

November 24, 2014

Planning Board
City of Alameda
2263 Santa Clara Ave
Alameda, CA 94501

Dear Planning Board Members:

I am writing on behalf of UNITE HERE Local 2850, the hotel and food-service workers' union in the East Bay. We pay close attention to hotel development throughout the East Bay, and we are familiar with the unique and often very significant impacts that hotel development has on the environment and on the surrounding community. While we are particularly concerned with the effects of such development on the working conditions and livelihoods of our members and other hotel workers, our members are affected by development not only as workers, but also as residents who live, work, shop, and play in communities throughout the East Bay, including the City of Alameda. For example, hundreds of our members work very close to the site of the proposed hotel at 2350 Harbor Bay Parkway, at the Oakland Airport and the Oakland Airport Hilton.

I am writing to urge you not to approve the staff recommendation on the Final Development Plan and CEQA determination for the proposed Fairfield Inn at 2350 Harbor Bay Parkway. As detailed below, the project does not satisfy the City's parking requirements, and the results of a recent study indicate that it would likely suffer from chronic parking shortages. Furthermore, contrary to the staff report's assertion, the project does not meet the requirements for the infill-development exemption from the California Environmental Quality Act (CEQA).

Parking

As the staff report and accompanying letter on trip generation and parking demand both acknowledge, the minimum parking required by chapter 30-7.6 of the Alameda Municipal Code for a hotel with 105 rooms is 131, 59 more than what the project proposes to provide. The applicant provides a letter from Abrams Associates claiming to demonstrate that the project will only generate demand sufficient to require 69 parking spaces. However, this letter does not constitute a "Parking Demand Study" as required by Code chapter 30-7.13, but merely a statement of Marriott parking requirements, average parking demand for a "business hotel" from the International Transportation Engineers' (ITE) *Parking Generation Manual*, and a set of unsubstantiated assumptions related to the proposed hotel's location, shuttle service, and speculation regarding possible agreements with nearby property owners. It should be noted that the parking demand ratio cited from the ITE manual (0.66 spaces per room) does not represent maximum parking demand, but the demand generated on the *average Saturday*. The same manual

gives a ratio of 0.75 spaces per room for weekdays at the 85th percentile. (Again, this is not a maximum; it means that on 15% of weekdays, the parking demand ratio would be greater than 0.75.) Using this more appropriate ratio, the proposed hotel would be assumed to require 79 parking spaces, 7 more than it proposes to provide.

Furthermore, even this more conservative estimate is not the result of a Parking Demand Study, but merely the application of a ratio derived from a broad survey not specific to the context of the proposed project. Fortunately, an actual study was performed recently that is applicable to this project. In August of this year, the Planning Board reviewed a proposal for another hotel on Harbor Bay Parkway, about half a mile away from the project site. The Home2 hotel project also proposed to provide fewer parking spaces than normally required by the Code, and the applicants commissioned a study by Kittelson & Associates to justify the reduced parking. Accordingly, Kittelson & Associates observed actual parking demand generated by the 105-room Hampton Inn at 1700 Harbor Bay Parkway, which in terms of size and type of hotel is perfectly comparable to the proposed hotel at 2350 Harbor Bay Parkway. (Fairfield Inn and Hampton Inn are equivalent midscale limited-service hotel brands in the Marriott and Hilton brand families, respectively. Also, the Hampton Inn provides free shuttle service to and from the Oakland Airport, Park Street, and elsewhere, just as the proposed hotel would do.) Using data from observation of occupied parking spaces at approximately 6:00 am on 77 mornings, the study found that the *average* ratio of occupied parking spaces to occupied rooms was 0.99, much higher than either the average ratio or the 85th-percentile ratio taken from the ITE manual. The same data set showed that the average room occupancy was approximately 79%, suggesting that *on the average day*, 82 parking spaces were occupied overnight. Considering that the proposed project would provide only 72 spaces for a hotel with the exact same number of rooms, it can be anticipated that the proposed hotel would suffer from significant parking shortages not only on the days with the highest level of demand, but on the *average* day. On nights with the highest hotel occupancy (over 85%), the study found a lower ratio of occupied parking spaces to occupied rooms: 0.82. Given that the average occupancy on these nights was approximately 96%, this suggests an average parking demand on high-occupancy nights of approximately 83 spaces. It should be noted that these projections are for the average night (and average high-occupancy night), and therefore the parking shortages would likely be even worse than this roughly half of the time.

Finally, it should be noted that the plans submitted with the application show 70 parking spaces, not 72 as claimed—12 fewer than what would be needed on the average day.

CEQA

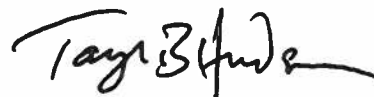
The staff report claims that the project is exempt from CEQA under the categorical exemption for infill projects under CEQA Guidelines section 15332. This categorical exemption has a number of requirements, including consistency with all applicable General Plan policies and zoning regulations and that the site have “no value, as habitat for endangered, rare or threatened species.” The foregoing discussion of parking

requirements demonstrates that this project is not consistent with all of the applicable zoning regulations. Furthermore, the project is not consistent with the applicable General Plan regulations regarding floor area ratio (FAR). The project site's General Plan land use designation is "Business Park," for which "maximum FAR is .5, with increases up to a maximum of 2 permitted, proportional to the amount of required parking enclosed in a structure." Since this project does not propose any structured parking, the standard maximum FAR of 0.5 applies. The project proposes a total building area of 62,979 square feet on a lot with an area of approximately 50,958 square feet (1.17 acres), for an FAR of 1.24.

In claiming that the project site has no value as habitat for endangered, rare, or threatened species, the staff report refers to a letter from WRA Environmental Consultants regarding the burrowing owl. The letter states that, based on observation conducted by a WRA wildlife biologist, "no burrowing owls are currently present within or adjacent to the study area." However, the letter notably does not state that the site has "no value" as habitat for the burrowing owl. Rather, it notes the presence of "approximately 30 burrows" of the type used by burrowing owls. For a number of reasons, the letter concludes that "the site provides only poor-quality habitat"; however, this is not the same as concluding that the site "has no value as habitat," which is the standard established by CEQA Guidelines Section 15332. Furthermore, the letter goes on to say that although the site and the surrounding area "appear to lack the potential to support year-round burrowing owl occupation," that there is nevertheless "some limited potential for burrowing owl wintering to occur at the site." The letter notes that burrowing owls have been known to winter in similar "marginal, urban habitat areas" in the Bay Area. Accordingly, the letter recommends an additional pre-construction survey to ensure that construction of the hotel does not disturb burrowing owls that may be present at the site, as well as consultation with the California Department of Fish and Wildlife should any owls or signs thereof be observed. This is precisely the sort of additional study and consultation that should be performed in a CEQA study and/or identified as a mitigation measure in an EIR or Mitigated Negative Declaration.

In conclusion, we believe it is clear and unambiguous that the proposed project neither satisfies the City's parking requirements, nor qualifies for an exemption from CEQA and therefore should not be approved in its current form. We trust that the Planning Board will take seriously its duty to administer the development regulations in the Alameda Municipal Code and the City's obligations under CEQA. If you have any questions, please do not hesitate to contact me at thudson@unitehere.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Ty Hudson", with a stylized flourish at the end.

Ty Hudson
Research Analyst

Erin Garcia - Fwd: 2350 Harbor Bay Parkway 94502

From: Andrew THOMAS
To: Garcia, Erin
Date: 12/29/2014 11:31 AM
Subject: Fwd: 2350 Harbor Bay Parkway 94502

>>> Karen Armes <karen.arnes2014@gmail.com> 11/24/2014 5:58 PM >>>

I am writing in hopes that you will provide my comments at this evening's public meeting concerning the proposed hotel project at 2350 Harbor Bay Pkwy. in Alameda. I am unable to attend the public meeting this evening however, I felt it important to voice my opposition to the current plan for a five-story hotel.

I support the goal of building a business on the property, my concern however, is with the proposed height of the building. Most, if not all existing buildings in the business park are two stories. The proposed 5-story project is grossly out of proportion with the surrounding structures. A 5-story structure will degrade the waterfront and the public's access to the superior bay and sky views and coastline access that currently exist.

This may be the last piece of waterfront property that Alameda has to offer. As such, any proposed building at this prominent site, should be architecturally stunning and a project the citizens of Alameda will be proud of. I do not believe the proposed structure is such a project or is in the best interest of the community.

Regardless of the business that will ultimately occupy this building site, I feel strongly that the height of the building should not exceed two stories.

Thank you for considering my comments on this matter.

Respectfully,
Karen

Karen E. Armes
27 Duarte Ct.
Alameda, CA
510-529-1354

Erin Garcia - Fwd: Harbor Bay 5 story building

From: Andrew THOMAS
To: Garcia, Erin
Date: 12/29/2014 12:12 PM
Subject: Fwd: Harbor Bay 5 story building

>>> D Learn <dlearn1@gmail.com> 11/24/2014 6:15 PM >>>

----- Forwarded message -----

From: **D Learn** <dlearn1@gmail.com>
Date: Mon, Nov 24, 2014 at 6:09 PM
Subject: Harbor Bay 5 story building
To: egarcia@alameda.ca.gov, athomas@alameda.ca.gov

Dear City of Alameda;

Please read this statement at the meeting tonight on my behalf.

Please do not allow a 5 story Hotel to be built at the 2350 Harbor Bay Parkway site. This building is too tall for this very small lot. It will not fit into the aesthetics of the surrounding area, where most buildings are now 2 stories.

Fairfield Inns are known for value oriented services. Usually the buildings have very large, white, sterile looking architecture. They are not known for being attractive.

I do not want an ugly concrete style 5 story building to be sitting at the beautiful edge of the bay.

I also raise concerns regarding public access to the shoreline, traffic congestion, increased auto exhaust, increased crime rates, and possible alcohol consumption, which leads to many public safety issues.

This land has remained undeveloped for years. Please do not rush into building a monster, which the community may regret and will lower the standards of this jewel location within Alameda.

Donna Learn
Resident
Duarte Court
[510-508-9449](tel:510-508-9449)+

Ms. Karen E. Armes
27 Duarte Court
Alameda, CA 94502



December 29, 2014

Community Development, City of Alameda, City Hall
c/o Mr. Andrew Thomas, City Planner
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Dear Mr. Thomas

I am writing in regards to a proposed hotel project, PLN14-0305, located at 2350 Harbor Bay Parkway in Alameda. I understand there is a Planning Board Public Hearing scheduled for this project on January 12, 2015, which I hope to attend in person. However, I also felt it important to present my written concerns to the current proposal for a five-story hotel at this bay-front location.

I moved into my current residence over 18 years ago with the complete understand that the property in the Harbor Bay Business Park would one day be developed. As such, and as expressed previously in my November 24, 2014 email to Messrs. Thomas and Sablan, and Ms. Garcia, I support the goal of business development in the City of Alameda, and in particular in the Harbor Bay Business Park.

My concern over this proposed project is the projected height of the building. The vast majority of existing buildings in the Business Park are two stories. The proposed 5-story structure is grossly out of proportion with the surrounding structures and the environment in which it is proposed to be sited.

A 5-story structure will degrade the waterfront and the public's access to the uninhibited bay and sky views that currently exist, among other things impacted. A structure of this size, with proposed neon signage on the 4th and 5th stories will quite simply be an eyesore to everyone concerned – hundreds of residents in the immediate area, those who work in the Business Park, those that commute to and from the Harbor Bay Ferry and those that simply come to the bay front for recreational activities.

This may be one of the last waterfront properties on Harbor Bay Island that the city of Alameda has within its authority to develop, and as such, any proposed buildings at this prominent site should be architecturally stunning and environmentally responsible. I do not believe the hotel project, as proposed, is such a project or is in the best interest of the whole community.

Additionally, I question the impact of the reduced parking requirement for a structure of this size. I also question the business need of another hotel in Alameda, and in particular on Harbor Bay Island. Are the current hotels at existing capacity? Is a hotel the best tax-generating project for Alameda? Does the proposed project meet environmental and bay conservation goals and standards?

Clearly a lot of work has already gone into the proposed project and in receiving clearances needed by federal, state and local governments; however, it is my understanding that the Planning Board plays a significant role in approving the project or in recommending adjustments to the proposed plan. I believe this project deserves further consideration by the Board and discussion with the community before being approved. I also advocate for your support, at a minimum, to request the Applicant, Mina Patel, to reduce the size and scope of this project.

I appreciate the work the Community Development Department and Planning Board are charged to perform, and hope that my concerns and appropriate alternations to the project will be addressed at the upcoming January 12, 2015 public hearing.

Respectfully,



Karen E. Armes

cc: Alameda City Council