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CITY OF MENLO PARK  
BUILDING

Dear Mr. Rogers

This letter contains my comments on parking issues in response to the Draft EIR prepared for the Menlo Gateway Project proposed by the Bohannon organization.

**1. The required number of parking spaces is unrealistically low.**

The DEIR statements of the required number of parking spaces (e.g., 1 space/350 sq. ft. of office space) for each type of land use do not cite any authority for, or evidence of, the validity of those figures for this location and instead substitutes its own rates, which work to the advantage of the developer. The DEIR does not use Menlo Park's established parking rate standards (Ref. pg. 3.11-55) and thus may have no validity for use in this DEIR.

There is no basis for a belief that these proposed rates are credible for this location. The DEIR says, in effect, "Just trust us", with no further justification. The DEIR dismisses this issue by saying that the developer knows what's best for the city, **"While the use based rates and the M-2 rates are used by the City, the proposed M-3 rates provide an update to the City of Menlo Park parking standards that is more appropriate for the proposed project site."** (Ref. pg.3.11-55)

Note also that as stated earlier, the factors proposed for each of the DEIR land uses are very easy on the developer when considered in the context of what is required in many other California communities. This is apparent when viewing these requirements in Tables 1 – 5 where the developer's parking ratios are listed with those of other communities in the context of a rank order of cost and difficulty of implementation for each of the proposed land uses.

It is critical to ensure that there will be a sufficient number of parking spaces for this large project because: 1) there is no indication that there will be enough public transit capability at this location to permit people to come by means other than their cars; 2) there is likely to be insufficient parking capacity in the neighboring blocks to accommodate the overflow parking in the event that there turns out to be insufficient parking in the project area (This is

acknowledged in the DEIR when discussing the parking standards, *“These proposed rates must adequately accommodate the project’s entire parking demand since there is no potential for overflow parking into adjacent neighborhoods.”*(Ref. pg. 3.11-55) ; and 3) if it turns out that the developer has in fact provided insufficient parking space using its parking demand models, then future developers in the adjacent parcels will probably have to (unfairly) make up the shortfall as part of the requirements for their proposed projects.

Unfortunately, as explained in the following sections, this project appears to require more than 800 – 1,500 more parking spaces than has been proposed in the DEIR.

### Office/R&D

For Office/R&D use, the DEIR uses a Parking Ratio Requirement of 1 parking space/350 gross sq. ft. However, the experience of many other California jurisdictions is to require a larger amount of parking space for office activities. Furthermore, based on their experience, other communities have imposed a considerable difference in space requirements depending on the type of office.

Palo Alto was recently surprised to find a major commercial company’s move to a more employee-dense workplace model. Facebook’s recent move of 700 workers to new quarters in Palo Alto, with staff working around conference tables with laptops instead of the more traditional practice of using offices and cubicles, caught city planners by surprise because the buildings ended up with more workers than had been predicted by the city’s parking space model, and was causing parking problems in the adjacent neighborhood. The city’s Planning Director noted that, *“...the 1 parking space/300 sq. ft. for the research park may have to become 250 sq. ft.”*(Ref. Palo Alto Weekly. 9/3/09)

Because the developer for this DEIR has not indicated what type of office activity is likely to be established here, there is no guidance to suggest what the expected parking requirement should be. Consequently, the city should be planning for the worst case. If, for example, the office space is to be used for medical and dental offices, then that activity (based on the requirements required by many other California communities as shown in Table 1) would require more parking space than the amount of parking space that the developer has proposed for office land use. This is an important consideration because so much office space has been proposed. In fact, if a 200 – 250 sq. ft. figure is used (common for medical offices as seen in Table 1), then this amount of office use would require 794 – 1489 more spaces than proposed by the DEIR. If the developer expects the office space to be used primarily for Class A office space for large law firms, then it should be examining the experience of other law firms such as

Heller-Ehrman in Menlo Park, or the experience of other law firms presently installed in new high-rise buildings in Menlo Park's Whiskey Gulch/University Circle development.

#### Health Club

For the health club land use, the DEIR uses a Parking Ratio Requirement of 1 parking space/190 square feet. As shown in Table 2, this is in the neighborhood of what seems to be regular practice in other communities.

#### Café/restaurant

For the Café/restaurant land use, the DEIR uses a Parking Ratio Requirement of 1 space/65 sq. ft. The DEIR is not specific with regard to whether this is gross area, or just the area devoted to the proposed dining or seating area (as done by some other jurisdictions). This ambiguity should be resolved. The DEIR also does not note the square footage area of the dining or dancing areas, or number of seats in the dining area, as sometimes used in other communities as the basis for determining parking spaces. Such information should be provided because it would help determine the extent to which the requirement stated in the DEIR is a reasonable match with the ratios used by other communities. As shown in Table 3, the required number of parking spaces for restaurants is based on several different metrics (e.g., gross area, number of seats, and number of employees). Consequently, it is difficult to determine whether the proposed Ratio Requirement is reasonable.

#### Hotel

For the hotel land use, the DEIR uses a Parking Ratio Requirement of 0.91 space/guest room. As shown in Table 4, when considering only the number of guest rooms, the DEIR is slightly easier on the developer than many other communities (e.g., 0.91 versus 1.0 space/guest room), and may represent a slight undercount of the likely need. If the more commonly accepted ratio of 1 space/room was to be used, then the project, just for this consideration, would be short by 20 rooms for this hotel land use.

The DEIR is silent regarding any plans for conference rooms or banquet facilities associated with the hotel. It is general practice for Marriott Hotels to provide such facilities. Examples of some Marriott California hotels with about the same number of guest rooms as the proposed facility (230 rooms) are shown below.

<u>Marriott Hotel</u>	<u>No. Rooms</u>	<u>No. Meeting Rooms</u>	<u>Meeting Room Area (sq. ft.)</u>
Burbank	395 + 93 suites	22	46,000
San Jose	478 + 28 suites	19	21,000

Walnut Creek	326	13	17,500
Coronado	273 + 27 suites	23	14,000
Santa Ynez	122	12	12,000
San Francisco (JWM)	329 + 8 suites	19	11,820
Bakersfield	250 + 9 suites	10	9,136
San Diego(downtown)	230	6	4,500

Attendees to events in the meeting rooms who are not hotel guests (e.g., for banquets or 1-day technical conferences) will need parking space above and beyond that needed for hotel overnight-guest parking. That need is recognized in some communities by requiring additional space for meeting room areas, in addition to the amount of space dictated by the number of guest rooms. South Pasadena requires an additional 1 space/100 sq. ft. of conference meeting room area, and Oceanside requires an additional 1 space/50 sq. ft. of banquet seating area. If this consideration were to be added to the hotel Parking Ratio Requirement (a not unreasonable action), then additional parking space would be required for this type of hotel land use. But because the DEIR is silent on the amount of meeting room space, no estimate can be made of the amount of undercount of parking spaces for this factor. This issue needs to be addressed in the Final EIR.

Hotels require a sizeable staff for their maintenance and operation. Some sources cite an experience of one employee/10 guest rooms for medium-size, medium-class hotels. For this proposed hotel with its 230 rooms, this suggests a staff of 23 employees would be working at the hotel. It is not clear how this has been included in the DEIR parking analysis. As shown in Table 4, many communities add an additional hotel parking space requirement based on the number of employees (e.g., 1 space/ 1 – 2 employees). This DEIR is silent on the number of employees associated with this hotel, and how their parking needs are factored into the DEIR. This issue should be addressed in the Final EIR.

Given the points noted above, it appears that the number of parking spaces required for the hotel land use has been significantly under-stated by at least 20 spaces.

Retail/community facilities

The DEIR states that: 1) for the Independence site, *“...up to 3,000 sq. ft. of retail/community facilities could be located in the ground floor of the office building on the Independence site provided there was a corresponding decrease in the amount of the office area.”* (Ref. pg. 2-7); and 2) for the Constitution site, *“The neighborhood-serving convenience retail/community*

*facilities would occupy 7,420 sq. ft. and take the form of storefronts lining some of the street frontages of the buildings provided there was a corresponding decrease in the amount of office area.” (Ref. pg. 2-9) This is a total of a possible 10,420 sq. ft. of retail space.*

For retail/community facilities land use, the DEIR does not give a specific Parking Ratio Requirement. Furthermore, it does not identify specifically what kind of retail activity will be accommodated, although some general uses are identified as part of the description of the new M-3 Zoning status. The DEIR does not specify how many parking spaces will be provided for this retail activity.

If the retail space is to replace office space, then there will be a need to upgrade the number of parking spaces needed for this 10,420 sq. ft. because retail space generally requires more parking space than office space does.

Table 5 lists the parking ratios used by various communities for retail land use, and shows a wide range (1 space/20 sq. ft. – 1 space/500 sq. ft.) of ratios in use; most of the examples are around 1 space/250 square feet. If that figure were used instead of the 350 sq. ft. for office use, then an additional 12 parking spaces would need to be added to the plan.

#### Amphitheater

The DEIR describes an amphitheater that *“...is designed to serve the project as a space for employees to use as a small park/green space and as an informal gathering area.”* If the amphitheater is ever to be used for any kind of audience for presentations or performances, then that should be addressed in the Final EIR, along with the associated parking issues for outside participants and attendees.

#### Other Considerations

There is no indication of the location and amount of loading space on-street and on-site that will be provided for service vehicles for this project.

There is no indication of the distance from the hotel entrance to the parking structure entrance. There could be concerns regarding the requirement for hotel guests to carry their bags to and from their cars over that distance. This may not be a DEIR issue, but it does raise an issue about the siting of the parking resources.

### **2. The assumed amount of benefit of shared parking is unsupported and overly optimistic.**

The DEIR states that, *“On the Independence site, the proposed office/R&D building, hotel, health club, and café/restaurant would share parking. This shared parking configuration reduces the*

*total amount of parking that would otherwise be necessary, because it takes advantage of the different parking demands at different peak hours for each use.” (Ref. pg. 2-19)*

The DEIR claims that for the Independence site, shared parking will reduce their estimate of the number of required parking spaces (1,198) to a total (1,002) that is less than the 1,017 parking spaces planned to be built at that site in a 5-story parking structure. That is a margin of only 15 spaces over their estimated requirement. (Ref. pg. 3.11-56)

The DEIR claims that the Constitution site will require a total of 1,405 spaces. But it also states that, “*A shared parking analysis was also conducted for the Constitution site. According to the analysis the peak weekday shared parking demand would be 1,405 parking spaces ... for the Constitution site*”. This may be an error in the DEIR where the 1,405 number was given for shared parking estimate instead of some reduced number. That issue needs to be resolved. The required number (1,405) is less than the space that would be built (1,649). (Ref. pg. 3.11-56)

No justification is given in the DEIR for any amount of space reduction other than the general statement of, “*...different parking demands at different peak hours for each use.*” No data is given to show the time frequency distribution of space needed for each land use and for the total by hour of each of those uses as shown by the attached example from another source for a different project. How broad or how sharp are the assumed peaks for each land use, and how valid are these assumptions? Such data needs to be provided to support a claim for a specific space reduction due to this effect. If this postulated non-overlapping parking demand activity cannot be supported, then this amounts to another under-estimate of the demand for parking space.

Furthermore, the time distributions of the assumed parking demand for each type of land use has made some assumptions, not stated in the DEIR, about the type of use to be made of the office space at each site. Different types of use (e.g., medical/dental, major law firms, corporate headquarters, 24-hour call centers, theaters) will require different patterns of parking throughout the day. We are being asked to accept, without question, and without seeing, any supporting data from this cookbook recommendation.

For both sites, the DEIR takes a computed requirement that is artificially low because of the parking ratios that have been chosen, and then lowered that figure by about 200 more spaces by using a 2005 edition of a cookbook by the Urban Land Institute that may be obsolete for this site and for current notions about the use of office space.



Type of Office	Location	Rule	Reference
Medical	El Dorado County	1 space/150 sq. ft.	County Zoning Ord. Chapt. 17.18
Medical	Sacramento County	1 space/154 sq. ft.	Zoning Code of Sacramento County
Medical and dental	Oceanside	1 space/200 sq. ft.	Article 31. "Off-Street Parking & Loading Regulations"
Medical	Mt. View	1 space/200 sq. ft.	Mt. View Planning Commission minutes. Nov. 24, 2008
Medical and dental, clinics & labs	Hayward	1 space/200 sq. ft.	Hayward Article 2. "Off-Street Parking Regulations"
Medical	Santa Cruz	1 space/200 sq. ft.	Santa Cruz. "Downtown Parking District: Parking Deficiency Fees"
Medical and dental	Yuba City	1 space/200 sq. ft.	Yuba City Zoning Regulations. Article 61
Medical and dental	Healdsburg	1 space/200 sq. ft.	Healdsburg. Zoning Ordinance Article 19
Medical and dental	Newport Beach	1 space/200 sq. ft.	Chapt. 20.52 "Off-Street Parking & Loading Standards"
Professional	Sacramento County	1 space/ 222 sq. ft.	Zoning Code of Sacramento County
Administrative, corporate	So. Pasadena	1 space/250 sq. ft.	So. Pasadena Municipal Code. 36.310.040
R&D, laboratories	So. Pasadena	1 space/250 sq. ft. + 1 space for each company vehicle	So. Pasadena Municipal Code. 36.310.040
Clinics, medical/dental offices	So. Pasadena	1 space/250 sq. ft.	So. Pasadena Municipal Code. 36.310.040
Medical, dental	San Jose	1 space/250 sq. ft.	San Jose. "Parking Analysis Application"
Medical and dental	Commerce	1 space/250 sq. ft.	Zoning Ord. Chapt. 19.21
Medical, clinics	Yolo County	1 space/250 sq. ft.	Yolo County Code. Title 8. Chapter 2. Article 25
Business	San Jose	1 space/250 sq. ft.	San Jose. "Parking Analysis Application"
General	El Dorado County	1 space/250 sq. ft.	County Zoning Ord. Chapt. 17.18
General	Hayward	1 space/250 sq. ft.	Hayward. Article 2. "Off-Street Parking Regulations"
General	Livermore	1 space/250 sq. ft.	Livermore Code. Chapter 3-20 "Off-Street Parking"
General, financial, business, professional	Yolo County	1 space/250 sq. ft.	Yolo County Code. Title 8. Chapter 2. Article 25
Business, corporate, general	Newport Beach	1 space/250 sq. ft.	Chapt. 20.52 "Off-Street Parking & Loading Standards"
Medical offices & clinics	Shasta	1 space/250 sq. ft.	Shasta Code Chapt. 17.86 "Off-Street Parking & Loading Regulations"
Medical Practitioner	West Berkeley	1 space/300 sq. ft.	West Berkeley. Sect. 23E.64.080 "Off-Street Parking & Loading Requirements"
Business and professional	Oceanside	1 space/300 sq. ft.	Article 31. "Off-Street Parking & Loading Regulations"
Business	Yuba City	1 space/300 sq. ft.	Yuba City Zoning Regulations. Article 61
Administrative, business, professional	Healdsburg	1 space/300 sq. ft.	Healdsburg Zoning Ordinance. Article 19
Business/service, govt. banks, professional, financial services	Petaluma	1 space/ 300 sq. ft.	Chapt. 11 "Parking and Loading Facilities, Off-Street"
Professional, other than medical	Commerce	1 space/300 sq. ft.	Zoning Ord. Chapt. 19.21
<b>Bohannon Project DEIR</b>	<b>Menlo Park</b>	<b>1 space/350 sq. ft.</b>	<b>Draft EIR</b>
General	Santa Cruz	1 space/400 sq. ft.	Santa Cruz City. "Downtown Parking District: Parking Deficiency Fees"

Table 1 Sample Parking Ratio Requirements in California for Office Space

<u>Type of Office</u>	<u>Location</u>	<u>Rule</u>	<u>Reference</u>
Health club, gym	San Jose	1 space/80 sq. ft.	"Parking Analysis Information & Instructions"
Physical fitness facility	Costa Mesa	1 space/100 sq. ft.	Resolution PC-06-
<b>Project DEIR</b>	<b>Menlo Park</b>	<b>1 space/190 sq. ft.</b>	<b>Draft EIR</b>
Health/fitness facilities (over 2000 sq. ft.)	Newport Beach	1 space/200 sq. ft.	Zoning Code. Title 20
Athletic clubs, gyms, health clubs	Hayward	1 space/200 sq. ft.	Zoning. Article 2. "Off-Street Parking Regulations"
Health/fitness clubs	So. Pasadena	1 space/250 sq. ft. + 1 space for each employee	Muni. Code. Chapt. 36. Article 3
Health clubs and spas	Healdsburg	1 space/300 sq. ft.	Zoning Ord. Article 19
Health spas, gym	El Dorado County	1 space/300 sq. ft.	Zoning Ord. Chapt. 17.18 "Off-Street Parking & Loading"
Tennis, racketball/health clubs	Yuba City	1 space/400 sq. ft. + 1.5 spaces/tennis court	Yuba City Zoning Regs. Article 61. "Off-Street Parking & Loading"
Physical fitness centers	Sacramento County	1 space/every 2 occupants based on Max. allowed occupant load	Sacramento County Zoning Code Chapt. 30

Table 2 Sample Parking Ratio Requirements in California for Health Club Space

Type of Facility	Location	Rule	Reference
Bars, nightclubs, dancing establishments	So. Pasadena	1 space/30 sq. ft. of dance floor area	Muni. Code 36.310.040
Bars, nightclubs, dancing establishments	So. Pasadena	1 space/100 sq. ft. of bar/nightclub area	Muni. Code 36.310.040
Public eating establishments	San Jose	1 space/40 sq. ft. of dining area	"Parking Analysis Information & Instructions"
Eating & drinking	Oceanside	1 space/50 sq. ft. of seating area	Zoning. Article 31
<b>Bohannon Project DEIR</b>	<b>Menlo Park</b>	<b>1 space/65 sq. ft.</b>	<b>Draft EIR</b>
Eating & drinking	Newport Beach	1 space / 75 sq. ft.	Muni. Code Chapt. 20.52
Bars & nightclubs	Commerce	1 space/75 sq. ft. + 1 space/ 2 employees on largest shift	Zoning Chapt. 19.21
Restaurant (new space more than 1,000 sq. ft.)	So. Pasadena	1 space/100 sq. ft.	Muni Code 36.310.040
Restaurants, cafes, nightclubs	Yolo County	1 space/100 sq. ft.	County Code Title 8. Chapt. 2. Article 25
Restaurant (standard)	Shasta	1 space/250 sq. ft.	Zoning. Chapt. 17.86 "Off-Street Parking & Loading Regulations"
Quick or full-service restaurants	West Berkeley	1 space /300 sq.ft.	Zoning Section 23E.64.080
Bars, taverns, nightclubs and restaurants, coffee shop, cafe	Petaluma	1 space/2.5 seats	Zoning Ord. Chapt. 11
Restaurants and bars	Sacramento County	1 space/3 seats	Zoning. Chapt. 30. "Off-Street Parking"
Restaurants, taverns, bars, nightclubs	Hayward	1 space/3 seats + 1 space/200 sq. ft. for other areas	Zoning. Article 2. "Off-Street Parking Regulations"
Restaurants and cocktail	Yuba City	1 space/3 seats + 1 space/3 seats	Zoning Reg. Article 61. "Off-Street Parking and Loading"
Restaurants, bars, cocktail lounge	El Dorado County	1 space/3 seats	Zoning. Chapt. 17.18
Restaurants	Livermore	1 space/3 seats	Zoning. Chapt. 3-20
Restaurants	Healdsburg	1 space/3 seats	Zoning. Article 19
Restaurants, sit-down and cafes	Commerce	1 space/4 seats + 1 space/2 employees on largest shift	Zoning Chapt. 19.21

Table 3 Sample Parking Ratio Requirements in California for Cafe/Restaurant Space

<u>Type of Facility</u>	<u>Location</u>	<u>Rule</u>	<u>Reference</u>
Hotels and motels Hotels, motels, and time-share facilities	So. Pasadena Oceanside	1 space/guest room, and 1.5 spaces for each multi-room suite; plus 1 space for each 20 guest rooms and 10 spaces for each 1,000 sq. ft. of conference meeting room area 1.2 spaces/guest room + 1 space/50 sq. ft. of banquet seating area 1 space/unit or room + 1 space/ each employee on duty	Muni. Code 36.310.040 Zoning Regs. Article 31 Zoning. Title 8. Chapt. 2. Article 25 Zoning Ord. Article 19
Hotels and motels Hotels, motels, extended stay hotels, +...	Yolo County Healdsburg	1 space/guest room or 2 beds, whichever is greater, + 1 space/2 employees or owner/occupants 1 space/guest room + 1 space/ 2 employees	Zoning. Chapt. 17.86 Zoning Chapt. 17.18. "Off-Street Parking and Loading"
Hotel, motel, boarding house, or bed and breakfast guest facility	Shasta	1 space/room + 1 recreational vehicle space for every 10 units	Zoning Regs. Chapt. 11
Hotel/motel	El Dorado County	1 space/living or sleeping unit + 1 space for owner or manager	Zoning. Article 2. "Off-Street Parking Regulations"
Hotels and motels	Petaluma	1 space/room + 1 space/2 employees on largest shift	Zoning Regs. Article 61 Zoning Reg. Chapt. 3-20 Zoning. Chapt. 20.52
Hotels and motels	Hayward	1 space/unit + 1 space/2 employees	Zoning Code. Chapt. 30. "Off-Street Parking"
Hotels and motels	Yuba City	1 space/living or sleeping unit +...	Zoning Reg. Chapt. 19.21
Hotels, motels, and motor hotels	Livermore	1 space/guest room or unit	<b>Draft EIR</b>
Motels	Newport Beach	1 space/sleeping room, suite of rooms, or housekeeping unit	Zoning. Chapt. 20.52
Hotels, motels, auto courts Hotels and motels	Sacramento County Commerce	1 space/guest room or unit	Zoning Regs. Section 23E.64.080
<b>Bohannon Project DEIR</b>	<b>Menlo Park</b>	<b>0.91 space/guest room</b>	
Hotels	Newport Beach	1 space/2 guest rooms	
Hotels	West Berkeley	1 space/3 guest/sleeping rooms or suites + 1 space/3 employees	

Table 4 Sample Parking Ratio Requirements in California for Hotel Space

<u>Type of Retail Space</u>	<u>Location</u>	<u>Rule</u>	<u>Reference</u>
Convenience store	Commerce	1 space/20 sq. ft.	Zoning Ord. Chapt. 19.21
Neighborhood convenience retail stores	Healdsburg	1 space/150 sq. Ft.	Zoning Ord. Article 19
Convenience market, food stores	Livermore	1 space/200 sq. ft.	Zoning Regs. Chapt. 3-20
Retail sales	Oceanside	1 space/200 sq. ft.	Zoning Ord. Article 31
Banks, credit unions, savings & loans	Sacramento County	(for less than 5,000 sq. ft.) 1 space/200 sq. ft.	Zoning Code. Chapt. 30
Retail sales, goods	San Jose	1 space/200 sq. ft.	"Parking Analysis Information & Instructions"
Retail	Hayward	1 space/215 sq. ft.	Zoning. Article 2
Retail stores and shopping centers	Sacramento County	1 space/222 sq. ft.	Zoning Code. Chapt. 30
General retail/services	Commerce	1 space/250 sq. ft. + 1 space/ 2 employees on the largest shift	Zoning Ord. Chapt. 19.21
Multi-tenant retail site or building (2 or more uses)	So. Pasadena	1 space/250 sq. ft.	Muni. Code 36.310.040
Retail stores & shopping	Yuba City	1 space/250 sq. ft.	Zoning Reg. Article 61
Retail stores (over 500 sq. ft.)	Yolo County	1 space/250 sq. ft.	Zoning. Title 8. Chapt. 2. Article 25
Retail sales	Newport Beach	1 space/250 sq. Ft.	Zoning Code. Chapt. 20.52
Retail sales	Oceanside	1 space/250 sq. ft.	Zoning Ord. Article 31
Shopping center	Shasta	(for over 5,000 sq. ft.) 1 space/275 sq. ft.	Muni Code. Chapt. 17.86
General retail	Petaluma	1 space/300 sq. ft.	Zoning Ord. Chapt. 11
Retail (general merchandising not in a shopping center)	El Dorado County	1 space/300 sq. ft.	Zoning Ord. Chapt. 17.18
Retail	Santa Cruz	1 space/400 sq. ft.	"Downtown Parking District: Parking Deficiency Fees"
Commercial	West Berkeley	1 space/500 sq. ft.	Zoning. Section 23E.64.080
<b>Bohannon Project DEIR</b>	<b>Menlo Park</b>	<b>not specified for the 10,420 sq. ft. identified as "retail/community facilities"</b>	<b>Draft EIR</b>

Table 5 Sample Parking Ratio Requirements in California for Retail Space

# Shared Parking

## June - Weekday Shared Parking Accumulation

