Planning Commission
Staff Report

PARK CITY 1884
PLANNING DEPARTMENT

Subject: **Treasure**
Project #: **PL-08-00370**
Author: **Francisco J. Astorga, AICP, Senior Planner**
Date: **14 December 2016**
Type of Item: **Administrative – Conditional Use Permit**

Summary Recommendations

Staff recommends that the Planning Commission review Conditional Use Permit (CUP) criteria no. 8, 11, and 15 as presented in staff report. Staff recommends that the Planning Commission provide input and direction. Staff recommends that the Planning Commission conduct a public hearing and continue it to the January 11, 2016 Planning Commission meeting.

Description

Property Owner:	Sweeney Land Company and Park City II, LLC represented by Patrick Sweeney
Location:	Creole Gulch and Mid-station Sites Sweeney Properties Master Plan
Zoning:	Estate District –Master Planned Development
Adjacent Land Use:	Ski resort area and residential
Topic of Discussion:	CUP Criteria 8, 11, & 15
Reason for Review:	Conditional Use Permits are required for development per the Sweeney Properties Master Plan. Conditional Use Permits are reviewed by the Park City Planning Commission.

Background

The Planning Commission reviewed this application during the November 11, 2016 Planning Commission meeting. During the last meeting the applicant presented a Sketch-up model of the project in order to show different views and answered questions made by the Planning Commission. The Planning Commission conducted a work session discussion with the applicant, provided questions/comments regarding the proposed project, conducted a public hearing and continued it to this meeting.

The Planning Department and Planning Commission must review each of the CUP criteria when considering whether or not the proposed conditional use mitigates impacts. The purpose/focus of this staff report is to provide the Planning Commission relevant information regarding the review of the criteria related to mass, bulk, scale, physical compatibility, excavation, etc., as listed below:

> *8. building mass, bulk, and orientation, and the location of buildings on the site; including orientation to buildings on adjoining lots*;

11. physical design and compatibility with surrounding structures in mass, scale, style, design, and architectural detailing;

15. within and adjoining the site impacts on environmentally sensitive lands, slope retention, and appropriateness of the proposed structure to the topography of the site.

Applicant's Update

During this last review period, the applicant submitted two (2) sets of screen shots as presented during the November 9, 2016 Planning Commission meeting. One set consists of the massing of the 2008/2009 updated Conditional Use Permit in orange while the other set consist of the 1985 MPD study, the Woodruff 3d rendering in red. Staff was able to place each one of these shots side by side for comparison purposes. See Exhibit V - SketchUp Comparisons CUP (2009) & MPD Study (1985).

Based on correspondence received, the applicant will be ready to present on the following topics during this meeting:

- Review of the physical model of the project
- SketchUp presentation
- Discussion of efficiency issues
- Discussion of project design and grading matters

The only updated exhibit by the time of preparation of this staff report was Exhibit V - SketchUp Comparisons CUP (2009) & MPD Study (1985). No other documents have been presented in time for staff to review and comment in preparation for this December 2016 meeting.

Analysis

Many concerns were raised and issues identified through the Master Plan review process. It was identified that a project of this scale and complexity would pose similar and considerable consternation no matter where it was proposed to be built. The Master Planned Development procedure dealt with the general concept of the proposed development and deferred/relegated the very detailed project review elements to the conditional use stage of review. At conditional use review, the following Major Issues (Sweeney Properties Master Plan Section VI) related to mass, bulk, scale, physical compatibility are to be examined in considerable detail:

Scale - The overall scale and massiveness of the project has been of primary concern. Located within the Historic District, it is important for project designed to be compatible with the scale already established. The cluster concept for development of the hillside area, while minimizing the impacts in other areas, does result in additional scale considerations. The focus or thrust of the review process has been to examine different ways of accommodating the development of the property while being mindful of and sensitive to the surrounding

neighborhood. The relocation of density from the Town Lift site was partly in response to this issue. The concentration of density into the Creole Gulch area, which because of its topography and the substantial mountain backdrop which helps alleviate some of the concern, and the requested height variation necessary in order to reduce the mass perceived (higher versus lower and wider), have greatly improved the overall scale of the cluster approach. The sites along Park Avenue have been conceptually planned to minimize scale and have provided stepped facades and smaller-scale buildings to serve as a transition.

The scale and massiveness of the proposal is still a primary concern. During the November 9, 2016 Planning Commission meeting the Commission showed concern regarding the compatibility with the scale already established as they asked for a comparison of the proposal and the adjacent neighborhoods. Staff recognizes the challenges of the approved cluster concept on the hillside area adjacent to the Old Town. During the November 2016 meeting, the applicant indicated that, if the Planning Commission required, they would be willing to provide a feel for the buildings (proposal) on the context of the neighborhood; however, the applicant noted that would take a couple of months or more to complete.

Discussion requested. Does the Planning Commission find it necessary to have the applicant provide a contextual neighborhood analysis in order to address special considerations identified in the Scale section of the Major Issues of the Master Plan? The applicant indicated that they would be submitting the physical model of the project. By the preparation of this staff report, such review has not yet been presented to Staff; therefore, staff is unable to comment on this until sufficient time is obtained by staff to review what the applicant will present.

Neighborhood Compatibility - In reviewing the general compatibility of a project of this scale, an evaluation of possible alternative approaches was undertaken. In light of those other development concepts and associated impacts, the proposed clustering approach was deemed the most compatible. Rather than spread the density out and thereby impact the entire old town area, the cluster concept afforded the ability to limit the impacts to smaller areas. Efforts to minimize scale have been directed toward this issue as have the solutions to other problems related to traffic, site disturbance, and the preservation of open space. The non-hillside project sites have also been planned in accordance with both the Historic District guidelines and in keeping with the scale of existing residences. The long build-out period envisioned will also enable a more detailed review at the time when specific project proposals are developed. A number of the staff's recommended conditions are directed toward minimizing the potential conflicts related to neighborhood compatibility considerations.

The clustering approach of the Master Plan was deemed the most compatible. It is critical for the proposal to be in compliance with the Design Guidelines (1983) and in keeping the scale of existing residences. A number of conditions of approval were directed towards minimizing potential conflicts related to neighborhood compatibility as

the applicant's proposal has a significant amount of excavation which makes the project comply with the above-sea-level elevation restriction mentioned in the Master Plan for the two sites; however, the original MPD did not anticipate that the massive excavation would take place back in the 1980's. The Woodruff 3D diagram introduced by the applicant in June 2016 was derived by the site plan and the building sections. The site plan and the building sections were part of clause "*the following plans and exhibits, in addition to this report and the project file, constitute the complete development permit*" indicated on the first page of the Master Plan. When the Planning Commission and City Council approved the Master Plan in 1985/1986 they only had what was shown to them, which did not include the massive excavation which creates building façades exceeding what they reviewed. Furthermore, the Master Plan did not show any signs of the proposed building concept of double fronted buildings from the front and the back as the sample elevations, also include on the complete development permit, returned final (finished) grade back to existing (natural) grade.

> *Visibility - The issue of visibility is one which varies with the different concepts proposed and vantage or view points selected. The very detailed visual analyses prepared graphically demonstrated how the various proposals might look from key points around town. The cluster approach' although highly visible from certain areas, does not impose massive structures in the most prominent areas. Instead, the tallest buildings have been tucked into Creole Gulch where topography combines with the densely vegetated mountainside to effectively reduce the buildings' visibility. The height and reduction in density at the Mid-Station site has been partly in response to this concern. The staff has included a condition that an exhibit be attached to the Master Plan approval that further defines building envelope limitations and architectural considerations.*

Detailed visual analyses were prepared during Master Plan review. Even though it was recognized that the proposal would be highly visible from certain areas, it was not to impose massive structures in the most prominent areas. The Planning Commission has recognized several areas of concern, mainly as a result of the excavation. These areas of concern include the visual massing of buildings 3B and 5A due to the visible location of these buildings from Main Street and Heber Avenue as well as driving up Empire and Lowell Avenue and the entry along the Empire and Lowell Avenue switchback at building 4A as there is a dramatic contrast between the project's streetscape and the adjacent residential streetscape.

> *Grading - The proposed cluster concept will result in less grading than the alternatives considered. The MPD review enabled the staff, Planning Commission, and developer the opportunity to consider this kind of concern early in the project design process. The concept plans developed have examined the level of site work required and how potential impacts can be mitigated. Various conditions supported by staff have been suggested in order to verify the efforts to be taken to minimize the amount of grading necessary and correlated issues identified.*

The Master Plan indicates that less grading was considered in the selection of the clustering concept as it was identified early in the process and as it was reflected in the Woodward drawings. This section further indicated that the concept plan (Master Plan) examined the level of site work required and how impacts can be mitigated. The section identifies that that efforts are to be taken to minimize the amount of grading. The current proposal does the exact opposite of minimizing the amount of grading necessary as depicted in the concept showing the massive amount of excavation towards the rear of the project.

> *Disturbance - The eight distinct development scenarios presented each had a varying degree of associated site disturbance. The current concept results in considerably less site clearing and grading than any of the others presented (except the total high-rise approach). A balance between site disturbance and scale/visibility has been attained through the course of reviewing alternate concepts. General development parameters have been proposed for Master Plan approval with the detailed definition of "limits of disturbance" deferred until conditional use review.*

The selected scenario has the less amount of site clearing and grading than the ones not selected. The last sentence of the text above indicated that the limits of disturbance would be deferred to the condition use review. The 2004 Land Management Code defines “limits of disturbance” and Construction Activity as the following:

> 15-15-1.127. **Limits of Disturbance.** The designated Area in which all Construction Activity must be contained.
>
> 15-15-1 .56. **Construction Activity.** All Grading, excavation, construction, Grubbing, mining, or other Development Activity which disturbs or changes the natural vegetation, Grade, or any existing Structure, or the act of adding an addition to an existing Structure, or the erection of a new principal or Accessory Structure on a Lot or Property.
>
> [15-15-1.71. **Development.** The act, process, or result of erecting, placing, constructing, remodeling, converting, altering, relocating, or Demolishing any Structure or improvement to Property including Grading, clearing, Grubbing, mining, excavating, or filling of such Property. Includes Construction Activity.
>
> 15-15-1.214. **Structure.** Anything constructed, the Use of which requires a fixed location on or in the ground, or attached to something having a fixed location on the ground and which imposes an impervious material on or above the ground; definition includes "Building".]

Section V Narrative of the Master Plan/Hillside Properties section indicates that “*As part of the Master Plan, the land not included within the development area boundary will be rezoned to Recreation Open Space (ROS)*.” Staff finds that there are significant cliffscape/retaining walls outside of the line identified on Sheet 22, again same clause

applies: "*the following plans and exhibits, in addition to this report and the project file, constitute the complete development permit*", identified as the **building area boundary,** which also matches the ROS zoned areas.

Discussion Requested: Does the Planning Commission agree that the development which includes the cliffscape/retaining walls need to take place with the building area boundary, and not outside of this defined area?

Environmental Concerns

The applicant has submitted the following documents with their Conditional Use Permit application to address environmental concerns:

1. Exhibit L – Soils Capacity Letters (Appendix A-5). This document consists of the following documents:
    - 1977 Soils Investigation prepared by Rollins, Brown and Gunnell
    - 1979 Preliminary Engineering Geologic Report prepared by William Lund
    - 1994 Engineering Geology Reconnaissance Report prepared SHB AGRA
    - 2003 Geotechnical/Geological Consultation Letter prepared by AGEC

2. Exhibit M – Mine Waste Mitigation Plan (Appendix (A-6). The applicant submitted correspondence between the City's 2005 Environmental Coordinator and the applicant's Civil Engineer. These letter included the following attachments:
    - February 4, 2005 Letter from Mr. Jeff Schoenbacher, Environmental Coordinator
    - December 15, 2005 Letter from Mr. Jeff Schoenbacher, Environmental Coordinator Letter with attachment
    - January 27, 2006 Letter from Mr. Rob McMahon P.E., Alliance Engineering, Inc.

    The applicant explains in the Mine Waste Mitigation Plan narrative that they plan to keep on site the mineralized mine waste identified in the various adit sites. Some adit sites and other areas are to be treated in place with a mineral stabilizing additive to prevent metal leaching, covered with topsoil held in place with a geo-grid, and hydro-seeded with a native grasses and flowers seed mixture acceptable to PCMC. Another adit site is to remain in the development area and placed in a sealed liner and covered with a concrete cap or at least 10 feet of clean fill material.

    The City is currently reviewing the submitted documents, letters, reports, and will provide to the Planning Department an up-to-date recommendation in the future.

3. Exhibit R – LEED (Appendix A-14). This document prepared by the applicant, simply indicates the applicant's desire to utilize the LEED ND rating system that integrates the principles of smart growth, new urbanism, and green building. Additional information can be found at www.usgbc.org/leed/nd.

4. Exhibit T – Excavation Management Plan (Appendix A-16), document prepared by Alta Engineering, Rob McMahon, PE. The overall concept of the excavation operations is to manage all excavated materials on site as three (3) zones have been identified by the applicant to accept some of the estimated excess excavated material that is to be generated by the proposed construction. As written in the plan, the fill placement zones should be chosen carefully to minimize impacts on existing vegetation, preserve important vistas, to improve and enhance ski run grades, etc.

   The City is currently reviewing the submitted plan and will provide to the Planning Department an up-to-date recommendation regarding their excavation management proposal.

   The Planning Department recognized the following:

   - The proposed design requires a very large excavation and re-grading of the entire site. The project is located on the mountain side on steep topography. The impacts to the slope and existing topography are substantial and unmitigated. The project as designed will created a very large hole on the site. The project does not step with the natural topography of the site as shown on the Master Plan. As discussed previously, staff finds the project as designed is not in compliance with the concept approved by the City Council during the 1986 Master Plan approval.
   - The excavation management plans estimates a total of 960,000 cubic yards of excavation to be relocated from the site. The plan includes moving excavated material up the mountain on a conveyor system to re-grade portions of the ski runs. The submitted plan identifies specific locations for only 415,000 cubic yards. The remaining 625,000 cubic yards are outlined in the plan but not detailed in for the volumes in any one location. No grading plan has been submitted for any of the locations. Staff is not able to determine the depth of filling in any one location and its effects on drainage, mitigating factors, etc. The proposed primary and secondary zones are all on ski runs and other slopes that contains grades that are 25% and greater. One of the secondary zones removes all of the vegetation and places fill (unknown depth) just below the Treasure Hollow and Creole Gulch ski run intersection at the top of the Sweeney Property, zoned ROS, with no areas of designated ski runs.
   - The excavation management plan includes the areas on the mountain which will be re-graded. This methodology may create less construction traffic on the adjacent streets. The overall impact of excavating 960,000 cubic yards of existing earth will be a great impact to the site and the existing topography. Staff has not yet seen an analysis of the drainage and soil stability, once the excavated material is placed on site.
   - There is significant mine waste on the development site. In 2009 the Park City Environmental Coordinator indicated that he was not in agreement with the applicant's environmental proposal. The development is within the Spiro Drinking Water protection zone. All contaminated materials must be handled to meet local, state, and federal regulations. The letters written between the City's Environmental Coordinator and the applicant were attached as an exhibit on the

September 23, 2009 staff report. The specifics of a proposed plan have not been submitted.

Future Review

Staff recommends that the Planning Commission start familiarizing themselves, if they have not done so yet, with the traffic/transportation documents prepared by the applicant and the City for future review in order to begin addressing Conditional Use Permit criteria (2) traffic considerations including capacity of the existing Streets in the Area, (5) location and amount of off-Street parking, and (6) internal vehicular and pedestrian circulation system. Staff would like to start addressing these items soon; however, staff will respect the Planning Commission's comments provided in June 2016 regarding scheduling as they indicated that the schedule presented then was too ambitious and they would go through the process slowly and methodically. See available documents below currently on the City's website.

- 1st Addendum to Traffic Impact Analysis, PEC (March 2005)
- 2nd Addendum to Traffic Impact Analysis, PEC (April 6, 2005)
- 3rd Addendum to Traffic Impact Analysis, PEC (January 7, 2008)
- 4th Addendum, PEC (April 2, 2009)
- 5th Addendum, PEC (June 18, 2005) (parking generation study)
- 6th Addendum, PEC (June 25, 2009)
- Early (2008) Opinion Summary
- Lowell Ave. Improvements Opinion Summary, Alta Engineering (April 2, 2009)
- Parking Counts, Alta Engineering (April 15, 2009)
- Proposed Parking and Traffic Operations (July 16, 2009)
- Revised Letter, Walkability Study Recommended Improvements and Effects on Traffic of Proposed Roadway Section on Empire Ave. (June 18, 2009)
- Traffic Impact Analysis, PEC (July 2004)
- Treasurer Hill Traffic Review, Fehr & Peers (July 20, 2005) (funded by Park City)
- Updated Traffic Review, Fehr & Peers (December 2005)
- Walkability Study Recommended Improvements, PEC (March 31, 2009)

Notice

The property was posted and notice was mailed to property owners within 300 feet on May 11, 2016 for the initial 2016 meeting held on June 8, 2106. Legal notice was published in the Park Record according to requirements of the Land Management Code prior to every meeting.

Public Input

Public input has been received by the time of this report. See the following website with public input received as of April 2016. All public comments are forwarded to the Planning Commission via the staff report link above and kept on file at the Planning Office. Planning Staff will not typically respond directly to the public comments, but may choose to address substantive review issues in subsequent staff reports. There are four (4) methods for public input to the Planning Commission:

- Attending the Planning Commission meetings and giving comments in the public hearing portion of the meeting.
- Preparing comments in an e-mail to treasure.comments@parkcity.org.
- Visiting the Planning office and filling out a Treasure CUP project Comment Card.
- Preparing a letter and mailing/delivering it to the Planning Office.

Summary Recommendations

Staff recommends that the Planning Commission review Conditional Use Permit (CUP) criteria no. 8, 11, and 15 as presented in staff report. Staff recommends that the Planning Commission provide input and direction. Staff recommends that the Planning Commission conduct a public hearing and continue it to the January 11, 2016 Planning Commission meeting.

Exhibits/Links

Exhibit A - Public Comments
Exhibit B - Approved Sweeney Properties Master Plan (Narrative)
Exhibit C - Approved MPD Plans
Exhibit D - Proposed Plans – Visualization Drawings1

Sheet BP-01 The Big Picture
Sheet V-1 Illustrative Plan
Sheet V-2 Illustrative Pool Plaza Plan
Sheet V-3 Upper Area 5 Pathways
Sheet V-4 Plaza and Street Entry Plan
Sheet V-5 Building 4b Cliffscape Area
Sheet V-6 Exterior Circulation Plan
Sheet V-7 Parking and Emergency Vehicular Access
Sheet V-8 Internal Emergency Access Plan
Sheet V-9 Internal Service Circulation
Sheet V-10 Site Amenities Plan
Sheet V-11 Usable Open Space with Development Parcels
Sheet V-12 Separation-Fencing, Screening & Landscaping
Sheet V-13 Noise Mitigation Diagrams
Sheet V-14 Signage & Lighting
Sheet V-15 Contextual Site Sections - Sheet 1
Sheet V-16 Contextual Site Sections - Sheet 2

Exhibit E - Proposed Plans – Visualization Drawings2

Sheet V-17 Cliffscapes
Sheet V-18 Retaining Systems
Sheet V-19 Selected Views of 3D Model - 1
Sheet V-20 Selected Views of 3D Model – 2
Sheet V-21 Viewpoints Index
Sheet V-22 Camera Viewpoints 1 & 2
Sheet V-23 Camera Viewpoints 3 & 4
Sheet V-24 Camera Viewpoints 5 & 6

Sheet V-25 Camera Viewpoints 7 & 8
Sheet V-26 Camera Viewpoints 9 & 10
Sheet V-27 Camera Viewpoint 11
Sheet V-28 Illustrative Plan – Setback

Exhibit F - Proposed Plans – Architectural/Engineering Drawings 1a

Sheet VM-1 Vicinity & Proposed Ski Run Map
Sheet EC.1 Existing Conditions
Sheet SP.1 Site & Circulation Plan Sheet GP.1 Grading Plan
Sheet HL.1 Height Limits Plan
Sheet HL.2 Roof Heights Relative to Existing Grade
Sheet FD.1 Fire Department Access Plan

Exhibit G - Proposed Plans – Architectural/Engineering Drawings 1b

Sheet P.1 Level 1 Use Plan
Sheet P.2 Level 2 Use Plan
Sheet P.3 Level 3 Use Plan
Sheet P.4 Level 4 Use Plan
Sheet P.5 Level 5 Use Plan
Sheet P.6 Level 6 Use Plan
Sheet P.7 Level 7 Use Plan
Sheet P.8 Level 8 Use Plan
Sheet P.9 Level 9 Use Plan
Sheet P.10 Level 10 Use Plan
Sheet P.11 Level 11 Use Plan
Sheet P.12 Level 12 Use Plan
Sheet P.13 Level 13 Use Plan
Sheet P.14 Level 14 Use Plan
Sheet P.15 Level 15 Use Plan
Sheet P.16 Area, Unit Equivalent & Parking Calculations

Exhibit H – Proposed Plans – Architectural/Engineering Drawings 2

Sheet E.1AC2.1 Buildings 1A, 1C& 2 Exterior Elevations
Sheet E.1B.1 Building 1B Exterior Elevations
Sheet E.3A.1 Building & Parking Garage Exterior Elevations
Sheet E.3BC.1 Building 3BC Exterior Elevations
Sheet E.3BC.2 Building 3BC Exterior Elevations
Sheet E.3BC.3 Building 3BC Exterior Elevations
Sheet E.4A.1 Building 4A Exterior Elevations
Sheet E.4A.2 Building 4A Exterior Elevations
Sheet E.4B.1 Building 4B Exterior Elevations
Sheet E.4B.2 Building 4B Exterior Elevations
Sheet E.4B.3 Building 4B Exterior Elevations
Sheet E.4B.4 Building 4B Exterior Elevations
Sheet E.5A.1 Building 5A Exterior Elevations
Sheet E.5B.1 Building 5B Exterior Elevations

Sheet E.5C.1	Building 5C Exterior Elevations
Sheet E.5C.2	Building 5C Exterior Elevations
Sheet E.5D.1	Building 5D Exterior Elevations
Sheet S.1	Cross Section
Sheet S.2	Cross Section
Sheet S.3	Cross Section
Sheet S.4	Cross Section
Sheet S.5	Cross Section
Sheet S.6	Cross Section
Sheet S.7	Cross Section
Sheet S.8	Cross Section
Sheet S.9	Cross Section
Sheet UP.1	Concept Utility Plan

Exhibit I – Applicant's Written & Pictorial Explanation

I. Overview
II. Master Plan History
III. Site plans
IV. Special Features
V. Landscape
VI. Management
VII. Lift Improvement
VIII. Construction Phasing
IX. Off Site Amenities
X. Material Board
XI. Submittal Document Index

Exhibit J – Fire Protection Plan (Appendix A-2)
Exhibit K – Utility Capacity Letters (Appendix A-4)
Exhibit L – Soils Capacity Letters (Appendix A-5)
Exhibit M – Mine Waste Mitigation Plan (Appendix (A-6)
Exhibit N – Employee Housing Contribution (Appendix A-7)
Exhibit O – Proposed Finish Materials (Appendix A-9)
Exhibit P – Economic Impact Analysis (Appendix A-10)
Exhibit Q – Signage & Lighting (appendix A-13)
Exhibit R – LEED (Appendix A-14) Exhibit S – Worklist (Appendix A-15)
Exhibit S – Excavation Management Plan (Appendix A-16)
Exhibit T – Project Mitigators (Appendix A-18)
Exhibit U – Outside The Box (Appendix A-20)
Updated Exhibit V – SketchUp Comparison of CUP (2009) & MPD Study (1985)
Exhibit W – Applicant's Position Paper December 2016

November 9, 2016 Staff Report Exhibits
Exhibit W – Applicant's Draft Presentation
Exhibit X – Building Sections with Measurements
Exhibit Y – SPMP Building Sections (Sheet 18) with Measurements
Exhibit Z – SPMP Midstation Samples Elevations (Sheet 23) w Measurements
Exhibit AA – SPMP Creole Samples Elevations (Sheet 24) w Measurements
Exhibit BB – Treasure Presentation Cliffscapes
Exhibit CC – Applicant's Computer Renderings (from applicant's website)
Exhibit DD – Applicant's Photo Composites (from applicant's website)

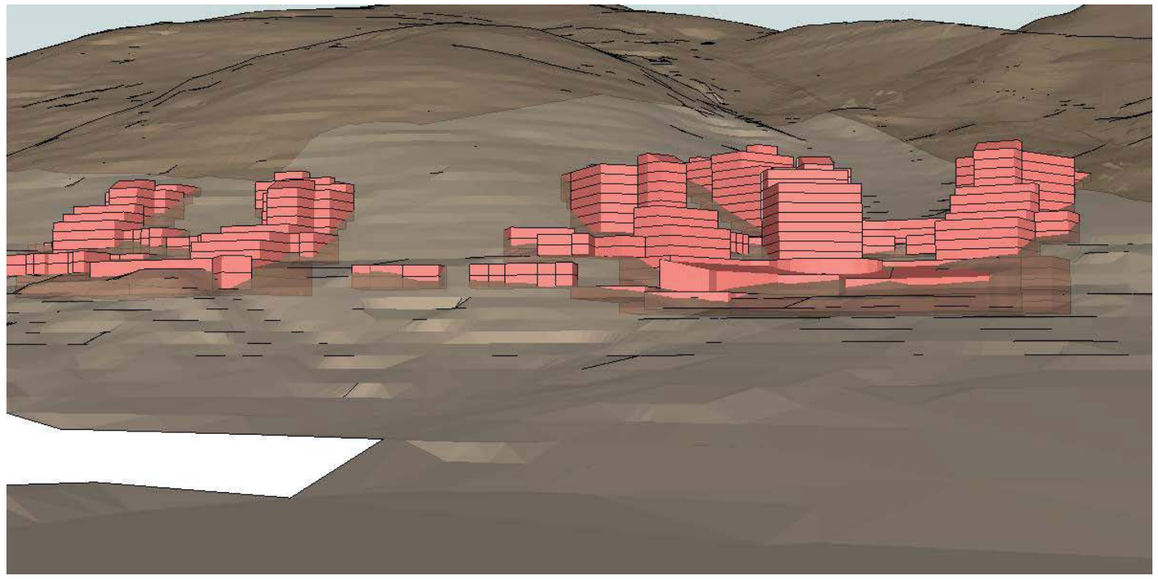
Exhibit EE – Applicant's Visualizations Sheets V-21 – V-27
Exhibit FF – SPMP Site Plan (Sheet 17) Exhibit GG – Proposed Site Plan
Exhibit HH – SPMP Development Requirements & Restrictions (Sheet 22) - Height

November 9, 2006 Planning Commission Minutes

Additional Exhibits/Links
2009.04.22 Jody Burnett MPD Vesting Letter
Staff Reports and Minutes 2016
Staff Reports and Minutes 2009-2010
Staff Reports and Minutes 2006
Staff Reports and Minutes 2005
Staff Reports and Minutes 2004
2004 LMC 50th Edition
1997 General Plan
1986.10.16 City Council Minutes
1985.12.18 Planning Commission Minutes
1986 Comprehensive Plan
1985 Minutes
1985 LMC 3rd Edition
Updated Exhibit 1983 Park City Historic District Design Guidelines
Parking, Traffic Reports and Documents
MPD Amendments:
- October 14, 1987 - Woodside (ski) Trail
- December 30, 1992 - Town Lift Base
- November 7, 1996 – Town Bridge

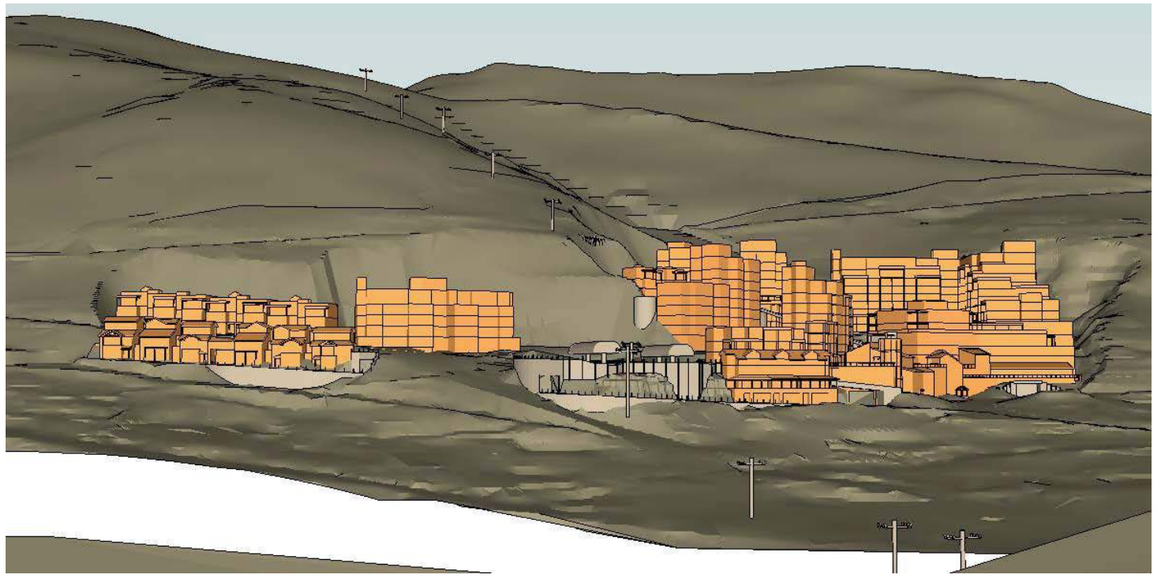
9th

CUP (2009)

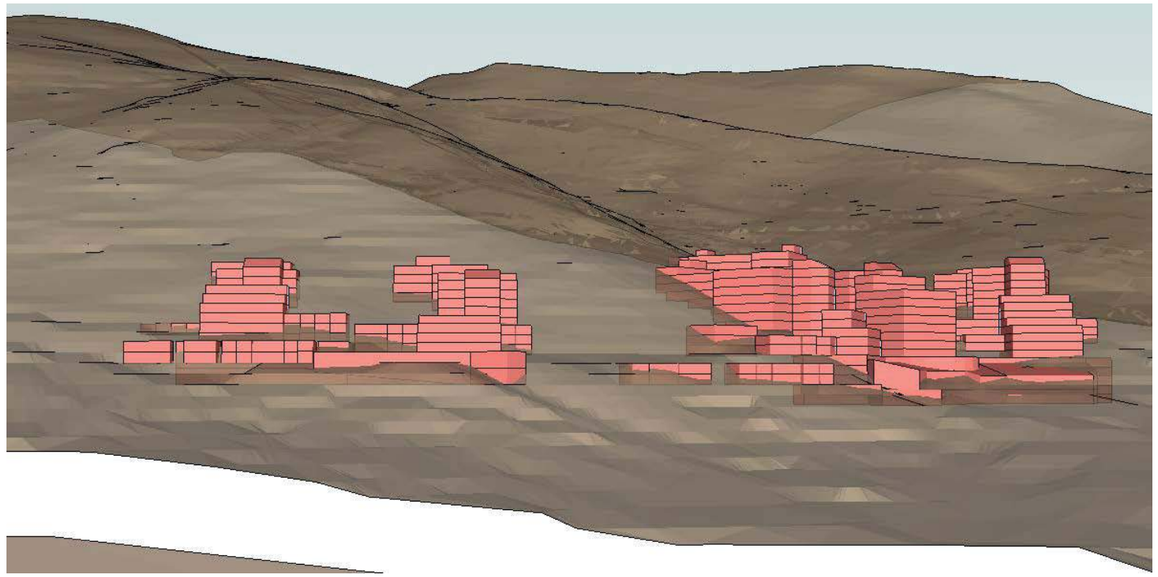


MPD Study (1985)

Above Transit

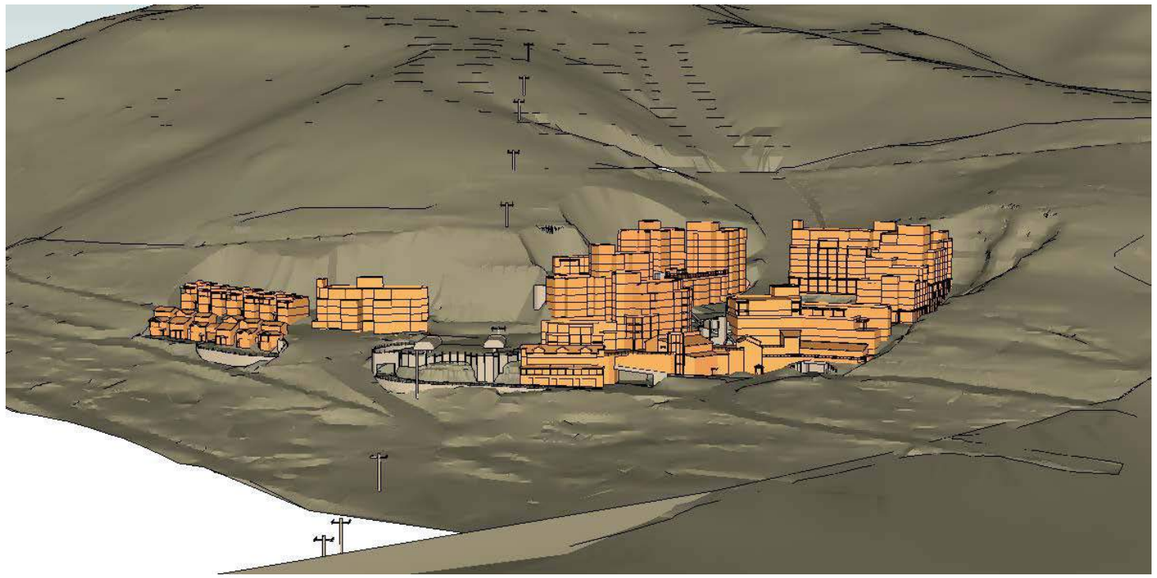


CUP (2009)

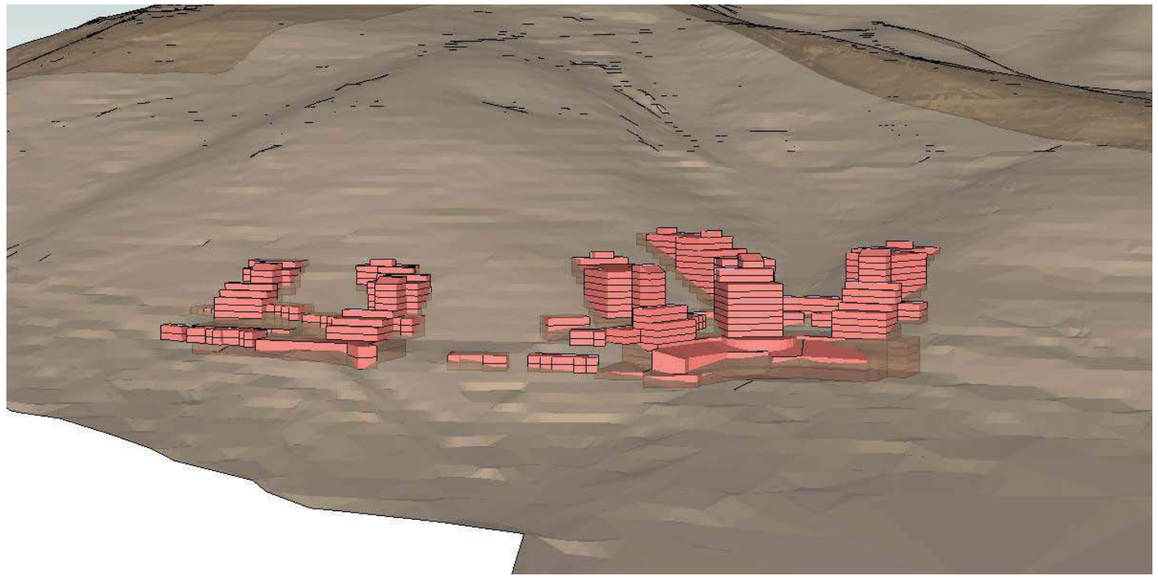


MPD Study (1985)

Aerie

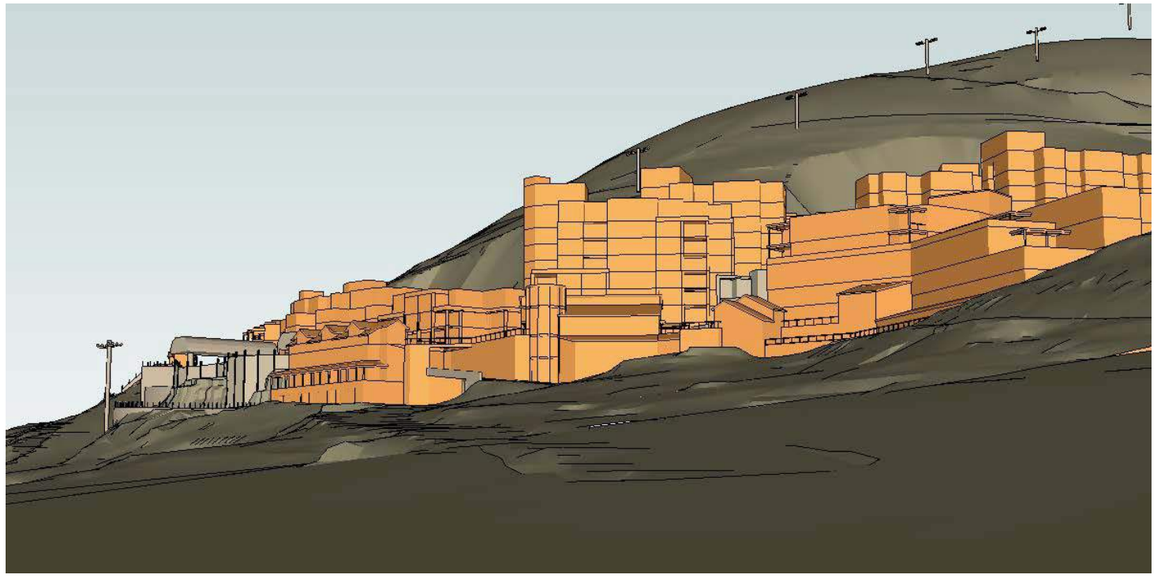


CUP (2009)

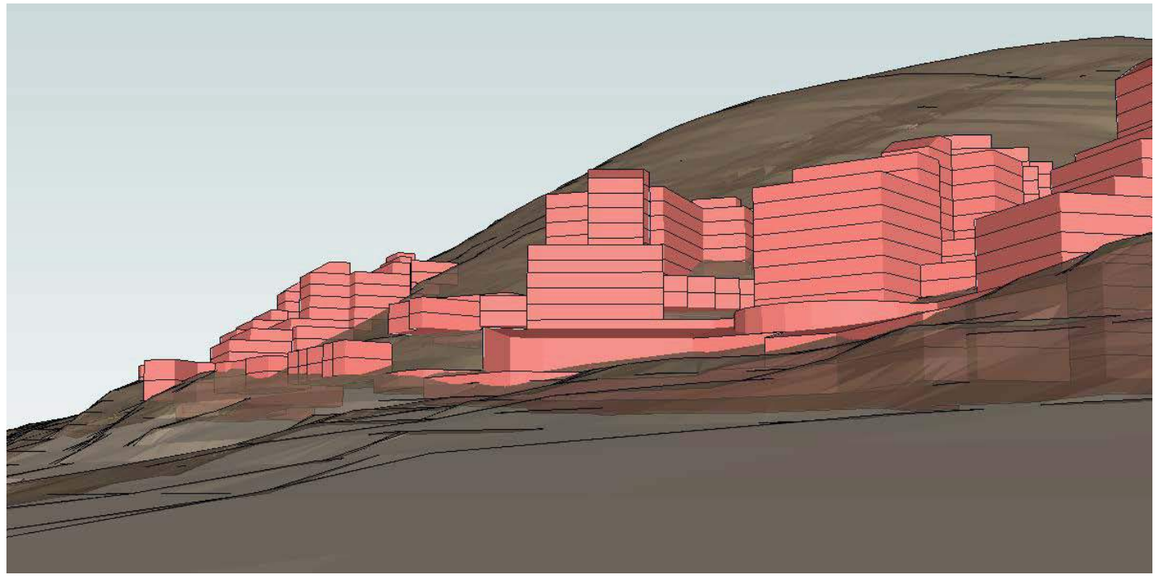


MPD Study (1985)

Lowell Empire



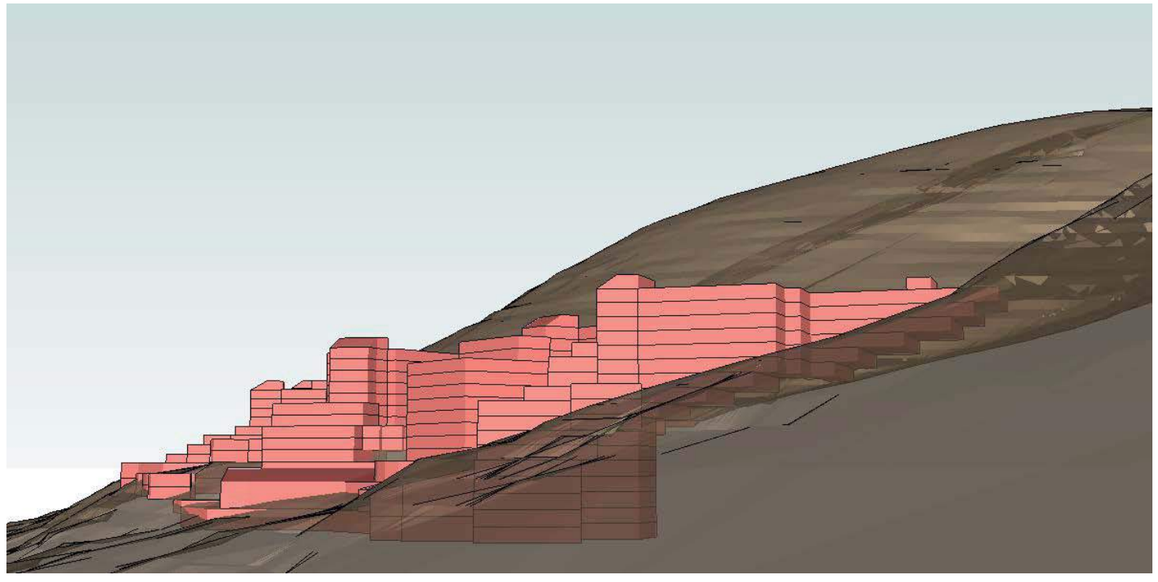
CUP (2009)



MPD Study (1985)

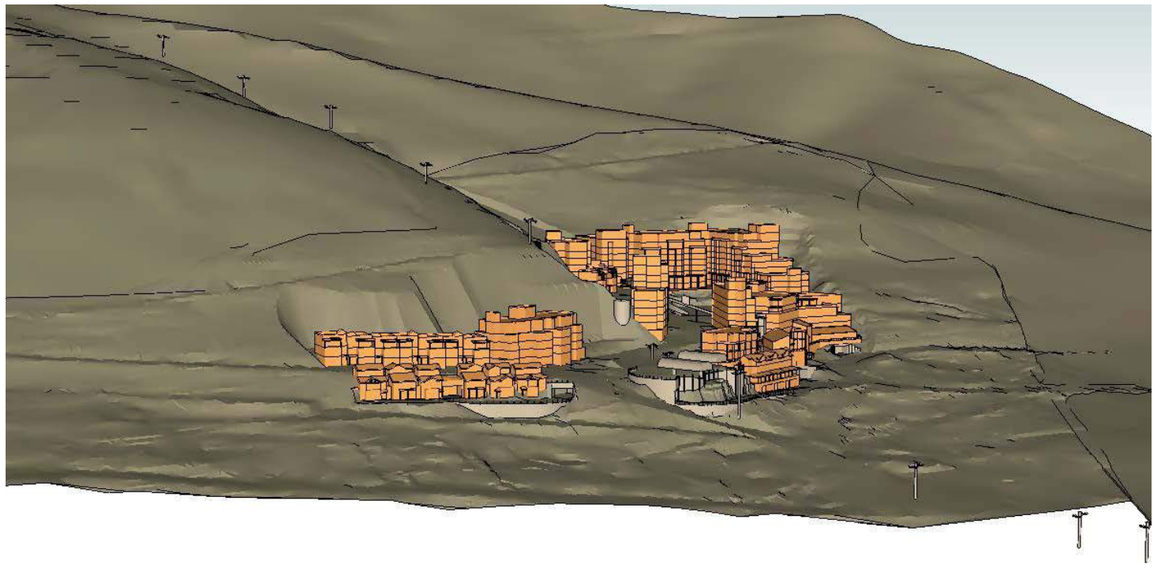
Northstar

CUP (2009)

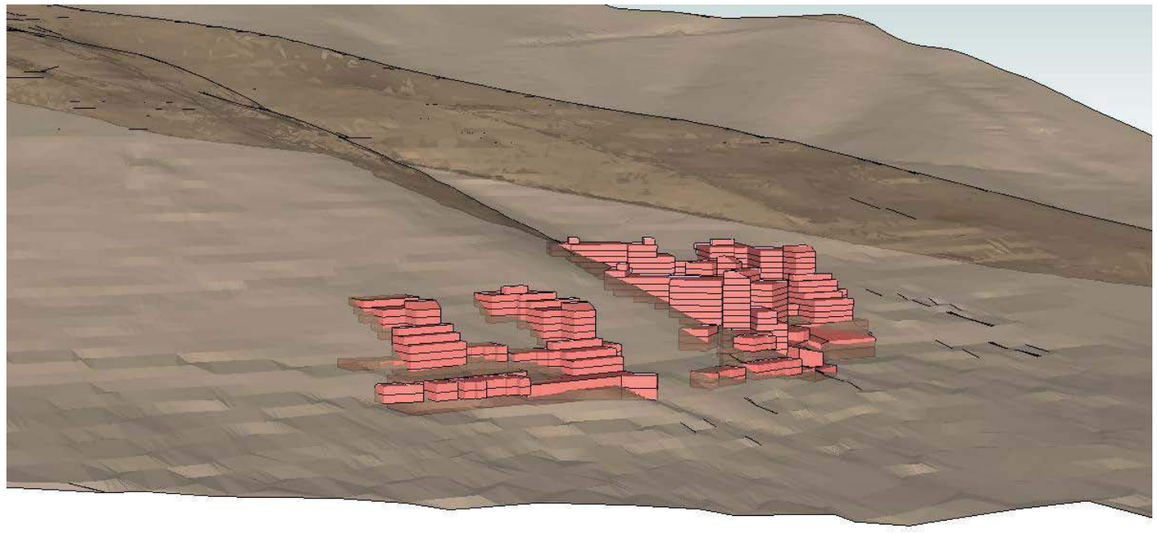


MPD Study (1985)

Ontario

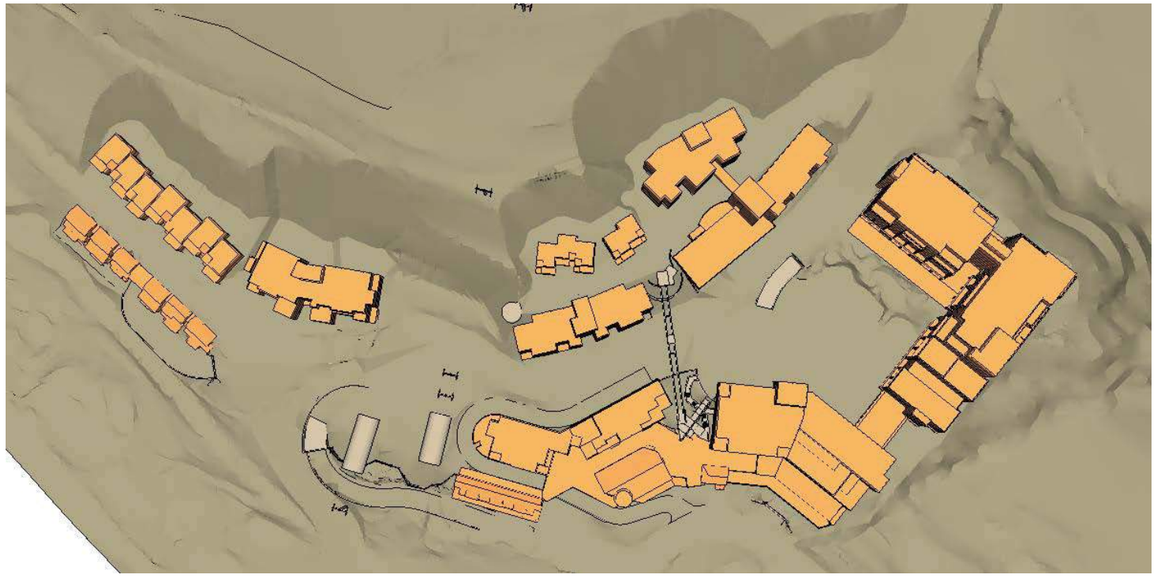


CUP (2009)



MPD Study (1985)

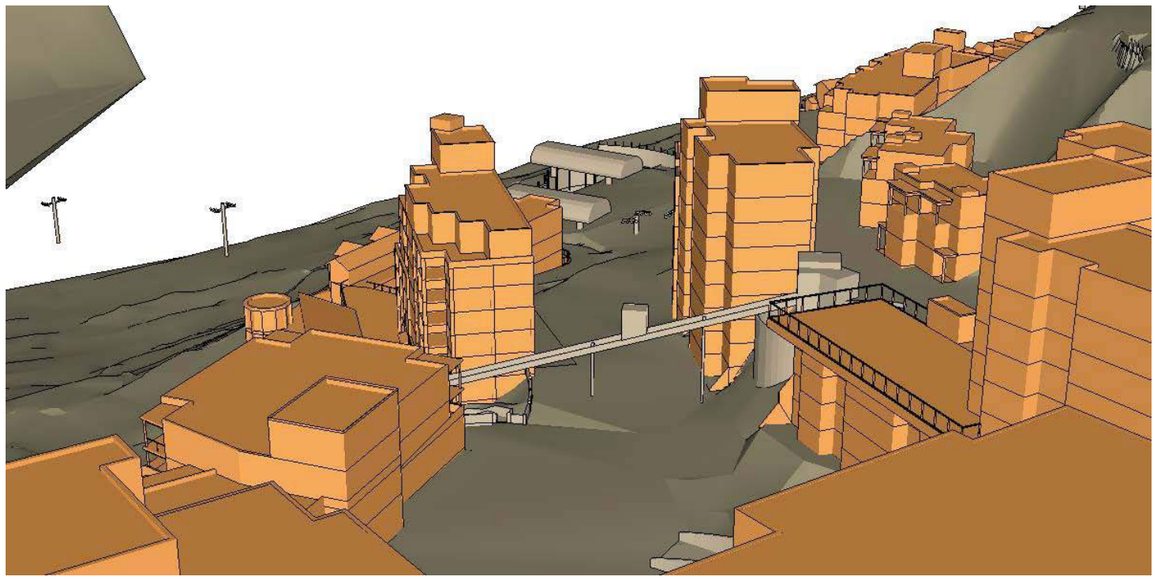
Plan View



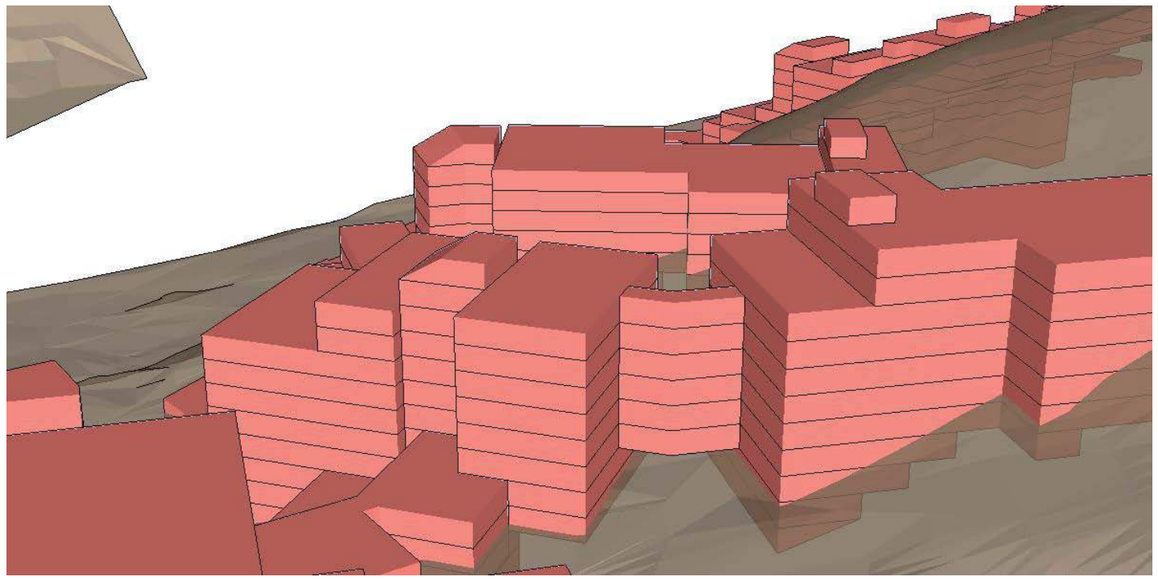
CUP (2009)

MPD Study (1985)

Ski Run

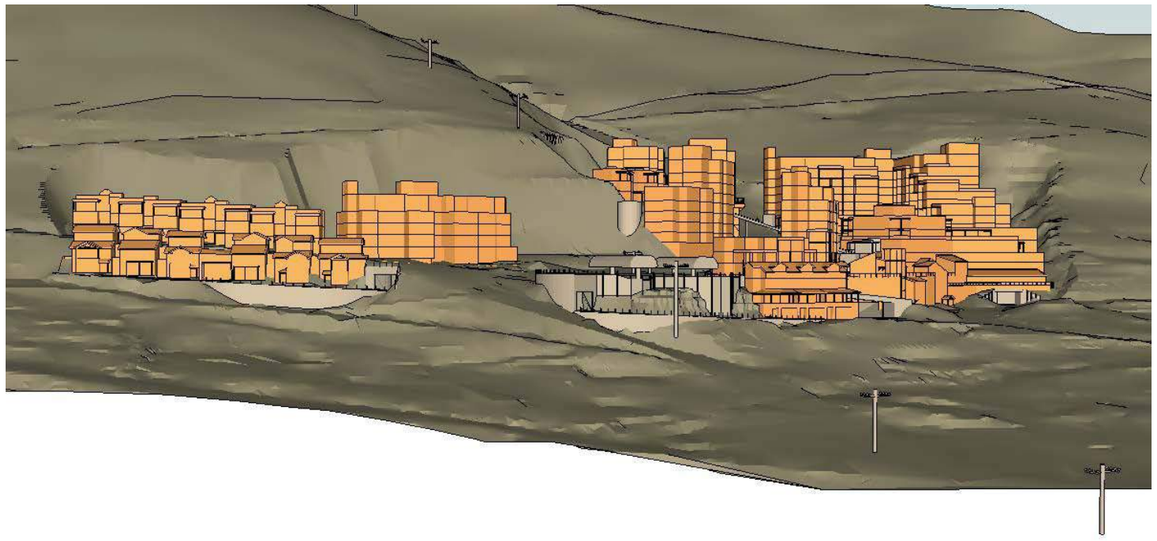


CUP (2009)

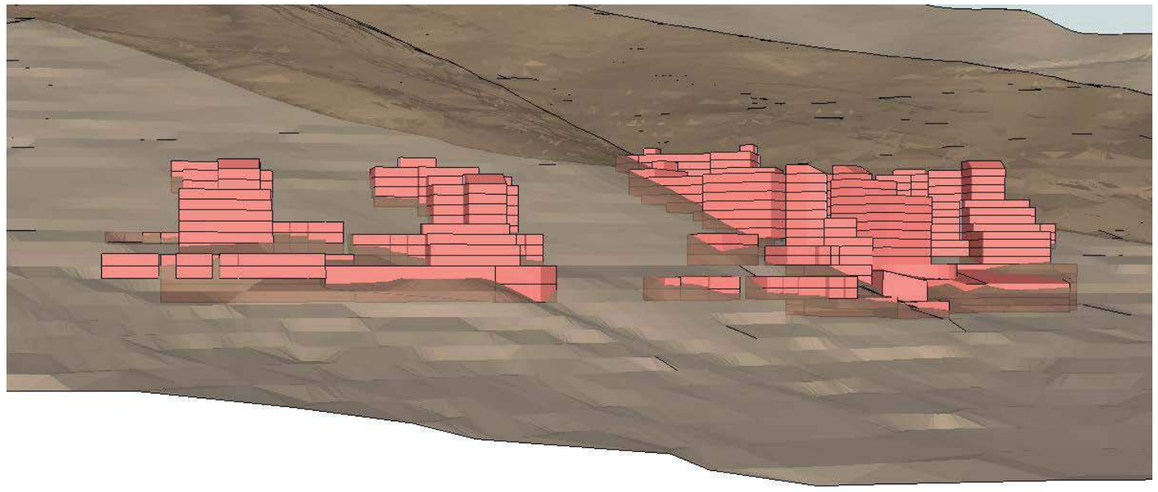


MPD Study (1985)

South Marsac



CUP (2009)



MPD Study (1985)

DATE: December 9, 2016

SUBJECT: Treasure Hill Properties' Square Footage and Volume Are Allowed and Appropriate under the Applicable Standards and Criteria

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1. Background.

The Planning Commission Staff Report dated July 13, 2016, recites the applicable background of the Sweeney Properties Master Plan ("SPMP") and current Conditional Use Permit ("CUP") Application. (*See* p. 1–2.)

In April 2016, the Applicant, MPE, Inc., requested that the Planning Commission place its CUP Application for the development of the Hillside Properties back on the Commission's agenda and to review the Application for compliance with the applicable Land Management Code ("LMC") and SPMP Approval. The Planning Commission held public hearings on the CUP Application on June 8, July 13, August 10, and September 14, 2016.

The topics that the Planning Commission directed Staff and MPE to address at these past hearings and at the hearing scheduled for October 12 address portions of several criteria under the Conditional Use Review Process set forth in the applicable 2003 LMC,[1] and in particular address the following criteria:

> 8. Building mass, bulk, and orientation, and the location of Buildings on the Site; including orientation to Buildings on adjoining Lots;
>
> 11. Physical design and Compatibility with surrounding Structures in mass, scale, style, design, and architectural detailing; and
>
> 15. Within and adjoining the Site, impacts on Environmentally Sensitive Lands, Slope retention, and appropriateness of the proposed Structure to the topography of the Site.

The topics also touch upon several of the CUP Standards for Review, including, in particular:

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[1] Staff and MPE agree that the Fiftieth Edition of the LMC revised on July 10, 2003 ("2003 LMC") applies to the CUP Application.

> 2. the Use will be Compatible with surrounding Structures in Use, scale, mass and circulation; and
>
> 4. the effects of any differences in Use or scale have been mitigated through careful planning.

The topics that MPE has discussed with the Planning Commission during the previous hearings in 2016 have also included several of the conditions of the SPMP Approval, including the building height and building envelope limits established by the SPMP Approval.

The CUP Application satisfies the CUP Standards for Review, each of the criteria set forth in the 2003 LMC, and the associated conditions of the SPMP Approval, including the criteria, standards, and conditions covered by the issues addressed during the prior hearings.

Because "[a] conditional use shall be approved if reasonable conditions are proposed, or can be imposed, to mitigate the reasonably anticipated detrimental effects of the proposed use," and because the CUP Application conforms to the conditions of the SPMP Approval and proposes additional mitigating factors to address the impacts of square footage and volume, the Planning Commission should conclude that the CUP Application meets the criteria, standards, and conditions relating to these issues. Utah Code § 10-9a-507(2)(a).

2. The CUP Application Is Efficient.

2.1 Staff Has Failed to Provide an Explanation of Its Conclusions about Efficiency, Despite the Applicant's Request.

In its July 13, 2016, report, Planning Staff concluded, without any explanation or justification, that the "current application is excessive and inefficient." (July 13, 2016 Staff Report, p. 105.) In its September 9, 2016, submission, the Applicant noted that this conclusion lacked "any analysis or explanation." (September 9, 2106 Position Paper, p. 4.)

Instead of providing an explanation or support for its conclusion, in its October 12, 2016, report, Staff again concluded, without providing any explanation, that "inefficient and excess square footage included in the project is creating adverse impacts from the building massing and bulk." (October 12, 2016 Staff Report, p. 51.) Despite the Applicant's request for an explanation of what square footage is "excess" and how the current Application is "inefficient," Staff has failed to provide a response to the Applicant's request.

2.2 Staff Continues to Repeat Inaccurate Analyses from Prior Staff Reports.

Although Staff has been unable to provide the Applicant with an explanation of its conclusions about efficiency, recent Staff reports have repeated false claims in older Staff reports about the design's efficiency. In particular, in the Staff Report of September 14, 2016, Staff quoted the following from the report dated September 23, 2009:

> Within Exhibit A, staff has calculated the common space, circulation, and accessory space as a percentage of each building.

> The percentage is up to 41% in some buildings creating an inefficient design.

(September 14, 2016 Staff Report, p. 97 (quoting September 23, 2009 Staff Report, p. 28).)

But Staff's analyses, as set forth in Exhibit A to the September 23, 2009, report—including Staff's claim about certain buildings having 41% of their square footage in common, circulation, and accessory space—are riddled with errors. Nonetheless, Staff compounded these errors by repeating them verbatim in recent Staff reports, without bothering to verify their accuracy.

First, Staff's September 23, 2009, efficiency calculations are based on imaginary numbers. The claimed 41% figure—which Staff touted in 2009 and continues to tout to this very day—comes from Staff's analysis of Building 1B. (September 23, 2009 Staff Report, Ex. A, p. 39.) In its analysis, Staff claimed that Building 1B has a total of 60,816 square feet, of which 25,079 square feet—or 41%—is common, circulation, and accessory space. (*Id*.)

Although it is uncertain where Staff obtained these numbers, it did not obtain them from the CUP Application. Attached hereto as Exhibit 1 is a spreadsheet titled "Efficiency Ratios of Above-Grade Spaces," which the Applicant has prepared based on its Application. (*See also* Sheet P.16 – Area, Unit Equivalent & Parking Calculations, March 20, 2009 rev. (setting forth correct building square footages for Staff in early 2009).) As demonstrated by Exhibit 1 and Sheet P.16, Building 1B actually has a total of 44,051 square feet of above-ground space, of which 13,248 is common, circulation, and accessory space. The percentage of such space to the total is therefore 30%, making the building 70% efficient.[2]

Similar errors are found in Staff's analysis of other buildings, including significant discrepancies for Building 4B, which Staff claimed to have 94,257 square feet of common, circulation, and accessory space[3] when, in reality, the building only includes 82,195 square feet of such space. (*Compare* September 23, 2009 Staff Report, Ex. A, p. 43 *with* Sheet P.16 – Area, Unit Equivalent & Parking Calculations, March 20, 2009 rev.)

Second, even where Staff used square footage information from the CUP Application, it failed to follow industry standards and the City's own Land Management Code when it calculated building efficiencies by including below-ground space, including parking. By including parking square footage in the common, circulation, and accessory category, the City made the Application artificially appear less efficient that it is.

As the Applicant has noted previously, the City's own definition of "Gross Floor Area" provides that "[b]asement Areas below Final Grade are not considered Floor Area." 2003 LMC § 15-15-1.91(A). Thus, such areas should not be included in any analysis of efficiency, which essentially looks at the ratio of residential/commercial unit space to the total amount of space. Penner, Richard H., *et al*., Hotel and Design Planning and Development (Second Edition,

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[2] Even if parking space is included in the calculations, which, as explained below, is not appropriate, Staff's calculations are off by more than 7,000 square feet—or nearly 15%.

[3] Even with parking space included, which is not appropriate, Staff's calculations are still based on incorrect numbers.

December 2012) at 318 ("The relative efficiency of typical hotel floors can be compared most directly by calculating the percentage of the total floor area devoted to guestrooms."). Of course, including parking space in any such analysis has the obvious effect of putting a thumb on the scale, making the project appear less efficient than it actually is.

The exclusion of parking space from the efficiency calculation is also consistent with industry standards. For example, the Cornell University School of Hotel Administration has explained, in a paper addressing hotel efficiency issues, that "[t]otal hotel gross area is the entire hotel, ***excluding parking***." deRoos, J. A. (2011), Planning and Programming a Hotel, at 5 (Fig. 21.3), Cornell University, School of Hospitality Administration (available at http://scholarship.sha.cornell.edu/articles/310) (emphasis added). Thus, in determining the efficiency of various hotel designs, the hotel industry excludes parking areas from the calculation of total space, as does Park City's Land Management Code.

2.3 By Objective, Industry Standards, the Proposed Design Is Efficient.

Measured against common, typical, and objective standards, the design proposed in the Application is highly efficient. As set forth in Exhibit 1, the vast majority of the project's floors have efficiency ratios greater than 70%, with many exceeding 80%. Common floor-efficiency standards within the hotel industry range between 60% and 75%. *See* Penner, Hotel and Design Planning and Development at 318 ("The relative efficiency of typical hotel floors . . . varies from below 60 percent in an inefficient atrium plan to more than 75 percent in the most tightly designed double-loaded slab."); *see id*. at 319 (Fig. 15.2).

Thus, even though a small handful of floors have ratios between 60% and 70%, these floors are still well within hotel-industry guidelines. Moreover, the floors in this range of efficiency often have unique uses that explain such lower ratios, such as employee facilities and ski ticket offices.

The very few floors with efficiency ratios less than 60% are explained by necessary hotel amenities and floor-area uses, such as lobbies, employee housing, ballrooms and associated facilities, and laundry/maintenance facilities. Obviously, such uses and facilities are common in hotels and will typically reduce the efficiency of particular floors within the hotel.

Indeed, in terms of overall square footage, the Applicant's design is efficient by industry standards. A typical hotel design that includes features and amenities similar to those proposed by the Applicant will have a total efficiency ratio in the range of 46–48%. *See* Penner, Hotel and Design Planning and Development at 308 (Fig. 14.6-"Summary Hotel Area Program"). Here, by contrast, the Applicant's design has an overall efficiency of 68%—far above typical hotel efficiency ratios.

2.4 The City's Own Analysis Confirms the Applicant's Design Is Efficient.

Contrary to the City's unsupported and unexplained statements about "excess" space and inefficient design, the City's own objective analysis proves otherwise. The City's Exhibit W, which is an analysis by the City's Planning Director of the percentage of square footage devoted to circulation and "back of house" uses in other hotels in the City, the Applicant's design is at least as efficient as the most comparable hotels in the City. According to the City's own analysis, the Applicant's design has less circulation and "back of house" than St. Regis, the same as The

Montage, and virtually the same as Marriott Mountainside. Moreover, the Applicant's review of publicly available information suggests the City's analysis includes significant errors that underestimate the percentages for the other hotels, but the City has been unwilling to provide the underlying data for Exhibit W despite repeated requests by the Applicant.

3. The Proposed Parking Is Also Efficient as Possible.

Although parking is specifically addressed under CUP criteria not currently before the Commission, including criteria 5 and 13, attached as Exhibit 2 is an analysis setting forth the average space per parking stall for each of the proposed parking areas in the CUP Application. The Applicant is submitting this information at this time to respond to specific inquiries by the Commission regarding this issue.

The proposed parking design takes into account numerous design requirements and approval parameters in the SPMP, including the need to accommodate all parking needs in underground facilities, the unique topography of the site, fire and safety concerns, service parking and staging requirements, access issues, guest expectations, minimizing neighborhood impacts, and other operational considerations. Exhibit 2 identifies how these considerations have impacted the overall square footage of certain portions of the proposed parking areas.

4. The Current Proposal Is the Same Concept as Approved in the SPMP.

Both the November 9, 2016 (p. 8), and the October 12, 2016 (p. 53), Staff Reports contain the same statement: "*As discussed previously*, staff finds the project as designed is not in compliance with the concept approved by the City Council during the 1986 Master Plan approval" (emphasis added). However, a search of the record for a prior discussion by Staff of compliance with the concept approved by the SPMP yields nothing. This same language is contained, verbatim, in the September 23, 2009, Staff Report, which itself provides no reference to any prior Staff discussions about such issue. (September 23, 2009 Staff Report, p. 34.) Thus, it appears that the City keeps repeating a purported finding for which it has never provided any explanation or analysis.

Moreover, these conclusory statements stand in sharp contrast to Staff's prior conclusion, stated in several other contemporary Staff reports, that "[t]he current Treasure Hill CUP plans comply with the clustered development concept approved with the Sweeney MPD." (See, e.g., March 9, 2005 Staff Report p. 2.)

Unlike Staff's current conclusory statement, as repeated from the September 23, 2009, Staff Report, Staff's earlier conclusion actually refers to the language of the SPMP approval.

Indeed, the SPMP refers to the proposed development "concept" several times. For example, Finding 1 refers to the "proposed clustered development concept." (SPMP Report, p. 2.) The SPMP Report provides additional context for this statement, explaining that

> [a] variety of development concepts were submitted during the course of reviewing the proposed Master Plan. . . . The alternative concepts ranged from a "conventional" subdivision approach involving the extension of Norfolk Avenue, to a modern high—rise

> concept. The staff, Planning Commission and general public have all favored the clustering of development as opposed to spreading it out. . . . The latest concept developed represents a refined version of the cluster approach originally submitted.

(SPMP Report, p. 7.) The SPMP further provides that "[t]he development concept proposed would cluster the bulk of the density derived into two locations; the Town Lift Mid-Station site and the Creole Gulch area." (SPMP Report, p. 8.)

Similarly, under the heading "Overall Concept," the SPMP Report explains that

> [t]he concept of clustering densities on the lower portion of the hillside with some transferring to the Coalition properties has evolved from both previous proposals submitted and this most recent review process. . . . After considerable staff discussion and input, the cluster concept was developed. Because of the underlying zoning and resultant density currently in place, the cluster approach to developing on the hillside has been favored throughout the formal review and Hearing process.

(SPMP Report, p. 12.)

Nothing about the Applicant's proposed design varies from the development concept approved in the SPMP. The application continues to cluster the density in the two locations identified in the SPMP for development. Thus, contrary to Staff's current unexplained finding, which itself conflicts with Staff's prior finding, the Applicant's current design is exactly the same as the concept approved in the SPMP.

BJM:

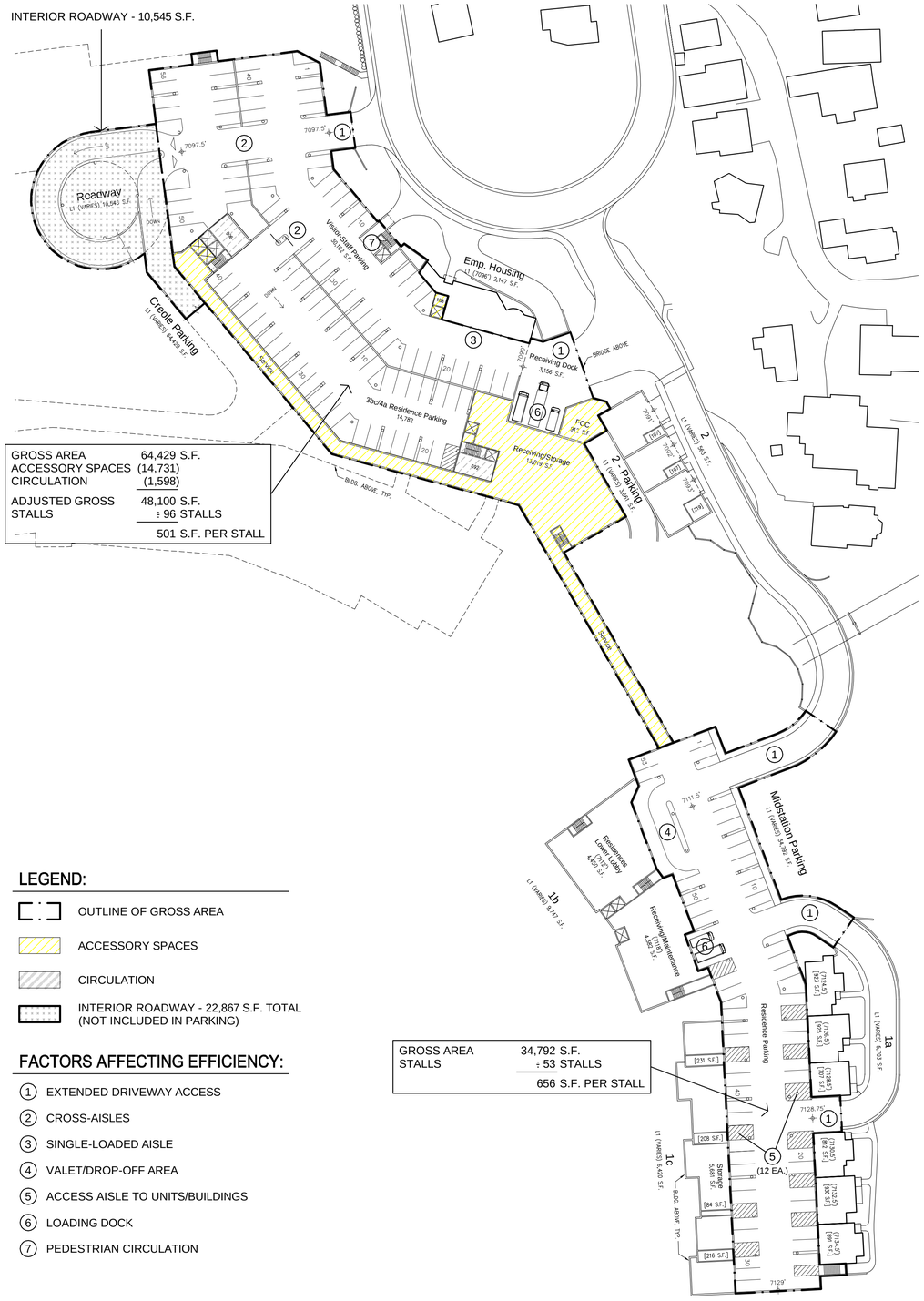
EXHIBIT 1

EFFICIENCY RATIOS OF ABOVE-GRADE SPACES

USEABLE SPACE | EFFICIENCY RATIO BETWEEN 60% & 70% | EFFICIENCY RATIO < 60%

BUILDING		ABOVE GRADE SPACES								EFFICIENCY RATIO	NOTES
BLDG. No.	LEVEL	UNITS * (NET)	COMMON & CIRCULATION	ACCESSORY	PARKING (GROSS)	VESTED COMM. * (GROSS)	SUPPORT COMM. * (GROSS)	MEETING SPACE * (GROSS)	TOTAL ABOVE GRADE (GROSS)	USEABLE AREA (*) ÷ TOTAL AREA	
PARKING	Midstn - L1								0	Below Grade	Note: Below grade spaces not included in efficiency ratios.
1A	3-Story Townhouses	2,146	249						2,395	89.60%	
		2,113	234						2,347	90.03%	
		1,776	200						1,976	89.88%	
		1,818	214						2,032	89.47%	
		2,171	229						2,400	90.46%	
		2,206	227						2,433	90.67%	
	SUBTOTAL	**12,230**	**1,353**	**0**	**0**	**0**	**0**	**0**	**13,583**		
1B	L1								0	Below Grade	
	L2	3,690	5,528	244					9,462	39.00%	3,880 s.f. lobby for 1 Buildings (38% of total)
	L3	7,164	1,647	244					9,055	79.12%	
	L4	7,164	1,647	244					9,055	79.12%	
	L5	7,164	1,647	244					9,055	79.12%	
	L6	5,621	1,559	244					7,424	75.71%	
	SUBTOTAL	**30,803**	**12,028**	**1,220**	**0**	**0**	**0**	**0**	**44,051**		
1C	L1								0	Below Grade	
	3-Story Townhouses	23,478	2,002						25,480	92.14%	
	SUBTOTAL	**23,478**	**2,002**		**0**	**0**	**0**	**0**	**25,480**		
MIDSTATION TOTAL		**66,511**	**15,383**	**1,220**	**0**	**0**	**0**	**0**	**83,114**	**80.02%**	
PARKING	Creole								0	Below Grade	
	4AB								0	Below Grade	
	5AD								0	Below Grade	
RAMP & ROADWAY									0	Below Grade	
2	L1	433	130		3,661				4,224	10.25%	Only stairs to units within parking garage are "useable space"
	2-Story Townhouses	5,936	524						6,460	91.89%	
	L4			750		1,397			2,147	65.07%	Ticket office, classified "resort accessory"
	SUBTOTAL	**6,369**	**654**	**750**	**3,661**	**1,397**	**0**	**0**	**12,831**		
EMPLOYEE HOUSING	L1			2,147					2,147	0.00%	Added per City's request
	L2			2,261					2,261		
	L3			2,261					2,261		
	SUBTOTAL			**6,669**	**0**	**0**	**0**	**0**	**6,669**		
3A	L1					3,746			3,746	100.00%	
	SUBTOTAL				**0**	**3,746**	**0**	**0**	**3,746**		
3B	L1		1,333	2,816		8,273			12,422	66.60%	Service corridor behind commercial uses, classified "accessory"
	L2	3,541	1,105	160					4,806	73.68%	
	L3	3,541	1,105	160					4,806	73.68%	
	L4	3,541	1,105	160					4,806	73.68%	
	L5	3,429	1,113	160					4,702	72.93%	
	L6	3,429	1,113	160					4,702	72.93%	
	L7	3,429	1,113	160					4,702	72.93%	
	L8	2,871	1,106	160					4,137	69.40%	Upper story stepped, decreasing useable area
	SUBTOTAL	**23,781**	**9,093**	**3,936**	**0**	**8,273**	**0**	**0**	**45,083**		
3C	L1		404			4,054			4,458	90.94%	
	L2	4,189	386						4,575	91.56%	
	L3	4,002	386						4,388	91.20%	
	SUBTOTAL	**8,191**	**1,176**		**0**	**4,054**	**0**	**0**	**13,421**		
PLAZA BLDGS.	STAIR		450	180					630	0.00%	Public access from Lowell
	POOL			792					792	0.00%	Public restrooms & snack bar
	SUBTOTAL		**450**	**972**					**1,422**		
4A	L1		7,574	8,763				10,815	27,152	39.83%	Ballroom lobby, breakout space & prep area (60% of total)
	L2		4,654	7,299				5,312	17,265	30.77%	Ballroom lobby, breakout space & prep area (69% of total)
	L3		377	4,663			10,994		16,034	68.57%	2,604 s.f. employee locker room (16% of total)
	L4		2,500	4,676			10,106		17,282	58.48%	2,274 s.f. project offices + 1,168 s.f. ski storage (20% of total)
	L5	11,290	1,735	654					13,679	82.54%	
	L6	5,941	1,237	654					7,832	75.86%	
	SUBTOTAL	**17,231**	**18,077**	**26,709**			**21,100**	**16,127**	**99,244**		
4B	B1								0	Below Grade	
	L1								0	Below Grade	
	L2		6,720	620			5,626		12,966	43.39%	3,098 s.f. lobby and registration area (24% of total)
	L3	4,700	2,687	2,218					9,605	48.93%	1,598 s.f. maintenance facility (17% of total)
	L4	13,316	6,003	10,737					30,056	44.30%	9,528 s.f. laundry facility (32% of total)
	L5	19,774	7,063	1,209					28,046	70.51%	
	L6	20,192	6,277	1,209					27,678	72.95%	
	L7	14,917	5,159	3,883					23,959	62.26%	2,674 s.f. sitting area/lounge for guests (11% of total)
	L8	17,503	5,247	1,209					23,959	73.05%	
	L9	16,354	5,153	1,209					22,716	71.99%	
	L10	15,469	4,980	1,209					21,658	71.42%	
	L11	16,001	4,202	507					20,710	77.26%	
	L12	14,382	4,187	507					19,076	75.39%	
	SUBTOTAL	**152,608**	**57,678**	**24,517**			**5,626**		**240,429**		
5A	B1								0	Below Grade	
	L1								0	Below Grade	
	L2	2,787	4,520	97					7,404	37.64%	3,119 s.f. lobby for 5 Buildings (42% of total)
	L3	5,281	1,494	214					6,989	75.56%	
	L4	5,281	1,494	214					6,989	75.56%	
	L5	5,281	1,494	214					6,989	75.56%	
	L6	5,281	1,494	214					6,989	75.56%	
	L7	5,281	1,611	97					6,989	75.56%	
	L8	2,578	1,122	214					3,914	65.87%	Number of units half of levels below
	L9	2,578	1,122	214					3,914	65.87%	
	L10	2,578	1,122	214					3,914	65.87%	
	SUBTOTAL	**36,926**	**15,473**	**1,692**					**54,091**		
5B	B1								0	Below Grade	
	3-Story Townhouses	9,445	1,070						10,515	89.82%	
	SUBTOTAL	**9,445**	**1,070**						**10,515**		
5C	B1								0	Below Grade	
	L1								0	Below Grade	
	L2	3,303	1,577	304					5,184	63.72%	Number of units half of levels above
	L3	6,606	2,477	304					9,387	70.37%	
	L4	6,606	2,477	304					9,387	70.37%	
	L5	6,606	2,477	304					9,387	70.37%	
	L6	3,303	1,991	97					5,391	61.27%	Number of units half of levels below
	L7	3,303	1,616	304					5,223	63.24%	
	L8	3,303	1,726	194					5,223	63.24%	
	L9	3,303	1,616	304					5,223	63.24%	
	L10	3,303	1,616	304					5,223	63.24%	
	L11	3,303	1,616	304					5,223	63.24%	
	SUBTOTAL	**42,939**	**19,189**	**2,723**					**64,851**		
5D	B1								0	Below Grade	
	L1	4,985	1,176	179					6,340	78.63%	
	L2	4,985	1,176	179					6,340	78.63%	
	L3	4,985	1,642	179					6,806	73.24%	
	L4	4,985	1,176	179					6,340	78.63%	
	L5	4,985	1,176	179					6,340	78.63%	
	L6	4,985	1,176	179					6,340	78.63%	
	SUBTOTAL	**29,910**	**7,522**	**1,074**					**38,506**		
CREOLE TOTAL		**327,400**	**130,382**	**69,042**	**3,661**	**17,470**	**26,726**	**16,127**	**590,808**	**65.63%**	
PROJECT TOTAL		**393,911**	**145,765**	**70,262**	**3,661**	**17,470**	**26,726**	**16,127**	**673,922**	**67.40%**	

EXHIBIT 2



GROSS AREA	64,429 S.F.
ACCESSORY SPACES	(14,731)
CIRCULATION	(1,598)
ADJUSTED GROSS	48,100 S.F.
STALLS	÷ 96 STALLS
	501 S.F. PER STALL

GROSS AREA	34,792 S.F.
STALLS	÷ 53 STALLS
	656 S.F. PER STALL

LEGEND:

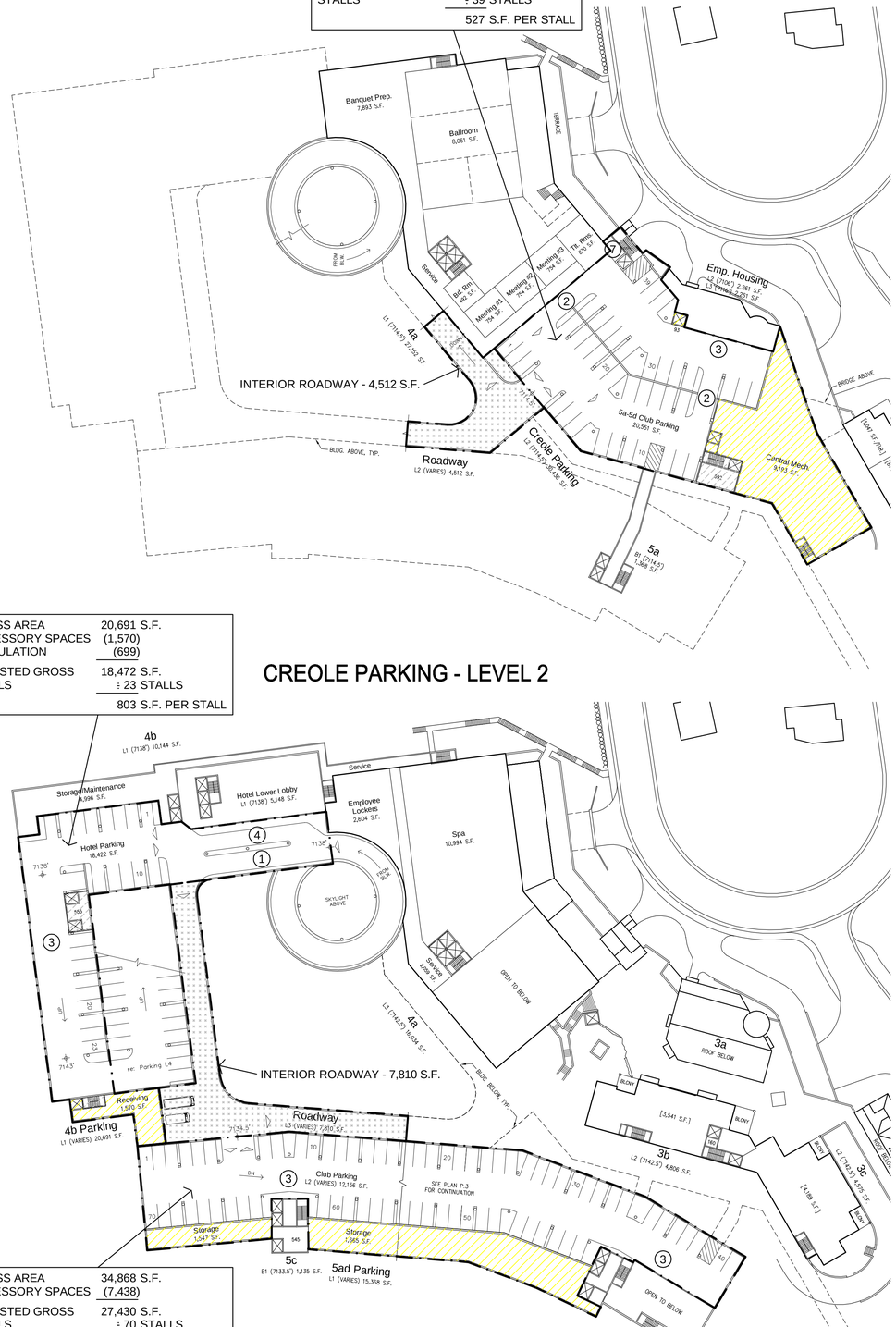
- OUTLINE OF GROSS AREA
- ACCESSORY SPACES
- CIRCULATION
- INTERIOR ROADWAY - 22,867 S.F. TOTAL (NOT INCLUDED IN PARKING)

FACTORS AFFECTING EFFICIENCY:

1. EXTENDED DRIVEWAY ACCESS
2. CROSS-AISLES
3. SINGLE-LOADED AISLE
4. VALET/DROP-OFF AREA
5. ACCESS AISLE TO UNITS/BUILDINGS
6. LOADING DOCK
7. PEDESTRIAN CIRCULATION

CREOLE & MIDSTATION PARKING - LEVEL 1

GROSS AREA	30,436 S.F.
ACCESSORY SPACES	(9,193)
CIRCULATION	(692)
ADJUSTED GROSS	20,551 S.F.
STALLS	÷ 39 STALLS
	527 S.F. PER STALL



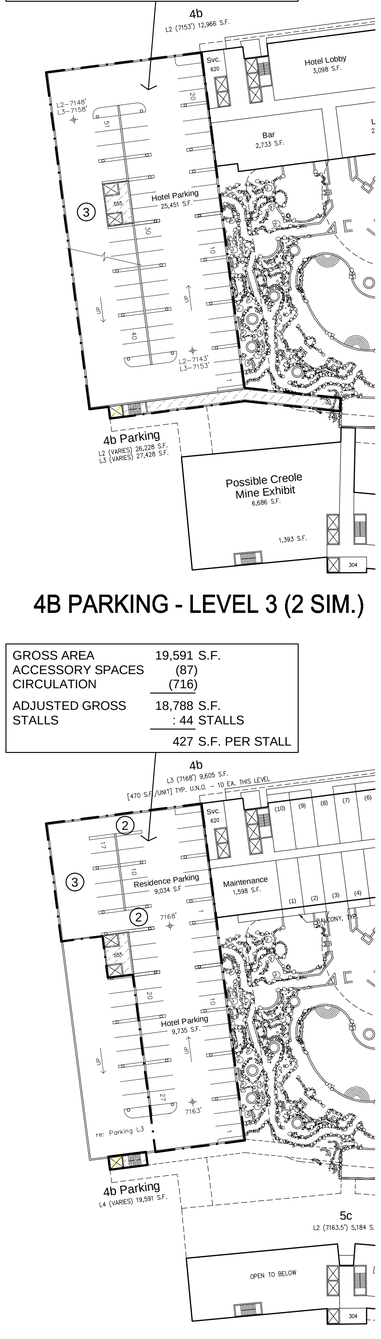
GROSS AREA	20,691 S.F.
ACCESSORY SPACES	(1,570)
CIRCULATION	(699)
ADJUSTED GROSS	18,472 S.F.
STALLS	÷ 23 STALLS
	803 S.F. PER STALL

CREOLE PARKING - LEVEL 2

GROSS AREA	34,868 S.F.
ACCESSORY SPACES	(7,438)
ADJUSTED GROSS	27,430 S.F.
STALLS	÷ 70 STALLS
	392 S.F. PER STALL

4B & 5AD PARKING - LEVEL 1

GROSS AREA	27,428 S.F.
ACCESSORY SPACES	(78)
CIRCULATION	(1,899)
ADJUSTED GROSS	25,451 S.F.
STALLS	÷ 51 STALLS
	499 S.F. PER STALL



4B PARKING - LEVEL 3 (2 SIM.)

GROSS AREA	19,591 S.F.
ACCESSORY SPACES	(87)
CIRCULATION	(716)
ADJUSTED GROSS	18,788 S.F.
STALLS	÷ 44 STALLS
	427 S.F. PER STALL

4B PARKING - LEVEL 4