



City of St. Helena

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

1572 Railroad Ave.
St. Helena, CA 94574
Phone: (707) 967-2792
Fax: (707) 963-7748

www.cityofsthelema.org

July 7, 2021

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

Re: Final RHNA Methodology and Subregional Shares

Dear President Arreguin:

The City of St. Helena recognizes the significant milestone of the ABAG Executive Board approving the Final RHNA on May 20, 2021. We further recognize the State is in a housing crisis and HCD and ABAG are leading agencies on the forefront of planning for each subregion to meet this challenge. This letter serves the purpose to convey our concerns with the additional 83 very low and low income "equity adjustment" beyond the 171 units we received in October 2020. While we are not filing an appeal, we find that the 254 unit RHNA assignment poses a legitimate threat to the City's safety and water supply as articulated further below.

- **Fire Hazard:** In 2020 the City of St. Helena experienced a local emergency as the Glass Fire consumed 67,000 acres of vegetation in Napa and Sonoma Counties as well as damaging 14 structures in the city limits. It was a sober lesson that the City cannot plan for additional housing growth in this PG&E Tier 3 high risk zone as our hillside areas contain high amounts of fire fuel. Unlike many larger Bay Area cities that have no fire hazard areas which can therefore accommodate housing infill, St. Helena's land availability is very constrained and consequently there is a very diminished land capacity that can be assumed for housing growth. Additionally, our relatively remote, rural location with limited emergency evacuation routes presents a particularly concerning safety hazard to both our existing and future residents.
- **Water Shortage:** As communicated in our November 24, 2020 letter to ABAG, 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 II water emergency, which occurs when the projected water supply is not sufficient to meet projected demands from the City's existing customers without significant conservation measures being implemented. This has had an immediate impact upon our development potential as no new water connections are permitted during a Phase II emergency. Since we submitted our last correspondence to ABAG related to the RHNA, our water emergency has become more urgent and residents are currently under water rationing requirements and subject to fines and penalties. A link to a recent article is noted below.

https://napavalleyregister.com/community/star/news/st-helena-calls-on-water-customers-to-cut-consumption-by-30/article_108f155f-2693-5c3d-830a-35385325bfe4.html

The City is in the process of conducting analyses of its existing water supply to better assess its ability to meet current and future demand, as well as exploring additional water resources including but not limited to developing recycled water infrastructure that can be used for irrigation and other non-potable purposes. While the current drought is the impetus for the Phase II emergency, it has raised significant concerns about the City's ability to accommodate its existing users, let alone significant new development of the type contemplated by the City's RHNA numbers. We find that our circumstances will result in a likely diminished ability to rely on our local groundwater supply to meet our current domestic water supply needs. This could put the City in an untenable position, stuck between our obligations and desires to both provide our fair share of housing within the region, and ensure the health, safety and welfare of existing and future residents by ensuring an adequate water supply.

- “Equity Adjustment” : In February 2021, ABAG released the updated Draft RHNA with the equity adjustment for 49 jurisdictions exhibiting above average racial and economic exclusion using a composite score based on the jurisdiction's divergence index score (a measure of segregation) and percent of the jurisdiction's households above 120% AMI. We were disappointed to find that our City was further penalized after articulating the many land and infrastructure constraints in our November 24, 2020 letter. We find the equity adjustment did not take into account the aforementioned special circumstances in the City of St. Helena.

In closing, the State of California envisions both wildfires and droughts getting worse with climate change. This is not just about a current drought or related increased fire risk, but reflects a long term reduction in water availability and growth in wildfire danger. Regionally, other larger communities in the Bay Area have a better ability to adjust to drought and have reduced issues with wildfire and we ask that ABAG consider this constraint in future RHNA methodology considerations. The City of St. Helena appreciates this opportunity to share our ongoing concerns with the RHNA assignment. If you have any questions, please do not hesitate to contact me at mderosa@cityofsthelelena.org.

Best regards,



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