

## 6th Cycle Housing Element Update - HCD Review Comments Tracking Sheet

Topic	Subtopic	05.17.2023 HCD Review Letter Comments	08.07.2023 HCD Informal Review Comments	HCD Comments - Formal Review 09.21.2023	Response / Edits To Date	Appendix / Section / Page No. <small>Note: Page numbers may be different between clean draft and redlined draft.</small>
Housing Needs, Resources, and Constraints	Housing Needs; Disproportionate Housing Needs	The element includes some general information on persons experiencing homelessness and housing conditions but should also evaluate those needs, impacts and patterns within the City, such as areas of higher need. For homelessness, the element should examine patterns of need or areas with higher concentrations of persons experiencing homelessness, including access to transportation and services. For housing conditions, the element should discuss any areas of potentially higher needs of rehabilitation and replacement. The element should utilize local data and knowledge such as service providers and code enforcement officials to assist this analysis.	None	None	To adequately assess fair housing in the City of Napa, more details have been added about the patterns of homelessness and areas with higher concentrations of homeless persons. More details were also added about areas of higher concentrations of older/poorer condition housing stock with higher need for rehabilitation or replacement.	Appendix A, Sections A.4.1 and A.5.5, pgs A-21, 22, 30, and 31,
Housing Needs, Resources, and Constraints	Housing Needs; Identified Sites and Affirmatively Furthering Fair Housing (AFFH)	The element includes some discussion of the number of sites by concentrations of socio-economic characteristics. However, this approach to whether identified sites AFFH should account for where the sites are located. The analysis should address the number of units by all income groups, and location (e.g., neighborhood, planning area, census tract), discuss any isolation of the regional housing need allocation (RHNA) by income group and evaluate the magnitude of the impact on existing concentrations of socio-economic characteristics by area. The analysis should be supported by local data and knowledge and other relevant factors and address overlapping fair housing issues with other components of the assessment of fair housing (e.g., segregation and integration, concentrated areas of poverty, disparities in access to opportunity).	None	None	To adequately assess fair housing in the City of Napa, new maps and a summary table were created to identify fair housing issues across four main geographic areas of the city. Narrative summaries of the findings from new mapping analysis are also provided. A new program was created in response to the complete analysis to increase investment in areas of greatest need, including the South East Quadrant, with specific actions and timeline (see New Program H4-4.2).	Appendix C, Sections C.7 and C.8, pgs C-83 to C-102; and Housing Element, Section 5, pg 67, Program H4-4.2
Housing Needs, Resources, and Constraints	Housing Needs; Contributing Factors to Fair Housing Issues	Based on the outcomes of a complete analysis, the element should re-assess and prioritize contributing factors to fair housing issues	None	Prioritized?	Based on the complete assessment of fair housing in the City of Napa, including a more detailed geographic breakdown of fair housing issues, the previously identified contributing factors and proposed actions/housing programs to address them are still valid with no need for significant revision; however, more emphasis was added on geographic locations and a new program was created to increase investment in areas of greatest need, including the South East Quadrant, with specific prioritized actions and timeline (see New Program H4-4.2).	Appendix C, Sections C.7 and C.8, pgs C-83 to C-102; and Housing Element, Section 5, pg 67, Program H4-4.2
Housing Needs, Resources, and Constraints	Housing Needs; Extremely Low-Income (ELI) Households	While the element quantifies existing and projected ELI households, it must also analyze their housing needs. The analysis of ELI housing needs could consider tenure, overpayment, overcrowding, resources and the effectiveness of strategies and the magnitude of housing need.	None	Strategies and past efforts addressed  Still should address characteristics and disproportionate housing needs (e.g., tenure, overpayment, overcrowding)	To complete the analysis of population characteristics, trends, and special housing needs, additional analysis and discussion of housing currently available and suitable in Napa for extremely low-income households was added in Section A.3.9, including discussion of existing zoning allowances for such housing types. Disproportionate housing needs are also discussed in relation to tenure, overpayment, overcrowding, and other factors in Sections A.3.8, A.5.11, C.6.1, C.6.2, and C.8.4.	Appendix A, Section A.3.7, pg A-15; and Appendix E, Section E.1.1.2.3, pg E-20 to 27
Housing Needs, Resources, and Constraints	Housing Needs; Overpayment	While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner) and add or modify policies and programs as appropriate.	None	None	To complete the analysis of population characteristics, trends, and special housing needs, additional analysis and discussion of cost burden for lower-income households in Napa was added.	Appendix A, Section A.5.11, Table A-5-6, pg A-43 and 44
Housing Needs, Resources, and Constraints	Housing Needs; Special Housing Needs	The element reports data on households and persons with special housing needs. However, for persons with disabilities, female-headed households and large households, it must also describe the resources available and effectiveness of strategies to these special housing needs groups, then determine the magnitude of housing needs to better formulate policies and programs.  In addition, given the importance of the viticulture industry and the disproportionate housing needs of farmworkers, the element should closely examine the housing needs of farmworkers. For example, the analysis could address household characteristics, income, challenges faced by the population, the existing resources to meet those needs, an assessment of any gaps in resources, and the effectiveness of past policies, programs, and funding to help address those gaps.  The analysis may utilize past farmworker housing studies and other studies generally applicable to their special housing needs. For example, the element could utilize a recent study conducted by University of California at Merced that is available at: See link in "Link Column"  Based on the outcomes of the analysis, the element should add or modify programs to address this significant special housing need in the region.	None	Programs H2-2.1, H2-4.2  Should add actions to address the housing needs of farmworkers	To complete the analysis of population characteristics, trends, and special housing needs, additional discussion of characteristics, available resources, and Housing Element programs addressing special housing needs populations in Napa was added, including more details regarding Large Households, Female-Headed Households, People with Disabilities, and Farmworkers. Recognizing farmworkers as a critical and underserved segment of the population, the City will take actions under Program H2-4.2 to support Napa County Housing Authority in providing and expanding housing programs for this population.	Appendix A, Section A.5.1, pg A-26; Section A.5.2, pg A-28; Section A.5.4, pg A-33; and Section A.5.6, pg A-37

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Housing Needs, Resources, and Constraints	Site Inventory; Progress in Meeting the RHNA	The element indicates that 337 units affordable to lower- income households and 135 units affordable to moderate-income households have been built or are under construction or approved (p. B-6) but provides minimal information documenting how affordability of the units was determined. The element must describe the City's methodology for assigning these units to the various income groups based on actual sales price or rent level of the units and demonstrate their availability in the planning period. Availability should address the status, anticipated completion, any barriers to development, and other relevant factors such as build-out horizons, phasing, and dropout rates to demonstrate the availability or likelihood of development in the planning period.	Status of each project must detail timing, any phasing requirements or other barriers to securing entitlements. CL to send sample.	None	To complete the housing sites inventory analysis, a new section was added to discuss affordability ratings of the pipeline project units, including summarizing the methodology for determining affordability and providing additional details on affordability of specific projects. Details were also added for each pipeline project regarding timing, phasing, and barriers to securing entitlements, if any.	Appendix B, Section B.2.2.1, pg B-7; and Section B.2.3, pg B-11 to B-18
Housing Needs, Resources, and Constraints	Site Inventory; Parcel Listing	The element lists parcels by various factors such as size, zoning, and general plan designation. However, the element must also include a sufficient description of existing uses to facilitate an analysis of the potential for additional development on non- vacant sites. For example, the inventory could describe the use as offices, structure(s) older than 50 years in poor condition, vacancies present, existing floor area of 0.1 versus allowable floor area. Alternatively, the inventory could utilize various data layers with similar information.	Existing uses in Table B-16 (for underutilized parcels) must be explicit. Roll your descriptions from the non-vacant sites analysis into the actual inventory itself. I need to know what is on that site (hopefully not a Whole Foods). ;)	None	To complete the housing sites inventory analysis, the Assessor's land use codes and additional property-specific information about existing uses were added for each nonvacant/underutilized parcel included in the inventory.	Appendix B, Section B.7, pgs B-47 to 51, Table B-16
Housing Needs, Resources, and Constraints	Site Inventory; Zoning for Lower-Income Households	The element must demonstrate densities appropriate to accommodate housing for lower income households. The element notes that its zones or General Plan designations allow for development at the default density of 20 units per acre or higher (p. B-19). However, Table B-15 only specifies GPLU maximum densities allowed and some General Plan designations in Table E-1, notably Medium and High Density Residential and Residential Mixed Use appear to have minimum densities between 8-18 units per acre. The element should address this inconsistency. Otherwise, an analysis must demonstrate appropriate densities based on factors such as market demand, financial feasibility and development experience within identified zones.	None	None	This was a misunderstanding of the information presented. Additional clarification was added about affordability assumptions based on state law and assumed densities of inventory sites based on zoning and General Plan designations.	Appendix B, Section B.3.2, pg B-21
Housing Needs, Resources, and Constraints	Site Inventory; Small and Large Sites	The element currently discusses how development might occur on small and large sites, but it must still provide analysis of past trends or present other evidence to demonstrate the suitability of these sites. For example, the analysis could describe the City's role or track record in consolidating or subdividing parcels and identify policies or incentives offered or proposed to ensure parcels are suitable and ready for residential development or intensification.	None	Analysis is OK  Should add program to facilitate parceling, coordinate with school district and property owners, encourage appropriate parceling (1-10 acres) through incentives and assist with development, including a quantified objective in line with assumptions in the inventory	To complete the housing inventory sites analysis, examples of recently approved and/or constructed projects on small sites were added. It was also further clarified that only 10% of the 26.69-acre Harvest Middle School site is counted toward the inventory (2.65 acres counted at 20 du/ac), which aligns with recent trends for infill site development. Program H2-3.3 was also added to facilitate and incentivize the site's development as assumed in the inventory.	Appendix B, Sections B.3.8 and B.3.9 (formerly B.3.7 and 8), pgs B-31 and 32
Housing Needs, Resources, and Constraints	Site Inventory; Suitability of Nonvacant Sites	While the element identifies the methodology used to screen parcels for inclusion and describes its realistic capacity assumptions for nonvacant sites (pp. B-17-22), it provides minimal description of their potential for redevelopment.  The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. To address this requirement, the element should analyze the existing uses of nonvacant sites to demonstrate the potential for redevelopment in the planning period. The description of existing uses should be sufficiently detailed to facilitate an analysis demonstrating the potential for additional development in the planning period. In addition, the element needs to also analyze the extent that existing uses may impede additional residential development. 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.	None	Per 9/21/2023 email: single family residence means only one unit [no additional edits needed]	To complete the housing sites inventory, more details were added regarding the methods and assumptions for including non-vacant, underutilized sites in the inventory.	Appendix B, Sections B.3.1 to B.3.4, pgs B-19 to B-30

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Housing Needs, Resources, and Constraints	Site Inventory; Adequate Sites Alternative	The City is crediting 142 units affordable to lower-income households towards its RHNA through Project Homekey and rehabilitation. To credit these units toward the City's housing need, the element must demonstrate compliance with all the statutory requirements (Gov. Code, § 65583.1, subd. (c)(2)(D)). For example, the element must demonstrate that the affordability for the units determined will be maintained for at least 55 years, units be made available for people experiencing homelessness as defined in Section 578.3 of Title 24 of the Code of Federal Regulations and will be affordable to very-low and low-income households at the time the units were identified for preservation, among other things. For additional information and an Alternative Sites Checklist, see the Building Blocks at <a href="https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/adequate-sites-alternatives/docs/adequate_site_alt_checklist.pdf">https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/adequate-sites-alternatives/docs/adequate_site_alt_checklist.pdf</a> .	If you have not already done so, please attach completed checklist to HE and as part of the record.	Complete checklist for Hotel/motel conversion project	To complete the housing sites inventory analysis, more details were added regarding the executed affordability agreements for the Project Homekey and rehabilitation pipeline projects, Heritage House/Valle Verde and Valley Lodge. Alternative Sites Checklists are attached at the end of Appendix B.	Appendix B, Section B.2.3, pg B-11 and pg B-17
Housing Needs, Resources, and Constraints	Site Inventory; Accessory Dwelling Units (ADU)	The element projects 366 ADUs to be constructed over the planning period, averaging approximately 46 units per year. This projection was based on annual permit data from 2018-2021 (p. 30). However, Annual Progress Reports submitted by the City indicate building permit figures of 20, 34, 45, and 60 for 2018, 2019, 2020, and 2021, respectively. The element should reconcile these figures and adjust assumptions as appropriate.	None	None	To complete the housing sites inventory analysis, clarification was added that ADU projection is based on the adoption of loosened regulations in 2019, allowing the City to use permit numbers from 2019 to 2021 as the baseline average, consistent with accepted projection methodology.	Appendix B, Section B.4, pg B-37
Housing Needs, Resources, and Constraints	Site Inventory; Infrastructure	The element includes discussion on water, sewer, and dry utilities capacity. However, it also describes potential limitations to sewer infrastructure that will require capacity improvements (pp. B-30-31). The element must clarify whether there is sufficient total sewer capacity (existing and planned) to accommodate the RHNA and identify programs to address needed improvements and capacity, as necessary.	Enough capacity or not? Dry utilities capacity?	None	To complete the housing sites inventory analysis as it relates to public facilities and services, explicit statements about capacities were added for dry utilities, water, and sewer. All utilities are available to serve all areas of the City chosen for candidate housing sites at sufficient capacities to serve existing and future housing development, during both normal and dry years.	Appendix E, E.2.3, pg E-54 to E-55
Housing Needs, Resources, and Constraints	Site Inventory; 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.) Local governments are required to immediately deliver the housing element to water and sewer service providers. HCD recommends including 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 <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/priority-water-and-sewer</a> .	None	City is the water provider  Is the Napa Sanitation District independent from the City?  Does the City have a written procedure to grant priority water (and sewer if applicable)? If not, is there a program? If not, add a program.	To complete the housing sites inventory analysis, a memorandum to NapaSan and the City of Napa Utilities Department, Water Division, was added. The memo will be delivered to utility providers following certification and adoption of the element. In addition, Program H4-3.2 was added to develop a written policy to prioritize water service.	Appendix H, Section H.4.5, pg H-27
Housing Needs, Resources, and Constraints	Site Inventory; Environmental Constraints	The element notes that identified sites are not constrained by any known environmental factors (p. B-18) but should also discuss any other known conditions that preclude development in the planning period. Examples include parcel shape, easements, property conditions, contamination and airport compatibility.	None	None	To complete the housing sites inventory analysis, clarification was provided that any sites with environmental constraints or other unusual conditions were disqualified from inclusion in the inventory; therefore, none of the sites in the inventory have known conditions that would preclude development in the planning period.	Appendix B, Section B.3.1, pg B-20
Housing Needs, Resources, and Constraints	Site Inventory; Zoning for a Variety of Housing Types; Emergency Shelters	The element discusses zoning and capacity for emergency shelters (pp. E-25-26) but must also identify and analyze any development standards (e.g., spacing, parking, concentration requirements) and other requirements imposed on emergency shelters. Secondly, the element must include analysis that describes whether areas within the district may be unfit for human habitation. The element may need to add or modify programs based on the outcomes of a complete analysis. Thirdly, the element must describe compliance with Government Code section 65583, subdivision a)(4)(A) or modify Program H2-2.1 (Zoning Ordinance Updates) to comply with this requirement. For your information, pursuant to Government Code section 65583, subdivision (a)(4)(A), parking requirements should be limited to allowing sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone. Lastly, for your information, while the City allows emergency shelters by-right in the PQ-P district, subsequent draft submissions must comply with the requirements of Chapter 654, Statutes of 2022 (AB 2339). Please note, these requirements became effective on January 1, 2023 and apply to any housing element submitted after January 1, 2023 if a jurisdiction failed to submit the initial draft before the due date of the housing element. As the City's initial draft was submitted on February 16, 2023, after the January 31, 2023 due date, these provisions will apply. Among other changes, these amendments to Government Code section 65583, subdivision (a)(4) expand the definition of "emergency shelters," specifies the type of zoning designations that must be identified to allow emergency shelters as a permitted use without a conditional use or other discretionary permit and demonstrate the appropriateness of sites to accommodate emergency shelters. For more information and applicable timing, see HCD's AB 2993 memorandum at <a href="https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf">https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf</a> .	No shelters within city? I couldn't find your operating standards in the Municipal Ordinance but please add analysis if present (bed limitations, lighting, spacing requirements more than 300 ft.) It not, state in analysis. Please clarify whether AB 2339 requirements apply in the analysis. Also, I am not seeing emergency shelters as a carve-out in App. K. Need to clarify program compliance with AB 139.	Program H2-2.1  See Page E-5. Are residential uses allowed in the PQ-P zone? If not, how addressing AB 2339 which requires identifying a zone where residential uses are allowed?  If using another zone, Program H2-2.1 should specify zone, and commit to a zone where residential is allowed and sufficient capacity, including proximity to services	To provide a complete inventory that meets the Napa community's housing needs, additional details were added about the percentage of available public/institutional land within the planning area that is fit 2.1 for human habitation (~90% of 1,105 acres), as well as current development standards for shelters and community care facilities. Program H2-2.1 also now includes updates to the definition, development standards (e.g., parking), and zoning districts where shelters are allowed by right, pursuant to recent changes in state law.  A more specific analysis of emergency shelters and requirements effective as of Jan. 1, 2023, are included in Appendix K, Zoning Diagnosis Report.	Appendix E, Section E.1.1.2.3, pg E-25; Housing Element, Section 5, Program H2-

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Housing Needs, Resources, and Constraints	Site Inventory; Zoning for a Variety of Housing Types; Transitional and Supportive Housing	The element states supportive and transitional housing are permitted throughout its residential zones. Additionally, the element included Table E-2 listing allowable uses per zoning district. However, this table did not reflect whether supportive housing is a permitted use in all zones allowing residential uses. The element should reconcile this information and specifically clarify whether the City permits transitional and supportive housing as a residential use and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone pursuant to Government Code section 65583 (a)(5).  Additionally, 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 these requirements and modify Program H2-2.1 (Zoning Ordinance Updates) as appropriate.	Didn't locate in App. K. Program language either through App. K or H2-2.1 should be explicit and use the GC Section 65651 language re: by-right in zones where MF and MU are permitted, including non-residential zones allowing MF uses.	None	To complete the housing sites inventory analysis, it was clarified that transitional, supportive, and small employee (6 or fewer residents) housing projects are currently allowed in the same zoning districts and under the same provisions as the type of housing they most closely resemble. Program H2-2.1 will further clarify compliance with state law through updates to the Zoning Ordinance, including that supportive housing is allowed wherever multi-family housing is allowed. Program H2-2.1 was updated to explicitly describe changes in the Zoning Ordinance for compliance with state law.	Appendix E, Section E.1.1.2, pg E-7, Table E-2 and Section E.1.1.2.3, pg E-24; Housing Element, Section 5, Program H2-2.1
Housing Needs, Resources, and Constraints	Site Inventory; Zoning for a Variety of Housing Types; Low-Barrier Navigation Centers (LBNCs)	Low-Barrier Navigation Centers 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 65660. Program H2-2.1 (Zoning Ordinance Updates) should be modified to explicitly identify program commitments to meet these statutory requirements.	None	None	To provide a complete inventory that meets the Napa community's housing needs, Program H2-2.1 was updated with more details about Low-Barrier Navigation Centers in compliance with state law and a timeline to complete the program by the end of 2023.	Housing Element, Section 5, Program H2-2.1, pg 51
Housing Needs, Resources, and Constraints	Site Inventory; Zoning for a Variety of Housing Types; Housing for Agricultural Employees	The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.), specifically, sections 17021.5 and 17021.6. Section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. In addition, 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. To address this, the element includes Program H2-2.1 (Zoning Ordinance Updates) but must explicitly identify program commitments to meet these statutory requirements.	Missing 17021.5 reference.	None	To provide a complete inventory that meets the Napa community's housing needs, Program H2-2.1 was updated with more detail, to reference state law where applicable, and a timeline to complete the program by the end of 2023.	Housing Element, Section 5, Program H2-2.1, pg 51
Housing Needs, Resources, and Constraints	Site Inventory; Zoning for a Variety of Housing Types; Accessory Dwelling Units (ADUs)	A cursory review of the City's last submitted ADU ordinance submitted to HCD in 2017 identified areas which appear to be inconsistent with State ADU Law. In addition, ADUs appear to be restricted in several nonresidential zones that allow residential uses, as identified in Table E-2. The element should address these inconsistencies and add or modify a program to update the City's ADU ordinance in order to comply with state law. For more information, please consult HCD's ADU Guidebook, updated in July 2022, which provides detailed information on new state requirements surrounding ADU development.	None	None	To provide a complete inventory that meets the Napa community's housing needs, Program H2-2.1 was updated with more detail and a timeline to complete the program by the end of 2023.	Housing Element, Section 5, Program H2-2.1, pg 51
Housing Needs, Resources, and Constraints	Site Inventory; Zoning for a Variety of Housing Types; Manufactured Homes	The element identifies notes that mobilehomes are currently prohibited in several residential districts and undefined in the City's Zoning Ordinance. As such, Program H2-2.1 (Zoning Ordinance Updates) should be modified to explicitly identify program commitments to meet statutory requirements to permit manufactured homes similar to single family uses.	Program also needs an action to define mobilehomes/manufactured housing in the ZO. App. K - didn't see any of the zones referenced other than RT (what about RO, MU-G, CL, DMU, DN, AR, other MU zones where appears mobilehomes are prohibited)?	Program H2-2.1 should also address Government Code section 65852.3	To provide a complete inventory that meets the Napa community's housing needs, it was clarified that manufactured and mobile homes are currently allowed the same as any other single-family dwelling. Mobile home parks are currently not allowed in all districts or General Plan designations allowing residential uses, so Program H2-2.1 was updated with more detail regarding revisions for compliance with state law, including updating the definition of mobile/manufactured home. Commitment is to complete the program by the end of 2023.	Housing Element, Section 5, Program H2-2.1, pg 51 and Appendix E, Section E.1.1.2.3, pg E-21
Housing Needs, Resources, and Constraints	Site Inventory; Electronic Sites Inventory	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 <a href="https://www.hcd.ca.gov/housing-elements-hcd">https://www.hcd.ca.gov/housing-elements-hcd</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> 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 <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> .	None	None	The site inventory has been submitted in the required digital format.	Appendix B, Section B.7, pgs B-47 to 51, Table B-16

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Housing Needs, Resources, and Constraints	Constraints; Land Use Controls	While the element lists some development standards for each zone, it should also list lot coverage requirements for each zone. In addition, the element should independently and cumulatively evaluate the impact of development standards on housing supply (number of units), cost, feasibility and ability to achieve maximum densities. For example, the analysis should address the combination of floor area ratios, setbacks, heights, lot coverage and other bulk standards for impacts on achieving maximum densities. The element may utilize input from the development community and past projects to address these requirements.	Needs stronger analysis. Reference to 1/3 of multi-family projects have developed at upper-range of densities. What about the 2/3? Would be helpful to include table with sample project(s) over prior planning pd. and can use trends from pipeline projects. Compare site characteristics between the projects (size, zone, density, actual number of units constructed).	Higher densities without exceptions? Element should clarify	To complete the analysis of potential governmental constraints on housing development, lot coverage was added for all districts where it applies and additional discussion was provided describing the cumulative impacts of the City's development standards. Discussion includes recent trends seen in Napa to develop sites at the maximum density, use density bonuses, and add units to ongoing projects where recent General Plan updates have increased the maximum density allowed, as evidenced by several current projects developing at or above the maximum density. The narrative also clarifies max densities can be achieved without exceptions and discusses specific site characteristics for the example projects.	Appendix E, Section E.1.1.2.1, pgs E-9 to 10, Table E-3, and pg E-13 to 14
Housing Needs, Resources, and Constraints	Constraints; Local Processing and Permit Procedures	While the element includes some information about permit processing procedures and processing times (pp. E-28-33), it should also describe approval procedures including the number of public hearings, approval findings, and any other relevant information for a typical single-family and multifamily development.  In addition, the element should address public comments on this 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 H3-1.2 (Design Standards) and H3-2.2 (Design Review Guidelines) as appropriate.  Finally, the element should discuss whether procedures and provisions comply with Senate Bill (SB) 9 (Chapter 162, Statutes of 2021) which generally, among other provisions, requires ministerial approval of a subdivision of a parcel in a single-family zone into two parcels.	The CEQA revisions need some work. CL to send sample analysis. Timeframe for Program H3-1.2 should be revised to move up earlier in planning pd. to implement objective design requirements, given the City acknowledges subjective design criteria is a constraint.	Where is Program H3-1.2 to promote objectivity in design guidelines?	To complete the analysis of potential governmental constraints on housing development: - Additional details were added about development review procedures and processing times, approval findings, and the City's design guidelines. Program H3-1.2 calls for the design guidelines to be updated by 2025 to ensure they are objective, support review outcome certainty, and support the community's housing needs. - Additional details were added about SB 35, including that the City was only subject to SB 35 starting in 2022 and has not seen any qualifying applications since. It was also clarified that Napa currently complies with SB 9 and Program H2-2.1 will codify existing procedure. - A new section regarding CEQA requirements was added, including timing, costs, and examples of required environmental review for recent projects.	Appendix E, Section E.1.3.1, pgs E-29 to 34; Table E-6 and Section E.1.3.2, pg E-35; Section E.1.3.3, pg E-36; and Housing Element, Section 5, pgs 53 and 62, Programs H2-2.1 and H3-1.2
Housing Needs, Resources, and Constraints	Constraints; Code Enforcement	The element includes a discussion of the City's code enforcement procedures (p. E-27) but could also describe resources provided to residents and typical citations and complaints received.	Typical citations received?	None	To provide a more complete analysis of potential governmental constraints on housing development, examples of common code enforcement citations and available resources were added.	Appendix E, Section E.1.2.1, pgs E-28
Housing Needs, Resources, and Constraints	Constraints; Zoning and Fees Transparency	The element references compliance with new transparency requirements for the posting of all zoning and development standards on its website (p. E-5), but it must also clarify its compliance with the posting of all fees.	None	None	To complete the analysis of potential governmental constraints on housing development, a sentence was added stating that all current development fees are also available to the public on the city's website.	Appendix E, Section E.1.1.2, pg E-5
Housing Needs, Resources, and Constraints	Constraints; Housing for Persons with Disabilities	While the element included some information on the City's reasonable accommodation procedures (pp. C-79-80), it must also analyze the approval findings in Chapter 17.65 of the Napa Municipal Code for potential constraints on housing for persons with disabilities. As an example, the analysis should identify who approves requests, identify any fees charged by the City in processing requests, and indicate whether there is an appeals process. The element may need to add or modify programs as appropriate based on the outcomes of this analysis.	None	None	To complete the analysis of potential governmental constraints on housing development, more details about the City's reasonable accommodation procedure, fee (there is none), and appeal process were added.	Appendix E, Section E.1.1.2.3, pg E-22 to 23
Housing Needs, Resources, and Constraints	Constraints; Approval Time and Requests Lesser Densities	The element must include analysis of requests to develop housing at densities below those identified and identify the length of time between receiving approval for a housing development and submittal of an application for building permits that potentially. The element must address any hindrance on the development of housing and include programs as appropriate.	None	None	To complete the analysis of potential nongovernmental constraints on housing development, more detail was added regarding requests to develop at lower densities than the minimum allowed, which are rare and would conflict with the General Plan. The typical timeline observed by staff between discretionary approval and building permit application was also added (15-18 months for affordable housing developments, though concurrent review and next day submittal are both options).	Appendix E, Section E.1.1.2.1, pg E-13 to 14, and Section E.1.3.1, pg E-32
Housing Needs, Resources, and Constraints	Development as being at-risk of conversion	The element identifies the Napa Creek Manor development as being at-risk of conversion during the next ten years. Given this observation, the element must include an analysis such as a comparison of costs for replacement versus preservation of the at-risk units. For more information and a sample analysis, see the Building Blocks at <a href="https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/assisted-housing-developments-risk-conversion">https://www.hcd.ca.gov/planning-and-community-development/housing-elements/building-blocks/assisted-housing-developments-risk-conversion</a> .	This comment is calling for a specific cost analysis - CL to send sample.	None	To provide a complete analysis of existing assisted housing developments, details were added about actions the City will take to prevent the conversion of Napa Creek Manor and other affordable units to market-rate (see Program H5-1.5). A new section containing a specific cost analysis comparing options for addressing the potential conversion of the Napa Creek Manor units was also added, including analysis of preserving/rehabilitating the units, replacing the units with new construction, or providing tenant-based rental assistance.	Appendix A, Section A.5.8, pg A-40, Section A.5.8.1, pg A-41; and Housing Element, Section 5, pg 71, Program H5-1.5

## 6th Cycle Housing Element Update - HCD Review Comments Tracking Sheet

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		HCD Review Letter Comments	HCD Informal Review Comments			Note: Page numbers may be different between clean draft and redlined draft.
Housing Programs	Programs must have specific commitment and discrete timelines	<p>To have a beneficial impact and achieve the goals and objectives of the housing element, programs must have specific commitment and discrete timelines (e.g., at least annually or by 2025), as follows:</p> <ul style="list-style-type: none"> <li>•Program H1-1.1 (Housing to Populations with Special Needs): The Program should commit to annual outreach to identify development opportunities.</li> <li>•Program H2-2.4 (Infill Housing Prototypes): The Program should commit to how often the City will work with developers.</li> <li>•Program H2-3.1 (Low Income and Special Needs Funding): The Program should commit to how often the City will utilize funding.</li> <li>•Programs H2-4.4 and H5-1.1 (Anti-displacement): The Program should commit to a timeline earlier in the planning period and consider potential options for addressing displacement risk.</li> <li>•Program H3-3.1 (Code Enforcement): The Program should commit to a timeline earlier in the planning period.</li> <li>•Program H4-2.3 (Transportation Options): The Program should commit to how often the City will work with the transportation authority.</li> </ul>	<p>All programs with exception to H2-4.4 and H5-1.1 look good. As part of the AFFH requirements and stronger AFFH programs, I recommend the City commit to some or all of the strategies identified from anti-displacement engagement in 2026 by [Month] XXXX, You may need to move up the outreach date, because implementation of actions after 2026 seems pretty late in the planning period to produce actions that will address the AFFH issues. And after reviewing the analysis, displacement is one of the City's priority issues to address.</p>	<p>Program H4-4.2 generally lacks timing</p>	<p>To better achieve the goals and objectives of the Housing Element, program timelines were updated as follows:</p> <ul style="list-style-type: none"> <li>- Program H1-1.1 (Housing to Populations with Special Needs): Ongoing during 6th Cycle (2023-2031), conduct outreach annually, produce an annual report to track progress.</li> <li>- Program H2-2.4 (Infill Housing Prototypes): Ongoing during 6th Cycle (2023-2031), monitoring conducted annually. Establish initial timeline with developers and stakeholders for ongoing collaboration (e.g., annual meeting) by 2025. Reported with APRs.</li> <li>- Program H2-3.1 (Low Income and Special Needs Funding): Ongoing during 6th Cycle (2023-2031), Notice of Funding Availability issued annually.</li> <li>- Programs H2-4.4 and H5-1.1 (Anti-displacement): By July 2026 and Ongoing during 6th Cycle (2023-2031), initial outreach by 2025.</li> <li>- Program H3-3.1 (Code Enforcement): By 2026, possibly in tandem with Zoning Ordinance updates.</li> <li>- Program H4-2.3 (Transportation Options): Ongoing during 6th Cycle (2023-2031), monitoring and at least one meeting conducted annually.</li> <li>- Program H4-4.2 (Investment in Area of Greatest Need): commitment to completion of 1 priority action per year</li> </ul>	<p>Housing Element, Section 5, pgs 48 to 72, Programs H1-1.1, H2-2.4, H2-3.1, H2-4.4, H3-3.1, H4-2.3, and H5-1.1</p>
Housing Programs	Programs to Rezone if necessary	<p>As noted in Finding A3, 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:</p> <ul style="list-style-type: none"> <li>•Publicly Owned Sites: If the element identifies City-owned sites to accommodate a portion of the RHNA, the element must include a program or modify Program H2-2.2 (Conversion of Publicly Owned Lands for Housing) that ensures compliance with the Surplus Lands Act. The program should also include numerical objectives and provide incentives and actions, along with a schedule, to facilitate development of City-owned sites. Actions could include outreach with developers, financial assistance and incentives, issuing requests for proposals, final entitlements, building permits issues and alternative actions, including rezoning other sites, if developments do not progress as anticipated.</li> <li>•Sites Identified in Prior Planning Periods: Sites identified in prior planning period(s) are generally deemed inadequate unless a program rezones prior identified sites. If necessary, the Program must commit to permit development with 20 percent affordability by right at appropriate densities (e.g., 20 units per acre). If, that are currently identified to accommodate housing for lower income.</li> <li>•Replacement Housing Requirements: Absent a replacement housing program, sites with existing residential uses meeting specified requirements are not adequate sites to accommodate lower-income households. The replacement housing program should commit to the same requirements as set forth in Government Code section 65915, subdivision (c)(3). The housing element must be revised to include such analysis and a program, if necessary.</li> </ul>	<p>Program level of detail needs work. Still includes language to consider...CL to send sample.</p>	<p>Should add program for large school district site. Program should coordinate with school district and future property owner, encourage appropriate parceling (1-10 acres) through incentives and assist with development (funding, processing), including a quantified objective in line with assumptions in the inventory.</p> <ul style="list-style-type: none"> <li>- Should add a program for alternative adequate sites. Necessary program components include:</li> </ul> <p>(A) Identify the specific, existing sources of committed assistance and dedicate a specific portion of the funds from those sources to the provision of housing pursuant to this subdivision.</p> <p>(B) Indicate the number of units that will be provided to both low- and very low income households and demonstrate that the amount of dedicated funds is sufficient to develop the units at affordable housing costs or affordable rents.</p> <p>(C) commit to meet the requirements of Gov Code 65583.1</p> <p>Program H2-2.2: See yellow highlights to the left for additional steps that should be added with discrete timing</p> <p>Were the recent zoning changes completed prior to the beginning of the planning period? [Yes, the increased densities in the 2040 GP were adopted before the 6th Cycle Planning Period started]</p>	<p>To ensure housing sites in the inventory will be available and to facilitate and encourage housing development:</p> <ul style="list-style-type: none"> <li>- Program H2-2.2 was updated to include compliance with the Surplus Lands Act, quantified objectives, and actions the City will take following review of publicly and institutionally owned lands for housing development. The program includes prescribed actions and discrete timelines.</li> <li>- Further discussion and clarification was added about how the 9 inventory sites from the 5th Cycle Housing Element that were carried over are still appropriate to accommodate lower-income housing (by-right densities have increased to 40 units per acre under the new 2040 General Plan designations for these sites).</li> <li>- Program H2-2.1 was also updated to include implementation of a replacement housing program in compliance with 65915(c)(3).</li> <li>- Program H2-2.10 was added for alternative adequate sites pursuant to state law.</li> </ul>	<p>Housing Element, Section 5, pg 54, Program H2-2.2; Appendix B, Section B.3.6, pg B-29, Table B-11; and Housing Element, Section 5, pg 53, Program H2-2.1</p>
Housing Programs	Programs must have specific commitment and discrete timelines	<p>As noted in Findings A4 and A5, 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.</p>	<p>None</p>	<p>Program H3-1.2 to promote objectivity in design guidelines?</p>	<p>With the updates to Appendix E and Housing Programs based on comments recieved, constraints on housing development have been addressed.</p>	<p>Appendix E and Housing Element</p>

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		HCD Review Letter Comments	HCD Informal Review Comments			Note: Page numbers may be different between clean draft and redlined draft.
Housing Programs	Programs must have specific commitment and discrete timelines	As noted in Finding A1, the element requires a complete AFFH analysis. Depending upon the results of that analysis, the element may need to revise or add programs. Goals and actions must specifically respond to the analysis and the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or higher income areas, place-based strategies for community revitalization and displacement protection.	Specific programs to address farmworkers? Large households? I'm still seeing programs, including Program H4-4.2 that includes exploratory language.  Let's talk - at minimum here, we should be thinking community revitalization strategies considering most tracts in the City are low-resourced, transforming low-resourced opportunities into higher areas of opportunity, strong anti-displacement protection measures. Here we can tie in actions that the City might be pursuing through and Environmental Justice element, Safety, infrastructure, etc.  Quantified metrics need to be early in the planning period, and ideally captured across your programs. For a list of sample program actions: see pg. 73 of HCD's AFFH Guidance Memo.  <a href="https://www.hcd.ca.gov/community-development/affh/docs/AFFH_Document_Final_4-27-2021.pdf">https://www.hcd.ca.gov/community-development/affh/docs/AFFH_Document_Final_4-27-2021.pdf</a>	Programs generally lack geographic targeting and numeric objectives related to AFFH – could add to individual programs or re-work summary table  - Add or modify existing programs for housing mobility in relatively higher income areas  - Add specificity and numeric objectives in place-based strategies (H4-4.2) such as prioritize CIP and annually apply for funding and target 1-2 investments per year	Based on additional mapping and analysis of fair housing issues across geographic areas of the City, it was found that all four quadrants are, and will continue to be, good locations for future affordable housing units. To promote and affirmatively further fair housing in Napa, a new program was created to increase investment in areas of greatest need, including the South East Quadrant, with specific actions and timeline (see Program H4-4.2). Other programs have been updated for more geographic and objective specificity based on AFFH factors (e.g., H2-1.1, H2-4.4, H4-4.1, H5-2.3).	Appendix C, Section C.8, pg C-99 to C-102; and Housing Element, Section 5, pg 67, Program H4-4.2
Quantified Objectives	Quantified Objectives	The element includes quantified objectives in Section 5, but it did not consistently identify objectives by all income groups. This requirement could be addressed by utilizing a matrix like the one illustrated below:	Mod. income objectives? Roll program H3-1.1 objectives into table.	- Break out extremely low, very low and low income - Add quantified objectives for conservation beyond at-risk preservation (Program H5-1.5). Other programs could include H1-2.4, H2-4.4, H3-3.1, H4-3.1 and H5-1.1)	To confirm the established number of units that can be constructed, rehabilitated, or conserved over the planning period, a table was added that summarizes the quantified objectives identified in various Housing Element Programs by income group. It should be noted that the Moderate Income quantified objectives in the element exceed the RHNA of 405 for that income group.	Housing Element, Section 5, pg 44, Table 5-1