



SAND HILL PROPERTY COMPANY

February 16, 2023

Jocelyn Shoopman, Associate Planner
Community Development Department
Town of Los Gatos
110 E. Main St.
Los Gatos, CA 95030

RE: 15600 and 15650 Los Gatos Blvd. Letter of Justification – Parking Reduction

Dear Ms. Shoopman,

Thank you for reviewing our application for 15600 Los Gatos Blvd. We are pleased to submit a project that will allow for the revitalization of this property so it will again contribute to the vibrancy, community, economy, and overall success of the Town.

Project Parking

Our application is for a 40,190 sf supermarket building (Whole Foods), which includes all areas enclosed by 50% or more of wall area. The Town's parking rate is 1 space for every 235 sf of enclosed area. This equates to an overall parking space requirement of 171 spaces. At this time, we are proposing a total parking count of 164 spaces. While this is short of a strict application of the Town's parking requirement by 7 spaces, we believe the project will meet the actual customer parking demand, based on the following justifications.

Parking Demand Analysis

Per suggestion from Town staff, we submitted a Parking Demand Analysis from Hexagon Transporting Consultants. In their report, it was determined that 164 spaces would be sufficient with the implementation of a Transit Demand Management (TDM) program.

The number of required spaces is only 7 spaces more than what would be provided. It is recommended the project implement a TDM plan to include measures, such as a transit fare subsidy, ride matching assistance, and commute trip reduction marketing and education, to encourage employees to use alternative transportation options and reduce parking demand.

Transit Demand Management (TDM)

Currently the Town does not have a policy that would allow for a reduction in vehicle trips or vehicle parking based on a parking management plan. Most jurisdictions in Santa Clara County allow for significant reductions in vehicle trips, or single occupancy vehicle trips, based on a

TDM program that redirects trip to various other transportation solutions. Redirecting trips can include bicycle incentives, transit subsidies, employee carpool incentives, off-peak trips, etc. More aggressive TDM plans can require up to a 45% trip reduction (Mountain View) and less aggressive plans can require only 15% reduction (San Jose). In this case, a 7-space reduction equates to a 4% reduction in trips which is easily achievable through the most basic TDM measures. In their report, Hexagon Transporting Consultant addressed this option and made the following recommendation:

The project should implement a TDM plan to include measures, such as a transit fare subsidy, ride matching assistance, and commute trip reduction marketing and education, to encourage employees to use alternative transportation options and reduce parking demand.

Whole Foods Parking Demand

The anticipated tenant for this building is a new Whole Foods Market. Whole Foods has been the leader in home grocery delivery in place of customer trips to their stores. This can be measured in their percent of sales to in-store customers versus home delivery (ie. 1 trip per 10+ deliveries). Based on an understating of their parking demand, Whole Foods believes that 164 parking spaces is still far in excess of what will be the actual parking demand for this store.

Town Code Variance Findings

The Planning Commission may grant a Variance if applications meet the required findings, basis on evidence submitted. We believe the justifications outlined in this letter allow the Planning Commission to make the following findings for a small parking reduction:

- 1) Because of special circumstances applicable to the property, including size, shape, topography, location or surroundings, the strict application of this ordinance deprives such property of privileges enjoyed by other property in the vicinity and under identical zone; and

As stated above, the anticipated use of the property as a Whole Foods Market creates a special circumstance where a strict application of the Town's parking ordinance requires a number of parking spaces that is in excess of what will be the actual parking demand for this use. This is proven by Whole Foods understanding of actual demand for their store. As stated above, the reduced number of trips is primarily based on the percent of sales via home delivery. Other similar uses in the area do not have a high percent of home delivery and require a larger number of spaces for in-store shopping.

The property is unique in shape with an acute angled corner that is not easily usable parking or vehicle circulation. We have placed the building fronting on Los Gatos Boulevard, per Town design guidelines, and the building was forced to be located into this acute edge area since the access driveways from the two street cannot be placed near this corner. This is due to minimum setback distances for driveways from intersections. The affect has made a parking field that wraps around the rear and sides of the building

that is less efficient that could otherwise be achieved if the parking area was consolidated near the corner.

- 2) The granting of a variance would not constitute a grant of special privileges inconsistent with the limitations upon other properties in the vicinity and zone in which such property is situated.

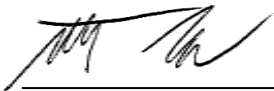
We are seeking a modest reduction in parking (7 parking spaces) while still providing a significant number of spaces - 164 car and 10 bike spaces. This number of parking spaces is consistent with the percent of parking provided at other shopping centers on Los Gatos Boulevard, some of which do not meet current parking requirements. In addition, we are proposing a TDM program that will easily reduce the parking demand to accommodate the 7-space reduction. If the Planning Commission desires, we can submit a TDM that will reduce parking demand well in excess of the 7-space we are seeking relief from.

From the above information, we believe that a modest (4%) reduction in 7 parking spaces can easily be justified through:

- A better understanding of actual demand for the store, and
- An entry level TDM with trip reduction strategies.

We look forward to hearing Staff's comments and to continue working with the Town on this exciting project.

Sincerely,



Steve Lynch
Director of Planning and Entitlements
Sand Hill Property Company

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