

**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	<p>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 <a href="https://www.hcd.ca.gov/community-development/affh/index.shtml">https://www.hcd.ca.gov/community-development/affh/index.shtml</a>.</p>	<p>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.</p>
A-1	<p>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.</p>	<p>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.</p>
A-2	<p>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 4<sup>th</sup> cycle planning period and the project will help the City provide housing and build a portion of their RHNA. The element</p>	<p>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.</p>

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	<p>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.</p>	
<p><b>A-2</b></p>	<p><b>Realistic Capacity:</b> 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</p>	<p>We have added the following information:</p> <p>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.</p> <p>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.</p> <p>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.</p>

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	<p>or multifamily projects to analyze all development activity by zone, size, allowable density, built density and affordability.</p> <p>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.</p>	
<p><b>A-2</b></p>	<p>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.</p>	<p>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]</p>
<p><b>A-2</b></p>	<p>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</p>	<p>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].</p> <p>We have added program H-ZZ as follows:  <a href="#">H-ZZ Lot Consolidation</a></p>

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	<p>with a commitment to facilitate and incentivize lot consolidation.</p>	<p><u>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.</u></p> <p><u>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.</u></p> <p><b><u>Objectives:</u></b></p> <p><u>Post the sites on the City’s website by October 2023 and provide list to interested developers when requested, and review annually for accuracy</u></p> <p><u>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</u></p> <p><u>Facilitate lot consolidation for high density residential developments by providing appropriate assistance to developers to encourage negotiations between property owners</u></p> <p><u>Encourage the development of 39 lower- and 39 moderate income units during the planning period.</u></p> <p><u>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</u></p>
<p><b>A-2</b></p>	<p>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</p>	<p>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 coverage, parking, environmental sensitives on site, and service connection obstacles from the 2015 analysis [pages 2-199 to 2-204].</p>

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	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.	
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 <a href="https://www.hcd.ca.gov/community-development/housing-element/index.shtml">https://www.hcd.ca.gov/community-development/housing-element/index.shtml</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> .	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, cost, feasibility and supply (number of units) of housing.	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.  <b>New Text, page 2-137 to 2-138</b> <a href="#">Development standards related to maximum lot coverage and height pose potential</a>

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		<p><a href="#">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.</a></p> <p><b>New Actions: Program H-N: Zoning to Facilitate Higher Density Housing</b>  <a href="#">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.</a></p> <p><a href="#">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></p>
<p><b>A-3</b></p>	<p>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</p>	<p>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.</p> <p><b>Revised text, page 2-153, above Table 35</b>  <a href="#">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 Error! Reference source not</a></p>

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	<p>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.</p>	<p><b>found.</b> <a href="#">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.</a></p> <p><b>Program H-N: Zoning to Facilitate Higher Density Housing [new action]</b>  <a href="#">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></p>
<p><b>A-3</b></p>	<p><b>Local Permit and Processing Procedures:</b> 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 5<sup>th</sup> 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).</p> <p>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</p>	<p>We have revised our analysis to summarize allowed uses in the MR zone, and to clear up confusion related to implementation of the 5<sup>th</sup> 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.</p> <p>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.</p> <p><b>New text page 2-166 to 2-167:</b>  <a href="#">Currently (2023) the MR zone does not allow for multifamily uses without a conditional use permit (CUP), with the exception of 5<sup>th</sup> 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</a></p>

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	<p>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).</p> <p>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.</p>	<p><a href="#">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.</a></p> <p><a href="#">Please note: the City implemented 5<sup>th</sup> 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:</a></p> <p><a href="#">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)</a></p> <p><a href="#">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.</a></p> <p><b>Revised text, page 2-41, Evaluation of 5<sup>th</sup> Cycle program HE1.D:</b> 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) <del>land use designation zone</del> and all of the Housing Opportunity Sites (<a href="#">Key Housing Sites</a>, see Section 17.40.020(N)) located within the</p>
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		<p><a href="#">Medium Density Residential (MR) zone</a><del>other designations</del> 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.</p> <p><b>Program H-N: Zoning to Facilitate Higher Density Housing [new action]</b>  <a href="#">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.</a></p> <p>We have also added program H-AAA to address compliance with the Permit Streamlining Act as follows:  <b><a href="#">H-AAA Permit Streamlining Act</a></b>  <a href="#">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).</a></p> <p><b><a href="#">Objective:</a></b>  <a href="#">Amend the municipal code for compliance with State law within 18 months of adoption of the Housing Element</a></p> <p><b><a href="#">Timeframe:</a></b>  <a href="#">Within 18 months of adoption of the 2023-2031 Housing Element</a></p>
<p><b>A-3</b></p>	<p>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.</p>	<p>We have revised the summary of fees and exactions to include the following analysis immediately following Table 36 on page 2-159.</p> <p><b>New Text, page 2-159</b>  <a href="#">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</a></p>

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		<a href="#">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>
<b>A-3</b>	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.	<p>We have revised the relevant action in Program H-F to include this specific language. Revisions are shown in track changes below.</p> <p><b>Revised Action, Program H-F</b>  <del>Define and 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.</del>  <a href="#">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.</a></p>
<b>B-1</b>	<b>Replacement Housing Requirements:</b> 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).	<p>We have added a new program, H-YY, as follows:</p> <p><b>Replacement Unit Program</b>  <a href="#">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:</a></p> <ul style="list-style-type: none"> <li><a href="#">currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and</a></li> <li><a href="#">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</a></li> <li><a href="#">subject to any other form of rent or price control through a public entity’s valid exercise of its police power, or</a></li> <li><a href="#">occupied by low or very low-income households</a></li> </ul>

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<p><b>B-1</b></p>	<p><b>City-Owned Sites:</b> 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.</p>	<p>We have revised program H-L as follows:</p> <p><b><del>H-L City-Owned Sites</del></b></p> <p><a href="#">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.</a></p> <p><a href="#">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 <del>meaningful</del> meaningfully incentivize affordable housing development on these sites. The City shall proceed with the findings for housing development by <del>2025</del>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</a></p>

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<b>B-1</b>	<p>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.</p>	<p>We have included a new program action in Program H-F with this language, as shown below.</p> <p><b>New Action, Program H-F</b>  <a href="#">Allow permanent and supportive housing pursuant to Government Code section 65661 without discretionary action.</a></p>
<b>B-2</b>	<p>As noted in Finding A3 the element requires a complete analysis of potential governmental and</p>	<p>See response to A3 above.</p>

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	<p>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><b>B-3</b></p>	<p>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.</p> <p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> <li>H-XX: Fair Housing Provider</li> <li>H-E: Streamline Special Needs Housing</li> <li>H-H: Workforce and Farmworker Housing</li> <li>H-I: ADU Workforce Housing Incentive Program</li> <li>H-W: Missing Middle Housing</li> <li>H-LL: Special Needs Housing Opportunities</li> <li>H-GG: Affordable Homeownership</li> <li>H-V: Multi-unit Development in High Resource Areas</li> <li>H-Q: Direct Assistance for ADU Development</li> <li>H-R: Place-based ADU Strategy</li> <li>H-A: Sites Inventory</li> <li>H-K: Nonvacant Sites</li> <li>H-JJ: Housing Coordinator</li> <li>H-BB: Special Housing Needs Rehabilitation</li> <li>H-AA: Vacation Rentals</li> <li>H-X: Condominium Conversions</li> </ul>