

Erin Morris
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City of Napa Planning Division
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Re: EIR Valle Verde and Heritage House Project PL17-0114

The plan for the Valle Verde and Heritage House Project includes 85 parking spaces. The EIR indicates that the Project is required to provide 79 spaces – 46 for Valle Verde and 33 for Heritage House.

The Napa municipal code has the following requirement for SROs:

1 space per sleeping room.

Exception: Planning Commission may reduce to 0.5 spaces per unit when

- a. Development is within 1/4 mile of food market and regularly scheduled public transit stop; and*
- b. Some or all units are available long term to low income households; or*
- c. Tenant vehicles are limited to the number of non-guest parking spaces provided; and*
- d. Development agreement is provided regarding items b. and c. above.*

Obviously your calculation is using the exception. However, item “a” is not fulfilled because Heritage House is more than ¼ mile from any food market (7/10 mile) and from the public transit stop (1/3 mile).

I would also like to point out that your proposal is considering “ a conservative assumption of two persons per unit in the Heritage House” (EIR 3.16.2.2), or 132 residents, increases the possible need for parking. Note that this “assumption” conflicts with the US HUD definition of SRO which indicates that “Unlike apartments shared by roommates, each SRO unit is individually leased” and “SROs offer lifestyle options not possible in shared apartments. Because each unit in an SRO development features independent access and an independent lease, an SRO offers increased independence and privacy, which is appealing to potential renters” (<https://www.huduser.gov/portal/pdredge/pdr-edge-trending-062518.html>)

So the project’s proposed parking does not conform to Napa requirements and if it were to conform, it could not fit on the current acreage.

This raises an additional question. The buildings, parking, and other paved areas seem to put this project well over the lot coverage for RM of 50%. What is the lot coverage in this proposal?

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