



PETITION FOR APPEAL

Community Development • Planning & Building
 2263 Santa Clara Ave., Rm. 190
 Alameda, CA 94501-4477
 alamedaca.gov
 510.747.6800 • F: 510.865.4053 • TDD: 510.522.7538
 Hours: 7:30 a.m.–3:30 p.m., M–Th

Please print clearly. This petition is hereby filed as an appeal of the decision of the:

Planning Board, which
 (Community Development Director/Zoning Administrator/Planning Board/Historical Advisory Board)

Granted for application
 (Denied/Granted/Established Conditions)

Design Review and Parking Reduction number PLN17-0538
 (Application Type) (Application Number)

at 1825 Park Street on 1/28/2019
 (Street Address) (Date of Action)

State the reasons or justification for an appeal (attach additional sheets if needed):

See attached letter.

Appellant

Name: Ty Hudson, UNITE HERE Local 2850 Phone: 213-509-9114

Address: 1025 3rd St, Oakland, CA 94607

Email: thudson@unitehere.org

Alameda Municipal Code (AMC) 30-25, Appeals and Calls for Review, provides that within ten (10) days a decision of the Community Development Director or Zoning Administrator may be appealed to the Planning Board, and decisions of the Planning Board or the Historical Advisory Board may be appealed to the City Council. In addition to the appeal process, decisions of the Community Development Director or Zoning Administrator may be called for review within ten (10) days to the Planning Board by the Planning Board or by the City Council and decisions of the Planning Board or the Historical Advisory may be called for review by the City Council or a member of the City Council.

Fees (must accompany this petition)

Single-Family or Duplex Residence: \$250 plus time and materials cost up to \$500, max \$750.

Multi-Family Residential, Commercial, or Non-Residential: \$350, plus time and materials costs up to \$2,500, max \$2,850

Ty Hudson
 Appellant Signature

2/1/2019
 Date

Ty Hudson
 Print name

FOR OFFICE USE ONLY

Received by: [Signature]

Receipt No.: 529048

Date Received Stamp

Revised 11/6/2013

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UNITEHERE!LOCAL 2850

East and North Bay's Union for hotel, foodservice, and gaming workers

February 1st, 2019

Andrew Thomas
Planning Manager
Community Development Department
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501



Dear Mr. Thomas,

UNITE HERE Local 2850 hereby appeals the decision of the Planning Board on January 28th, 2019, to approve the proposed hotel at 1825 Park Street (PLN17-0538). We believe the Planning Board erred and abused its discretion for the following reasons.

Parking

The Alameda Municipal Code requires one parking space per hotel room for this project, which would be 96 spaces. The project would only provide 62 spaces. The project purports to take advantage of reductions in parking requirements provided for by Section 30-7.13 of the Code. This section provides that “The schedule of required minimum off-street parking provided by subsection 30-7.6 may be reduced, upon approval of the Planning Board, if the applicant can demonstrate that parking demand will be reduced for the life of the project through one (1) or more of the following methods...” (emphasis added). The applicant has not demonstrated any such thing, and neither the Transportation Demand Management (TDM) Program nor Parking Demand Study meets the requirements spelled out in Section 30-7.13.

Subsection 30-7.13(1)(a) allows a reduction in parking requirements if the applicant can demonstrate reduced demand for parking through the implementation of a TDM Program. While the applicant has promised to implement certain “TDM measures” (as described by the staff report), these measures do not constitute a TDM Program as described by Subsection 30-7.13(1)(a). The “TDM measures” are not accompanied by performance targets, a monitoring and reporting procedure, or supplementary measures to be implemented if initial performance targets are not met, all of which are required elements of a TDM Program. Nor is there any attempt to demonstrate that the proposed “TDM measures” will reduce parking demand sufficiently to justify the reduced parking requirements.

Subsection 30-7.13(1)(b) allows a reduction in parking requirements if the applicant can demonstrate reduced demand for parking through a Parking Demand Study. The applicant submitted a Traffic Study that contains a cursory discussion of the parking demand that would be generated by the project. The conclusion it purports to reach—that 62 parking spaces would be sufficient for the peak parking demand generated by the proposed hotel—are supported by observations of a single hotel on only two days—one weekday and one weekend. No reasonable person could honestly consider this anecdotal

observation to constitute a genuine Parking Demand Study, nor would any reasonable person conclude that such a "study" is sufficient to "demonstrate that parking demand will be reduced for the life of the project," as required by Section 30-7.13. Furthermore, the study admits that its conclusions are at odds with the ratio published in the Institute of Transportation Engineers (ITE) Parking Generation manual, which is the standard reference in the field, and which represents a compilation of voluminous data. According to the ITE manual, this project should require 86 parking spaces.

Because the applicant has not even come close to meeting the requirements of Section 30-7.13, the project is not in compliance with the parking requirements of the Code, as it would provide 34 fewer parking spaces than required by Section 30-7.6. Furthermore, because the project is not consistent with these requirements, it does not qualify for the Class 32 categorical exemption from CEQA, which requires consistency with applicable zoning regulations.

Housing

The staff report does not mention that the parcel on which this hotel is proposed carries the Multi-family Residential Combining Zone designation, in addition to the base zoning (NP-G). The Code describes the purpose of this combining zone as follows:

The Multi-family residential combining zone (MF District) is an overlay zone intended for lands in Alameda that are well located for transit oriented Multi-family housing, necessary to accommodate Alameda's share of the regional housing need, and available to facilitate and encourage the development of a variety of types of housing for all income levels, including Multi-family rental housing as required by California Government Code sections 65580 and 65583.

Very few parcels in the City of Alameda carry this designation. The parcel on which this hotel is proposed is one of only two such parcels on the entire Park Street corridor. Given the housing crisis currently faced by the City of Alameda and the entire Bay Area, we believe it is irresponsible to allow a hotel on this parcel. The hotel will house nobody and will create low-wage jobs, thus increasing the number of workers in Alameda who cannot afford to live in Alameda, making the housing crisis worse.

For these reasons, we humbly request that the City Council reverse the decision of the Planning Board and deny approval of the design review and parking reduction application for the proposed hotel. This reversal is necessary to maintain the integrity of the development regulations of the Alameda Municipal Code, and to ensure that development in Alameda is consistent with the urgent needs of the City and its residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Ty Hudson", with a stylized, flowing script.

Ty Hudson
Senior Research Analyst