



City of St. Helena

*"We will conduct city affairs on behalf of our citizens
using an open and creative process."*

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November 24, 2020

Jesse Arreguin, President
Association of Bay Area Governments (ABAG)
Bay Area Metro Center
375 Beale Street Suite 800
San Francisco, CA 94105

Re: Proposed RHNA Methodology and Subregional Shares

Dear President Arreguin:

The City of St. Helena would like to thank the ABAG Housing Methodology Committee (HMC) for its important work and for the opportunity to provide HMC with more insight on how the Regional Housing Needs Allocation Proposed Methodology dated October 2020 would affect a small, rural community like St. Helena. We have carefully reviewed the Proposed Methodology and submit the following comments as part of the public comment period on the Proposed RHNA Methodology and Draft Subregion Share:

- The St. Helena General Plan designates nearly 50% of the incorporated areas as agriculture and open space with an additional 15% being heavily wooded areas on steep mountainous slopes (designated Woodlands and Watershed), leaving relatively limited in-fill capacity for development at densities needed to accommodate the allocation targets under the draft methodology.
- The recently adopted General Plan assumed up to 332 new housing units through year 2040 or approximately 15 units a year.
- The proposed RHNA assignment of 171 units over an 8-year planning period requires 21.375 units per year to be constructed, a 42.5% increase over the annual growth rate contemplated by the current General Plan. While St. Helena recognizes that all cities must share in the region's need to build new housing, this is a faster growth rate than anticipated in the City's planning documents.
- The accelerated growth required by these RHNA assignments will escalate the need for expanded and updated infrastructure; how are small communities like St. Helena going to pay for this infrastructure? We will enthusiastically work with ABAG-MTC and other local governments to advocate for additional State funding to assist with expanded and updated infrastructure in support of affordable housing projects.
- Although St. Helena is served by the Vine, Napa County's public transit system, this system is seldom used by those who have access to cars – in other words, it does not draw significant

numbers of commuters who either work in St. Helena or who live in St. Helena and work elsewhere. As a result, except where construction of low and moderate income housing enables workers to live closer to their place of employment, housing development beyond that contemplated by the City's General Plan would increase VMT and traffic congestion, and would not support greenhouse gas (GHG) emission reduction targets.

- Small, rural, agricultural communities are not appropriate locations for “high-rise” residential housing which further limits their ability to increase density.
- Our ability to assume more growth in the City became further constrained on October 27, 2020, when the City of St. Helena declared a Phase 2 water emergency. No new water connections are permitted during a Phase II emergency.
- The hills and mountains that frame the Napa Valley are in PG&E's Tier 3 high fire risk zone and have proven to be high fire hazard areas as evidenced by the Tubbs, Atlas, Hennessy (LNU Complex), and Glass fires of 2017 and 2020; this further limits our ability to accommodate additional growth outside existing urban limits.
- Placing homes near job centers and away from natural hazards (fire severity zones etc.) and preserving agricultural and open space areas should be given a high priority to avoid the inadvertent loss of farmland and open space and to reduce the significant cost of emergency mitigation and assistance.
- The aggregate total of St. Helena units in Table 5 should be 171, not 172. The proposed distribution by income category is:
 - Very Low: 46
 - Low: 27
 - Moderate: 27
 - Above Moderate: 71
- Upon the arrival of the COVID-19 pandemic in the Spring of 2020, a paradigm shift has occurred in urban centers around the world relating to commuting patterns and the density of cities identified as job rich centers. Many of the current telecommuting arrangements from Silicon Valley's technology giants are expected to remain post COVID-19. The region is also experiencing an exodus of workers leaving the Bay Area for Sacramento and other more affordable areas outside the region which will have impacts for years to come. Has ABAG and the RHNA Methodology Committee considered how these demographic shifts may change the assumptions?
- The City of St. Helena has faced extraordinary economic challenges this year due to the pandemic and the wildfires. Under these circumstances, it will be important for RHNA to avoid placing a disproportionate adverse financial impact on small, rural communities like ours.

The City of St. Helena appreciates this opportunity to review and comment on this very important housing growth strategy as our region prepares to begin the Housing Element update process. If you have any questions, please do not hesitate to contact me at mderosa@cityofsthenana.org.

Best regards,

A handwritten signature in cursive script, appearing to read "Maya DeRosa".

Maya DeRosa, AICP
Planning and Building Director
City of St Helena

cc: Mayor and City Council
Planning Commission
Mark T. Prestwich, City Manager
Aaron Hecock, AICP, Senior Planner
Ethan Walsh, City Attorney