

2.A TOPICAL RESPONSE TO COMMENTS

TR-2 PARKING

The analysis of required and proposed vehicle parking for the Project is provided in Section 4.K, Transportation and Parking, of the Draft EIR. Section 4.K summarizes the findings of the Parking Assessment for the Proposed Rowland Heights Plaza and Hotel Project prepared by Linscott, Law & Greenspan, Engineer (May 14, 2015) (Parking Assessment) and provided in Appendix I-2 of the Draft EIR. Within Section 4.K, specific discussions of the parking analysis are provided on pages 4.K-17–4.K-18, 4.K-20–4.K-22, and 4.5-45–4.K-48. A revised Parking Assessment has been prepared by Linscott, Law & Greenspan in May 2016 to and is provided in Appendix B of the Final EIR.

Section 22.52 of the County's Zoning Code provides the unadjusted parking requirements (that is, without taking into account shared parking) for the individual components of the Project. Table 4.K-9 in Section 4.K, Transportation and Parking, of the Draft EIR provides a summary of the unadjusted Code parking calculation for the Project. As shown in Table 4.K-9, without adjustment, the County would require 1,509 vehicle parking spaces to serve all proposed Project uses. However, it is expected that the actual number of parking spaces needed to serve the Project is less. Accordingly, the Project Applicant proposes to provide parking for the Project through the County's Parking Permit process. The County's Zoning Code (Part 7 of Chapter 22.56) allows projects to apply for a Parking Permit, which states: "It is the intent to conserve land and promote efficient land use by allowing...the dual or shared use of parking facilities by two or more uses." The Parking Permit allows the applicant for a mixed-use project the option of providing a parking supply that is less than the sum total of the maximum parking requirements for each individual use or component. As stated in the Zoning Code, the application for a Parking Permit must demonstrate that "...the uses sharing vehicle parking facilities operate at different times of the day or days of the week."

Using the ULI methodology, the peak parking demand was identified in the Draft EIR as 1,143 spaces for all Project uses, since the proposed hotel, commercial, and office uses do not have simultaneous peak demand periods. The Project's proposed supply of 1,161 spaces, as evaluated in the Draft EIR, would have provided 18 surplus spaces above and beyond that demand, including the portion of the Project Site within the City of Industry (the Northern Parcel). The peak parking demand and proposed supply were derived from the detailed shared parking study provided in the Parking Assessment prepared by Linscott, Law & Greenspan, Engineers for the Project and provided in Appendix I-2 of the Draft EIR. The Parking Assessment was prepared based on the methodology provided in the Shared Parking Manual published by the Urban Land Institute (ULI), which is considered the primary reference for preparation of such parking demand studies.

The Shared Parking Manual provides parking demand factors for various land uses (e.g., hotels, restaurants, office, etc.) according to different times of day and days of the week, based on detailed counts of parking demand received and evaluated by ULI at existing developments. The Shared Parking Manual provides parking factors which indicate, for example, that hotel guestrooms will generate the highest parking demand at night, when retail uses generate less or no demand. At other hours of the weekday, hotel guestroom demand is approximately 55 percent, since most hotel guests are off-site. In this manner, the collocation of hotels with the Commercial Center makes shared parking feasible, because peak parking demand for the two uses is complementary. This allows a degree of shared parking that would not be possible if the entire Project Site were to be developed with commercial or other uses with coincident peak parking demand.

Moreover, as also stated in the Parking Assessment appended to the Draft EIR (see p. 7), certain land uses serve “captive markets” (i.e., patrons already on-site), with hotels a prime example. Hotel restaurants, bars, and banquet space are ancillary uses within hotels, patronized predominantly by hotel guests whose parking needs are already accounted for in the hotel parking requirement and supply, rather than functioning as destination locations generating additional parking demand by patrons visiting from off-site points of origin. Hotel guests also represent a captive market for the Commercial Center restaurants and retail establishments, since they are expected to be patronized, in part, by hotel guests who do not generate additional demand for Commercial Center parking since their parking needs are, again, accounted for in the hotel parking supply. This contributes substantially to the ability of shared parking to efficiently meet the parking demand of multiple collocated uses.

As another example, at 6:00 P.M. on a weekday, parking demand at an office is expected to be 25 percent of the highest demand observed at 10:00 A.M. and 2:00 P.M. On weekends at an office building, the peak parking demand is expected to occur at 11:00 A.M., but this demand would only be 10 percent of the peak weekday demand. To summarize, if an office building require 100 parking spaces at its weekday peak hour of parking demand, below is the corresponding breakdown of expected parking demand during various hours of a typical weekday and weekend day:

- Weekday 10:00 A.M.: 100 spaces
- Weekday 2:00 P.M.: 100 spaces
- Weekday 6:00 P.M.: 25 spaces
- Weekend 11:00 A.M.: 10 spaces

The concept of shared parking is such that, for land uses within a mixed-use development, there is the opportunity to “share” a single parking space if that space is able to accommodate the peak parking demands of both uses as the result of complementary and not conflicting (simultaneous) demand. For example, related to an office use, the following other land uses can share spaces:

- Retail: While retail generally has high parking demand during the midday periods, similar to an office, the peak weekday demand for retail parking is 10 percent less than the peak demand for parking on a weekend day, when office parking demand is essentially dormant. For example, if a retail center generates a maximum of 100 parked cars on a Saturday, the maximum parking demand during the weekday is expected to be 90 parked cars. For shared parking purposes, a parking space used during the weekday by an office tenant can be used during the weekend by a retail patron.
- Restaurant: While some sit-down restaurants will have a high level of parking demand during the midday lunch period, its highest period of parking demand will occur in the evening, coinciding with dinner service, when office parking demand is greatly reduced. Thus, a parking space used during the day by an office tenant can be used in during the evening by a restaurant patron. Further, during weekends (day and nighttime) essentially all of the parking used by office workers during weekdays would be available for use by restaurant patrons.

Parking adjustment factors for specific times of day and days of the week, as defined in the Shared Parking Manual, were applied to each of the Project components. Peak parking demand was determined by applying the County Code parking requirements (e.g., Code parking rates for hotels, restaurants, retail, office, etc.).

Thereafter, for each hour of a weekday and a weekend day, parking demand was calculated for the Project by applying the ULI demand factors to Code parking requirements for each proposed land use. For every hour of the day, the cumulative total parking demand was calculated.

As noted, the parking demand analysis provided in the Draft EIR utilized the County Code parking rates for purposes of estimating the highest parking demand for each Project component. The Code parking rates are intended to identify the parking demand for all users related to each component. For example, for hotels, the County Code rate is intended to satisfy the parking needs for hotel guests, hotel employees, and service vehicles (e.g., linen service). Thus, the parking demand analysis provided in the Draft EIR similarly evaluates the parking demand for all users of the Project Site: tenants, employees, patrons, visitors, etc.

However, in response to the County's request to conservatively increase the Project parking supply to incorporate a buffer, and as amended in Section 3.0, Corrections & Additions, of this Final EIR, the Applicant now proposes a total of 1,203 spaces, an increase over the parking supply evaluated in the Draft EIR. The highest demand for Project parking as calculated per the shared parking analysis is now expected to occur 12:00 P.M. on a weekend (Saturday) afternoon when 1,130 spaces would be occupied at on-site, instead of 1,143 spaces at 8:00 P.M. as stated in Section 4.K of the Draft EIR. The current proposed supply of 1,203 spaces would adequately accommodate the forecast demand, with a 73-space or 6.5 percent buffer above and beyond the calculated peak demand. As shown in the updated Parking Assessment tables summarizing peak parking demand for the shared Project uses, parking demand at other hours of the day is expected to be less than the forecast peak demand of 1,130 spaces. Thus, substantial surpluses of parking can be anticipated at other times during a weekday and weekend day.

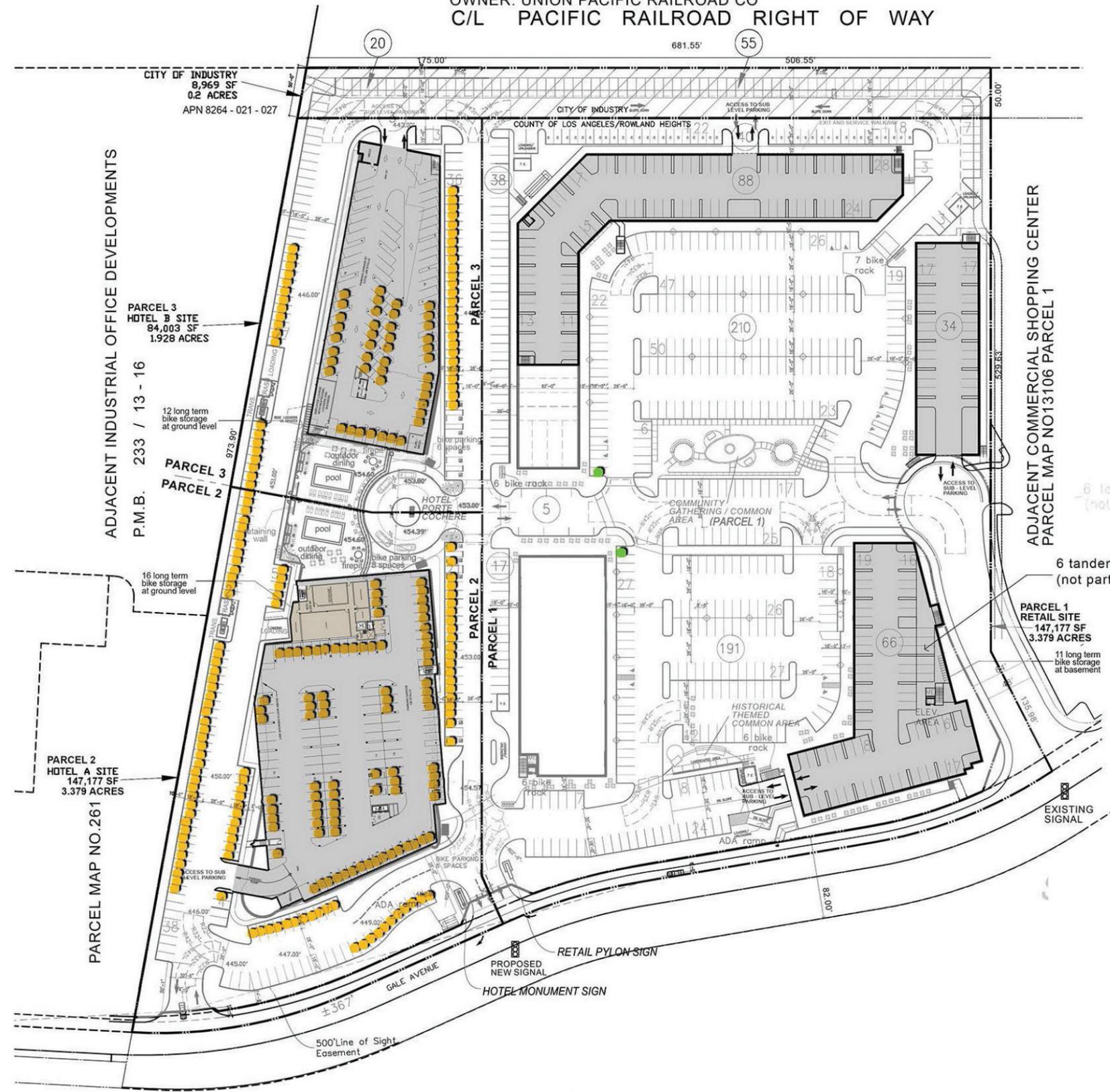
To further demonstrate the aspects of the proposed shared parking program for the Project, exhibits have been prepared to illustrate the potential parking utilization at the site during a weekday at the following hours, and are incorporated into this Topical Response as **Figure 2-1, Shared Parking Demand by Hour: 6:00 A.M.**; **Figure 2-2, Shared Parking Demand by Hour: 11:00 A.M.**; **Figure 2-3, Shared Parking Demand by Hour: 1:00 P.M.**; **Figure 2-4, Shared Parking Demand by Hour: 6:00 P.M.**; and **Figure 2-5, Shared Parking Demand by Hour: 11:00 P.M.** Figure 2-1, the 6:00 A.M. exhibit, expectedly shows cars parked around the two hotels, with substantial vacancies (i.e., calculated at 938 surplus spaces) available on the balance of the Project Site. At 1:00 P.M., office parkers are shown on Parcel 1, the Commercial Center, but at 6:00 P.M. (after many office workers have departed), these same parking spaces on the Parcel 1 Commercial Center are now used by restaurant patrons. By 11:00 P.M., commercial parking demand has subsided and there is a substantial parking surplus parking available to serve the hotels.

With respect specifically to restaurant parking, the shared parking analysis is highly conservative ("worst case") in that it assumes all of the food-serving uses would have their highest peak demand for parking simultaneously (i.e., in the evening). In reality, particularly for a larger commercial project, some food-serving uses (particularly "quick-serve" restaurants such as Subway) will have their peak occupancy during the lunchtime period while other restaurants (e.g., with full waiter service) experience their peak use during the dinner period. By assuming all restaurants in the Project have their peak parking demand at one time, the parking analysis provided in the Draft EIR evaluates a highly conservative, worst-case condition. Actual parking demand for the Project will likely be measurably less than what is forecast in the Draft EIR.

Additionally, as stated on page 4.K-21 of the Draft EIR, a Project Design Feature is proposed (PDF-TRAF-3) that would limit restaurant occupancy loads throughout the commercial center to 1,561 occupants. The parking demand analysis provided in the Draft EIR is based on a maximum of 1,561 occupants; thus, PDF-TRAF-3 ensures that parking demand related to restaurants will not exceed the values provided within the demand analysis which may occur at other unregulated centers. With respect to hotel parking evaluated in the parking demand analysis, the following is noted:

- The shared parking analysis assumes as a baseline the County’s Code parking rate for hotel guestrooms, which is one-half of a parking space for every guest room plus one parking space for every guest suite. Contrary to some comments received, it is not necessary to provide a parking space for every hotel guestroom, as many hotel guests arrive by taxi or shared ride service (Super Shuttle, Uber, etc.) or as part of larger group (e.g., in a van or tour bus).
- Related to on-site meeting and restaurant space at the hotel, the shared parking analysis assumes a portion of the usage of these ancillary facilities will be by hotel guests. Therefore, the parking demand for hotel guests using the ancillary facilities is already accounted for within the allocation of parking for the hotel guestrooms and suites within the parking analysis. The use of this “captive” parking adjustment for the ancillary uses within the parking demand analysis is consistent with the methodology recommended in the ULI Shared Parking Manual.
- It is reasonable to assume that a number of hotel guests will walk to the commercial portion of the Project to eat in the restaurants, shop in the retail spaces, etc. Conservatively, no adjustment (reduction) in the forecast parking demand related to the Project’s Commercial Center was assumed in the parking demand analysis based on the likelihood that some patronage will be derived from hotel guests walking to the site, and therefore not using a parking space within the Commercial Center.

APN 8264-021-801
 OWNER: UNION PACIFIC RAILROAD CO
 C/L PACIFIC RAILROAD RIGHT OF WAY



- 263** ● HOTEL ROOMS
- 0** ● HOTEL MEETING SPACE AND RESTAURANT
- 2** ● RETAIL
- 0** ● MEDICAL OFFICE AND OFFICE
- 0** ● RESTAURANT

265 TOTAL DEMAND AT 6:00 AM
1,203 PARKING SUPPLY
938 SHARED PARKING AT 6:00 AM

6 tandem parking
 (not part of parking count)

6 tandem parking
 (not part of parking count)

PARCEL 1
 RETAIL SITE
 147,177 SF
 3.379 ACRES
 11 long term
 bike storage
 at basement

VICINITY MAP



Shared Parking Demand by Hour: 6:00 A.M.

FIGURE

2-1



APN 8264-021-801
 OWNER: UNION PACIFIC RAILROAD CO
 C/L PACIFIC RAILROAD RIGHT OF WAY



- 152 ● HOTEL ROOMS
- 210 ● HOTEL MEETING SPACE AND RESTAURANT
- 229 ● RETAIL
- 93 ● MEDICAL OFFICE AND OFFICE
- 351 ● RESTAURANT

1,035 TOTAL DEMAND AT 1:00 PM
 1,203 PARKING SUPPLY
 168 SHARED PARKING AT 1:00 PM

VICINITY MAP



Shared Parking Demand by Hour: 1:00 P.M.

Rowland Heights Plaza and Hotel Project
 Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2016.

APN 8264-021-801
 OWNER: UNION PACIFIC RAILROAD CO
 C/L PACIFIC RAILROAD RIGHT OF WAY



- 208 ● HOTEL ROOMS
- 193 ● HOTEL MEETING SPACE AND RESTAURANT
- 218 ● RETAIL
- 58 ● MEDICAL OFFICE AND OFFICE
- 445 ● RESTAURANT

1,122 TOTAL DEMAND AT 6:00 PM
 1,203 PARKING SUPPLY
 81 SHARED PARKING AT 6:00 PM

VICINITY MAP



Shared Parking Demand by Hour: 6:00 P.M.



APN 8264-021-801
 OWNER: UNION PACIFIC RAILROAD CO
 C/L PACIFIC RAILROAD RIGHT OF WAY



- 276 ● HOTEL ROOMS
- 27 ● HOTEL MEETING SPACE AND RESTAURANT
- 23 ● RETAIL
- 0 ● MEDICAL OFFICE AND OFFICE
- 351 ● RESTAURANT

677 TOTAL DEMAND AT 11:00 PM
1,203 PARKING SUPPLY
526 SHARED PARKING AT 11:00 PM

6 tandem parking
 (not part of parking count)

6 tandem parking
 (not part of parking count)

VICINITY MAP



Shared Parking Demand by Hour: 11:00 P.M.

Rowland Heights Plaza and Hotel Project
 Source: Parallax Investment Corporation; Architects Orange; Gene Fong Associates, 2016.



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