element update identifies residential sites adequate to accommodate a variety of housing types for all income levels and needs of special population groups, defined under state law (California Government Code Section 65583). It analyzes governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons. The project would update the City of St. Helena Housing Element as part of the 6th cycle of updates. For St. Helena, the planning period runs from January 31, 2023 through January 31, 2031.

Additionally, the Housing Element update would bring it into compliance with state legislation passed since the adoption of the 2040 General Plan and 2015-2023 Housing Element. There are multiple main components of the Housing Element update that mirror those of the previous Housing Elements, but that have been updated to reflect current conditions, including:

- An **introduction** to review the requirements of the Housing Element, public participation process, and data sources
- A profile and analysis of the city's demographics, housing characteristics, and existing and future **housing needs**
- An analysis of **constraints** on housing production and maintenance, including market, governmental, and environmental limitations to meeting the City's identified needs
- A review of **resources available** and results of a housing sites inventory analysis conducted to demonstrate the City of St. Helena's ability to satisfy its share of the region's future housing need
- A review of the City's **housing programs** and evaluation of accomplishments under the 2013-2021 Housing Element
- A **Housing Plan** to address the city's identified housing needs, which identifies the City's housing goals, policies, and implementing programs
- An identification of the **goals, policies, and programs** and the city's quantified objectives for the 2023-2031 planning period, by income group, based on growth estimates, past and anticipated development, and income data

The Housing Element update establishes objectives, policies, and programs to assist the City in achieving state-mandated housing goals. The city's implementation of these policies and programs includes future amendments to other elements of the General Plan and the rezoning of several sites in the inventory of potential sites for meeting the city's RHNA obligation. Pursuant to Government

Code section 65583(c)(1), these actions will be accomplished within three years of the City of St. Helena's adoption of the Housing Element update. As required by Government Code Section 65583(c)(8), the Housing Element update provides a timeline for processing each of the amendments to the General Plan, Zoning Ordinance and other land use documents which implement the Housing Element update.

1.6 Environmental Review

In April 2019, the City of St. Helena certified the St. Helena 2040 General Plan update and Final EIR (City of St. Helena General Plan 2040, State Clearinghouse Number 2010042001) for an update to General Plan, including the Land Use Element. The certified Final EIR discussed the potential environmental impacts (both direct and indirect impacts) associated with future development allowed under the General Plan update and included a thorough analysis of the estimated build out of the City through the horizon year 2040. The EIR estimated new development for residential, commercial, office, industrial, hospital and hotel uses throughout the city and sphere of influence and evaluated the potential environmental impacts associated with an estimated total buildout of 400 new dwelling units. The EIR found that, with implementation of the policies and programs contained in the General Plan and recommended mitigation measures, all impacts (direct and indirect) associated with future development under the General Plan update would be less than significant, except impacts on agricultural resources, air quality, energy, greenhouse gas emissions, and climate change, and transportation and traffic which would be significant and unavoidable.

In considering the potential environmental impacts of the Housing Element update, the City determined that the EIR certified for the 2040 General Plan update is of continuing informational value. The City also determined that the potential environmental impacts (both direct and indirect impacts) of the Housing Element update are within the scope of the previously certified EIR and that none of the conditions requiring subsequent or supplemental environmental review under CEQA Guidelines Section 15162 exists. Based on the information and analysis provided below, the City determined that only minor or technical changes to the previously certified EIR are necessary and that that preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate. Like the 2040 General Plan update, the Housing Element update does not include any development proposal or approval and future development of any specific housing site would be subject to additional environmental review pursuant to CEQA Guidelines Section 15168(c).

1.7 Discretionary Action

Implementation of the Housing Element would require the following discretionary actions by the City of St. Helena City Council:

- Approval of an Addendum to the General Plan EIR
- Adoption of the updated Housing Element and Public Health, Safety, and Noise Element

In addition to the above-mentioned actions, future amendments to the St. Helena Municipal Code (SHMC) consistent with the implementing programs of the updated Housing Element would also be adopted by the City Council.

The California Department of Housing and Community Development reviews the proposed Housing Element in accordance with California law. No other review by outside public agencies is required.

1.8 Prior Environmental Document(s)

The City of St. Helena General Plan 2040 Final EIR, State Clearinghouse Number 2010042001.

1.9 Location of Prior Environmental Document(s)

The location and custodian of the City of St. Helena General Plan 2040 EIR is the City of St. Helena Planning Department, 1088 College Avenue St. Helena, CA 94574. A copy of the EIR also is available online at the City of St. Helena website: https://www.cityofsthelena.org/planning/page/2040-general-plan-update

2 Project Context

The project consists of a comprehensive update to the Housing Element of the St. Helena General Plan and update to the existing Public Health, Safety, and Noise Element of the General Plan (collectively referred to as "project"). These elements are a part of the St. Helena General Plan, which is a long-term document with text and diagrams that express the goals, objectives, and policies necessary to guide the community toward achieving its vision over approximately 20 years (i.e., 2040).

2.1 St. Helena General Plan

California law requires that each city and county in California adopt "a comprehensive, long-term general plan," the purpose of which is to plan for important community issues such as new growth, housing needs, and environmental protection. Furthermore, the General Plan is used to project future demand for services such as sewer, water, roadways, parks, and emergency services. A General Plan is only successful when it reflects the priorities and values of the community and is a key tool for influencing quality of life.

City of St. Helena decision-makers (e.g., City Council and Planning Commission), rely on the General Plan as the basis for making decisions on matters such as land use and the provision of public facilities (e.g., roads, parks, fire stations). It is also a policy document that guides decisions related to protecting, enhancing, and providing those things that the community values most, such as open space, habitat conservation, economic development, and protecting the character of the community.

California law requires that every general plan, at a minimum, address certain subject categories (called "elements"), which include land use, circulation, housing, conservation of natural resources, open space, noise, safety, and environmental justice. A general plan may also address other subjects that are of importance to the community's future, such as sustainability, community design, and public art. St. Helena's adopted General Plan includes the following elements which address all state-mandated elements with additional policies and actions to address Environmental Justice issues:

- Land Use and Growth Management
- Economic Sustainability
- Public Facilities and services
- Circulation
- Historic Resources
- Open Space and Conservation
- Public Health, Safety, and Noise
- Climate Change
- Housing
- Parks and Recreation
- Arts, Culture, and Entertainment

2.1.1 Housing Element

2.1.1.1 Purpose of the Housing Element

The Housing Element of the General Plan is designed to provide the City of St. Helena with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. A priority of both state and local governments, Government Code Section 65580 states that "the availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order."

Pursuant to the state law, the Housing Element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs
2. To provide a strategy that establishes housing goals, policies, and programs

The Housing Element is one of the eight General Plan elements the state mandates in Government Code Section 65302. The Housing Element serves as an integrated part of the General Plan but is updated more frequently to ensure its relevancy and accuracy. The City of St. Helena's current Housing Element, adopted in 2015, identifies strategies and programs that focus on:

1. Conserving and improving existing affordable housing
2. Maximizing housing opportunities throughout the community
3. Assisting in the provision of affordable housing
4. Removing governmental and other constraints to housing investment
5. Promoting fair and equal housing opportunities

The residential character of St. Helena is largely determined by the variety, location, and maintenance of its housing. The Housing Element is an official response to the need to provide housing for all economic segments of the population, establishing goals, policies, and programs that will guide the City of St. Helena decision making and set forth an action plan to implement these housing programs through an established planning period.

2.1.1.2 Updates to the Housing Element

State law requires that housing elements be updated every eight years (California Government Code Section 65588). The Housing Element must identify residential sites adequate to accommodate a variety of housing types for all income levels and to meet the needs of special population groups as defined under state law (California Government Code Section 65583). The Housing Element analyzes market and governmental constraints to housing maintenance, improvement, and development; addresses conservation and improvement of the condition of existing affordable housing stock; and outlines policies that promote housing opportunities for all persons.

The previous Housing Element covered an eight-year planning period (January 31, 2015 through January 31, 2023), Government Code Section 65588(e).

The City of St. Helena Housing Element is now being revised as part of the 6th cycle of updates, the period of which runs from January 31, 2023 through January 31, 2031. Therefore, this update is referred to as the "Housing Element update."

The 2023-2031 Housing Element would bring the Element into compliance with California law enacted since the City's adoption of the 2015-2023 Housing Element and with the current Association of Bay Area Governments' (ABAG's) RHNA. The 2023-2031 Housing Element includes the following components, as required by California law:

- An assessment of the City's population, household, and housing stock characteristics, existing and future housing needs by household types, and special needs populations.
- An analysis of resources and constraints related to housing production and preservation, including governmental regulations, infrastructure requirements and market conditions such as land, construction, and labor costs as well as restricted financing availability.
- Identification of the City's quantified objectives for the 2023-2031 RHNA and inventory of sites determined to be suitable for housing.
- Opportunities for Conservation in Residential Development: California law requires cities to identify opportunities for energy conservation in residential development.
- Review of the 2015-2023 Housing Element to identify progress and evaluate the effectiveness of previous policies and programs.
- A Housing Plan to address the City's identified housing needs, including housing goals, policies, and programs to facilitate the 2023 Housing Element update (6th Cycle).

2.1.1.3 Changes in California Law

The following items represent substantive changes to California law since the City's last Housing Element was adopted and certified in 2015. The Housing Element update incorporated and addressed all pertinent housing law changes.

- Affordable Housing Streamlined Approval Process: Senate Bill (SB) 35 (2017)
- Additional Housing Element Sites Analysis Requirements: Assembly Bill (AB) 879 (2017) and AB 1397 (2017)
- Affirmatively Furthering Fair Housing: AB 686 (2017)
- No-Net-Loss Zoning: SB 166 (2017)
- Safety Element to Address Adaptation and Resiliency: SB 1035 (2018)
- By Right Transitional and Permanent Supportive Housing: AB 2162 (2018) and B 101 (2019)
- Accessory Dwelling Units: AB 2299 (2016), SB 1069 (2016), AB 494 (2017), SB 229 (2017), AB 68 (2019), AB 881 (2019), AB 587 (2019), SB 13 (2019), and AB 671 (2019)
- Density Bonus: AB 1763 (2019)
- Housing Crisis Act of 2019: SB 330
- Surplus Land Act Amendments: AB 1486 and AB 1255 (2019)
- Housing Impact Fee Data: AB 1483 (2019)
- Emergency and Transitional Housing Act of 2019: AB 139 (2019)
- Standardization of Sites Inventory Analysis and Reporting: SB 6 (2019)

2.1.1.4 Regional Housing Needs Assessment and Required Buffer

The Housing Element must address the City's fair share of the regional housing need (as determined by ABAG) and specific California statutory requirements. It must also reflect the vision and priorities of the local community. As of December 2021, ABAG determined a final RHNA Allocation of 256 units for the City of which 162 must be affordable to lower-income households, as shown in Table 1.

Table 1 City of St. Helena Regional Housing Needs Allocation

	Income Category (Percent of Napa County Area Median Income)				
	Very Low (<50%)	Low (50-80%)	Moderate (80-120%)	Above Moderate (>120%)	Total Housing Units
RHNA Housing units	104	59	26	67	256
RHNA + 20% Buffer	121	71	31	79	302

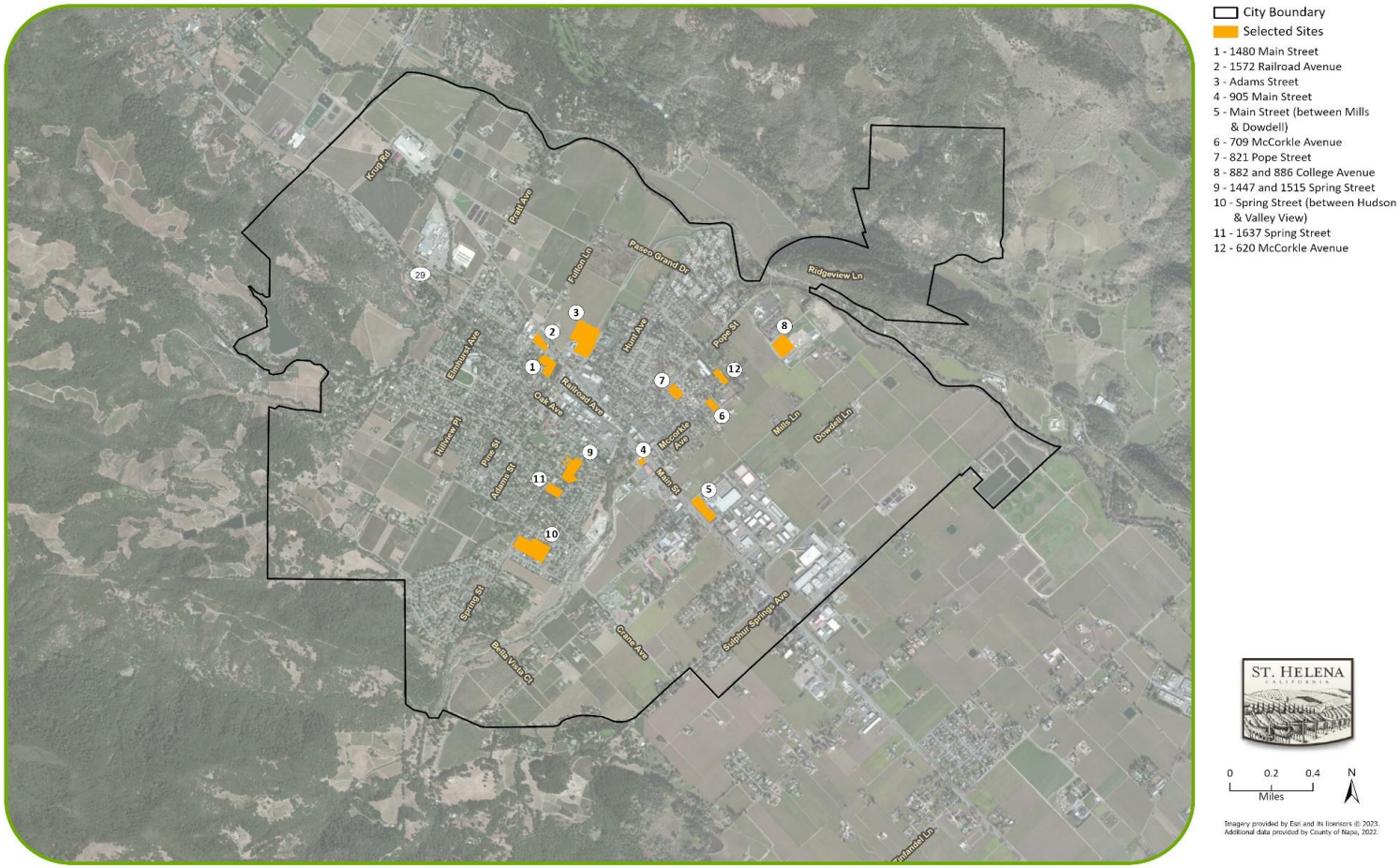
California law requires local jurisdictions to identify enough future housing sites inventory to not only cover the jurisdiction's 6th Cycle RHNA, but to also provide for an additional buffer capacity above the RHNA. The buffer capacity is required to accommodate realistic production rates of affordable housing units. Additionally, the buffer can allow for instances when a smaller residential project must be considered for a given property or when existing units are demolished. The "No Net Loss" Law (Government Code Section 65863) requires maintenance of sufficient sites to meet the RHNA for all income levels throughout the planning period. With this required buffer, the number of housing units identified in the Housing Element is 307.

To meet the objectives of the RHNA and provide sufficient capacity for housing development, the Housing Element identifies sites for residential development. The Housing Element update identifies some sites for land use changes either to be consistent with the existing Land Use Element or to permit or increase residential uses on the sites. However, neither the Housing Element nor the City itself develops housing. Moreover, as described in further detail in Section 5, *Addendum Methodology*, below, the Housing Element update, in and of itself, does not itself implement land use changes, but puts forth goals and policies that support housing efforts. As described in the Housing Element update, the City's RHNA can be accommodated in the following categories:

- Vacant or underutilized sites, where new residential units can be developed under current General Plan regulations;
- Sites to be rezoned to permit residential uses or permit them at a high density
- Planned or pending projects where no rezoning is required; and
- Current accessory dwelling units, also known as "granny flats"

Figure 3 shows the locations of the vacant and underutilized sites identified in sites inventory in the Housing Element update. All sites in the housing sites inventory are within the City's limits.

Figure 3 Housing Element Sites Inventory Locations – Vacant and Underutilized (Nonvacant) Sites



2.1.1.5 Zoning and General Plan Amendments

The project would involve an amendment to the City's Zoning Ordinance to rezone existing land use designations to Mixed-Use, Medium Density Residential, and High Density Residential. Some existing sites are designated as land uses other than a residential land use category and would be rezoned to mixed-use or residential land use categories. Select sites would be upzoned from existing residential land use categories to more dense residential land use categories. Most of these sites are located in the central areas of the City to reflect the intensity of existing nearby higher density parcels. Future development of those sites would require separate CEQA review and compliance with local development standards.

Due to the proposed zoning modifications on particular Draft Housing Element vacant and underutilized sites, a General Plan Amendment would be required to change the land use designations on those sites to be consistent with the zoning.

2.1.2 Public Health, Safety, and Noise Element

The Safety element is one of the eight General Plan elements the state mandates in Government Code Section 65302. The project includes revisions to the Public Health, Safety, and Noise Element which identifies forces of nature and events resulting from human action that have the potential to cause harm to life and property in the City. The goal of a Safety Element is to reduce the potential short and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards. Identifying the source of such threats allows decision-makers to take preemptory action to minimize the damage, particularly as it relates to new development. The Public Health, Safety, and Noise Element also addresses noise, fire and police protection, hazardous materials, solid waste, and public utility systems. A climate change vulnerability assessment identifying potential impacts from climate change on vulnerable populations and natural and built assets in St. Helena was also conducted for the Public Health, Safety, and Noise Element update.

California law requires specific changes to a safety element when the municipality undergoes an update to the Housing Element. The Public Health, Safety, and Noise Element update includes revisions to be consistent with California law through the following actions:

- Identify and propose policies for residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation routes.
- Update information relating to flood and fire hazards and city assets at risk due to climate change vulnerability.
- Propose and strengthen policies related to risk reduction, emergency preparedness and evacuation, and community and facility resilience infrastructure and strategies.
- Propose additional policies to address climate change hazards, including extreme heat days, extended drought, increased precipitation, and worsening air quality such as investing in backup power sources, funding for weatherization of homes, and providing cooling centers.

2.1.2.1 Changes in State Law

The following represent bills passed by the California State Legislature and approved by the Governor that require substantive changes to a Safety Element when a municipality undergoes an update. The Safety and Community Services Element update has incorporated and addressed all pertinent safety element law changes.

- Residential Emergency Evacuation Routes: SB 99 (2019)
- Evacuation Routes: AB 747 (2019)
- General Plans: SB 1035 (2018)
- Climate Change Adaptation: SB 379 (2015)
- Integration of Local Hazard mitigation Plan: AB 2140 (2006)
- Seismic and Geologic Hazards: SB 926 (2004)
- Flood Mapping: AB 162 (2007)

2.1.3 2040 General Plan EIR

The 2040 General Plan update EIR addressed the potential environmental effects (direct and indirect) of the planned buildout of St. Helena through the year 2040 and concluded that implementation of the General Plan would result in levels of environmental impacts as detailed in Table 2.

Table 2 Summary of Areas of Potential Impact under the 2040 General Plan Update EIR

Issue Area	Highest Level of Impact	Mitigation Proposed in the General Plan EIR
Aesthetics	Less than significant	None
Agricultural Resources	Significant and Unavoidable	None
Air Quality	Significant and Unavoidable	Mitigation Measures AQ-1, AQ-2, AQ-3, AQ-4, AQ-5, and AQ-6
Biological Resources	Less than significant	None
Cultural, Historic, and Tribal Cultural Resources	Less than significant	None
Energy, Greenhouse Gases, and Climate Change	Significant and Unavoidable	Mitigation Measure GHG-1
Geology, Soils, and Seismicity	Less than significant	None
Hazards and Hazardous Materials	Less than significant	None
Hydrology and Water Quality	Less than significant	HYDRO-1
Land Use, Population, and Housing	Less than significant	None
Noise	Significant and Unavoidable	Mitigation Measure NO-1
Public Services and Recreation	Less than significant	None
Transportation and Traffic	Significant and Unavoidable	Mitigation Measures TR-1, TR-2, TR-3, TR-4, TR-5, and TR-6
Utilities and Service Systems	Less than significant	None

The General Plan has an approximate year 2040 horizon, but actual buildout of all planned land uses may occur earlier or later, as long-range demographic and economic trends are difficult to accurately predict. The designation within the proposed General Plan of a site for a certain use does not necessarily mean that the site will be developed or redeveloped with that use during the planning period, as most development will depend on property owner initiative and market conditions.

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3 Overview of CEQA Guidelines Section 15164

Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when changes are proposed to a project that has a previously certified EIR. When considering the need for additional environmental review, the fundamental determination a lead agency must make is whether the previously certified EIR retains some informational value or whether changes in the project or circumstances have rendered it wholly irrelevant. If the previously certified EIR has continuing informational value, the lead agency then must determine whether the proposed changes in the Project requires additional environmental review under Public Resources Code Section 21166 and CEQA Guidelines Section 15162.

CEQA Guidelines Section 15164 provides that a lead agency will prepare an addendum to a previously certified EIR if some changes or additions are necessary, but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. CEQA Guidelines section 15162(a) states that no Subsequent or Supplemental EIR may be prepared for a project with a certified EIR unless the lead agency determines, based on substantial evidence in the light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
   A. The project will have one or more significant effects not discussed in the previous EIR.
   B. Significant effects previously examined will be substantially more severe than shown in the previous EIR.
   C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
   D. Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The analysis pursuant to Section 15162 demonstrates whether the lead agency can approve the activity as being within the scope of the existing certified EIR, that an addendum to the existing EIR would be appropriate, and no new environmental document, such as a new EIR, would be required. The addendum need not be circulated for public review but can be included in or attached to the

final EIR, and the decision-making body shall consider the addendum with the final EIR prior to deciding on the project.

The City of St. Helena prepared this Addendum, pursuant to CEQA Guidelines Sections 15162 and 15164, to evaluate whether the project's environmental impacts are covered by and within the scope of the General Plan Final EIR). The following Addendum details any changes in the project, changes in circumstances under which the project is undertaken, and/or "new information of substantial importance" that may cause one or more significant effects to environmental resources.

The responses herein substantiate and support the City of St. Helena's determination that the potential environmental impacts of the Housing Element update and Public Health, Safety, and Noise Element update policies and programs are within the scope of the General Plan EIR, do not require subsequent or supplemental environmental review under CEQA Guidelines Section 15162 and, in conjunction with the EIR, preparation of an Addendum pursuant to CEQA Guidelines Section 15164 is appropriate.

4 Environmental Effects & Determination

4.1 Environmental Areas Determined to Have New or Substantially More Severe Significant Effects Compared to Those Identified in the Previous EIR

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in Project, change in circumstances, or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

■ None

□ Aesthetics	□ Agricultural Resources	□ Air Quality
□ Biological Resources	□ Cultural, Historic, and Tribal Cultural Resources	□ Energy, Greenhouse Gases, and Climate Change
□ Geology, Soils, and Seismicity	□ Hazards & Hazardous Materials	□ Hydrology and Water Quality
□ Land Use, Population, and Housing	□ Noise	□ Public Services and Recreation
□ Transportation and Traffic	□ Utilities and Service Systems	

4.2 Determination

Based on this analysis, the 2040 General Plan EIR has continuing informational value and:

□ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

- No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the preparation of an Addendum to the previously certified EIR (City of St. Helena, 2040 General Plan Environmental Impact Report (2040 General Plan EIR State Clearinghouse Number 2010042001, dated October 2018) is adequate and appropriate.

Signature	April 24, 2023 Date
Maya DeRosa Printed Name	Community Development Director Title

5 Addendum Methodology

5.1 2040 General Plan Consistency

To promote a uniform and compatible vision for the development of the community, California law requires the General Plan be internally consistent in its goals and policies. The Housing Element and the Public Health, Safety, and Noise Element are components of the General Plan, and thus, the Housing Element update and Public Health, Safety, and Noise Element update must be consistent with the vision of the General Plan and supported by goals and policies of the other General Plan elements. General Plan elements and policies that affect housing are summarized below:

The **Land Use and Growth Management Element** directs the location, amount, and type of residential development in St. Helena. It presents the desirable pattern for the ultimate development of the city and reflects the community's evolution and changing demographics over the General Plan horizon. The Land Use Plan details the location and the density of development allowed throughout the city.

The **Community Design Element** guides the form, character, and appearance of the community to preserve the city's history and character in future commercial, industrial, and residential development.

The **Circulation Element** defines a safe, efficient, and adequate circulation system in St. Helena that responds to all circulation needs. Circulation means the actual physical circulation system consisting of freeways, streets, bicycle routes, sidewalks, and trails, as well as modes of transportation, including cars, buses, trucks, trains, bicycles, ridesharing, and walking.

The **Open Space and Conservation Element** and **Parks and Recreation Element** establish goals and polices to protect sensitive resources from development impacts; maintain and improve appropriate access to open space; and ensure park and recreation opportunities are sufficient to meet the needs of future residents.

The **Economic Sustainability Element** establishes goals and policies to guide city efforts to maintain an economically viable community, including providing a range of housing and employment opportunities that meet the needs of residents and workers alike, that attract families and businesses to create demand for planned land uses, and that establish and fund public service levels to preserve St. Helena's quality of life.

The **Climate Change Element** directs the City's response to and plans for climate change by addressing energy and water conservation, renewable energy production, transportation, sustainable business development, and reduction of climate change impacts in the city.

5.2 Accommodation of the RHNA

The City's RHNA for the current planning period is 256 units, which includes 162 very low and low-income housing units, 26 moderate income housing units, and 68 above moderate housing units. The City must demonstrate the availability of sites with appropriate zoning and development standards that can facilitate and encourage the development of such units. As shown in Table 3, the City anticipates the development of 72 accessory dwelling units (ADUs) during the eight-year planning period and 93 units would be accommodated from planned and approved (pipeline)

projects, which can count towards the RHNA. A total of 307 units were identified on vacant and nonvacant sites under the existing General Plan land uses, as well as on sites requiring rezoning under Program H-A.

Although the housing sites inventory has been identified for future planning purposes as part of the Housing Element update, the adoption of the Housing Element itself does not change the current zoning or General Plan designations of the properties. California Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the start of the Housing Element planning period to rezone sites, including adoption of minimum density and development standards. Therefore, the City's rezoning program, which is identified as Program H-A of the Housing Element update, would be a separate project and evaluated in accordance with CEQA at the time of its review. Prior to the approval of any changes in land use, the City would evaluate the potential environmental impacts from the rezoning or change in land use.

Table 3 Housing Unit Yield per Site Category

Site Category/Approach	Very Low/Low	Moderate	Above Moderate	Total
RHNA plus buffer	**192**	**31**	**79**	**302**
Vacant or underutilized parcels	203	69	35	307
Planned or Pending Projects, no rezone	4	1	88	93
Accessory Dwelling Units	0	0	72	72
Total	**207**	**70**	**195**	**472**
RHNA Surplus	***(15)***	***(39)***	***(116)***	***(171)***

As shown in Table 3, existing vacant or underutilized residentially zoned properties, planned, and pending projects that require no zone change, and accessory dwelling units would yield four very low and low income housing units under current conditions. Therefore, the City of St. Helena needs to account for the additional 188 very low and low income housing units through a combination of the remaining approaches. The 188 very low and low income housing units fall within the projected horizon year buildout and housing unit assumptions addressed in the General Plan and General Plan EIR.

5.3 Consistency with Horizon Year 2040 Projections

The General Plan EIR reports that in 2018 there were 2,735 existing housing units in St. Helena and predicts that by horizon year 2040, St. Helena will have 3,067 units (Chapter 2, Project Description), assuming an addition of 332 new housing units citywide between 2018 and horizon year 2040. As discussed above, the City of St. Helena's RHNA for the current planning period is 256 units. In addition, the Housing Element includes a required buffer which plans for a total of approximately 302 units during the planning period. Including the pending and approved projects, ADU trends, and vacant and nonvacant sites, the Site Inventory would accommodate approximately 472 units as shown in Table 3 which would exceed the 332 units by an additional 140 units. Therefore, additional environmental analysis would be required prior to the implementation of the rezoning program identified as Program H-A in the Housing Element.

5.4 Preliminary Environmental Considerations

The Housing Element update, in and of itself, does not propose specific development projects, but rather puts forth goals, policies, and programs that support housing efforts in St. Helena. Each future housing development project and housing program adopted in the Housing Element would be subject to separate review to determine potential impacts on the environment related to each project as potential impacts are location-specific and cannot be assessed in a meaningful way until a project site and development proposal are identified. When a specific development proposal is considered for approval, that project would be subject to adopted development guidelines and standards and be required to incorporate applicable mitigation measures and alternatives developed in the 2040 General Plan EIR certified in 2019 (in accordance with CEQA Guidelines Section 15168(c)(3)). If a subsequent activity (in this case a specific development proposal) would have effects not identified in the program EIR (the 2040 General Plan EIR and this Addendum), the lead agency must prepare additional CEQA documentation.

Similarly, the goals, policies and programs in the updated Public Health, Safety, and Noise Element, in and of themselves, do not propose specific projects that result in a physical change to the environment. Should a project associated with implementation of the Public Health, Safety, and Noise Element have the potential to result in a physical change in the environment, it would be subject to separate review under CEQA.

This Addendum Evaluation, therefore, includes the analysis of the changes and potential impacts related to the adoption of Housing Element and Public Health, Safety, and Noise Element updates. No physical development or changes in land use are addressed or evaluated. The City would analyze any future development or changes in land use separate from the adoption of the Housing Element. This Addendum Evaluation is intended to demonstrate the project's consistency with the existing St. Helena 2040 General Plan update Final EIR to satisfy the requirements of CEQA. In particular, and pursuant to Public Resources Code Section 21083.3, this Addendum Evaluation assesses whether the updated Housing Element and Public Health, Safety, and Noise Element, as a policy and programs document, includes impacts not addressed or analyzed as significant effects in the St. Helena 2040 General Plan update Final EIR.

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6 Addendum Evaluation

6.1 Aesthetics

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the General Plan update:							
a. Have a substantial adverse effect on a scenic vista?	Less than Significant	None	No	No	No	Yes	Yes
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant	None	No	No	No	Yes	Yes
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	Less Than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Aesthetics Findings

The 2040 General Plan EIR determined that impacts to aesthetic resources would be less than significant for scenic vistas, scenic highways, visual quality, and light and glare (Section 3.1, *Aesthetics*). It further stated that individual development projects would be subject to project-specific development and planning review, including adherence to goals and policies in the Land Use and Growth Management Element and Community Design Element related to urban design and visual quality. As such, all projects proposed under General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning aesthetic resources such as those that address architectural design, lighting, landscaping, building setbacks, and visual compatibility.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the time a Housing Element is adopted to rezone sites, including adoption of minimum density and development standards. The City would evaluate any proposed land use changes for potential environmental impacts prior to approval of the proposed land use change. Furthermore, future development proposals could be subject to further environmental analysis, pursuant to CEQA Guidelines Section 15168(c) and as required by state law, to evaluate potential impacts specific to that proposal.

Because it is a policy document, the Housing Element update would not, in and of itself, result in impacts to scenic vistas, scenic resources, or visual character, and would not create new sources of substantial light or glare which adversely affects views. The sites are located on vacant as well as non-vacant properties such as those with existing buildings or vineyards. However similar to the analysis within the 2040 General Plan EIR, any individual development projects consistent with the Housing Element would be subject to project-specific development and planning review, including adherence to goals and policies in the Land Use and Growth Management Element and Community Design Element related to urban design and visual quality. As such, all projects proposed under the Housing Element implementation would be required to conform to zoning, design standards, and other regulations concerning aesthetic resources such as those that address architectural design, lighting, landscaping, building setbacks, and visual compatibility.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. None of the implementation items would cause impacts to scenic vistas or resources or directly develop new structures which would impact views and create substantial glare. Any potential updates to structures to mitigate potential risks to wildfire or other climate safety hazards would be subject to project-specific development and planning review, including adherence to goals and policies in the Land Use and Growth Management Element and Community Design Element related to urban

design and visual quality. Therefore the Public Health, Safety, and Noise Element update would not result in significant adverse impacts related to aesthetics.

Conclusion

Based on the analysis above, the project would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR and no additional environmental assessment of aesthetics is required.

6.2 Agricultural Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Significant and Unavoidable	None	No	No	No	Yes	Yes
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	Less than Significant	None	No	No	No	Yes	Yes
c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Agricultural Resources Findings

The 2040 General Plan EIR determined that there would be significant and unavoidable impacts to agricultural resources (Section 3.2, Agricultural Resources). The EIR found that implementation of the 2040 General Plan could result in the loss of up to 118 acres of land identified as Important Farmland, including Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. The 2040 General Plan EIR found the loss of farmland is not directly mitigable, without preventing development altogether. No feasible mitigation measures were identified for agricultural land conversion that would fulfill the objectives of and implement the 2040 General Plan update. Therefore, and implementation of the plan would result in significant and unavoidable impacts to Important Farmlands.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the time a Housing Element is adopted to rezone sites, including adoption of minimum density and development standards. .

The General Plan goals and policies support continued farming and restrict uses that would interfere with farming and open space uses in certain areas. Most of the sites identified within the Housing Element update are located on sites with existing development and on sites zoned for residential or commercial uses. The Housing Element update includes one site identified for housing which is located on prime farmland. However, the site has a land use designation of Public and Quasi-Public and housing development would not result in any more severe impacts to agricultural resources than were a public facility developed on the site as currently shown in the General Plan. In addition, the 2040 General Plan EIR determined that there would be significant and unavoidable impacts to farmland (Section 3.2, Agricultural Resources). Therefore, the Housing Element update would not result in new or more severe impacts than those identified in the General Plan EIR. .

There would also be no new impacts to Williamson Act contracts, as none of the identified sites in the sites inventory are under Williamson Act contract.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. These updates would not convert existing farmland or forested land and would not impact any land under Williamson Act contract. Therefore, the Public Health, Safety, and Noise Element update would have no impact related to agricultural resources.

Conclusion

The Housing Element Update does not propose the development on housing on any areas of the City not already analyzed for development in the 2040 General Plan EIR. The Public Health, Safety, and Noise Element update would update information and goals, policies, and objectives to be consistent with the State legislation and would not change growth assumptions or buildout assessed

in the 2040 General Plan EIR. Therefore, the project would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR and no additional environmental assessment of agricultural resources is required.

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6.3 Air Quality

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant	None	No	No	No	Yes	Yes
b. Violate air quality standards or contribute substantially to an existing or projected air quality violation?	Significant and Unavoidable	AQ-1, AQ-2, and AQ-3	No	No	No	Yes	Yes
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	AQ-1, AQ-2, and AQ-3	No	No	No	Yes	Yes
d. Expose sensitive receptors to substantial pollutant concentrations?	Less than significant with Mitigation	AQ-4, AQ-5, and AQ-6	No	No	No	Yes	Yes
e. Create objectionable odors affecting a substantial number of people?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Air Quality Findings

As discussed under in Section 3.3, *Air Quality,* of the 2040 General Plan EIR, impacts related to consistency with applicable air quality plans would be less than significant. The 2040 General Plan would support the goals of Bay Area Air Quality Management District's (BAAQMD's) 2017 Clean Air Plan, include all applicable control measures, and would not conflict with its implementation.

The 2040 General Plan EIR concluded that impacts related to criteria pollutants would be significant and unavoidable. Construction emissions associated with a potential level of annual development that is consistent the General Plan's 2040 growth projections could result in reactive organic gas (ROG), NO_x, CO, and particulate matter (PM) emissions construction activity that exceeds BAAQMD-recommended CEQA significance thresholds. All other potential construction emissions would be below BAAQMD-recommended CEQA significance thresholds. In addition, maximum daily operational emissions associated with potential 2040 growth under the General Plan would result in ROG and PM_{10} emissions that could exceed BAAQMD-recommended CEQA significance thresholds. All other potential operational emissions would be below BAAQMD-recommended CEQA significance thresholds. To reduce impacts related to air quality emissions of criteria air pollutants, the 2040 General Plan EIR required implementation of Mitigation Measures AQ-1, AQ-2, and AQ-3 which would reduce ROGs from architectural coating, and PM from construction, as well require all development with the potential to create point-source air quality impacts to receive BAAQMD review prior to approval. In addition, any development under the 2040 General Plan would be required to comply with all applicable air quality plans, California Air Resources Board (CARB) and BAAQMD regulations, Title 24 energy efficiency standards, and policies within the 2040 General Plan aimed at reducing air pollution emissions. However, because the detail of future projects under the General Plan cannot be known, the 2040 General Plan EIR concluded impacts would be significant and unavoidable.

Mitigation Measure AQ-1: Require construction projects in the City of St. Helena to implement best management practices (BMPs) to reduce fugitive dust emissions. BMPs may include:

- Watering all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) three times per day using recycled water.
- Covering all haul trucks transporting soil, sand, or other loose material.
- Removing all visible mud or dirt track-out onto adjacent public roads using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- Limiting all vehicle speeds on unpaved roads to 15 mph.
- Completing all roadways, driveways, and sidewalks to be paved as soon as possible. Laying building pads soon as possible after grading unless seeding or soil binders are used.
- Minimizing idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- Maintaining and properly tuning all construction equipment in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper working condition prior to operation. • Staging construction equipment as far as possible from existing sensitive receptors (away from the southeast property line and surrounding residences).

- Posting a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
- Where warranted, the project sponsors shall incorporate the following language into construction specifications if significant risk is anticipated based on design level construction schedule, duration and concurrent construction activities:
- Powering portable equipment by electricity if available or if electricity is not available, using propane or natural gas if feasible. Diesel engines shall only be used if electricity is not available and it is not feasible to use propane or natural gas.
- Ensuring that all mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days continuously or 20 hours cumulative meets, at a minimum, U.S. EPA particulate matter emissions standards for Tier 2 engines or equivalent and be equipped with diesel particulate matter filters that meet CARB-certified Level 2 or 3 Diesel Particulate Filters. Alternatively-fueled equipment (i.e., non-diesel) would meet this requirement.

Mitigation Measure AQ-2: Require that applicants proposing development of projects within the City of St. Helena require contractors, as a condition of contract, to reduce construction-related fugitive ROG emissions by ensuring that low-volatile organic compounds (VOC) coatings that have a VOC content of 10 grams/liter (g/L) or less be used during construction. All project applicants shall submit evidence of the use of low-VOC coatings to BAAQMD prior to the start of construction.

Mitigation Measure AQ-3: Require all development applications with the potential to create point-source air quality impacts be referred to the Bay Area Air Quality Management District (BAAQMD) for review and comment to ensure compliance with BAAQMD requirements prior to approval of the project.

Mitigation Measure AQ-4: Require development projects to meet CARB setback recommendations from air contaminant sources for sensitive uses, or conduct specific air quality and health risk impact analyses and identify project specific mitigation measures.

Mitigation Measure AQ-5: To protect sensitive receptors require discretionary projects in proximity to Highway 29, Silverado Trail and the Rail Corridor to include an analysis of mobile source toxic air contaminant health risks. The analysis, if necessary, shall identify feasible mitigation measures to reduce health risks to acceptable levels.

Mitigation Measure AQ-6: All applicants proposing development of projects within 1,000 feet of existing sensitive receptors, as defined by BAAQMD, shall prepare a site-specific construction health risk assessment (HRA) taking into account both project-level and cumulative health risks (including existing toxic air contaminant sources). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project level and cumulative thresholds (as appropriate), then additional mitigation would be unnecessary. However, if the HRA demonstrates that health risks would exceed BAAQMD project-level and/or cumulative thresholds (as appropriate), additional feasible on- and offsite mitigation shall be analyzed by the applicant to help reduce risks to the greatest extent practicable.

The 2040 General Plan EIR determined that impacts to sensitive receptors regarding pollutant concentrations by the General Plan would be less than significant. Although implementation of the General Plan could result in new sensitive residential receptors and new non-residential land uses that would potentially be emissions sources, permitted stationary sources in St. Helena are primarily located in commercial or semi-rural areas while most of the sensitive receptors, such as schools, residences, and retirement homes, are located in the downtown area of the city. In addition, individual development projects would be evaluated through the BAAQMD permit process and the CEQA process to identify and mitigate any significant exposures. Implementation of Mitigation Measures AQ-1 through AQ-6 would reduce potential impacts to sensitive receptors to less than significant.

Buildout under the General Plan would not cause or significantly contribute to CO concentrations that exceed State or federal ambient air quality standards for CO. Regulatory mechanisms, including asbestos National Emission Standards for Hazardous Air Pollutants regulations for demolition and renovation outlined in BAAQMD Regulation XI, Rule 11-2, would ensure impacts from asbestos containing materials present during demolition of existing structures would be less than significant. Heath risks associated with receptor exposure to Diesel Particulate Matter (DPM) would be less than significant because the use of off-road heavy-duty diesel equipment would be temporary and would combine with the highly dispersive properties of DPM, additional reductions in exhaust emissions would occur in the future, and construction-related activities would be short-term, incremental through time, and would occur at scattered locations throughout the city such that an individual receptor location would not be exposed to DPM exposure for a prolonged period of time. However, without specific details on the locations of building footprints or their construction schedules, a quantitative evaluation of potential health risk impacts is not possible. Mitigation Measures AQ-1, AQ-4, AQ-5, and AQ-6 would mitigate air quality impacts from construction to reduce health related impacts.

The 2040 General Plan EIR determined impacts related to objectionable odors affecting a substantial number of people would be less than significant.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Government Code Section 65583 (c)(1)(A) states that cities have up to three years from the time a Housing Element is adopted to rezone sites, including adoption of minimum density and development standards.

While potential air quality-related impacts of future projects cannot be assessed in a meaningful way until the project site and development design is known, including the number of units, potential number of residents, and potential vehicle miles traveled, operational impacts would be addressed by provisions in the General Plan, the Green Building Code, and other regulations and standards that govern air quality in St. Helena. Short-term air quality impacts resulting from construction of the sites, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers would be subject to BAAQMD rules and protocols Further General Plan goals

and policies support reduction of air quality impacts. Mitigation measures identified in the General Plan EIR will be implemented to help reduce impacts to the greatest extent possible. These measures would remain in practice with implementation of the Housing Element update.

Consistent with buildout under the 2040 General Plan, implementation of the proposed Housing Element update could contribute to impacts related to criteria pollutants. Annual development under the Housing Element update could increase construction emissions from indirect land use changes. Potential impacts caused by more development would be reduced through implementation of Mitigation Measures AQ-1 through AQ-6 identified in the General Plan EIR. However, impacts would remain significant and unavoidable even with implementation of mitigation, the same as impacts identified in the General Plan EIR. Implementation of the proposed Housing Element update could impact sensitive receptors. However, the Housing Element update does not proposed new land use changes which would place new sensitive receptors in areas with emission sources.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update would not directly result in development or activities that would generate air pollutants, cause an increase in VMT, or generate objectionable odors. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would not allow for more housing units or increase projected growth forecasts in the city. In addition, the updates would be subject to all applicable air quality plans, CARB and BAAQMD regulations, Title 24 energy efficiency standards, and policies within the 2040 General Plan aimed at reducing air pollution emissions. Therefore, the Public Health, Safety, and Noise Element update would have less than significant impacts related to air quality.

Conclusion

Based on the above, the Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

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6.4 Biological Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the Housing Element update:							
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant	None	No	No	No	Yes	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant	None	No	No	No	Yes	Yes
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than significant	None	No	No	No	Yes	Yes
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant	None	No	No	No	Yes	Yes
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	No Impact	None	No	No	No	Yes	Yes

2040 General Plan EIR Biological Resources Findings

The 2040 General Plan EIR determined that impacts to biological resources would be less than significant for effects to listed species or their habitats, loss of significant populations of sensitive species, protected wetlands, wildlife migration or movement corridors, local policies or ordinances protecting biological resources, or conflicts with conservation plans and habitat management plans and habitat groups identified therein (Chapter 3.4 Biological Resources). Individual development projects would be subject to project-specific development and planning review. As such, all projects proposed under General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning the protection of biological resources, including listed species, habitats, and all planning resources designed to protect and conserve these resources. Furthermore, future development would be required to comply with State and federal law and policies within the Open Space Element of the General Plan that protect biological resources. The General Plan is consistent with the SHMC and Open Space and Conservation Element policies and standards for tree preservations. The General Plan does not include any policies that would interfere with the Pacific Gas & Electric (PG&E) Habitat Conservation Plan for PG&E facilities, rights-of way, buffer lands, owned lands and easements, access routes and mitigation areas.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan that identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031).

Most sites identified in the sites inventory are located in previously developed areas with limited potential for disruption to undeveloped habitat areas, including sites that have previously been developed or infill sites in well developed areas. The sites inventory also includes vacant sites, although these sites have been previously disturbed and are in proximity to developed areas. Consistent with the 2040 General Plan EIR, the project would not adversely affect biological resources, including special-status species, riparian habitats or wetlands, or migratory species and wildlife corridors, to a greater extent than buildout under the General Plan, and impacts would remain less than significant. Build out under the Housing Element update would be subject to all applicable requirements of the SHMC and Open Space and Conservation Element policies as well as the PG&E Habitat Conservation Plan for PG&E facilities, rights-of way, buffer lands, owned lands and easements, access routes and mitigation areas.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. Policies contained within the update include vegetation management and maintenance and debris removal in stream channels that are designed to mitigate wildfire, erosion, and flood risk. These policies also stipulate that such activities must use best practices to protect wildlife and habitat. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review, including zoning, design standards, and other regulations concerning the protection of biological

resources, including listed species, habitats, and all planning resources designed to protect and conserve these resources. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts related to biological resources.

Conclusion

The Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.5 Cultural, Historic, and Tribal Cultural Resources

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed? Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the Housing Element update:							
a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA § 15064.5?	Less than significant	None	No	No	No	Yes	Yes
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA § 15064.5?	Less than significant	None	No	No	No	Yes	Yes
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant	None	No	No	No	Yes	Yes
d. Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native Tribe and that is: ▪ Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or ▪ A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Cultural Resources Findings

As discussed under Impact CUL-1 in Section 3.4, *Cultural, Historic, and Tribal Cultural Resources,* of the 2040 General Plan EIR, impacts related to historic, cultural, and tribal cultural resources would be less than significant. Future development under the General Plan could result in demolition, deconstruction, relocation, or alteration of historic resources. The SHMC establishes procedures for archaeological surveys and mitigation measures for archaeological and paleontological resources and protections for significant architectural or historical buildings. Policies within the Historic Resources Element would further mitigate potential impacts on historic districts and buildings. Implementation of the 2040 General Plan would be less than significant with implementation of existing regulations and the proposed policies and implementation actions within the Historic Resources Element.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program 1.1 to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031).

Consistent with buildout under the 2040 General Plan, implementation of the proposed Housing Element update, including associated construction activities would result in less than significant impacts to historic, cultural, and tribal cultural resources within the Plan Area. Buildout under the Housing Element update would adhere to State and local development guidelines that govern historical, cultural, and tribal cultural resources, including AB 52 and SB 18 and policies in the City's Historic Resources Element. Native American tribes requesting consultation will be notified of projects when project-specific environmental review begins, according to AB 52 and SB 18 (if applicable), and tribal representative requests will be included into project approval, including notification, monitoring, and consultations in accord with federal and state requirements. Any evidence of cultural resources that might be unearthed in the process of construction would be required to comply with SHMC which establishes mitigation measures for archaeological resources. Compliance with existing regulations would ensure impacts related to archaeological resources and human remains would remain less than significant, the same as impacts identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and comply with relevant policies and standards within the General Plan Historic Resources Element and the SHMC previously adopted to protect archaeological and paleontological resources and significant architectural or historical buildings. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts related to cultural resources.

Conclusion

The 2040 Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.6 Energy, Greenhouse Gases, and Climate Change

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and Unavoidable	GHG-1	No	No	No	Yes	Yes
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Significant and Unavoidable	GHG-1	No	No	No	Yes	Yes
c. Cause wasteful, inefficient, and unnecessary consumption of energy during project construction, operation, and/or maintenance?	Less than Significant	None	No	No	No	Yes	Yes
d. Conflict with the CBC Energy Efficiency Standards, the CARB passenger vehicle GHG emission reduction targets for 2020 and 2035, or any other applicable energy conservation regulations?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Energy, Greenhous Gas Emissions, and Climate Change Findings

The 2040 General Plan EIR determined impacts related to greenhouse gas (GHG) emissions would be significant and unavoidable, Section 3.6, *Energy, Greenhouse Gas Emissions, and Climate Change*. Buildout under the 2040 General Plan would result in a substantial increase in GHG emissions from baseline conditions by 2040 and would not make substantial progress towards meeting the State's 2050 goal of 80 percent reduction from 1990 levels pursuant to Executive Order S-03-05. The primary source of GHG emissions under the General Plan would be from the transportation sector and the second largest source of emissions would be from the commercial/industrial sector. To reduce impacts related to greenhouse gas emissions, the 2040 General Plan EIR required Mitigation Measure GHG-1. However, even with implementation of the mitigation measure and policies within the 2040 General Plan aimed at reducing GHG emissions, the 2040 General Plan EIR concluded that impacts would remain significant and unavoidable.

> **Mitigation Measure GHG-1**: The City of St. Helena shall adopt and begin to implement a Climate Action Plan within a goal of 18 months, but no later than 36 months, of adopting the Proposed Plan update to address the GHG reduction goals of Executive Order B-30-15 and Executive Order S- 03-05 for GHG sectors that the City has direct or indirect jurisdictional control over. The Climate Action Plan shall include a community inventory of GHG emission sources, and quantifiable GHG emissions reduction targets for 2030 and 2050, and an interim target for the General Plan buildout year 2040, that are consistent with the statewide GHG reduction targets. The City shall monitor progress toward its GHG emissions reduction goals and prepare reports every five years detailing that progress.

In addition, the 2040 General Plan EIR concluded that impacts related to consistency with applicable plans, policies, and regulation regarding GHG reductions would be significant and unavoidable. Under buildout of the 2040 General Plan, per capita emissions would exceed the significance threshold of 2.3 metric tons of carbon dioxide equivalent per service population in 2040, which would conflict with CARB's 2017 Scoping Plan, AB32, and Executive Order S-03-05, and BAAQMD's CEQA Guidelines. Mitigation Measure GHG-1 would help reduce GHG emissions, however further action at the State and federal level would be necessary to achieve State reduction targets. At the time, there were no post-2030 State or federal measures that would assist the city in achieving the efficiency target in 2040, even with implementation of Mitigation Measure GHG-1. Therefore, the General Plan could potentially conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs, meaning impacts would remain significant and unavoidable.

The 2040 General Plan EIR concluded that impacts related to energy resources would be less than significant for energy consumption and consistency with state or local plans for renewable energy or energy efficiency. The General Plan EIR determined that implementation of the General Plan would decrease net energy consumption and per service population energy consumption due to delivery of energy through Marin Clean Energy which has higher goals for renewable energy than PG&E and through an increase in fuel efficiency for vehicles. Furthermore, policies within the General Plan aim to reduce energy consumption of natural gas, electricity, and gasoline and diesel fuels by fostering an increase in energy efficiency and renewable energy, encouraging bicycle and pedestrian transit, and decreasing use of cars. All future development under the Proposed Plan would be required to comply with the latest California Building Code (CBC) requirements, including CBC Energy Efficiency

Standards, as well as all federal, State, and local rules and regulations pertaining to energy consumption and conservation.

By decreasing demand for energy- and fuel-related energy resources both overall and on a per service population basis and complying with applicable federal, State, and local regulations, impacts to energy consumption and consistency with state or local plans for renewable energy or energy efficiency would be less than significant.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031).

Implementation of the Housing Element update could increase the demand for electricity and natural gas. However, new development would be required to comply with statewide mandatory energy requirements outlined in CALGreen, which could decrease energy consumption in new and retrofitted structures. In addition, consistent with the General Plan, the Housing Element supports higher density that would reduce vehicle miles traveled (VMT) and fuel consumption compared to existing lower-density development. Therefore, energy consumption would not be wasteful, inefficient, or unnecessary, and the Housing Element update would not conflict with nor obstruct a State or local plan for increasing renewable energy or energy efficiency. Impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

Consistent with buildout under the 2040 General Plan, implementation of the proposed Housing Element update could increase the frequency and/or severity of GHG emissions or otherwise conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gases. Annual development under the Housing Element update could exceed the GHG significance threshold applied in the 2040 General Plan EIR and conflict with the 2017 Climate Change Scoping Plan. Potential impacts caused by development allowed under the Housing Element would be reduced through implementation of Mitigation Measure GHG-1, identified in the General Plan EIR. However, impacts would remain significant and unavoidable even with implementation of mitigation, the same as impacts identified in the General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update would not increase built out or population increases in the city and would not directly result in development or activities that would increase demand for energy or increase VMT. Policies within the update encourage use of renewable back-up power sources and storage that would support the City's a more reliable and less wasteful source of energy for use during emergencies. In addition, any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk from climate safety hazards would be subject to project-specific development and planning review and comply with the CBC Energy Efficiency Standards, policies within the General Plan aimed at reducing energy consumption of natural gas, electricity, and gasoline and

diesel fuels, and all federal, State, and local rules and regulations pertaining to energy consumption and conservation. Therefore, the Public Health, Safety, and Noise Element update would have less than significant impacts related to GHG emissions, energy or climate change.

Conclusion

Based on the above, the Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.7 Geology, Soils, and Seismicity

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the Housing Element update:							
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:			No	No	No	Yes	Yes
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or based on other substantial evidence of a known fault?	Less than significant	None	No	No	No	Yes	Yes
2. Strong seismic ground shaking?	Less than significant	None	No	No	No	Yes	Yes
3. Seismic-related ground failure, including liquefaction?	Less than significant	None	No	No	No	Yes	Yes
4. Landslides?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
b. Result in substantial soil erosion or topsoil loss?	Less than significant	None	No	No	No	Yes	Yes
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than significant	None	No	No	No	Yes	Yes
d. Be located on expansive soil, as defined in Section 1803.5.3, Expansive Soil, of the California Building Standards Code (2013), creating substantial risks to life or property?	Less than significant	None	No	No	No	Yes	Yes
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Geology, Soils, and Seismicity Findings

The 2040 General Plan EIR determined that impacts to geology, soils, and seismicity would be less than significant for adverse effects related to rupture of a known fault, strong ground shaking, seismic-related ground failure, or landslides; soil erosion; landslide, lateral spreading, subsidence, liquefaction, or collapse; locating development on expansive soils; and installing septic tanks and alternative waste water disposal systems in expansive soils, Section 3.7, *Soils, Geology, and Seismicity*. It further stated that individual development projects would be subject to project-specific development and planning review, including adherence to standards for geology, soils, and seismicity impacts. Implementation of the 2040 General Plan would be less than significant in regard to impacts to geology, soils, and seismicity.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the 2040 General Plan, buildout under the Housing Element update could result in impacts related to geologic hazards, including seismic activity, faults, liquefaction, landslides, erosion, and unstable soils. However, new development would be required to comply with local and state codes and requirements related to geologic hazards, including the CBC, the National Pollutant Discharge Elimination System (NPDES) program, and applicable General Plan policies. Compliance with these requirements would ensure impacts would remain less than significant. In addition, consistent with buildout allowed under the General Plan, new development under the Housing Element update would connect to the existing sewer system and not include septic tanks or other alternative wastewater disposal systems. Therefore, impacts related to geology and soils would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions that would mitigate potential impacts related to geology and soils by requiring soils and geology reports for new development, prohibiting development on instable slopes, and limiting development in hillside areas with potential for slope failure. None of the implementation items would directly result new structures that would be exposed to seismic activity, faults, liquefaction, landslides, erosion, or unstable soils or involve septic tanks. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and any impacts would be mitigated through compliance with all applicable General Plan policies, the CBC, the NPDES program, and all other applicable local and state codes and requirements. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts.

Conclusion

The Housing Element update as well as the Public Health, Safety and Noise Element Updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.8 Hazards and Hazardous Materials

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant	None	No	No	No	Yes	Yes
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than significant	None	No	No	No	Yes	Yes
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant	None	No	No	No	Yes	Yes
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant	None	No	No	No	Yes	Yes
f. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Less than significant	None	No	No	No	Yes	Yes
g. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, public use airport, or private airstrip, would the project result in a safety hazard for people residing or working in the Planning Area?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Hazards and Hazardous

The 2040 General Plan EIR determined that impacts for hazards and hazardous materials would be less than significant for transport, use, and disposal of hazardous materials; upset and accident conditions involving the release of hazardous materials into the environment; emissions or handling of hazardous materials within one-quarter mile of a school; location of development projects on hazardous materials sites such that the new use would create a hazard to the public or the environment; interference with an adopted emergency response or evacuation plan; and risk from wildland fire in lands adjacent to urbanized or residential areas, Section 3.8, *Hazards and Hazardous Materials*. It further stated that the Plan Area. The 2040 General Plan EIR described that individual development projects would be subject to project-specific development and planning review, including adherence to state, regional, and local regulations and standards related to hazards. There are no airport land use compatibility plans within the planning area or public airports, public use airports, or private airstrips within two miles of affecting any portion of the General Plan planning area.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the 2040 General Plan, construction and operation of the development allowed under the Housing Element update would be subject to existing regulations related to use, storage, handling, and disposal of hazardous materials. Applicable regulations would include those set forth by the California Department of Toxic Substances Control, State Water Resources Control Board, Regional Water Quality Control Board, California Highway Patrol and California Department of Transportation, and BAAQMD. Compliance with these existing regulations would ensure impacts related hazardous materials would remain less than significant, consistent with the 2040 General Plan EIR. The proposed Housing Element update would not include circulation changes and is not located within the planning boundaries of any airports. Therefore, impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions to enhance emergency response and evacuation procedures through testing of response exercises and maintaining the City's emergency response plan. In addition, policies and implementation actions address risk associated with the use, transport, and disposal of hazardous materials and wildfire prevention and response. The update is would not directly result in development that would have the potential to impact hazards or hazardous materials. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and would be required to comply with relevant

policies within the General Plan California, as well as applicable standards from the Department of Toxic Substances Control, State Water Resources Control Board, Regional Water Quality Control Board, California Highway Patrol and California Department of Transportation, and BAAQMD. Therefore, the Public Health, Safety, and Noise Element update would not result in significant adverse impacts.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.9 Hydrology and Water Quality

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Violate any water quality standards or waste discharge requirements?	Less than significant	None	No	No	No	Yes	Yes
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less than significant	None	No	No	No	Yes	Yes
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Less than Significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
d. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than significant	None	No	No	No	Yes	Yes
e. Otherwise substantially degrade water quality?	Less than significant	None	No	No	No	Yes	Yes
f. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Less than significant with Mitigation	HYDRO-1	No	No	No	Yes	Yes
g. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Less than significant	None	No	No	No	Yes	Yes
h. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, or inundation by seiche, tsunami, or mudflow?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
i. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Hydrology and Water Quality Findings

The 2040 General Plan EIR determined that impacts to hydrology and water quality would be less than significant for water quality standards and waste discharge requirements, depletion of ground water, drainage, runoff, erosion, and siltation. It further stated that new development under the General Plan would primarily result in redevelopment of previously developed sites with residential, commercial, and public uses, which would have a limited effect on local drainage or runoff characteristics. The 2040 General Plan EIR also concluded that on-going compliance with the NPDES requirements, including required implementation of BMPs to treat storm water runoff and protect water quality, the Bay Area Stormwater Management Agencies Association's Manual design guidance for stormwater treatment, Title 16 of the SHMC, and General Plan policies would reduce potential impacts related to water quality, runoff, and flooding. Buildout of the General Plan would generate a small increase in impervious surfaces, although the planning area is already largely developed. However, it would not be anticipated that new development would contribute to a significant impact on water quality, groundwater recharge, or runoff.

The 2040 General Plan EIR determined that impacts related to placement of housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map would be less than significant with mitigation. Implementation of the General Plan could result in development on sites partially or fully within the 100-year flood zone or construction of new housing within flood hazard zones. Policies within the General Plan and compliance with the SHMC regulate development in flood hazard areas, consistent with standards from the Federal Emergency Management Agency. To further reduce impacts related to development within flood zones, the 2040 General Plan EIR required Mitigation Measure HYDRO-1, which would reduce impacts to a less than significant level.

> **Mitigation Measure HYDRO-1:** Any proposed development or redevelopment on land designated as regulatory floodway on current Federal Emergency Management Agency maps shall, prior to issuance of a construction permit, obtain and submit to the City a Letter of Map Revision from the Federal Emergency Management Agency, demonstrating that a hydrologic and hydraulic analysis showed that grading modifications were performed such that the proposed development would no longer be within the floodway. These modifications shall be completed without raising the base flood level or impacting other properties.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Development allowed under the Housing Element update would be subject to existing regulations, including NPDES requirements, required BMPs, San Francisco Bay Area Stormwater Management Agencies Association 's Manual design guidance for stormwater treatment, Title 16 of the SHMC, and General Plan policies related to water quality, runoff, and erosion, siltation, and flooding control. Compliance with these existing regulations would ensure

impacts related to water quality, drainage, erosion, siltation, runoff, and flooding would remain less than significant, the same as impacts identified in the 2040 General Plan EIR.

Consistent with buildout under the General Plan, implementation of the proposed Housing Element update, including associated construction activities could result in impacts to groundwater supply. Individual projects allowed under the Housing Element update would be subject to Mitigation Measure HYDRO-1 identified in the General Plan EIR and project-level environmental review, which would identify potential impacts and reduce impacts to a less than significant level, the same as under the General Plan.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions that reduce risk of floods and impacts related to flood hazards. None of the policies or implementation actions would impact hydrology or water quality or directly result in development that would alter existing drainage patterns, contribute to runoff, degrade water quality, impact groundwater supply and recharge, or expose people or structures to flood hazards. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and would be required to comply with NPDES requirements, including required implementation of BMPs to treat storm water runoff and protect water quality, the Bay Area Stormwater Management Agencies Association's Manual design guidance for stormwater treatment, Title 16 of the SHMC, and applicable General Plan policies. Therefore, the Public Health, Safety, and Noise Element update would not have an adverse impact and hydrology and water quality.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

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6.10 Land Use, Population, and Housing

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Physically divide an established community?	No Impact	None	No	No	No	Yes	Yes
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact	None	No	No	No	Yes	Yes
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	No Impact	None	No	No	No	Yes	Yes
d. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
e. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Land Use Planning, Housing, and Population Findings

The 2040 General Plan EIR determined that impacts to land use and planning would be less than significant as they pertain to dividing established communities, conflicts with applicable land use plans, habitat conservation plan or natural community conservation plan, and displacing substantial numbers of existing housing or people, Section 3.10 *Land Use, Population, and Housing*. The 2040 General Plan EIR further found that General Plan implementation would not physically divide an established community and would beneficially increase connectivity throughout the city. The 2040 General Plan EIR further stated that individual development projects under the General Plan would be subject to project-specific development and planning review, which would ensure adherence to standards for land use planning, housing, and population.

Addendum Analysis

The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies a range of sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites may differ from those identified in the General Plan EIR. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031Consistent with development under the General Plan, the Housing Element update would not involve circulation changes to the Plan Area, and individual development projects would occur within private and City-owned property in already developed areas. In addition, projects under the Housing Element update would be subject to General Plan policies related to increased connectivity for pedestrians, bicycles, and drivers in the City. Therefore, development under the Housing Element update would not physically divide a community, and impacts would remain less than significant. Moreover, consistent with the General Plan, development under the Housing Element update would be subject to existing zoning and development regulations in the SHMC and policies in the General Plan. Compliance with these regulations and policies and required development and planning review would ensure individual projects would not conflict with applicable land use policies, plans, and regulations. Therefore, impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. None of the policies or implementation actions would result in new structures that would physically divide a community or change existing land uses. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would not displace people or housing or result in population growth. would not result in significant adverse impacts related to land use, population, and housing.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

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6.11 Noise

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the General Plan update:							
a. Expose persons to or generate noise levels in excess of standards established in the proposed General Plan Noise Element, or applicable standards of other agencies?	Less than significant	None	No	No	No	Yes	Yes
b. Expose persons to or generate excessive groundborne vibration or groundborne noise levels?	Less than significant with mitigation	NO-1	No	No	No	Yes	Yes
c. Result in a substantial permanent increase in ambient noise levels in the vicinity of the Planning Area above levels existing without the project?	Significant and unavoidable	None	No	No	No	Yes	Yes
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the Planning Area to excessive noise levels?	No Impact	None	No	No	No	Yes	Yes
f. For a project within the vicinity of a private airstrip, expose people residing or working in the Planning Area to excessive noise levels?	No Impact	None	No	No	No	Yes	Yes

2040 General Plan EIR Noise Findings

As discussed under in Section 3.11, *Noise*, of the 2040 General Plan EIR, impacts related to construction, traffic, railway, and stationary noise sources would be less than significant. Policies within the Public Health, Safety, and Noise Element address construction operation noise, noise compatibility along the rail line, traffic noise impacts, and stationary noise sources. Impacts from to traffic-related vibration and rail vibration was determined to be less than significant with mitigation.

The 2040 General Plan EIR concluded that impacts related to vibration during construction would be less than significant with mitigation. Impacts related to traffic vibration and rail vibration were less than significant. Construction of new development under the 2040 General Plan could result in use of heavy duty equipment that could produce vibration that may be felt by adjacent uses. Construction equipment operating within 25 feet of sensitive land uses could generate distinctly perceptible vibration, non-pile driving construction activities occurring within 25 feet of sensitive uses could result in significant vibration impacts. In addition, pile driving occurring within approximately 175 feet or 300 feet of sensitive uses for vibratory/sonic pile drivers and impact pile drivers, respectively, could also result in significant vibration impacts. As the specific future projects to be developed under the General Plan are not known at this time, and as the level of construction activity that would occur at various locations for future projects is also not known, it is possible the future construction activities could result in significant vibration impacts in portions of the Planning Area near historic structures and sensitive receptors such as schools and residences. To reduce construction related vibration impacts, the General Plan EIR required Mitigation Measure NO-1 which would reduce impacts to less than significant.

> **Mitigation Measure NO-1:** Where vibration impacts have the potential to cause structural damage or distinctly perceptible human response (reference Tables 3.11-12 to 3.11-14, or more recent sources), require a vibration study, prepared by a qualified vibration consultant. The study should include a site-specific engineering assessment of potential vibration impacts to structures and sensitive receptors from construction activities and specify a mitigation plan to minimize the impacts using all reasonable and feasible means available. The mitigation plan should include a procedure for establishing threshold and limiting vibration values for potentially affected structures, based on an assessment of each structure's ability to withstand the loads and displacements due to construction vibrations and a commitment to develop a vibration monitoring plan during the engineering phase and to implement a compliance monitoring program during construction.

The 2040 General Plan EIR reported there would be no noise impacts related to exposure of people residing or working in the Planning Area to excessive noise levels related to use of a public airport or private airstrip since the Planning Area is not in proximity to either a public airport or private airstrip. The nearest public airport to St. Helena is Angwin-Parrett Field located 4 miles northeast of the Planning Area and the nearest private airstrip is the Pope Valley Airport located 7 miles northeast of the Planning Area.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element,

change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the General Plan, construction of individual projects under the proposed Housing Element update could increase the frequency and/or severity of noise levels within the city. Individual projects allowed under the Housing Element update would be subject to Mitigation Measure NO-1, which would reduce construction vibration impacts to a less than significant level. Operation of individual projects under the proposed Housing Element update could increase the frequency and/or severity of traffic-related noise levels within the city but they would be less than significant. Individual projects allowed under the Housing Element update would be subject to policies identified in the Public Health, Safety, and Noise Element and standards within the SHMC related to noise. Compliance with these requirements would ensure impacts related to increases in noise levels from construction, traffic, rail, and stationary sources would remain less than significant. Consistent with development allowed under the General Plan, the proposed project would not be located within the vicinity of a private air strip or an airport land use plan and would not expose people residing or working in the area to excessive airport-related noise levels. Therefore, impacts would be less than significant, the same as those identified in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update contains policies and implementation actions aimed at minimizing noise, including noise generated by construction and traffic. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and would be required to comply with noise standards within the SHMC and General Plan. Therefore, the Public Health, Safety, and Noise Element update would have no impact related to noise.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.12 Public Services and Recreation

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Implementation of the Proposed Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, or other public facilities?	Less than significant	None	No	No	No	Yes	Yes
b. Implementation of the Proposed Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Implementation of the Proposed Plan would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Public Services and Recreation Findings

As discussed in Section 3.12, *Public Services*, of the 2040 General Plan EIR, buildout under the 2040 General Plan would not result in significant impacts to local fire and police agencies or other public facilities within the City of St. Helena. Projected new development under the 2040 General Plan could result in population and employment increase but would not result in substantial increase demand for fire services, police services, schools, parks, recreation, and library facilities. The increase in service population would not require construction of new or expansion of existing facilities for fire service, police service, schools, parks or other public facilities. Policies within the General Plan monitor the need for additional public facilities, pursue sites for future facilities, require Fire Department and Police department review of individual development projects, and implement public safety impact fees. In addition, potential new or expanded public service facilities would be subject to additional CEQA review. Therefore, impacts were found to be less than significant.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). Consistent with buildout under the General Plan and analyzed in the 2040 General Plan EIR, buildout under the Housing Element update could increase the demand for fire, police, schools, parks, and library services within the city but is not anticipated to generate a need for the construction of new facilities or expansion of existing ones. Most sites are urban infill sites where development already exists and public services are already being provided. New development would be required to pay safety impact fees and subject to review by the Fire Department and Police Department. Additionally, General Plan policies governing public services would remain in effect for the Housing Element update and future development projects. Compliance with General Plan goals and policies regarding public services and recreation would ensure that new housing would not result in a substantial demand to public services. These goals and policies would continue to apply to projects implemented under the Housing Element update. Therefore, potential impacts to public services associated with implementation of the updated Housing Element are within the scope of impacts analyzed in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update would not result in development that would increase demand for public services or governmental or recreational facilities. The update includes policies and implementation actions that would ensure adequate provisions of public services, including fire and police protection, and protect of City facilities from potential natural and made-made hazards which would improve response times and safety. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would increase service ratios, response times, and other performance objectives for public services and facilities. Potential development

would be subject to project-specific development and planning review and comply with General Plan goals and policies regarding public services and recreation. Therefore, the Public Health, Safety, and Noise Element update would have no impact related to public services or recreation.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.13 Transportation and Traffic

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?				
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?	Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
Would adoption of the General Plan update:							
a. Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit?	Significant and unavoidable	None	No	No	No	Yes	Yes
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Not discussed	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Less than significant	None	No	No	No	Yes	Yes
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant	None	No	No	No	Yes	Yes
e. Result in inadequate emergency access?							
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?							

2040 General Plan EIR Transportation Findings

The 2040 General Plan EIR concluded that impacts related to transportation would be significant and unavoidable regarding consistency with policies and regulations related to roadway, transit, pedestrian, and bicycle facilities, Section 3.13, *Transportation.* The 2040 General Plan EIR determined 7 out of 27 analyzed intersections would have significant impacts. Policies and actions within the General Plan aim to reduce single occupancy vehicle trips, improve circulation throughout the city, and promote options for alternate forms of transportation. To reduce impacts to intersections, the 2040 General Plan EIR required Mitigation Measures TR-1, TR-2, TR-3, TR-4, TR-5, and TR-6. However, even with implementation of the mitigation measures, the 2040 General Plan EIR concluded that impacts would remain significant and unavoidable. Main Street is a State highway (State Route 29), therefore mitigation measures along Main Street are subject to Caltrans approval and cannot be guaranteed by the City. In addition, improvements to accommodate future traffic volumes may not be implemented due to lack of funds. Therefore, because the City cannot guarantee that needed improvements would be implemented, impacts to intersection traffic operations are significant and unavoidable.

The 2040 General Plan EIR determined that other transportation impacts would be less than significant, including potential to conflict with applicable congestion management programs, change in air traffic patterns, increase in hazards due to a design feature or incompatible uses, emergency access, and potential to conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites evaluated previously for potential environmental impacts in the General Plan EIR. The Housing Element update identifies sites, shown in Figure 3, that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031), including urban infill sites and sites with existing development.

Pursuant to CEQA Guidelines Section 5064.3, subdivision(b), a project's transportation impact is now based on VMT instead of an level of service analysis as conducted under the 2040 General Plan EIR. Under the updated State requirements, VMT are derived based on location and the amount and distance of vehicle travel attributable to a project, including induced automobile travel. Significance criteria used to determine VMT impact include questions as to whether the project would cause substantial additional VMT, or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (e.g., by adding new mixed flow travel lanes) or by adding new roadways to the network.

The Housing Element update would facilitate development of 307 units to meet the City of St. Helena's RHNA for the current planning period. The proposed housing sites in the Housing Element update would concentrate housing development in the City, which would reduce overall VMT. Furthermore, the policies within the General Plan encourage the use of transit, bicycling and pedestrian routes and work to reduce VMT. Buildout under the Housing Element update would be subject to comply with these policies. Therefore, potential transportation impacts associated with

implementation of the updated Housing Element are within the scope of impacts analyzed in the 2040 General Plan EIR.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update includes policies and implementation actions to alleviate evacuation constraints for residential developments with less than two emergency evacuation routes and would strengthen emergency preparedness and evacuation procedures. None of the policies or implementation actions would impact congestion management programs, change air traffic patterns, increase hazards due to a design feature or incompatible use, impair emergency access, or conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would be subject to project-specific development and planning review and comply with applicable policies in the General Plan aimed at reducing VMT and transportation impacts. Therefore, the Public Health, Safety, and Noise Element update would have no adverse impacts related to transportation.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

6.14 Utilities and Service Systems

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
Would adoption of the General Plan update:							
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Less Than Significant	None	No	No	No	Yes	Yes
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than Significant with Mitigation	UTS-1	No	No	No	Yes	Yes
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less than significant	None	No	No	No	Yes	Yes
d. Have insufficient water supplies available to serve the project from existing entitlements and resources such that new or expanded entitlements needed?	Less than Significant	None	No	No	No	Yes	Yes

EIR Evaluation Criteria	EIR Significance Conclusion	EIR Mitigation Measures	CEQA Guidelines Section 15162 Is a Subsequent EIR Needed?			Are Only Minor Technical Changes or Additions Necessary or Did None of the Conditions Described in §15162 Occur? (§15164(a))	Project is within the Scope of General Plan EIR?
			Do the Proposed Changes Involve a New or Substantial Increase in the Severity of Previously Identified Impacts?	Are There New Circumstances Involving a New or Substantial Increase in the Severity of Previously Identified Impacts?	Is There New Information of Substantial Importance Requiring New Analysis or Verification?		
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	None	No	No	No	Yes	Yes
f. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less than Significant	None	No	No	No	Yes	Yes
g. Not comply with federal, State, and local statutes and regulations related to solid waste?	Less than Significant	None	No	No	No	Yes	Yes

2040 General Plan EIR Utilities and Service Systems Findings

The 2040 General Plan EIR concluded that impacts related to wastewater, water supply, and solid waste would be less than significant provided that proposed projects would comply with federal, State, and local statutes and regulations and the policies and actions within the General Plan addressing wastewater capacity, stormwater runoff, water conservation, waste management, recycling, and composting. The City plans to increase the wastewater treatment plant permitted capacity from 0.5 million gallons per day to 0.65 million gallons per day by 2030, which would have sufficient capacity to accommodate buildout under the General Plan. Any new stormwater facilities would comply with all applicable environmental regulations, including project-level environmental review and NPDES permits regulations. The City's Water Neutral Policy for Development would ensure future water demand does not exceed current demand by requiring any new water demand be offset by water conservation retrofits or in-lieu payments for the City to conduct retrofits. Buildout under the General Plan would not require exceed the capacity of the Clover Flat Landfill which has significant remaining capacity. Therefore, the General Plan EIR determined there would be no significant impacts to the city's utilities or service systems.

Addendum Analysis

The Housing Element update is a policy document consistent with the General Plan. The Housing Element update identifies sites, shown in Figure 3, evaluated previously for potential environmental impacts in the General Plan EIR that could be developed to meet the City's 6th cycle RHNA throughout St. Helena. Some of these sites could require land use changes that would bring the zoning into consistency with the Land Use Element, change the existing land use, or allow for increased density. Many of these sites have existing connections to utility and service systems as they are infill sites or already developed. As discussed in Section 5, *Addendum Methodology*, the City of St. Helena has several options for sites that could undergo land use changes through Program H-A to facilitate development of housing units to meet the RHNA during the 6th cycle (2023-2031). . All future development accommodated under the Housing Element update would be required to adhere to the General Plan, adopted master plans, and other regulatory requirements concerning water, wastewater, storm drains, solid waste, and other infrastructure; water supply; and wastewater treatment systems.

Consistent with buildout under the General Plan, implementation of the proposed Housing Element update could increase population such that new or expanded wastewater facilities would be required to provide utilities and service systems to new development. In addition, future development for new or expanded facilities would be subject to further environmental analysis, pursuant to CEQA Guidelines section 15168(c) and as required by state law, to evaluate potential impacts.

The Public Health, Safety, and Noise Element update revised information on public and critical facilities, discussed safety impacts from climate change, and added implementation measures to create evacuation plans and educate residents and address climate vulnerability. The update includes policies and implementation actions that aim to enhance and protect the City's utilities and service system, such as improving efficiency of stormwater drainage systems and ensuring adequate water supply. Any potential updates to structures or development of climate resilient infrastructure designed to mitigate potential risk of climate safety hazards would work to address these goals and would be subject to project-specific development and planning review and comply with applicable policies in the General Plan, NPDES permits regulations, and the City's Water Neutral Policy for

Development. Therefore, the Public Health, Safety, and Noise Element update would have no adverse impacts related to utilities and service systems.

Conclusion

The Housing Element update, as well as the Public Health, Safety, and Noise Element updates would not result in new or more severe impacts (direct or indirect) than were analyzed in the 2040 General Plan EIR.

7 Summary of Findings

The Housing Element update is part of the City's General Plan, and like other elements within the General Plan, includes goals and policies that the City should meet when it comes to the planning of housing. The Housing Element is unique from the other elements within the General Plan in that it is required to be periodically updated to align with the State's allocation of the RHNA. Also, the Housing Element includes Housing Programs that are required to be implemented within the planning period established for the Housing Element. These programs are usually implemented over time as a separate project after the Housing Element is adopted. The Housing Element update does not involve site-specific projects but does include identified sites that could undergo land use changes through Program H-A to facilitate development of RHNA housing units during the 6th cycle. The sites inventory (provided in the Housing Resources chapter of the Housing Element update) yields housing units that exceed the number needed to meet the RHNA requirements, as demonstrated in Table 3.

The General Plan Program EIR is accompanied the City's 2040 General Plan update. Future development and zoning changes associated with the Housing Element's Housing Programs will be subject to applicable development standards and reviews established by City ordinances.

The Public Health, Safety, and Noise Element update does not involve site-specific projects but proposes policies and implementation actions that are aimed at enhancing emergency response and evacuation procedures and minimizing impacts to people and structures from natural and man-made disasters. Any potential updates to structures or development of climate resilient infrastructure would be designed to mitigate potential impacts associated with climate safety hazards. Potential updates and development would not generate population growth or additional VMT or result in an increase in demand for services or facilities.

This analysis demonstrates that adoption of the Housing Element and Public Health, Safety, and Noise Element update would not result in impacts beyond those addressed or analyzed in the General Plan EIR, nor does the General Plan update present new information that shows impacts would be more significant than those described in the General Plan EIR. Therefore, the General Plan EIR applies to the General Plan update and no additional environmental assessment is required.

This analysis was performed pursuant to CEQA Guidelines Sections 15162 and 15164 and is intended to determine if additional environmental review is required or if the changes proposed by the project are within the scope of the previously certified 2040 General Plan EIR. This analysis determined that the 2040 General Plan EIR is of continuing informational value, the proposed changes in the General Plan update are within the scope of that previously certified EIR, and none of the conditions requiring the preparation of subsequent or supplemental environmental review under CEQA Guidelines section 15162 exists. Therefore, the City of St. Helena, as lead agency, has determined that this Addendum to the EIR is sufficient to meet the requirements of CEQA and no additional environmental review is required. Pursuant to CEQA Guidelines section 15164, this Addendum does not need to be circulated for public review and can be included in or attached to the final EIR. The decision-making body shall consider the Addendum with the Final EIR prior to deciding upon the Project.

8 References

Bibliography

St. Helena, City of. 2018. *St. Helena General Plan Update 2040 Draft Environmental Impact Report SCH#2010042001.* St. Helena, CA. October, 2018.

St. Helena, City of. 2019. *General Plan Update 2040.* St. Helena, CA. April, 2019.

List of Preparers

Rincon, Consultants, Inc. prepared this Addendum under contract to the City of St. Helena. Persons involved in data gathering analysis, project management, and quality control are listed below.

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9 Public Health, Safety, and Noise

9.1 Purpose of the Element

The Public Health, Safety, and Noise Element presents a framework for minimizing risks posed by environmental and human-caused hazards that may impact St. Helena residents' health and welfare. The Public Health, Safety, and Noise Element aims to protect St. Helena residents, workers, and visitors from negative exposure to flooding, fires, hazardous materials, air pollution, geologic and seismic hazards, **disaster response, and climate change hazards.**

The Public Health, Safety, and Noise Element includes the following sections.

- **9.2 Public Health, Safety, and Noise in St. Helena.** Summarizes key issues related to the public health and safety of St. Helena residents, workers, and visitors (p. 9-1).
- **9.3 Key Findings.** Identifies key findings based on an existing conditions analysis (p. 9-14).
- **9.4 Goals.** Defines overarching goals to guide policies and implementing actions (p. 9-17).
- **9.5 Policies and Implementing Actions.** Identifies policies and implementing actions to minimize hazards and risks to life and property (p. 9-17).

9.2 Public Health, Safety, and Noise in St. Helena

St. Helena is surrounded by natural beauty, hillsides, vineyards, and waterways. While these natural features are great assets for the community, they can present risks due to flood, fire, geologic, seismic and **climate change.** In addition, human-caused risks, such as hazardous materials, air pollution, and unhealthy noise levels can also pose risks to community health and safety. Effective planning to prepare for and mitigate the adverse effects of these natural and human-caused risks can help ensure that St. Helena maintains a high level of safety for its residents, workers, and visitors. Following is a discussion of the **steps St. Helena takes to prepare for these risks, the potential impacts the various risks could have on St. Helena and ways for the City to minimize or prepare for these potential impacts.**

Public Safety Services

Identification of public safety services in the Public Health, Safety, and Noise Element is important because these services are critical to the property and life savings effort required during an emergency and must be identified to comply with Government Code 65302. The Napa County Fire Department and the City of St. Helena Fire Department provide fire and emergency services for St. Helena. The City is served by the following fire stations that have the capability to respond to medical emergencies, rescues, structural fire, and wildfire: Napa County Station #26, located at 3535 Saint Helena Highway in Calistoga, the Napa County Station #12, located at 7401 Solano Ave in Yountville, the Napa County Volunteer Station #15, located at 1989 Highway 29 in Rutherford, the Napa County Volunteer Station #21, located at 680 Sanitarium Road, and the St. Helena Fire Station, located at 1480 Main St in St. Helena. Additional public safety services are provided by the St. Helena Police Department. The St. Helena Police Department is located at 1480 Main Street in St. Helena.

Emergency Preparedness

The State of California requires all municipal governments to prepare and plan for potential emergencies including natural and human caused events. St. Helena seeks to ensure the safety of its residents, services, infrastructure, businesses, and buildings during an emergency scenario.

Emergency preparedness efforts in St. Helena include:

- **Implementation of risk reductions measures identified in the Napa County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP).**
- **Implementation of emergency operation protocols as included in Napa County Emergency Operations Plan.**
- **Continued coordination of evacuation management planning through Zonehaven, in conjunction with the Napa County Sheriff Department, Napa County Office of Emergency Services, CAL FIRE, and neighboring jurisdictions.**
- **Education and training of residents on emergency response management and preparedness as part of the Napa Valley Community Emergency Response (CERT) program.**
- **Upgrades to structures and infrastructure to comply with building and fire codes.**
- **Maintaining a cooling center at the St Helena Library (1492 Library Lane) during extreme heat events.**

The City is actively engaged in local and regional emergency planning efforts. St. Helena is a participating jurisidction of the Napa County MJHMP, which includes a hazard mitigation assessment and mitigation actions for Napa County and participating jurisdictions. Additionally, the City is involved in the development and regular updates to the Napa County Operational Area Emergency Operations Plan, which describes emergency operation planning processes and protocols for Napa County jurisidctions These efforts combine with an actively engaged and educated public to support emergency preparedness for the City.

Critical Facilities

Critical facilities are structures and institutions necessary for a community to respond to and recover from emergencies. Identification of them is important because critical facilities must continue to operate during and following a disaster to reduce the severity of impacts and accelerate recovery. They are essential to the health and welfare of residents and are relied upon to recover following hazard events. Such facilities have been identified in the Napa County MJHMP and several are located in St. Helena or in close proximity to the City. They include police stations, fire stations, hospitals, elder care facilities, schools, regional emergency services, critical water facilities, and governmental buildings. Additionally, facilities such as natural gas pipelines and the transportation system are identified as critical infrastructure, which enable buildings, residences, and the transport of good and services to remain functional. These critical facilities are identified in Figure 9.1 below.

Emergency Evacuation & Isolated St. Helena Neighborhoods

Evacuation routes are used to move residents out of impacted areas before or during a disaster or hazard event. St. Helena's major evacuation routes include State Route 29 and the Silverado Trail, which lies east of and directly parallel to State Route 29. In addition to identification of these major routes, St. Helena is required by Government Code Section 65302 (g)(5) (as amended by

Senate Bill 99) to update the Public Health, Safety, and Noise Element to include information identifying residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation access roads. Identifying residential developments without access to two emergency evacuation access roads allows the City to identify opportunities to improve evacuation capacity and connectivity for vulnerable neighborhoods. Figure 9.2 identifies residential neighborhoods that have a single access road for entry and exit (i.e., roads that connect to a collector or arterial road by only a single route).

There are currently two neighborhoods in the City that have been identified as having only a single access road. The neighborhood identified off College Avenue is partially located in the 500-Year flood zone, Bell Canyon Dam failure inundation area, and the high and medium liquefaction susceptibility area. The neighborhood identified off Vineyard Avenue is within the medium liquefaction susceptibility area. These neighborhoods are most vulnerable during evacuation scenarios and pose significant logistical challenges. As a result, policy and implementing actions have been developed to minimize evacuation challenges for these specific neighborhoods.

Figure 9.1Critical Facilities in and near St. Helena

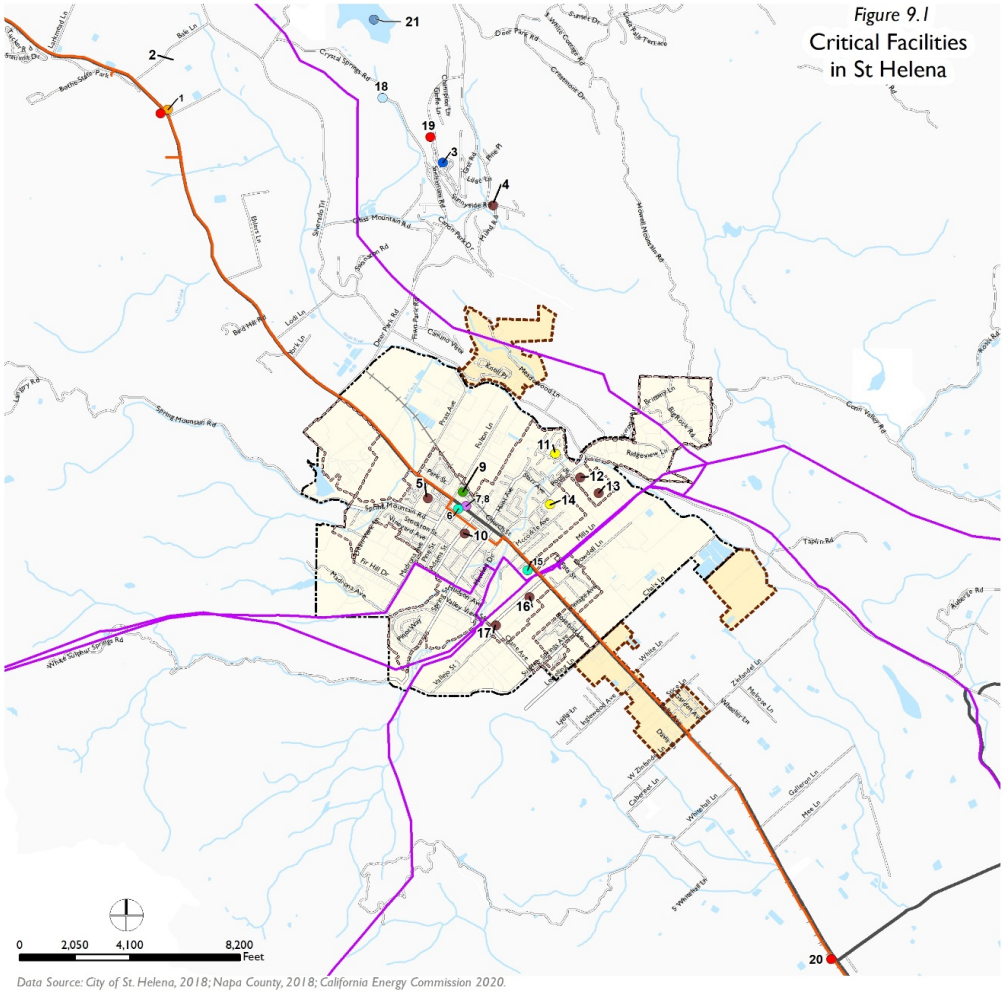
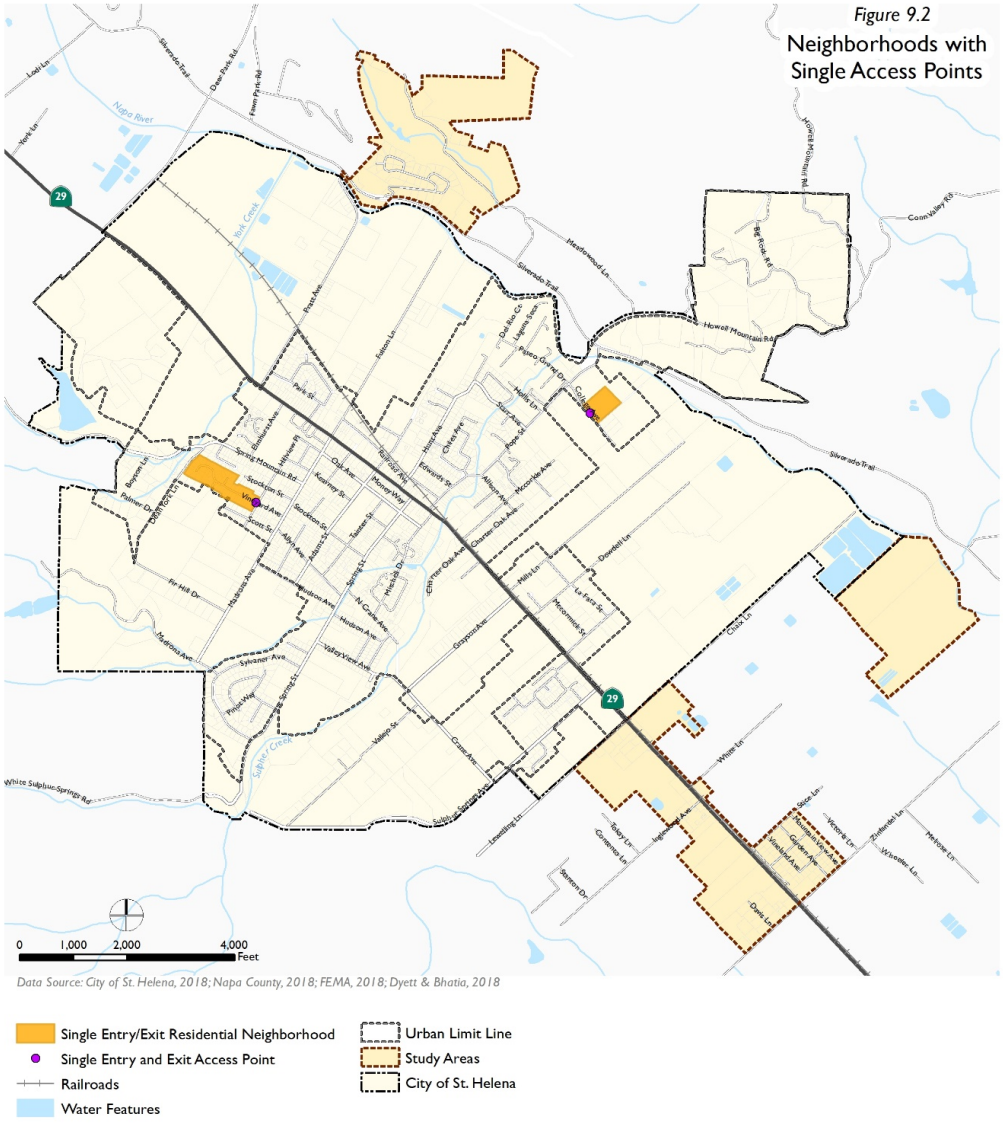


Figure 9.2Neighborhoods with Single Access Points



Flooding

The Napa River and some of its tributaries are prone to flooding, which poses a risk for people and structures in adjacent parts of the Napa Valley. The Napa River flows are largely influenced by precipitation. The peak flows generally occur in January, February, and March. Some of the worst flooding in the immediate area of St. Helena has occurred in December and April, especially in and around the Vineyard Valley Mobile Home Park, which is near the confluence of Sulphur Creek and the Napa River. The area experienced significant flooding in 1986, 1995, 1997, and 2005 with extensive property loss.

Flood hazards also exist in the York Creek and Sulphur Creek Watersheds in St. Helena. During the 2005 New Year's Eve storm event, flooding from York Creek significantly impacted residential and industrial properties, including buildings located on the properties of Beringer Winery and the Culinary Institute. The Beringer water treatment plant flooded and ponds overflowed into the creek. In addition, the creek flooded vineyards on both sides of its corridor, downstream of State Route 29 to the Napa River.

Flood hazards in the Sulphur Creek watershed are due primarily to channel bed aggradation in the lower reach where gravel mining was historically conducted. Sulphur Creek continues to supply and deposit substantial amounts of sediment in this reach. Consequently, the increased volume of sediment currently stored in the channel decreases the volume available for floodwater, potentially causing an increased flood hazard locally and within the City of St. Helena. Further study needs to be done of the Sulphur Creek area in order to prevent future flooding and to protect habitat for steelhead and salmon.

The City collaborated with the Napa County Board of Supervisors and the Napa County Flood Control District to study the Napa River's hydraulics between Deer Park Road and Pope Street. The resulting study identified the need for an extension of the 100-year floodplain beyond the areas previously identified by the Federal Emergency Management Agency (FEMA). Figure 9.3 identifies areas that fall within the City's 100-year (one percent) and 500-year (0.2 percent) floodplain and reduced risk areas due to the levee system on the Napa River; as identified by the Federal Emergency Management Agency (FEMA) in 2018. Figure 9.4 includes areas in and around St. Helena that would be inundated in the case of dam failure. **The City has several critical facilities, as seen in Figure 9.1, located within the FEMA flood zone and the dam failure inundation zone. The Vineyard Valley Mobile Home Park is located within the reduced flood risk area due to the levee and Silverado Orchard Retirement Apartments are located within 500-year flood zone. Napa Valley College – St. Helena and St. Helena Montessori School are located in the dam failure inundation zone.**

Comprehensive Flood Control and River Restoration

In 2011, the City completed a Comprehensive Flood Control and River Restoration Project north of the Pope Street bridge and on the west side of the Napa River. The purpose of this project was to protect residential property in the floodplain from the 100-year storm events and restoring the Napa River and its surrounding habitat. The project is designed to reduce flood risk to protect approximately 470 homes, including the Vineyard Valley Mobile Home Park and the Hunt's Grove Apartment Complex, that were located in a FEMA-designated flood zone prior to completion of the project. The project site was about 36 acres. The project planning began in 2000, with actual construction starting in May 2009. Phase I of the project consisted of construction of a levee, along with a storm drain bypass and other related infrastructure improvements. Phase II, the final phase of the project, included construction of a floodwall that is roughly eight feet high where it is

anchored to the levee. The floodwall gradually reduces in height as it continues south along the Napa River to the confluence of the river and Sulphur Creek. It then turns to the west and continues along Sulphur Creek, terminating at Paseo Grand Avenue. The wall is about three and a half feet high at its terminus. The total project cost was about $32 million, with the cost of construction at about $9.1 million.

To balance the removal of land from the floodplain, the area known as "lower terrace B" was cut down significantly and widened to accommodate the large flood flows. In Phase II, this terrace was cut down to the level of the Napa River and is designed to carry significant amounts of flood water, should it become necessary.

The second half of this $9.1 million project is the continuation of the flood wall around Vineyard Valley and habitat restoration in the "upper terrace B." The habitat restoration was a critical element of the overall plan and included the installation 40,000 plantings and anchoring fallen trees into the terrace. This project also included maintenance conducted according to a maintenance plan, irrigation, and development of a pedestrian interpretive trail.

St. Helena has developed an Operations and Maintenance Manual for the Comprehensive Flood Control and River Restoration Project, which describes the extent of the project and outlines operation and maintenance activities that the City and Napa County Flood Control District will work together to manage. The manual describes project features, routine monitoring and maintenance activities, pump station operation, emergency operations, surveillance, personnel training, utility coordination and design.

Geologic and Seismic Hazards

Although St. Helena is located in a seismically active region, there are no known active faults located in the city *(*see Figure 9.5). Faults are commonly considered to be active or likely to have another earthquake sometime in the future, if they have moved one or more times in the past 10,000 years. The California Geological Survey, the primary source of geologic information used for decision-making by California's government agencies, designates Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults in the state and provides maps for use in planning and controlling new or renewed construction so as to minimize associated risks. According to the most recent maps the nearest active faults to St. Helena are the West Napa Fault, located 14 miles to the south, and the Rodgers Creek Fault, located 13 miles to the west. Additionally, a number of unnamed, relatively small, older faults are located at the base of the Sonoma and Vaca mountains along the margins of the Napa Valley; however, based on available information, displacement of these faults occurred more than 10,000 years ago and as such these faults are not considered active.

Overall, the fault rupture hazard for the city is considered to be low, and the primary geologic hazards of concern are those that could result from excessive shaking effects stemming from earthquakes elsewhere in the region. For instance, a large earthquake event in the area could result in liquefaction in the city's low-lying areas *(*see Figure 9.6), and landslides and debris flow in areas with sloped, hilly terrain (see Figure 9.7). Development in the city's upland areas has often required the removal of trees and vegetation, leaving some hillsides susceptible to erosion and landslides during heavy rains. Actions available to the City to protect areas of the community at greatest risk and minimize the risks of injury and property damage include restricting development in the hillside areas and requiring prompt re-vegetation on slopes prone to instability. The use of best management practices during construction can also limit erosion and the risk of landslides. Employing earthquake engineering strategies in the design of buildings and structures, such as

installation of earthquake drains or use of low mobility grouting and dynamic compaction during construction, can limit risks associated with liquefaction.

Air Pollution and Hazardous Materials

Mitigating the public health and safety risks caused by air pollution and hazardous materials will inevitably require changing human behavior. Air pollution resulting from auto exhaust, tobacco smoke, and fugitive dust creates unhealthy air conditions for residents and can pose a particular threat to sensitive populations, such as children and older adults. Implementing measures to reduce auto trips, tobacco smoke exposure, and construction-related fugitive dust can help St. Helena reduce residents' contact with air pollution. Compact development patterns, facilities to encourage walking and biking, and incentives to reduce automobile trips are just a handful of ways that St. Helena can help improve local air quality.

The Bay Area Air Quality Management District (BAAQMD) is the public agency responsible for regulating stationary sources of air pollution in Napa County and the San Francisco Bay Area. BAAQMD monitors air quality in the nine-county Bay Area and reports annually on pollutant concentrations for comparison to State and federal health-based ambient air quality standards. Data indicates that in the Bay Area, as throughout the state, the transportation sector and mobile sources of emissions are the most significant sources of air pollution. Senate Bill (SB) 375, approved by the Governor on September 30, 2008, seeks to reduce greenhouse gas emissions—and, consequently, other pollutants—from mobile sources by integrating land use and transportation planning at the regional level. *(For a more detailed discussion of SB 375 and related opportunities see the Climate Change Element.)*

Hazardous materials used by local businesses are often transported on the City's roadways and found present in smaller quantities in private homes in the form of solvents, cleaning fluids, and other substances. Implementing policies to improve the safe use, transport, and disposal of these materials can be instrumental in avoiding environmental contamination and human health impacts.

Noise

Noise is a sound which is unhealthy or unwanted. It can be a human-caused public health hazard which includes excessive, intrusive, or objectionable noises that disrupt daily life. Noise has been tied to physiological effects ranging from hearing loss, high blood pressure, and sleep disturbance to communication interference and general interruption and annoyance of normal daily activities. Definitions of acoustical terms used in this discussion are listed in Table 9.1.

Land uses have different levels of compatibility relative to noise, and the State of California mandates that general plans include noise level compatibility standards for the development of land as a function of a range of noise exposure values (see Table 9.2). Table 9-3 identifies interior noise standards.

The ambient noise environment throughout much of St. Helena is extremely quiet in comparison to typical urbanized settings, especially in the evenings and at nighttime. With the exception of Main Street (State Route 29) and major collector roadways, the noise environment can be characterized as being that of a quiet rural setting. Residential areas are generally shielded from traffic noise on highways, arterials, and collectors and register very low background sound levels.

Sleep disturbance and the annoyance of sound not only depend on the absolute sound level of a noise source but are related to the magnitude of the noise above that of background sound levels. This means that in particularly quiet rural environments, the control of extraneous, intrusive, and

annoying noise sources is important to maintaining the public health and a quality living sound environment expected by the community. Typically, a change in noise levels of less than 3 dBA is not discernable to the general population. Increases in average noise levels from 3 to 5 dBA are clearly discernable to most people**. and Iincreases** in average noise levels **over the background ambient** of more than 5 dBA are ~~**common**~~ considered to constitute **an adverse ~~significant~~** environmental impact health and quality of life. ~~**in many California communities.**~~

Vehicular traffic on Highway 29 and collector streets is the primary source of noise in the community. Other non-stationary sources which are intermittent and generally inconsequential to the noise environment include flyover commercial aircraft at high altitudes, and small general aviation and helicopter flyovers. The Wine Train travels to St. Helena each day and emits a loud horn at crossings, along with the low frequency rumble of the diesel engines. Typical stationary noise sources in St. Helena include agricultural and industrial activities. Agricultural activities result in noise from wind machines, tractors, and sulphur blowers which are employed in the spring in the early hours of the morning. The St. Helena Fire Department has sirens at two locations which sound on average twenty times annually, with approximately half of them occurring during nighttime hours. Noise contours as of 2018 are seen in Figure 9.8.

Noise concerns in St. Helena are principally linked to land use compatibility. Concerns relate to adverse noise effects from new commercial development on surrounding noise-sensitive uses such as residences and schools, and also to adverse noise effects from agricultural activities within the city limit. Right-to- farm provisions necessitate accommodating agricultural uses while also seeking to minimize conflicts. To address these concerns and to promote a compatible noise environment throughout the city, Table 9.4 establishes limits on intrusive noise and regulates the amount of noise a specific sound source can emit relative to the typically low residential background sound levels. This standard is specific to residential areas within St. Helena. Additionally, by generally promoting good neighbor practices and facilitating open communication between agricultural, commercial, and residential uses the City can help to foster a healthy noise environment. Noise contours projected for 2040 for highway traffic ~~**as a result of the General Plan**~~ are shown in **Figure 9.9**. **The physical distances of noise contours from the roadway centerline to be used in determining land use compatibility are listed in Table 3.11-11 of the EIR.**

Fire

Key human-caused public health and safety hazards affecting St. Helena include structural fires, vegetation fires, and other disasters that require advanced planning. Overall, in the urbanized portion of St. Helena within the city limit, the risk of vegetation fire is moderate to low; however, areas of the city in the hilly terrain along the western perimeter of the city and east of the Napa River are **designated by the California Department of Forestry and Fire Protection (CAL FIRE) as moderate, high or very high fire hazard severity zones, according to CAL FIRE 2020 data (see Figure 9.10). St. Helena does not have any critical facilities, as seen in Figure 9.1, located within a fire hazard severity zone.**

As described in the Public Safety Services section, fire services are provided to residents by Napa County Fire Department and the City of St. Helena Fire Department. Fires occurring in the heavily-wooded hillside areas can be difficult for firefight**ing efforts due to slope, topography, and availability of fuels. Fire burns more intensely up slopes and securing a fire on steep terrain is challenging for firefighting efforts.** ~~**to address due to t**~~**Traffic** congestion on City streets**, including** ~~**particularly when emergency vehicles must travel on or across**~~ State Route 29**, a two-lane highway, can provide limited ingress and egress for emergency vehicles that must gain access to**

the fire. Furthermore, traffic congestion can pose ~~important~~ **major** challenges to St. Helena's collaboration with neighboring municipalities and agencies ~~seeking~~ **that seek** to establish and implement regionally coordinated disaster planning for police, fire, and emergency medical services. The City can work with local, regional, and state agencies to address key traffic-related concerns on State Route 29 and County roads to ensure that adequate levels of fire protection are maintained, particularly on hillsides and in fire-prone areas, and to support regional collaboration for disaster preparedness.

In 2021, the Napa Communities Firewise Foundation led the development of the Napa County Community Wildfire Protection Plan in collaboration with Napa County agencies, PG&E, CAL FIRE and local jurisdictions. The Plan seeks to reduce wildfire risk in Napa County, including areas surrounding St. Helena, through a variety of proposed wildfire mitigation projects.

Napa County has experienced many historical fires in the past several decades. Historical fires in or adjacent to St. Helena since 1950 are summarized ~~seen~~ below in Table 3.

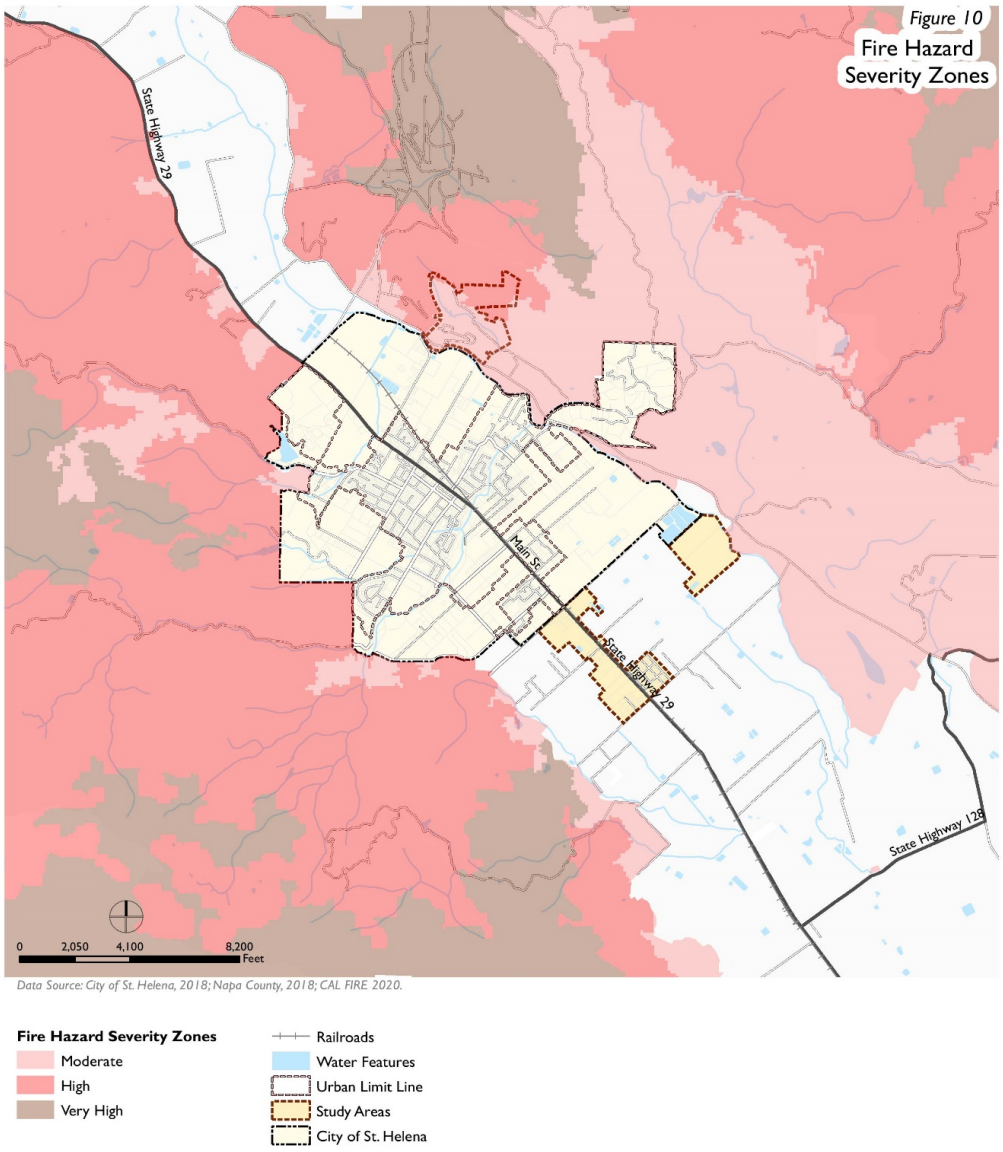
Table 3 Historic Fires in or adjacent to St. Helena (1950-2022)

Name	Year	Acres Burned
Roadside #14	1964	231
Atlas Peak	1981	33606
Howell Mountain Fire	1983	2354
Silverado	2003	69
Deer	2008	233
Hillcrest	2016	17
Tubbs	2017	36702
Atlas	2017	51625
Nuns	2017	55798
Glass	2020	67484
LNU Lightning Hennessey	2020	305651
Spring	2021	1
Pope	2022	4

Source: CAL FIRE 2021

Peak water supply and water availability are crucial for fighting wildfires. Peak load water supply refers to the sum total of water required for fire flow, operational daily consumption, and emergency storages. With new developments, the City will need to increase its peak load water supply reserves. Policies PS4.G and PS4.H seek to address water supply demand concerns.

Figure 9.10 Fire Hazard Severity Zones



Climate Change Hazards

The St. Helena Climate Vulnerability Assessment, found in Appendix B, includes an evaluation of how climate change may impact vulnerable community members as well as critical services, facilities and infrastructure in the City. Key findings from the assessment are summarized below.

Climate change is a global phenomenon that can impact local health, natural resources, infrastructure, emergency response, and many other aspects of society through changes in climate conditions. In St. Helena, climate conditions and associated natural hazards are expected to change in the following ways:

- **Increasing temperatures: Average maximum temperatures in St. Helena are expected to rise between 3.3°F and 4.4°F by 2050, and between 4.2°F and 7.2°F by 2100.**
- **Extreme heat: Extreme heat days occur when the maximum temperature is above 100.4°F. The annual number of extreme heat days is projected to increase by as much as 31 days per year by 2100.**
- **Increasing intensity of precipitation events and longer dry periods. It is projected that by the end of the century the largest precipitation events in the Bay Area region will increase in volume (inches of rain per day) between 6% and 37%.**
- **Wildfire: There will be increased wildfire probability due to variable and decreasing precipitation and increasing temperatures.**

Climate change will disproportionately impact certain populations in St. Helena. The following vulnerable populations have been identified in St. Helena:

- **Young Children. St. Helena has one of the highest concentrations of children in Napa County (St. Helena General Plan 2019). Children are particularly at risk to climate hazards because they are dependent on others for care, are vulnerable to injury or sickness, and may not understand or are not capable of taking the measures needed to protect against or evacuate from climate hazards.**
- **Older Adults. Silverado Orchards Retirement Community and Vineyard Valley Mobile Home Park are two particularly vulnerable facilities in the City, as they are home to a substantial population of elderly individuals.**
- **Outdoor Workers. Extreme heat and smoke events pose disproportionate health risks to the city's outdoor workers who are employed in viticulture, agriculture, construction, and other outdoor occupations**
- **Individuals that are Linguistically Isolated. Individuals that are linguistically isolated have no to limited English proficiency. Linguistically isolated households may not understand important safety, public health, or evacuation orders and communications when conducted exclusively in English during a hazard event, which may compromise the ability of residents to remain safe and healthy. They may not have access to resources available to help recover from climate related impacts if resources are only available in English.**
- **Visitors. St. Helena is surrounded by an expanse of vineyards and agricultural lands. The City is a popular tourist destination in Napa County. Visitors are at risk during climate hazard events as they may not receive adequate warning and may not have knowledge regarding access to emergency services.**

All residents of St. Helena rely on various infrastructure and services such as water systems, electricity, natural gas, and roads. These systems and assets are vulnerable to the impacts of

climate change, which puts the wellbeing of residents at risk. Those with pre-existing and chronic health conditions that rely on services and systems, are particularly vulnerable in situations where hazard events impact access to electricity, food, water supplies, healthcare, sanitary resources, transportation, and communication platforms. Impacts to St. Helena from climate change are wide ranging and expected to include the following:

- **Extreme heat can cause heat-related illnesses such as heat stress, heat stroke, and dehydration and may exacerbation of existing respiratory and cardiovascular conditions. Those who do not have access to cooling, who have high outdoor exposure, and those who have health conditions or physiological conditions are particularly at risk. Extreme heat may trigger a power safety shutoff to decrease wildfire risk and/or manage high demand.**
- **Drought can impact the reliability of affordable water services for city residents which may cause individuals to become dehydrated and/or experience costs burdens associated with increased water rates. Prolonged droughts may limit the water supply for fire suppression efforts. Drought can also negatively impact wildlife dependent on local water resources. It can lead to declining quality and yield of vineyards located in St. Helena.**
- **Wildfires can cause individuals to be injured from smoke inhalation or burns. People may also have their belongings or homes destroyed or damaged during a wildfire event. Residential and commercial buildings, critical facilities, and critical infrastructure can be damaged from a wildfire. Wildfires may move through open spaces, threatening local wildlife. In order to mitigate further risk, a power safety shutoff may be initiated during a wildfire which would impact electricity services in the city.**
- **Floods can cause individuals to be injured from high velocity or high-volume floodwaters. People may have their belongings or homes destroyed or damaged from floodwater inundation. Flooding can cause structural damage to residential and commercial buildings, critical facilities, and critical infrastructure. High volumes of floodwater may cause stormwater systems to get overwhelmed and impaired.**

Implementation of policies and programs included in this Public Health, Safety, and Noise Element that improve the community's adaptive capacity, including addressing some of the underlying contributing factors, will reduce the negative impacts that climate change could have on vulnerable populations, critical services, facilities, and infrastructure.

Concepts, Trends and Ideas

Hazard Mitigation Planning

Hazard mitigation is defined by the Federal Emergency Management Agency (FEMA) as "sustained action taken to reduce or eliminate long-term risk to people and their property from hazards." The goal of hazard mitigation is to ensure long-term resilience against natural and human- caused hazards.

Mitigation Plans form the foundation for a community's long-term strategy to reduce losses from disaster and break the cycle of catastrophic event, disaster damage, and reconstruction.

As a condition for receiving certain types of non- emergency disaster assistance, State, Tribal, and local governments are required to develop a hazard mitigation plan. **The Napa County Multi-Jurisdictional Hazard Mitigation Plan was written in cooperation with the cities of St. Helena, Calistoga, American Canyon, Yountville, and local special districts, and was developed in**

accordance with the Disaster Mitigation Act of 2000 (DMA 2000) and followed FEMA's 2011 Local Hazard Mitigation Plan guidance. The Napa County MJHMP identified and profiled hazards, assessed facilities and populations at risk, and sets forth goals, mitigation strategies and mitigation action items for flooding, earthquakes, wildfire, severe weather, drought, climate change, slope failure, dam failure, agricultural disaster, and pandemic disease. Working together, local communities and jurisdictions in Napa County can reduce the long-term risks associated with natural and human-caused hazards. Consistent with that effort, the Public Health, Safety and Noise Element is St. Helena's primary policy tool for ensuring local action and St. Helena's involvement in implementing regional hazard mitigation strategies. **For more information about the Napa County MJHMP, visit https://mitigatehazards.com/napa-county-mjhmp/documents/.**

9.3 Key Findings

There are several challenges and opportunities facing St. Helena related to Public Health, Safety, and Noise. The following key findings are based upon comprehensive existing conditions analysis and community input.

Flooding

- Flooding in Napa County generally occurs within the low-lying Napa Valley floor. Between 1961 and 1997, flooding resulted in approximately $540 million in property damages. St. Helena experienced major flood events in 1986, 1995, and 2005 that caused an estimated combined total of $95.6 million in damages in the city. Most flooding occurred in the vicinity of Vineyard Valley from Fulton Lane to Pope Street.
- The flood history of York Creek suggests that the creek bed is not of adequate size to convey larger storm events. During the 2005 New Year's Eve storm event, flooding from York Creek significantly impacted residential and industrial properties. The Beringer water treatment plant flooded and ponds overflowed into the creek. In addition, the creek flooded vineyards on both sides of its corridor, downstream of State Route 29 to the Napa River.
- Until 2002, an aggregate mining operation, now discontinued, removed approximately 40,000 to 50,000 cubic yards of material from Sulphur Creek annually. Further study is needed to determine how aggregate buildup at Sulphur Creek may affect flooding issues in the area.
- Completed in June 2011, the City of St. Helena Comprehensive Flood Control and Environmental Restoration Project provides a minimum 100-year level of flood protection within the project and surrounding area of St. Helena. Design of the project was done on the basis of a Napa River Flood Model Study from Zinfandel Lane to Lodi Lane completed jointly by the City of St. Helena and the Napa County Flood Control and Water Conservation District with Measure A funding. The individual elements of the project include floodplain terracing, shoreline restoration, a new levee, floodwall and bank stabilization, and storm- water management features including a detention basin and pumping facility. The project protects hundreds of homes and is projected to save millions of dollars in flood insurance claims.
- Portions of St. Helena's residential, commercial and winery industrial areas are located within or near the 100-year floodplain and/or dam failure inundation zone. Requiring infrastructure and drainage plans to minimize risk in these areas, in compliance with State and federal requirements, at a minimum, can promote the safety of residents and businesses. Moreover, restricting new development within the FEMA- designated floodplain and prohibiting

development in the floodway can minimize additional flood hazards and the need for further mitigation measures.

Seismic and Geologic Activity

- St. Helena is located in a seismically-active region, with seismic activity primarily related to movements in the San Andreas Fault Zone (SAFZ). Although there are a number of active faults in the region, there are no known active faults in St. Helena.
- Local earthquake hazard mapping suggests that a magnitude 7.9 or greater earthquake on the San Andreas Fault, or a 6.5 magnitude event on the West Napa Fault, could result in strong shaking in the city. As a result, St. Helena's susceptibility to liquefaction ranges from low in the upland areas west of downtown, to very high along the Napa River. United States Geological Survey (USGS) maps indicate that slope stability and landslide issues exist in St. Helena's upland areas, and a major earthquake event could result in significant debris flow. As noted previously, the recent August 2014 earthquake had a magnitude of 6.0, which resulted in no measurable soil liquefaction within the City of St. Helena.
- By limiting the type and scale of new development in hillside areas, or areas subject to liquefaction, the City can limit the potential for property damage and loss of life as a result of major seismic activity. In addition, complying with the Universal Building Code (UBC) and adopting other standards for building safety along with emergency response disaster planning will help minimize the impacts of seismic and geologic disasters.

Air Pollution and Hazardous Materials

- The greatest source of greenhouse gas emissions in the City of St. Helena is the Transportation sector, which comprises 59 percent of total emissions according to a 2018 inventory compiled for the General Plan update. The transportation sector is also the largest generator of air pollution emissions in the County, with mobile sources – automobiles and trucks – providing the greatest level of emissions. A 2007 Bay Area Air Quality Management District (BAAQMD) GHG inventory indicated that approximately 56 percent of GHG emissions in Napa County resulted from mobile source emissions. Mobile emissions are a significant source of other pollutants, as well, including carbon monoxide and particulate matter.
- The development of a Climate Change Element for the St. Helena General Plan is an important step forward in contributing to the effort to improve regional and local air quality. Napa County's Communitywide Climate Action Plan and the Climate Change Element provide a strategic policy framework to reduce greenhouse gas emissions and reduce air pollution derived from its multiple sources.
- CalEnviroScreen have shown that people living in agricultural areas of California have higher amounts of pesticides in their bodies than other people, which can result in adverse health outcomes. Based on data compiled by the Office of Environmental Health Hazard Assessment (OEHHA), census tracts in St. Helena are in the top quartile in terms of pounds of pesticide per square mile in the state for the years 2012-2014. The Napa County Agricultural Commissioner is responsible for ensuring the safe use of pesticides in all settings in the county. The County runs a Pesticide Use Enforcement program to educate pesticide users of their legal responsibilities and conduct inspections and investigations to ensure the safety of workers, the public, and the environment. Compliance and enforcement activities are complemented with extensive training and outreach to help growers and employees ensure safe handling and use of pesticides.

Noise

- The primary source of noise in the community stems from motor vehicle traffic and commercial activity, particularly in areas near major roads, such as State Route 29. Mitigating traffic noise can be difficult, particularly the noise generated along State Route 29 throughout the day and night. However, the City can adopt noise standards to address more infrequent noise sources, such as those related to off-hours delivery, and commercial loading and unloading.
- While there are few industrial noise sources in St. Helena, passing trains and aircraft generate intrusive noise periodically in the community.
- Agricultural operations generate noise on a seasonal basis; however, local right-to-farm policies limit the City's power to regulate noise impacts. Encouraging the regular communication of planned agricultural activities to surrounding residents can help address potential conflicts relating to noise compatibility. In addition, adopting noise compatibility standards for sensitive land uses can help to minimize the impacts of intrusive noise sources.

Fire and Emergency Response

- **St. Helena's ~~paid per call~~ full time fire department, supported by six full time and 19 part time firefighter staff members (hired in Fall 2021) ~~two permanent staff members (hired in Summer 2018),~~** provides fire protection services for wildland and structural fires within the city limits and in unincorporated areas of Napa County. Although service levels within the city are generally adequate, the heavily-wooded and frequently dry hillside areas could create significant challenges for firefighters.
- By limiting the type and scale of new development in hillside areas and requiring sufficient road widths and turning radii to accommodate emergency response vehicles, the City can limit the potential for property damage and loss of life due to fires.
- Traffic congestion can adversely impact emergency response time in St. Helena, particularly when emergency vehicles must cross State Route 29. The City can work with emergency response providers to create solutions that address traffic-related emergency response challenges.
- **The City of St. Helena Fire Department and Napa County Fire Department provide fire services to St. Helena.**
- **In Napa County, wildfires have grown in frequency and intensity over the past two decades. There have been several fires in or adjacent to St. Helena since 1950.**
- **Water availability and peak water supply are extremely important for fighting fires and preparing for disaster events. St. Helena can ensure adequate water availability by pursuing water supplies from additional sources.**

Climate Change Hazards

- **Climate change is projected to increase the frequency and/or intensity of various natural hazards in the coming decades.**
- **St. Helena will experience increasing average maximum temperatures, increasing intensity of precipitation events, and longer dry periods.**
- **St. Helena is vulnerable to growing impacts from extreme heat and wildfire.**
- **As climate change occurs, communities and assets will be affected to varying degrees based on level of sensitivity to a particular hazard.**

- **The City's most vulnerable populations include young children, older adults, outdoor workers, individuals that are linguistically isolated, and visitors.**
- **Vulnerable critical services and infrastructure include water systems, natural gas, and roads.**
- **Extreme heat, drought, wildfire, and flooding will have impacts to critical facilities, services, and infrastructure that are vulnerable and located in hazard zones.**
- **Wildlife may suffer from loss of habitat and decreased availability of food and water sources due to increased severity and frequency of extreme heat, drought, wildfire, and floods.**

9.4 Goals

The goals of the Public Health, Safety and Noise Element are:

Maintain High Levels of Public Health and Safety

St. Helena is committed to maintaining high standards of public health and safety through anticipation of and preparation for potential natural and human-caused hazards.

Effectively Coordinate Responses to Emergencies and Natural Disasters

St. Helena is dedicated to protecting residents, businesses, and the environment through efficient local emergency response efforts, public education, and effective coordination with regional, State, and federal agencies.

9.5 Policies and Implementing Actions

A range of policies and implementing actions are outlined below and organized into the following topic areas:

1. Air Quality;
2. Noise;
3. Seismic and Geologic Hazards;
4. Fire and Hazardous Materials;
5. Flood Hazards;
6. Disaster Planning; and
7. **Climate Change Hazards**

The following policies and actions mandate, encourage, or allow certain initiatives to be pursued throughout the duration of the General Plan. Together, they serve as strategic directions for City staff and partners, highlighting where time and resources should be focused.

Topic Area
1 Air Quality

Policies

PS1.1 Achieve and maintain clean, healthy air for the residents of St. Helena to preserve environmental quality and community health.

PS1.2 Support regional efforts to achieve and maintain state ambient concentration standards to protect public health, reduce adverse industrial plant effects, and enhance the visual environment. In particular, provide local support for implementation of policies and measures set forth **in the Napa Valley Countywide Transportation Plan.** ~~**Napa County Congestion Management Program.**~~

PS1.3 Encourage effective regulation of those sources of air pollution, both inside and outside of St. Helena, which affect air quality, by implementing as many of the recommendations of **the Napa Valley Countywide Transportation Plan** ~~**the Napa County Congestion Management Plan**~~ as **are** ~~**is**~~ **cost-effective, equitable and** feasible.

PS1.4 Promote an optimized land use development pattern that minimizes cumulative air quality impacts from proposed developments **consistent with statewide air quality standards and local affordable housing and economic development goals.**

Implementing Actions

PS1.A Minimize local adverse air quality impacts related to construction by requiring dust abatement procedures for local projects **as required by existing laws and regulations.**

~~**PS1.B Mandate the use of EPA-approved wood stoves or fireplace inserts, rather than fireplaces, as a means of reducing emissions into the air.**~~

PS1.B Review project proposals for their potential to generate hazardous air pollutants.

PS1.C Develop guidelines for locating new sensitive uses, including residences, schools, and childcare facilities, away from air **stationary** pollutant sources **consistent with existing air quality laws and regulations.** The guidelines can include measures to mitigate air emissions from existing **stationary** sources, as well as to design buildings to prevent exposure.

PS1.D Encourage and support **cost-effective** regional efforts to use alternative modes of transportation.

PS1.E If sufficient user interest is demonstrated, c~~**C**~~**onsider** a citywide network to help commuters arrange carpools, including online coordination capabilities and designated areas for parking and pick-up.

PS1.F ~~**Adopt**~~ **Subject to modifications that reflect local conditions, costs, and variations, consider adopting the** thresholds of significance contained in the Bay Area Air Quality Management District's (BAAQMD) Guidelines for Assessing the Impacts of Projects and Plans for determining the significance of project impacts under the California Environmental Quality Act.

PS1.G Continue to implement an ordinance to restrict exposure to environmental tobacco smoke in new and existing multi-unit dwellings, public events, and outdoor areas, such as parks and playgrounds.

PS1.H Adopt a voluntary, **cost-effective,** employer-based transportation demand management (TDM) program for St. Helena businesses in compliance with the BAAQMD's 2017 Clean Air Plan (CAP). Components of a TDM program should include measures to reduce the use of single-occupancy vehicles for work-related commuting, such as carpool/vanpool matching services and employer-sponsored transit passes**., to the extent sufficient user interest is demonstrated.**

PS1.I The potential for sources of odors that **do not comply with national or state standards** ~~**includes**~~ **from** restaurants, auto body shops, or waste treatment facilities shall be considered when evaluating proposed residential projects and projects with sensitive recipients.

Topic Area
2 Noise

Policies

PS2.1 Preserve the current low levels of noise in St. Helena to maintain the City's rural atmosphere **consistent with accepted national or international standards for noise protection.**

PS2.2 Maintain a citywide environment that balances various City objectives while minimizing the impact of highway, railroad, and industrial noise. The City should manage both indoor and outdoor noise levels to protect health and safety. A combination of noise standards and existing noise levels should be used to determine impacts and mitigation measures.

PS2.3 Minimize potential noise impact conflicts between land uses by regulating ~~**incompatible**~~ land uses **that are non-compliant with adopted noise ordinances.** Encourage noise-generating uses to reduce their impacts while promoting land use patterns that avoid conflicts. Employ ~~**compatibility guidelines, interior noise level criteria,**~~ the City's noise standards, and noise contour maps to determine the compatibility of land uses.

PS2.4 Require a reduction and/or control of the use of machinery, mechanical systems and other noise-making equipment and sources in and near residential areas where the noise impacts **are non-compliant with local noise ordinances.** ~~**would be considered intrusive to adjacent residential property, unless consistent with the right-to-farm.**~~

PS2.5 An increase in average noise levels of 5 dBA or greater is considered to be significant and to constitute a noise impact by the noise source in question for the purpose of environmental analyses.

Implementing Actions

PS2.A Consider the environmental impact of transportation-related noise and other noise sources ~~**that are non-compliant with local noise ordinances**~~ in the review of any new projects and approval of subdivision plans and requests for changes in the zoning ordinance.

PS2.B ~~**Enforce**~~ **Consider** the Land Use Compatibility Standards presented in the State of California's General Plan guidelines when siting new uses**, subject to local variation based on local conditions and needs.** These standards identify the acceptability of a project based on levels of noise exposure.

~~**PS2.C Adopt and enforce Title 24 Standards for all types of new residential construction, including single family dwellings, duplexes, apartments, and dormitories.**~~

- ~~An interior maximum noise level of LAdn-45 dBA in all habitable rooms for all dwelling units;~~
- ~~A maximum allowable interior noise level for bedrooms of an hourly LAeq-35 dBA;~~
- ~~A maximum noise level of LAdn-60 dBA for residential exterior activity areas;~~
- ~~If interior noise standards are met by requiring windows to be closed, cooling and outside air exchange must also be provided in the building's design.~~

PS2.C~~D~~ Require an acoustical study, prepared by a qualified acoustical consultant for:

- All proposed projects that are likely to **be non-compliant with** ~~be exposed to noise levels greater than the standards;~~
- ~~All proposed projects that would generate noise where impacts on other uses would be greater than the standards;~~
- ~~Any project exposed to outdoor noise at or above a day-night average sound level (Ldn) of 60 or for any noise source that could create such outdoor noise levels for adjacent uses; and~~
- ~~Any project exposed to or that creates noise which may exceed the~~ adopted City standards.

PS2.D~~E~~ ~~Require~~ **Consider requiring a noise study when** new developments ~~to implement noise mitigation measures when~~ **are** built in close proximity to noise sources, such as State Route 29 and the railroad tracks. These developments should consider the exterior and interior noise environment.

PS2.E~~F~~ Require construction operations to use noise suppression devices and techniques and limit noisy construction activities ~~that can be heard at the property line to the least noise-sensitive times, as~~ per the City's noise ordinance.

~~**PS2.FG Consider including Include appropriate noise attenuation techniques in the design of all new arterial streets. Such techniques could include the use of site planning, building orientation, buffer distances, quiet pavement surfaces, and the use of correctly- engineered acoustical barriers and berms where necessary. Adopt the noise standard for intrusive noise at residences given in Table 9.4.**~~

PS2.F ~~H Amend~~ Consider amending the City's noise ordinance to regulate intrusive noise sources, such as the use of machinery and equipment, landscaping and property maintenance devices, animals, and idling buses or trucks in or near residential receptors or uses sensitive to noise.

~~**PS2.HI Incorporate right-to-farm legal provisions relative to noise in all newly- created deeds where agricultural activities may pose noise impacts in the future. Require similar language in deeds for properties similarly impacted by the Harold Smith & Son gravel plant operations.**~~

Topic Area
3 Seismic and Geologic Hazards

Policies

PS3.1 Minimize risk of injury, loss of life and property damage from seismically- induced and other known geologic hazards.

PS3.2 Restrict the intensity of development and the level of landform alteration in the hillside areas ~~in order to minimize~~ **where the** potential for slope failure **is significant based on existing seismic standards.**

PS3.3 The required soils and geologic reports for new development shall include geotechnical analysis for construction in areas with potential geological hazards and/or for purposes of environmental analysis. The analysis shall investigate all potential geo-hazard issues for the site where there is substantial evidence of a potential risk.

PS3.4 Geologic reports for new development shall describe hazards and include mitigation measures to reduce risks to acceptable levels. Where appropriate, an engineer's or geologist's certification ~~**shall**~~ **may** be required stating that risks have been mitigated to an acceptable level.

Implementing Actions

PS3.A Require a soils and geologic report to be submitted for new construction prior to the issuance of grading and building permits and the submission of final maps **in seismically hazardous areas.**

PS3.B Prohibit any development—including any land alteration, grading for roads, and structural development—in areas of **seismically hazardous** slope instability or other geo- logic concerns until mitigating measures are taken to limit potential damage to levels of acceptable risk.

PS3.C Require prompt re-vegetation of development areas on slopes prone to **seismically hazardous** instability. Use native and drought-tolerant plant species for landscaping on slopes where excess watering might induce **seismically hazardous** landslides and/or erosion.

PS3.D The City shall rely upon the most current and comprehensive geological hazard mapping available in the evaluation of potential seismic hazards associated with proposed new development.

PS3.E All development and construction proposals shall be reviewed by the City to ensure conformance to applicable building standards. **Reasonable ~~R~~recommendations** of the geotechnical analysis shall be implemented.

Topic Area
4 Fire and Hazardous Materials

Policies

PS4.1 Use the Zoning Code to define a **reasonable** transitional zone around industrial areas to protect the health and safety of residential neighborhoods.

PS4.2 Limit development in areas of High and Very High wildfire hazard as defined and mapped by the California Department of Forestry and Fire Prevention (**CAL FIRE**) in order to prevent the loss of lives, injuries, and property damage due to wildfires**, unless development is permitted by local approval under the CAL FIRE regulations.**

PS4.3 ~~Protect~~ To the extent feasible and cost effective, pProtect residents, employees, and visitors from wildfires.

PS4.4 ~~Protect~~ To the extent feasible and cost effective, protect St. Helena residents from health and safety impacts related to the use, storage, manufacture, and transport of hazardous materials.

PS4.5 ~~Discourage~~ Encourage new uses that **do not** rely extensively on the use of hazardous materials.

PS4.6 Facilitate communication and education about fire safety, non-point source pollution, household hazardous waste disposal, and recycling opportunities.

PS4.7 ~~**Ensure**~~ **To the extent feasible and cost effective, ensure** that all streets and roads ~~**are adequate**~~ **comply with best practices and standards** in terms of width, turning radius, and grade in order to facilitate access by City firefighting apparatus, and to provide alternative emergency routes of ingress and egress.

Implementing Actions

Wildfire

PS4.A Designate areas in St. Helena that are prone to fire hazards and make this information available to the community.

PS4.B Continue to require implementation of best practices in fire resistance for all new and remodeled structures in fire-prone areas, including fire fuel removal, creation of defensible space for firefighters, construction with fire-resistant building materials, and installation of automatic sprinkler systems. Study the need to designate a Wildland-Urban Interface Fire Area within St. Helena to provide protection in additional areas.

PS4.C Require all structures in high wildfire hazard areas to maintain a clearance of flammable vegetation away from structures and to use fire-resistant ground covers. The minimum clearance distance should be 100 feet in the Wildland-Urban Interface areas.

PS4.D Require all new development to meet the minimum fire flow rates specified by the City's Fire Code.

PS4.E Require all new development plans to be approved by the Fire Department prior to the issuance of building permits, grading permits, or final map approval.

PS4.F Develop a program to inform and educate the community about potential risks, resources, and roles and responsibilities for addressing fire safety in St. Helena. Inform residents of homes adjacent to public lands of their responsibility to provide fire breaks **and defensible space** adjacent to their homes.

PS4.G Investigate additional water supply sources to ensure the provision of adequate water availability to meet future peak fire, emergency, and domestic demands.

PS4.H Permit new development only within areas that have adequate water pressure.

PS4.I Coordinate with the Napa County Communities Firewise Foundation, the St. Helena Fire Safe Council, and neighboring jurisdictions to implement wildfire mitigation projects proposed in the Napa County Community Wildfire Protection Plan.

PS4.J Consider incorporating wildfire risk reduction measures, including load clearing and brush management into plans, operations and maintenance procedures for public access roads, parks, trails, open space, critical infrastructure, and critical roads.

PS4.K Provide educational materials to encourage businesses and residents to adopt drought tolerant and fire-resistant landscaping practices.

PS4.L Develop and disseminate education and outreach materials to landlords, businesses, and residents regarding retrofits and home-hardening measures that align with recommendations from CAL FIRE's Wildfire Home Retrofit Guide. Identify funding resources to support home retrofit and hardening projects.

PS4.M Partner with the St. Helena Fire Safe Council, the Napa Communities Firewise Foundation, and CAL FIRE to conduct educational workshops for landowners on defensible space, vegetation management, and home-hardening techniques based upon the most up-to-date science and State management guidelines to reduce wildfire hazards.

PS4.N Update standards in the zoning code to be consistent with the most recent SRA Fire Safe Regulations: title 14, CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 (commencing with section 1270) (SRA Fire Safe Regulations) and title 14, CCR, division 1.5, chapter 7, subchapter 3, article 3 (commencing with section 1299.01) (Fire Hazard Reduction Around Buildings and Structures Regulations).

PS4.O Minimize risks to existing development in areas at highest risk to wildfire by identifying existing non-conforming development and revise to meet contemporary fire safe standards. Address road standards and vegetative hazard, and require all development to meet or exceed CCR, division 1.5, chapter 7, subchapter 2, articles 1-5 requirements (SRA Fire Safe Regulations).

PS4.P Coordinate with CAL FIRE and Napa County Fire Department to incorporate best practices around wildfire risk reduction and vegetation management into maintenance planning of parks and open spaces.

PS4.Q Coordinate with CAL FIRE, Napa County Firewise Foundation, and Napa County Fire Department to identify funding sources and develop incentives to assist landowners in dead tree removal.

PS4.R Require fire protection plans for new development in areas of the City that are located adjacent to CAL FIRE hazard severity zones.

Hazardous Materials

PS4. S Review all new development proposals for their potential to introduce the production, use, storage, and/or transport of hazardous materials, and require reasonable controls on such materials.

PS4.T Develop a Hazardous Materials Response Plan that includes guidelines, protocols, and strategies to respond to a local hazardous materials spill.

PS4.U Continue to require compliance with federal, State, and local regulations for the safe production, transport, handling, use, and disposal of hazardous materials that may cause air, water, or soil contamination. Require buffers for operations which handle substantial amounts of hazardous materials. When siting new facilities or expanding existing facilities, require buffer zones between hazardous materials facilities and residential uses, parkland, trails, and open space facilities.

PS4.V Develop and launch a citywide education campaign to encourage the use of green products in order to reduce non-point source pollution. Target efforts towards the reduction of household chemical use and hazardous waste disposal.

PS4.W Require environmental assessments during the planning for development in areas previously used for agricultural, commercial, or industrial uses. Remediation of identified contamination that may result in health risks to construction workers and future owners and users shall be required prior to approval of construction, demolition, and grading permits for development.

PS5.X Work with the Napa County Agricultural Commissioner and other responsible agencies to identify and enforce mechanisms to control residual pesticides and pesticide runoff to prevent significant risk to water quality, vegetation, wildlife, and humans.

PS4.Y Develop a program to inform and educate the community about potential risks, resources, and roles and responsibilities for addressing fire safety in St. Helena. Inform residents of homes adjacent to public lands of their responsibility to provide fire breaks adjacent to their homes.

PS4.Z Review all new development proposals for their potential to introduce the production, use, storage and/or transport of hazardous materials, and require reasonable controls on such materials.

PS4.AA Develop a Hazardous Materials Response Plan that includes guidelines, protocols, and strategies to respond to a local hazardous materials spill.

PS4.AB Strengthen regulations for the safe production, transport, handling, use and disposal of hazardous materials that may cause air, water, or soil contamination. Require buffers for operations which handle substantial amounts of hazardous materials. When siting new facilities or expanding existing facilities, require buffer zones between hazardous materials facilities and residential uses, parkland, trails, and open space facilities.

PS4.AC Develop and launch a citywide education campaign to encourage the use of green products in order to reduce non-point source pollution. Target efforts towards the reduction of household chemical use and hazardous waste disposal.

Topic Area
5 Flood Hazards

Policies

PS5.1 Minimize the risk to people, property and the environment caused by flooding hazards. Site new development to minimize potential damage from a 100-year flood. **Consider changes in precipitation associated with climate change in the design of new development to avoid potential flood damages.** Continue to require that any new development is constructed to FEMA standards. Prohibit the siting of uses within Flood Hazard Areas inconsistent with FEMA standards that could result in health and safety hazards, including those due to the release of chemicals or other substances as a result of inundation or erosion. Ensure that any new flood protection projects comply with federal and State standards.

PS5.2 Ensure that new development or existing lots of record within the 100- year floodplain are properly graded, sited, and constructed to mitigate flood effects and do not cause increases or expansion of the flood area that increase flood risk.

PS5.3 Within the 100-year floodplain, encourage open space uses, such as parks or natural areas.

PS5.4 Ensure that construction of flood barriers does not adversely affect natural floodplains, stream channels and natural barriers that help accommodate or channel flood waters.

PS5.5 Prohibit new development within areas designated as Floodway in the current FEMA Flood Insurance Study (FIS) and Flood Insurance Rate Map (FIRM). (*Also see the Public Facilities and Services Element, Topic Area 3*)

PS5.6 Coordinate with the Napa County Flood Control and Water Conservation District and other responsible agencies to maintain protocols and funding for the regular inspection and maintenance of flood control facilities in the city, including levees, floodwalls, floodplain terracing, stormwater detention ponds, and pumping facilities.

PS5.7 Require that development within Special Flood Hazard Areas prepare and implement infrastructure and drainage plans compliant with State and federal requirements in order to minimize risk in these areas.

PS5.8 Locate**, when feasible and cost-effective,** new essential public facilities outside of Special Flood Hazard Areas, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities. *(Also see the Public Facilities and Services Element, Topic Area 3)*

Implementing Actions

PS5.A Coordinate with the Napa County Flood Control District to ensure that stream channels are routinely cleared of vegetation and debris which could impede stormwater flows, while protecting riparian habitat.

PS5.B Require developers with land adjacent to the Napa River to construct or contribute a fair share toward the construction of necessary flood control improvements.

PS5.C Strengthen and enforce regulations that prohibit the dumping of litter, fill, and waste materials into creeks and waterways. Educate the public about flooding and health hazards associated with these activities.

PS5.D Require that **best design practices** are implemented for sewer and water lines in areas subject to flooding **or** are sited to avoid contamination and flooding when pipelines break.

PS5.E Prohibit the introduction of urban development in FEMA-designated Floodway zones.

PS5.F Review Municipal Code Chapter 15.52, Flood Damage Prevention, to ensure that regulations reflect best practices. Periodically update the City's flood hazard regulations in accordance with FEMA/NFIP regulations.

PS5.G Implement the requirements of FEMA relating to construction in Special Flood Hazards Areas as illustrated on Flood Insurance Rate Maps.

PS5.H Implement low impact development practices for new development and redevelopment projects to reduce stormwater peak flow rates and volumes from smaller, more frequently occurring storm events.

Topic Area
6 Disaster Planning

Policies

PS6.1 Ensure that City emergency procedures are adequate in the event of potential natural or man-made disasters.

PS6.2 Ensure the swift and safe evacuation of residents, employees, and visitors in the event of a disaster event or other emergency.

PS6.3 Alleviate evacuation challenges associated with single access residential neighborhoods.

Implementing Actions

PS6.A Maintain and periodically update the City's Emergency Response Plan **to align with emergency planning efforts by Napa County Office of Emergency Services, Napa County Sheriff Office, Napa County Fire Department and Cal OES.**

PS6.B Conduct periodic emergency response exercises to test the effectiveness of City emergency response procedures**. Identify current emergency service and projected emergency service needs, and goals or standards for emergency services for training for City staff and volunteers.**

PS6.C Continue to collaborate with regional agencies and neighboring jurisdictions**, including Napa County Office of Emergency Services, Napa County Sheriff Department, Napa County Fire Department, and Cal OES,** to develop and implement a regional emergency coordination plan and agreement for police, fire, and emergency medical services.

PS6.D Maintain emergency roadways and improve them as necessary and appropriate to ensure ongoing serviceability.

PS6.E Maintain reliable communication pathways with the public to ensure a safe and streamlined evacuation.

PS6.F Engage with the Napa ~~County~~ Valley Transportation Authority, Caltrans, California Highway Patrol, adjacent cities, and Napa County to identify regional evacuation solutions that address major evacuation routes.

PS6.G Conduct outreach with residents in single access road neighborhoods to enforce home hardening and defensive space standards and conduct emergency preparedness and response trainings.

PS6.H Coordinate with Napa County Sheriff Department, Caltrans, Napa County Emergency Response Team (CERT), St. Helena Fire Safe Council, homeowner associations, and neighborhoods to facilitate the use of Zonehaven for evacuation coordination.

PS6.I Develop and employ evacuation alternatives and/or alternative emergency access routes in neighborhoods that have single ingress/egress.

PS6.J Develop and maintain evacuation options for vulnerable populations such as young children, older adults, outdoor workers, individuals that are linguistically isolated, visitors, and individuals with access and functional needs.

PS6.K Designate and publicize evacuation routes and evacuation shelters through Zonehaven.

PS6.L Designate and publish in Zonehaven safety zones and/or shelter-in-place locations as potential places of refuge when evacuation routes or evacuation shelter are inaccessible.

PS6.M Assist local and small businesses in planning for business continuity and emergency preparedness.

PS6.N Prioritize the City's essential facilities when conducting post-disaster building evaluations.

Topic Area
7 Climate Change Hazards

Policies

PS7.1 Protect the City's vulnerable population from the impacts of climate change.

PS7.2 Support greater resilience, redundancy, and reliability of local and regional infrastructure and services.

PS7.3 Protect and restore climate-vulnerable ecosystems, natural resources, and managed resources.

PS7.4 Increase local economic resilience and business continuity.

Implementing Actions

PS7.A Conduct an assessment on the effectiveness of current City cooling center operations to evaluate current amenities and resources available to ensure the needs of vulnerable populations are met during extreme climate events, such as high heat days and bad air quality days. Ensure the City's cooling center has adequate backup power sources and battery storage to mitigate service disruptions.

PS7.B Update the St. Helena building code to require cost-effective and reasonable weatherization and consideration of extreme heat for new developments.

PS7.C Explore opportunities to provide funding assistance to households and populations that are in greatest need of weatherization to address extreme heat, extreme storm, and air quality concerns.

PS7.D Consider climate change impacts and vulnerabilities during the infrastructure planning process. Identify projects as part of capital improvement programs that consider climate adaptation priorities.

PS7.E Invest in cost-effective, feasible renewable back-up power sources and storage options to increase energy resilience at critical facilities during extreme heat events, wildfires, extreme precipitation events, or other scenarios that may trigger a power safety shutoff or outage.

PS7.F Expand the use of drought-tolerant green infrastructure, including street trees, and landscaped areas where feasible and cost-effective, as part of cooling strategies in public and private spaces.

PS7.G Coordinate with PG&E and Napa County Office of Emergency Services to establish backup power and emergency grid shutdown protocols that protect the City's vulnerable populations.

PS7.H Evaluate critical facilities to assess the feasibility and cost-effectiveness of retrofitting to increase long-term resilience to climate change hazards including extreme heat, extreme precipitation events, and wildfire.

PS7.I Partner with St. Helena Chamber of Commerce and Visit Napa Valley to pilot and implement a local business resilience initiative to build small business resilience capacity by increasing the awareness of and preparedness for business continuity risks in the face of climate change. Provide resources to help local business manage risk and enhance resilience, and conduct outreach

campaigns to engage business, governmental, and community leaders to preparedness for economic resilience.

PS7.J Develop and disseminate guidelines and outreach materials on tree and plants species that are drought-tolerant and wildfire resistant to city residents and businesses.

PS7.K Partner with local researchers (such as, California State University-Sonoma) to make accessible localized viticulture climate adaptation strategies that address impacts of extreme heat, drought, wildfire, and extreme precipitation events to vineyards in and around the city.

PS7.L In recognition of the increase in severity and frequency of floods and wildfires, essential public facilities should be sited in areas that are least prone to hazard impacts, when feasible and cost-effective.

PS7.M Partner with the St. Helena Chamber of Commerce and St. Helena Welcome Center to develop emergency public health and evacuation communication strategies for visitors and tourists.

TABLE 9.1: Definition of Acoustical Terms

Term	Definition
Decibel, dB	A unit describing the amplitude of sound. Equal to 10 times the logarithm to the base 10 of the ratio of two like quantities.
Sound Pressure Level (SPL)	10 times the logarithm to the base 10 of the ratio between the square of the sound **pressure** to the square of the reference sound pressure of 20 µPascals. Sound pressure level is the quantity that is directly measured by a sound level meter and expressed in **decibels (dB).**
Frequency, Hz	The number of complete pressure fluctuations per second above and below atmospheric pressure is expressed in Hertz (Hz). Normal human hearing is **approximate**ly between 20 Hz and 20,000 Hz.
A-Weighted Sound Level, dBA	The SPL in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes low frequency components of sound in a manner similar to the frequency response of the human ear and correlates well with subjective response to sound.
Noise	Unwanted or unhealthful sound.
Equivalent Noise Level, LAeq	The average A-weighted sound level during the measurement period. The A-weighted equivalent continuous sound level.
LAmax, LAmin	The maximum and minimum A-weighted sound level during the measurement period with the sound meter using fast-time-weighting.
LA01, LA10, LA50, LA90	The A-weighted sound levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day/Night Noise Level, Ldn	The average A-weighted sound level during a 24-hour day, obtained after the addition of 10 decibels to levels measured at night between 10:00 pm and 7:00 am.
Total Sound	The composite of sound from all sources near and far.
Ambient Sound	The sound level measured in the absence of an intrusive or extraneous noise.
Intrusive Noise	That noise from a source of specific origin which intrudes above **or within** the existing background sound level. The degree of intrusiveness of a sound depends upon its amplitude, duration, frequency, time of occurrence, and tonal or informational content as in contrast to the prevailing background sound level which exists in the absence of the intrusive noise.
Background Sound Level	The LA90 of the ambient sound. It represents the ever present lower sound level due to distant sources which are individually indistinguishable, and in the absence of the Intrusive or Extraneous Noise.
Extraneous Noise	Specific or distinguishable intermittent sound from nearby sources such as mechanical devices, leaf blowers, pumps, **vehicles**, horns, sirens, barking, **talking,** shouting, birds, wind and other similar individual sources, which don't normally exist on a continuous or regular basis.
Intermittent Noise	A noncontinuous sound consisting of a number of clearly distinguishable sound events of varying frequency and/or intensity.

TABLE 9.2: Noise Land Use Compatibility Guidelines

Land Use Category	Completely Compatible[1]	Tentatively Compatible[2]	Normally Incompatible[3]	Completely Incompatible[4]
Residential	< 55 dBA	55-60 dBA	60-75 dBA	> 75 dBA
Commercial/ Office	< 65 dBA	65-75 dBA	75-80 dBA	> 80 dBA
Industrial/ Agricultural	< 70 dBA	70-80 dBA	80-85 dBA	> 85 dBA
School, libraries, churches, hospitals	< 65 dBA	65-70 dBA	70-80 dBA	> 80 dBA
Playground, neighborhood park	< 67 dBA	67-70 dBA	70-75 dBA	> 75 dBA

~~*a Expressed as Ldn or CNEL.*~~
1. Completely Compatible – Specified land use is satisfactory, based on the assumption that any buildings involved are or normal conventional construction.
2. Tentatively Compatible – New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems of air conditioning will normally suffice.
3. Normally Incompatible – New construction and development should generally be discourage. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must b made and needed noise insulation features included in the design.
4. Clearly Incompatible – New construction or development should generally not be undertaken.

TABLE 9.3: Maximum Interior Noise Level Criteria of Intermittent Noise for Public Use Facilities

Land Use	Maximum Intermittent Noise Level LAmax	Basis for Criterion
Concert Hall	25	Intrusion of noise may spoil artistic effect
Theater	30	Intrusion of noise may spoil artistic effect
School Auditorium	35	Minimize intrusion into artistic performance
School Classroom	55	Speech communication-20 ft.-raised voice
School Laboratory	60	Speech communication-6 ft.-normal voice
Church/Sanctuaries	45	Speech communication-50 ft.-raised voice
Library	55	Speech communication-3 ft.-normal voice

Source: Adapted from Table 2 in "Night Insulation Problems in Buildings," Paul S. Veneklasen & Associates, 1973; Noise Element of the Napa County General Plan, 1982.

TABLE 9.4: Standard and Adjustments for Determining Noise Impact of Intrusive Noise for Residential Receptors

STANDARD

The LAeq of an intrusive noise shall not exceed the following values:

- 7 am – 7 pm (daytime) 45 dBA
- 7 pm – 10 pm (evening) 40 dBA
- 10 pm – 7 am (nighttime) 35 dBA

Or shall not exceed LA90 + 5 dBA whichever is greater. The background sound level LA90 must be measured-**for a minimum of 10 minutes** in the absence of the intrusive noise at the appropriate time of noise impact.

The intrusive noise shall be measures in absence of extraneous noise.

Acoustical terms defined in Table 9.1 shall be considered as part of this standard.

The maximum noise level LAmax of any intrusive noise shall not exceed the LAeq limits by more than 10 dBA.

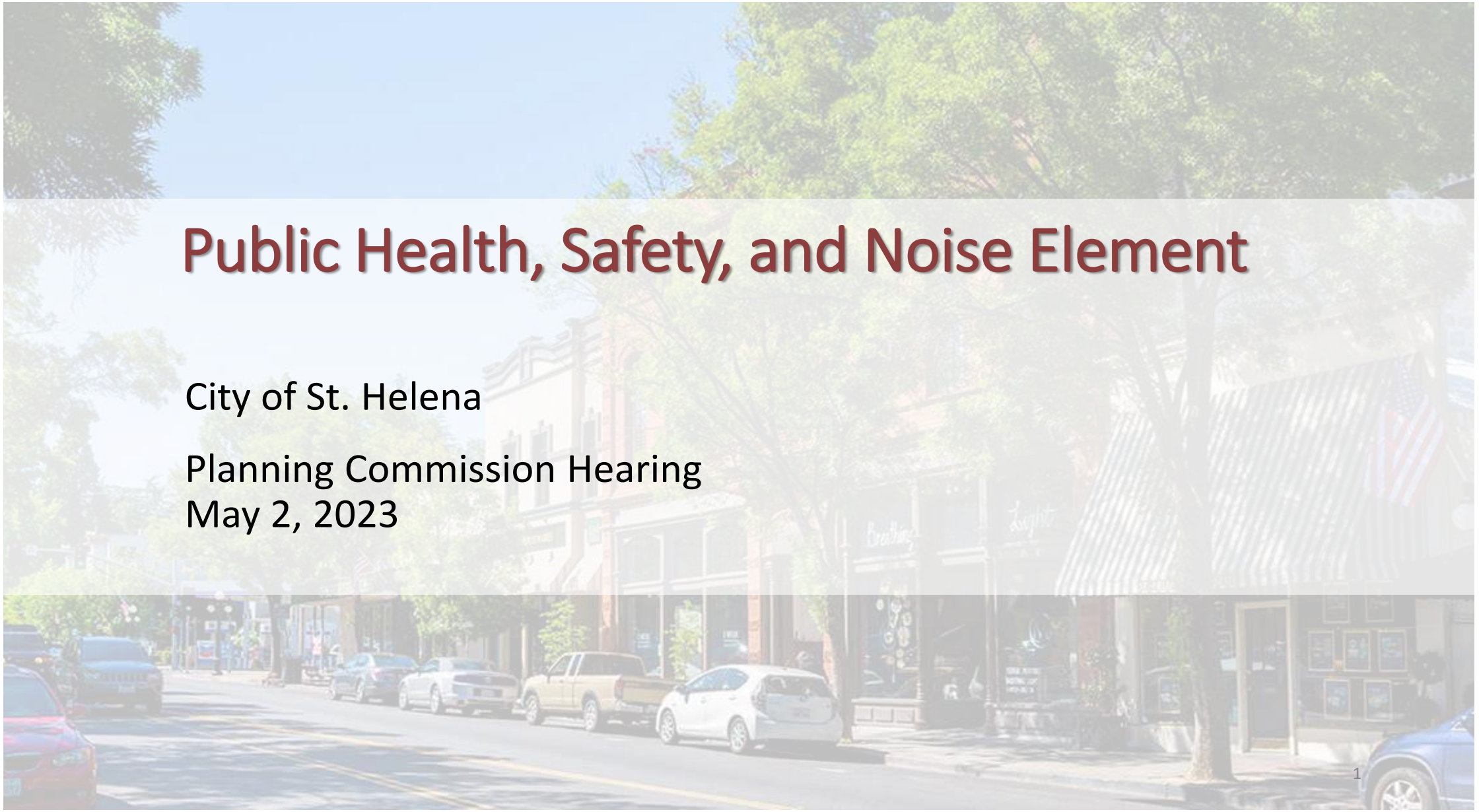
The limits for intrusive noise are to be corrected as indicated below.

These noise limits apply to the nearest residential property line or at the nearest affected location on the receiver's property.

CORRECTIONS FOR INTRUSIVE NOISE

Type of Correction	Circumstances of Correction	Correction[a]
Seasonal	Summer or year round operation	0 dBA
	December through March only	+ 5 dBA
Tone or Impulse	No tonal or impulse character	0 dBA
Characteristics	Tonal character[b] present in noise	- 5 dBA
	Impulsive[c], repetitious or modulating[d] signal	- 5 dBA[e]

Notes:
a Correction to be applied to the Standard's limits for intrusive noise.
b Tonality exists when the 1/3 octave noise level of the tone is 5 dB greater than the average level of the two adjacent 1/3 octave frequency bands.
c Transient sound having a peak level of short duration typically less than 100 msec.
d Either in amplitude, frequency or duration including compressor "hammering" noise.
e In addition to correction for tonality.



Public Health, Safety, and Noise Element

City of St. Helena

Planning Commission Hearing
May 2, 2023

Presentation Outline

- Public Health, Safety, and Noise Element Overview
- Climate Change Hazards in St. Helena
- Evacuation Routes and Vulnerable Neighborhoods
- Changes Based on Public Review and Joint Study Session Comments
- Discussion and Potential Action



Public Health, Safety and Noise Element

Public Health, Safety, and Noise Element

- Identifies and describes the natural and human-caused hazards that could impact the people, assets, services, and resources in the City
- Establishes policies and implementing actions to mitigate and recover from hazard
- Updates City practices and regulations to reflect new State law

Relevant Hazards to St. Helena

- Flood, earthquake, landslide, air pollution, hazardous materials, noise, fire, climate change hazards

Public Health, Safety, and Noise Element

- City's Existing Public Health, Safety, and Noise Element was revised and adopted in June 2019 as part of a comprehensive update to the City's General Plan
- Recent State legislation requires that Safety Elements by reviewed and updated as necessary alongside the 2023-2031 Housing Element Update
- Current update focuses on new legislation around evacuation planning, wildfire, flood, and climate change adaptation

Climate Change Hazards in St. Helena

- State laws require that the City consider and plan for the impacts of climate change on the community
- The City has prepared a Climate Change Hazards and Vulnerability Assessment as an Appendix to the Element
- Climate Change Hazards of Concern
  - Drought
  - Extreme Heat
  - Wildfire
  - Flooding
  - Air Pollution

Evacuation Routes and Vulnerable Neighborhoods

The Public Health, Safety, and Noise Element update includes:

- Major evacuation routes in St. Helena
  - State Route 29 and Silverado Trail
- Residential neighborhoods that have a single access road for entry and exit and therefore are vulnerable during evacuation scenarios
  - **Two** residential neighborhoods (Vineyard Ave. and College Ave.) in St. Helena were identified as having a single access road for entry and exit
  - Policy and implementing actions were developed to minimize evacuation challenges for these neighborhoods

Policies and Implementing Actions

- Policies and implementing actions were augmented and added to the Public Health, Safety and Noise Element to comply with new State legislation and ensure climate change hazard impacts are addressed.
- Policies and implementing actions in the following areas were augmented and added:
  - Wildfire
  - Disaster Planning
  - Climate Change Hazards

Changes based on Comments

Following the 30-day public review (September – October 2022)

- Minor adjustments to fire, noise, air quality, climate change hazards, and disaster planning background information
- Minor adjustments to the noise policies and implementing actions

Changes based on Comments

Following the Joint Study Session (September 2022)

- Minor adjustments to policies and actions to ensure feasibility, cost-effectiveness and implementation
- Minor adjustments to fire, noise, air quality, climate change hazards, and disaster planning background information and policies
- Addition of critical facility (Bell Canyon Dam)
- Removal of a residential neighborhood (Vineyard Valley Mobile Home Park) as a designated single access neighborhood
- Addition of information regarding specific critical facilities located in hazard zones
- Minor adjustments to the Climate Change Hazard and Vulnerability Assessment caveating certainty of future climate projections



Discussion & Next Steps

Discussion and Potential Action

1. Questions?
2. Potential Action:
   - *Planning Commission recommendation that the City Council of the City of St. Helena adopt a General Plan Amendment to update the Safety Element of the General Plan and adopt an Addendum to the General Plan Environmental Impact Report.*