



MEMORANDUM

DATE: September 21, 2022

To: Thomas J. Leary, MemorialCare Health System

FROM: Ken Wilhelm, Principal, LSA

SUBJECT: Supplemental Parking Analysis for San Clemente Senior Housing/Medical Office Project

LSA prepared a parking analysis for the proposed San Clemente Senior Housing/Medical Office project (project) at 654 Camino De Los Mares in San Clemente, California. The purpose of the analysis was to determine whether the proposed project would comply with the City of San Clemente's (City) Off-Street Parking Requirements. The analysis was completed on August 16, 2022.

On August 31, 2022, the City held a joint Study Session with the City Council and Planning Commission members. Several members had questions about parking and whether the project would provide adequate parking spaces to accommodate peak demand.

This memorandum summarizes the conclusions of the parking analysis and provides additional information to support the parking proposed for the project.

SUMMARY OF PROJECT SHARED PARKING ANALYSIS

The proposed project includes the demolition of the existing, vacant hospital and the construction of 250 dwelling units of senior housing (including one manager's unit) and 7,500 square feet (sf) of medical office use. The project would provide a total of 312 parking spaces on site, which includes 251 parking spaces reserved for the senior residents (including the manager's unit), 23 spaces dedicated to residential guests, and 38 parking spaces for the medical office building. A total of 61 parking spaces would be shared between the guests of the residents (including the manager's unit) and the medical office building.

The project meets the City Municipal Code Section 17.28.280 for the required number of parking spaces for the residents of the senior housing component. The project also meets the City Municipal Code Section 17.64.050 for the required number of parking spaces for the medical office component. The parking analysis evaluated the ability to share parking spaces between the guests of the senior residential component and the medical office component. The two components do not "peak" during the same time of day and therefore have the ability to share parking between the two uses.

The results of the parking analysis identified that the peak weekday utilization of the combined senior resident guest and medical office uses occurs at 7:00 p.m. when 61 spaces are occupied. Based on the proposed parking supply of 61 shared stalls, the parking supply would accommodate the peak parking demand. As a result, adequate parking supply would be provided during the weekday.

The analysis also described that the peak weekend utilization of the combined senior resident guest and medical office uses occurs between 7:00 p.m. and 10:00 p.m., when 50 spaces are occupied. Based on the proposed parking supply of 61 shared stalls, a residual of 11 stalls is expected. As a result, adequate parking supply would be provided during the weekend.

Therefore, the shared parking analysis demonstrates that the proposed parking supply of 312 spaces, including 61 spaces shared between guests of the senior residents and the medical office building, would adequately accommodate the expected parking demand during the weekday and weekend. Per City Municipal Code Section 17.64.120, the two components meet the findings necessary to share parking on-site.

INSTITUTE OF TRANSPORTATION ENGINEERS PARKING GENERATION

LSA reviewed the Institute of Transportation Engineers (ITE) *Parking Generation Manual* (5th Edition, 2019), which includes parking requirements for different land uses. The *ITE Parking Generation Manual* is accepted throughout the nation as an industry standard.

Based on the *ITE Parking Generation Manual* (Land Use 252 – Senior Adult Housing, Attached), the peak parking demand for senior housing occurs between the hours of 10:00 p.m. and 8:00 a.m. The average parking rate is 0.61 space per dwelling unit. This includes both residents and guests/visitors. Based on the 250 senior units for the proposed project, this would require 153 parking spaces for the senior residents and their guests. ITE also identifies an 85th percentile parking rate of 0.67 spaces per dwelling unit. Using this more conservative rate, the proposed project would require 168 parking spaces.

The proposed project will provide 274 dedicated parking spaces for the senior residents and their guests. This presents 121 more spaces than the average ITE rate for Senior Adult Housing and 106 more spaces than the 85th percentile parking rate identified in ITE.

URBAN LAND INSTITUTE SHARED PARKING

LSA reviewed the Urban Land Institute (ULI) *Shared Parking Manual* (3rd Edition, 2020), which includes a case study on senior adult housing parking requirements. The *ULI Shared Parking Manual* is also accepted throughout the nation as an industry standard.

Based on the survey of eight active adult senior housing facilities (Kimley-Horn, Figure 4-26 in the *ULI Shared Parking Manual*), the average parking rate is 0.88 space per dwelling unit. This includes both residents and guests/visitors. Based on the 250 senior units for the proposed project, this would require 220 parking spaces for the senior residents and their guests. The case study also identifies an 85th percentile parking rate of 0.90 space per dwelling unit. Using this more conservative rate, the proposed project would require 225 parking spaces.

The ULI *Shared Parking Manual* states “considering the parking behaviors, ITE parking ratios, and observed parking ratios, the recommended ratios of parking spaces per unit is 0.85 spaces per unit for weekdays and 0.76 spaces per unit for weekends,” which results in 213 and 190 spaces for the proposed project, respectively.

The proposed project will provide 274 parking spaces for the senior residents and their guests. This presents 54 more spaces than the average ULI rate in the case study for senior housing and 49 more spaces than the 85th percentile parking rate from ULI. This also results in 61 more spaces than the recommended ULI parking rate for senior housing.

SHORECLIFFS SENIOR APARTMENTS

An application to the City was submitted and approved by the Planning Commission on March 6, 2019, for a 150-unit senior housing development at the Shorecliffs Golf Course property. As included in the Planning Commission Staff Report, a parking analysis (attached) was provided to present actual parking demand at four comparable senior housing properties within Southern California.

The data presented shows an average parking requirement of 0.80 space per dwelling unit. Based on the 250 senior units for the proposed project, this would require 200 parking spaces for the senior residents and their guests. The proposed project will provide 274 parking spaces for the residential component. This represents 74 more spaces than the average parking rate of similar senior housing facilities nearby.

CONCLUSIONS

The shared parking analysis demonstrates that the proposed parking supply of 312 spaces, including 274 designated for senior residents and their guests, would adequately accommodate the expected parking demand during the weekday and weekend. The sources identified above based on actual observations, as summarized in Table A (attached), suggest that the peak parking demand for senior adult housing does not require one space per dwelling unit per the City’s Municipal Code requirement. As such, parking will be more than satisfied for the residents, guests, and medical office building on site.

Attachments: Table A – Senior Housing Parking Rate Summary
Shorecliffs Senior Apartments Parking Justification

Table A: Senior Housing Parking Rate Summary

Source	Parking Rate per Senior Unit	Project Parking Required	Project Parking Provided	Parking Surplus/(Deficit)
ITE Parking Generation Manual (5th Edition)				
- Average Rate	0.61	153	274	121
- 85th Percentile Rate	0.67	168	274	106
ULI Shared Parking Manual (3rd Edition)				
- Average Rate	0.88	220	274	54
- 85th Percentile Rate	0.90	225	274	49
- Recommended Rate	0.85	213	274	61
Shorecliffs Golf Course Senior Housing Parking Study				
- Average Rate	0.80	200	274	74

Memorandum

To: Amy Stonich, Contract Planner, City of San Clemente

From: Omar Rawi, Greystar

Re: Justification for Requesting Reduction in Number of Covered Parking Stalls

Greystar is proposing a 150-unit active adult senior housing development at the Shorecliffs Golf Course property specifically designated for senior housing by the City Council. The project is specifically subject to the parking standards generally applicable to senior projects in the City. Section 17.28.280(E) (2) of the City's Zoning Code requires one (1) covered space for each senior unit, plus one (1) additional space for every five (5) units. Greystar is proposing a total of 182 parking spaces, or two (2) more than required by the Zoning Code; but only 136 of the spaces are proposed to be covered (fourteen (14) fewer than the Zoning Code standard). However, Section 17.28.280 specifically allows for exceptions to the parking requirements if supported by a parking study.

The purpose of this memo is to provide information on actual parking demand at comparable senior housing properties in order to justify an exception to the standard number of covered parking spaces at the proposed project. The proposed 136 covered spaces at Shorecliffs equates to 0.91 per unit.

There is very limited parking demand data available on senior housing. In 2015, Greystar commissioned the engineering firm, Kimley Horn, to study parking demand for a project very similar to the proposed project: "Overture Fairview" located in the Dallas Fort Worth Area. The following is an excerpt from that study:

A review of recent available information on parking demands at senior living facilities shows that there are relatively few sources of data. Generally, the low traffic generation and parking demands associated with these types of developments mean that the sites very rarely cause any interference to their neighbors. As a result, the engineering community has had no need to document the characteristics of these uses.

The acknowledged source for national-level parking demand data is the Institute of Transportation Engineers (ITE) publication *Parking Generation*, 4th Edition (2010). The category matching Overture Fairview is Land Use #252 Senior Adult Housing – Attached. It shows an average peak period parking demand of 0.59 vehicles per dwelling unit (the highest observed parking demand during a typical weekday), and an 85th-percentile demand, often used for design, of 0.66 vehicles per dwelling unit.

Some older research was found in a paper from the 1996 ITE annual meeting, *Senior Housing Trip Generation and Parking Demand Characteristics* by Stephen B. Corcoran, P.E. The research at a mix of senior sites around Chicago found them generating traffic at about 2/3rds the rate of typical multifamily sites, and that the senior living trips occurred away from the typical commuter peak hours. The parking demand was observed to be 0.40 spaces per dwelling unit. This research was the spur to differentiate the retirement land use research to better fit the senior living, independent living, and other types.

The demand for parking at Greystar's "active senior" projects in suburban locations has generally exceeded the peak demand figures discussed in the national standards cited by Kimley Horn (0.59 and 0.4,), but the demand for resident or tenant spaces has consistently averaged well below one (1) per unit. Greystar

respectfully submits that because the one covered space per unit requirement is intended to ensure an adequate number of covered spaces *for tenants*, information on actual tenant parking demand (rather than overall parking demand) is the most relevant data for evaluating whether to allow a reduction in the number of covered spaces.

Therefore, Greystar has obtained information from four local senior projects. Two of the properties, Buena Vida and San Sebastian, are owned by Greystar. The other two, Vintage Shores in San Clemente and Vintage Aliso, are owned by a USA Properties. The average tenant parking demand at these four properties ranged from a low of 0.70 per unit to a high of 0.86 per unit, or 0.80 per unit on average. Note that the San Sebastian and Vintage Aliso projects have a greater percentage of two-bedroom units than proposed for the Shorecliffs project.

Total Parking Demand Data Summary

PROPERTY	LOCATION	RESIDENT DEMAND PER UNIT
LOCAL PROPERTIES		
Buena Vida	Rancho Santa Margarita, CA	.70
San Sebastian	Laguna Woods, CA	.86
Vintage Shores	San Clemente, CA	.82
Vintage Aliso	Aliso Viejo, CA	.82
LOCAL AVERAGE		.80

Conclusion

The proposed project proposes a total of 182 parking spaces, which exceeds expected overall parking demand and the City's standard. Additionally, while the project's proposed 136 covered parking spaces is short of the City's one (1) per unit standard, data suggests that providing 0.91 per unit will be more than adequate to accommodate the anticipated tenant parking demand at the property. If the project has average tenant demand for parking spaces, it would need 120 covered spaces to provide a covered space for each tenant that has a car (150 units x 0.80 per unit = 120).