



**Notice of Preparation
Draft Environmental Impact Report
City of Napa General Plan Housing Element**

Date: May 1, 2014

To: Public Agencies and Interested Parties

From: Ken MacNab, Planning Manager

Subject: Notice of Preparation for a Draft Environmental Impact Report for the City of Napa General Plan Housing Element

The City of Napa will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the update of the City's Housing Element of the General Plan for the 2015-2023 planning period. The Housing Element identifies sites in accordance with state law to accommodate the city's fair share of the regional housing need. The project description, location, and probable environmental effects of the City of Napa General Plan Housing Element are described in the attached materials.

The City of Napa is soliciting comments regarding the scope and content of the environmental information, which are germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering permitting or other approvals. Because of time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please provide your written response to the address shown below by **5:00 p.m. on May 31, 2014**. Please also provide the name of a contact person in your agency.

City of Napa
Community Development Department
Planning Division
1600 First Street
Napa, CA 94559
Attn: Ken MacNab, Planning Manager
Phone: (707) 257-9530
Fax: (707) 257-9522
Email: kmacnab@cityofnapa.org

CITY OF NAPA GENERAL PLAN HOUSING ELEMENT

1.1 - Project Location

The project is located in the City of Napa, Napa County, California (Exhibit 1). The City of Napa is located in southern Napa County and is surrounded by agricultural areas (north), Vaca Mountains (east), San Pablo Bay (south), and Mayacamas Mountains (west) (Exhibit 2). The Napa River flows from north to south through the City to the San Pablo Bay. State Routes 12, 29, 121, and 221 provide regional access to the City.

1.2 - Background

California Government Code Section 65302(c) mandates that each city shall include a Housing Element in its General Plan. The Housing Element is required to identify and analyze existing and projected housing needs, and include statements of the City's goals, policies, quantified objectives, and scheduled programs for the preservation, improvement, and development of housing. The City, in adopting its Housing Element, must consider economic, environmental, and fiscal factors, as well as community goals as set forth in the General Plan, in compliance with California *Government Code* Section 65580 et seq. Each jurisdiction within the Bay Area Region, which includes Napa County, must prepare an updated Housing Element for the fifth planning cycle, which covers the 2015–2023 period.

The City of Napa has initiated preparation of an Environmental Impact Report (EIR) to evaluate the potential environmental impacts that would be expected to result from adoption of the Housing Element, to the extent they can be foreseen at this time. **No specific development projects would be approved in connection with adoption of the Housing Element and all future developments will be subject to CEQA review.**

One important aspect of Housing Element updates that normally receives close attention is the identification of housing growth needs and the jurisdiction's capacity to accommodate that growth based on available sites for residential development. This process is referred to as the Regional Housing Needs Assessment (RHNA). At the beginning of each new housing element planning period, the California Department of Housing and Community Development (HCD) determines the amount of new housing needed for each income group in each region of the state, based on expected household growth. In February 2012, HCD determined that the nine-county Bay Area region would need 187,990 additional housing units between January 2014 and October 2022 to accommodate projected household growth.

Each Bay Area city's share of the regional housing need is based on a plan prepared by the Association of Bay Area Governments (ABAG), entitled the Final Regional Housing Needs Plan (RHNP) for the San Francisco Bay Area: 2014-2022, which was adopted in July 2013.

In preparing the RHNP, ABAG balanced state laws that require regional sustainable development with "fair share" components. ABAG directed much of the regional growth to infill locations near

transit and jobs and Priority Development Areas (PDAs). Directing growth to these infill areas was a key component in protecting the region's agricultural and natural resources. It also encouraged housing, and in particular affordable housing, in neighborhoods near transit, jobs, and services. However, to make sure that PDAs did not shoulder too much of the responsibility for meeting the region's housing need each jurisdiction was assigned a minimum number of units to meet 40% of its household formation growth, then "fair share" factors were applied that considered a community's past affordable housing construction, 2010 jobs, and transit service. This approach resulted in lower housing need numbers than in prior Housing Element planning periods to all jurisdictions in Napa County, including the City of Napa. The approach is supportive of local goals to protect the County's agricultural resources and to promote efficient use of land in core mixed-use areas where transit, jobs, and services are nearby. In the City of Napa, the Downtown and Soscol Gateway Mixed Use area is a designated PDA.

The draft Housing Element includes an inventory of vacant and underutilized sites with appropriate zoning that can fully accommodate the share of regional housing growth needs allocated to the City of Napa in the RHNP. **No changes to land use designations or development standards are proposed.**

In addition to the RHNA, the draft Housing Element includes a variety of programs intended to improve the quality of the City's housing stock, conserve existing neighborhoods, increase housing affordability, and remove potential constraints to housing for lower-income households and persons with special needs. These programs are discussed further in Section 1.3 Project Description, below.

1.3 - Project Description

In accordance with State Law, the City of Napa proposes to adopt a General Plan Amendment (GPA), updating the General Plan's Housing Element for the 2015-2023 planning period. The draft Housing Element includes the following sections:

Section 1 provides an overview of the Housing Element, state housing law, the process by which the City prepared the Housing Element, opportunities for public participation, and a review of the Housing Element's consistency with other elements of the General Plan.

Sections 2 and 3 of the Housing Element identify the goals and policies that will guide City decisions and activities relating to housing, while **Section 4** describes the program actions intended to implement the goals and policies. **Section 5** of the Housing Element presents background information and data regarding demographic characteristics and trends, housing needs and conditions.

Section 6 includes analysis of potential constraints to housing and available resources, as well as a discussion of the City's share of regional housing needs and potential sites that could accommodate the amount of housing development allocated to the City through ABAG's Regional Housing Needs Plan (RHNP). *It should be emphasized that while state law requires cities to identify sites with sufficient capacity to accommodate the level of development reflected in the RHNP, cities are not*

required to achieve RHNP objectives since development is ultimately determined by market conditions and landowner intentions.

Sections 1, 2, 3, 5, and 6 of the Housing Element provide background information and analysis relevant to City housing policies and programs, but would not change development patterns or result in any physical changes to the environment that requires CEQA review. All potential environmental impacts that would result from adoption of the Housing Element are determined by the program actions contained in Section 4 of the element. These programs describe the City's commitments to future actions and are listed below for each of the City's five broad housing goals. (Please refer to the draft Housing Element for the full text of these programs.)

Goal H1 – Napa is a Vital and Diverse Community

- Program H1.A Adequate Sites
- Program H1.B Future Land Use Planning
- Program H1.C Local Housing Need
- Program H1.D Job Housing Analyses
- Program H1.E Job Impact Analysis
- Program H1.F Housing Sites Study of Surplus Institutional Lands

These programs identify the City's commitment to broad policy objectives regarding housing needs and jobs-housing balance, and to conduct future studies. No specific developments or regulatory changes are proposed that would result in environmental impacts, therefore these programs will not be evaluated in the EIR. At such time that specific developments, regulations, or standards are proposed, they will be subject to CEQA review.

Goal H2 – We Have a Variety of Housing Types and Choices

- Program H2.A Adequate Sites for Multi-Family Use
- Program H2.B New Rental Units
- Program H2.C New Ownership Units
- Program H2.D First Time Homebuyer Programs
- Program H2.E Identify Potential Acquisition Sites
- Program H2.F Affordable Housing Overlay Zones
- Program H2.G Long-Term Affordability Agreements and Monitoring
- Program H2.H Sustainable Development and Practices
- Program H2.I Preferences in Affordable Housing
- Program H2.J Duplex and Triplexes in Other Areas

These programs establish commitments to conduct future studies of potential affordable housing sites, facilitate development and purchase of affordable housing, minimize constraints on affordable housing development, preserve existing affordable housing units, foster sustainable development practices, enhance affordable housing opportunities for Napa residents and employees, and consider a future General Plan amendment to facilitate duplex and triplex development. No specific developments or regulatory changes are proposed that would result in environmental impacts,

therefore these programs will not be evaluated in the EIR. At such time that specific developments, regulations, or standards are proposed, they will be subject to CEQA review.

Goal H3 – We Have Great Neighborhoods Offering a Variety of Nearby Services and Activities

- Program H3.A Design Review
- Program H3.B Use of Planned Development Zoning
- Program H3.C Housing Mix
- Program H3.D New Second Units
- Program H3.E Second Unit Standards and Fees
- Program H3.F Amnesty Program
- Program H3.G Rental and Owner Rehabilitation Programs
- Program H3.H Code Enforcement
- Program H3.I Targeted Neighborhood Improvement
- Program H3.J Historic Area Process
- Program H3.K Transportation Element Amendments
- Program H3.L Capital Improvement Programs for Neighborhood Improvement
- Program H3.M Parks and Recreation Element Update
- Program H3.N Retain Federal, State and Locally Subsidized Affordable Units
- Program H3.O Rental Acquisition and Maintenance
- Program H3.P Mixed-Use Livability

These programs establish commitments to support high-quality development, promote design flexibility, encourage a mix of housing opportunities including second units, facilitate housing maintenance and rehabilitation, preserve historic homes, ensure the provision of adequate streets, parks, and other infrastructure, retain existing affordable units, and develop guidelines for mixed-use development. No specific developments or regulatory changes are proposed that would result in environmental impacts, therefore these programs will not be evaluated in the EIR. At such time that specific developments, regulations, or standards are proposed, they will be subject to CEQA review.

Goal H4 – We Have Housing Linked with Services for Our Special Needs Populations

- Program H4.A Emergency Shelters
- Program H4.B Permanent Supportive/Transitional Housing
- Program H4.C Support Services
- Program H4.D Rental Assistance for Special Needs
- Program H4.E Capital Improvements for Non-Profit Facilities
- Program H4.F Encourage Well Managed New SRO Permanent Housing
- Program H4.G Rehabilitate Existing Facilities for SROs
- Program H4.H Coordination with Napa County and Other Actions to Address Farmworker Housing

These programs establish commitments to assist emergency shelters, transitional/supportive housing, non-profit facilities, SRO housing, and farmworker housing. No specific developments or regulatory changes are proposed that would result in environmental impacts, therefore these

programs will not be evaluated in the EIR. At such time that specific developments, regulations, or standards are proposed, they will be subject to CEQA review. Program H4.F includes a commitment to amend the SRO ordinance, however no specific changes have been identified at this time, therefore this issue will not be evaluated in the EIR.

Goal H5 – We Have a Strong Sense of Community and Responsibility

- Program H5.A Universal Design
- Program H5.B Traffic Impact Overlay
- Program H5.C Priority Processing
- Program H5.D Affordable Housing Fees
- Program H5.E Fair Housing
- Program H5.F Database Monitoring
- Program H5.G Legislation
- Program H5.H Housing Transfer Agreements
- Program H5.I Cities/County Coordination
- Program H5.J Community Outreach Efforts
- Program H5.K Use of Funds
- Program H5.L Maximize Rental Subsidies
- Program H5.M Public/Private Partnerships

These programs establish commitments to support accessible design and fair housing, monitor traffic impact policies and development trends, provide priority processing and fee deferrals for affordable and special needs housing, cooperate with other cities and the County on housing issues, increase community outreach, and seek funding for affordable housing and special needs housing. No specific developments or regulatory changes are proposed that would result in environmental impacts, therefore these programs will not be evaluated in the EIR.

In 1998, the City of Napa certified an EIR for the 2020 General Plan. In addition, two separate EIRs have been certified for the Gasser Master Plan (2006) and Downtown Specific Plan (2012) that significantly modified land uses identified in the 2020 General Plan. The draft 2015-2023 Housing Element would retain many of the programs of the current (2009) Housing Element, therefore the framework for environmental review of the proposed Housing Element amendment is established by CEQA Section 21166 and CEQA Guidelines Section 15162.

These sections of CEQA and the Guidelines provide that when an EIR has been certified for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence, one or more of the following:

1. Substantial changes are proposed in the project that would require major revision to the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which would require major revisions of the previous EIR due to the involvement

of new significant effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance shows that the project would have one or more significant effects not discussed in the previous EIR, or that significant effects previously examined would be substantially more severe, or that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects but the City declined to adopt them, or mitigation measures or alternatives that are different from those included in the previous EIR would substantially reduce one or more significant effects on the environment but the City declined to adopt them.

As discussed above, the program actions contained in Section 4 of the draft 2015-2023 Housing Element do not include substantial changes to the current (2009) Housing Element that would result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. However, changes may have occurred in circumstances related to proposed Housing Element programs that could require major revisions to the previous General Plan EIR with regard to transportation and traffic, noise, air quality, greenhouse gas emissions, land use and planning, or population and housing (see Section 1.5 below). In addition, new information is available for these topics that could change the conclusions regarding the significance of environmental impacts identified in the previous General Plan EIR. Therefore, the City has determined that a subsequent EIR should be prepared to evaluate these issues.

Since no specific developments or changes to regulations are identified in the draft Housing Element, the EIR will evaluate potential environmental impacts of development anticipated in the Housing Element at a programmatic level, pursuant to CEQA Guidelines Section 15168 (Program EIR). When specific developments or amendments to development regulations are proposed, they will be subject to subsequent CEQA review pursuant to Guidelines Section 15162 (Subsequent EIRs and Negative Declarations) or Section 15164 (Addendum to an EIR or Negative Declaration).

The draft Housing Element identifies potential housing sites that could accommodate development of 892 new housing units, which is the portion of the region's new housing need that has been allocated by ABAG to the City of Napa for the 2015-2023 period as shown in Table 1.

Table 1: Napa's 2015–2023 Regional Housing Needs Allocation (RHNA)

Very Low Income	Low Income	Moderate	Above Moderate	Total Units
185	106	141	403	835

Land suitable for residential development includes vacant residentially zoned sites; vacant non-residentially zoned sites that allow residential uses; underutilized residentially zoned sites capable of being developed at higher density or with greater intensity; and non-residentially zoned sites that can be redeveloped for, and/or rezoned for residential use. The Housing Element identifies appropriately zoned sites that could accommodate the housing needs identified in the RHNA during the 2015-2023 planning period, therefore no changes to land use plans or regulations are needed to

provide additional capacity for housing development. The EIR will evaluate potential environmental impacts that would be expected from development consistent with the RHNA and existing land use and zoning designations during the planning period.

1.4 - Required Approvals and Intended Uses

The proposed project requires the following discretionary approvals:

- General Plan Amendment – City of Napa

The Housing Element will also be reviewed by the California Department of Housing and Community Development (HCD) although this review does not constitute an “approval” within the context of CEQA.

1.5 - Environmental Review

1.5.1 - Potential Environmental Effects

The EIR will evaluate whether the proposed project may potentially result in one or more significant environmental effects. The topics listed below will be further analyzed in the EIR.

- Air Quality
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Population and Housing
- Transportation and Traffic

1.5.2 - Effects Found Not To Be Significant

Because of project characteristics, the proposed project would not have significant effects on the remaining CEQA topic areas, which will be addressed in the Effects Found Not To Be Significant Section of the EIR:

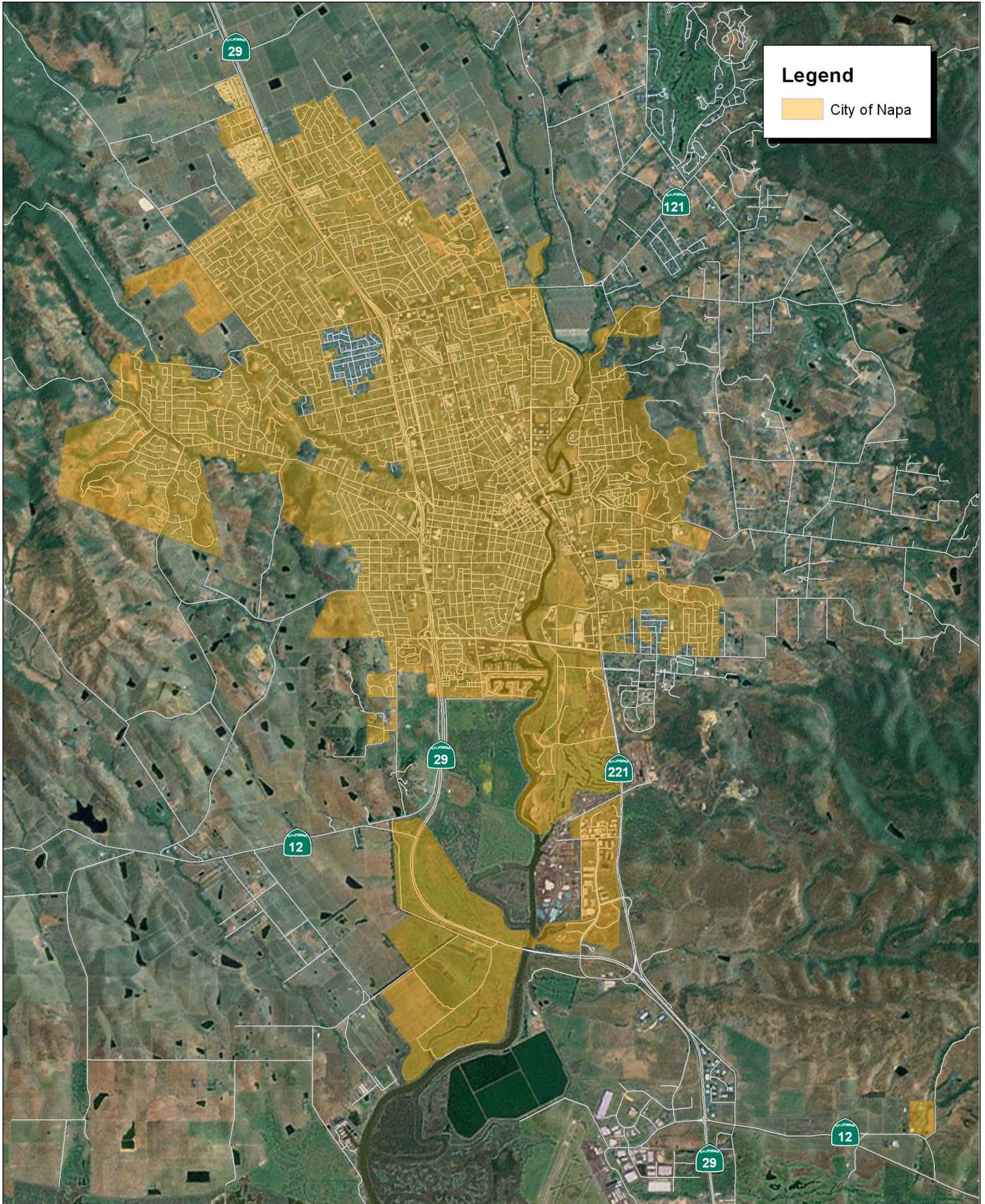
- Aesthetics
- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geology, Soils, and Seismicity
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Public Services and Utilities
- Recreation

1.6 - Scoping Meeting

A public scoping meeting will be held at **6:00 pm, Thursday, May 22, 2014**, at the following location:

City of Napa Council Chambers
955 School Street
Napa, CA 94559

At this meeting, agencies, organizations, and members of the public will be able to review the proposed project and provide comments on the scope of the environmental review process.



Source: ESRI Aerial Imagery. Napa County GIS Data, 2013.

Exhibit 2

Local Vicinity Map

Aerial Base

