

EXHIBIT B – APPEAL OF SPECIAL USE PERMIT (FILE NO. SP20-016)

3/27/2022

To: Honorable Mayor and City Council Members

Subject: Appeal of an Environmental Appeal

Appeal of Planning Director Hearing: Wednesday, March 23, 2022

Agenda Item #4 (SP20-016) 1212-1224 S. Winchester Blvd, San Jose

Dear Honorable Mayor and City Council Members:

We are residents of the Hamann Park neighborhood that would be impacted by this project. Many of us worked with the City in developing the Winchester Boulevard Urban Village Plan and were supportive of this engagement. We are aware of the City's economic goals and tax base objectives and very much support the City's efforts to attain some balance in the tax base/services delivery.

We also support hotel development, but this site stands out as inappropriate. This site has smaller, shallow parcels that will have a negative environmental impact on the neighborhood. Our concerns are listed below along with attached documents prepared by residents addressing these issues.

1. The Mitigation Monitoring and Reporting Program for the hotel project at 1212-1224 S Winchester attached to the January 11, 2022 City Council Agenda packet and fully incorporated into the City Council adopted Resolution is not the report for the subject property, but is a report for an entirely different project.

We believe that the City Council's January 11, 2022 actions on the mitigated negative declaration (MND) were not supported by fully accurate documentation and that this matter should go back to the City Council for a rehearing. **Since the zoning action was based on an inaccurate MND, it follows from our perspective that the rezoning action by the City Council should be redone as well.**

2. NEIGHBORHOOD/COMMUNITY COMMERCIAL, the land use designation assigned to the two block section of Winchester Blvd, which is the location of 1212-1224 S Winchester. The Winchester Urban Village Plan describes the "Neighborhood/Community Commercial" Land Use Designation and why it is applied to 1212-1224 S Winchester as follows: "This designation is applied to

smaller, shallow parcels fronting Winchester Boulevard and abutting single-family residences. Given the size of the parcels, parking requirements in the zoning code and the urban design step down policies, these properties are appropriate for the location of smaller commercial businesses. Neighborhood/Community Commercial uses should have a strong connection to, and provide services and amenities for, the community. These uses should be designed to promote this connection with an appropriate form that supports walking, transit use and public interaction. Also, this designation supports the neighborhood servicing retail and small businesses along Winchester Boulevard.” (Winchester Blvd Urban Village Plan p.19) Based on the way Land Use was planned and designated in the Winchester Urban Village, we believe that the hotel project has a significant negative impact on the Land Use and Planning resource.

3. The Winchester Blvd Urban Village Plan describes the “Urban Village Commercial” Land Use Designation on the same page as Neighborhood Community Commercial: *“The Urban Village Commercial land use designation is applied to properties on Winchester and Moorpark adjacent to, and on the south side of Interstate 280. This area was identified as an opportunity for new commercial development that could build off the success and vibrancy of the commercial development in the adjacent Santana Row/Valley Fair Urban Village. This designation supports commercial activity that is more intensive than that of the Neighborhood Urban/Community Commercial land use designation. Appropriate uses in this designation include a variety of commercial uses, mid-rise office buildings and hotels...” (Winchester Blvd Urban Village Plan p.19) The Winchester Urban Village Plan clearly states what area and what land use is intended for facilities like hotels. We believe this has a significant negative impact on the Urban Village Land Use and Planning resource.*

4. SECURITY - The Hotel Operations Plan (Project Documents; dated 9/27/21 lists “Cameras plus security guard (s) as needed” . Not one security guard is listed on the Employee Staff list. (Project Documents, “Response to Comment”,

the last 2 pages, labeled Attachment B) We believe that a security staff is necessary for a 119 room hotel with bar in the close vicinity to Castlemont Elementary School, Bethel Church, a sub-acute center next door, and our residential neighborhood. We believe not having a security staff is a significant safety concern.

5. FIRE SAFETY – In 2002, ashes fell onto the neighborhood from the Santana Row fire, which resulted in over \$100 million in damages. According to OSHA, “The options available for attacking a fire increase when a building’s perimeter becomes more accessible to fire apparatus...ideally the full perimeter would be accessible; however, this is not always feasible.” These developments on appropriately sized lots along Winchester have clearly marked fire lanes: A Grace Subacute, 1250 S. Winchester; Lynhaven Apartments, 919 S. Winchester; Villa Cortina, 801 S. Winchester. The Winchester Hotel Plan on the shallow lots leave no room for fire lanes; instead of fire lanes, hose paths are proposed around the sides and back as part of an Aerial Fire Plan (OSHA manual p14; Mercury News article on Santana Row fire). In a Memorandum dated 10/11/19 to Planning Dept Project Manager Michelle Flores from Gordana Sabatelli, San Jose Fire Department, she wrote that “The applicant has the option to apply for a Fire Department Variance to mitigate deficiencies noted in this Section. The Variance must be approved prior to Planning Approval.” Why has the Variance been deferred when it was clearly stated by the SJ Fire Dept that it “must be approved prior to Planning Approval”. The use of hose paths instead of Fire Access Lanes is a change to what other developments along Winchester Blvd have complied with up to this point. We believe this is a safety concern.

6. PEDESTRIAN/BICYCLIST RISK FROM DRIVEWAYS CROSSING THE SIDEWALK FOR THE GARAGE AND LOADING ZONE

Urban Village Vision: “Parking structures should not be visible from Winchester Boulevard.” and “Reduce pedestrian and vehicle conflicts by minimizing

driveways along the Primary Pedestrian Routes.” (Winchester Blvd Urban Village, DG-56 & DG-62)

The Winchester Hotel Plan: Parking Garage faces Winchester and driveways for both the Garage and the “Delivery and Loading Zone” cross the sidewalk. (Winchester Hotel Plan, pA.08, Rev-1; 11/01/2019) *“There may be brief moments when vehicles exiting and entering the parking garage would block the sidewalk. However, it is anticipated that delays to pedestrians on the sidewalk would be relatively brief and it would not impact traffic operations on Winchester Boulevard...**Recommendation:** Appropriate visible and/or audible warning signals should be provided at the garage entrance to alert pedestrians and bicyclists of vehicles exiting the parking garage.”* (Project Documents, Appendix H, Transportation Analysis, p.46) **Hexagon Transportation Analysis was working off the Hotel Plan dated 11/01/2019, which did not take into account the adjacent driveway for the on-site Delivery and Loading Zone for small trucks. We believe this is a safety concern that was not analyzed by the Hexagon Transportation Analysis.**

7. Guest and Valet Drop/Pick-up Zone Operations

To mitigate traffic issues related to the use of twenty-four two car mechanical parking lifts, the recommendation made by Hexagon Transportation Consultants, Inc. (“Hexagon”) in their 1212 South Winchester Hotel Development Transportation Analysis (“Transportation Analysis”), that a minimum of two to three valet staff would be required on site during the peak morning and afternoon periods, was not followed by the developer.

This issue which was listed in Item 4.17 of the Mitigated Negative Declaration Report as having a Non-CEQA Effect is not correct. The Developer’s decision to include only one parking valet in their Operations Plan has a direct negative effect on the following TRANSPORTATION/TRAFFIC CEQA related areas;

Pedestrian Access, Emergency Access, Bicycle Lanes, Traffic Safety, and Delivery Access. **The impact of this deviation from Hexagon’s recommended mitigation measures has not been evaluated by Hexagon nor is included in the current Mitigated Negative Declaration Report.**

8. 27' WIDE DRIVEWAY AREA CROSSING THE SIDEWALK EXPANDED TO 43'

“Vehicular access to the subterranean garage would be provided from a right in/right out” driveway adjacent to a second driveway for small trucks adjacent to the loading and delivery zone to the south. (Memorandum, City Council Staff Report, p.3; driveways posted on Winchester Urban Village Plan A.08) **Hexagon Transportation Analysis did not take this into consideration. As shown on page 47, it was relying on the Winchester Hotel Plan dated 11/1/19, which did not have the second driveway.** (The Hexagon Transportation Analysis addressed the Drop-Off and Load Space areas that were being located on the street.) **We believe that the Hexagon Transportation Analysis should have been updated to assess the impact on pedestrian/bicycle safety with the additional vehicles crossing the sidewalk and the added congestion due to the Drop Off Center inside the garage as to how that will affect more vehicles backing up onto the sidewalk. We believe this is a safety concern that was not analyzed by the Hexagon Transportation Analysis.**

9. TRAFFIC ON WINCHESTER AND PAYNE

“Based on the ITE (Intersectional Operations Analysis) rates with trip reductions, the proposed hotel development would generate a total of 1,266 daily vehicle trips, with 64 trips (37 inbound and 27 outbound) occurring during the AM peak hour and 75 trips (37 inbound and 38 outbound) occurring during the PM peak hour. (Transportation Analysis, p. 26)

Vehicular access to the project site at its proposed driveway would be restricted to right-in/right-out turn movements only due to the existing median along Winchester Boulevard. Therefore, inbound project traffic from southbound Winchester Boulevard would be required to proceed past the project site and make a U-turn at the Payne Avenue intersection. Similarly, outbound project traffic that is bound for southbound Winchester Boulevard would be required to exit the project driveway and proceed north along Winchester Boulevard to make a U-turn at the Fireside Drive intersection. It is anticipated that this driveway would serve approximately 64 AM peak hour trips (37 inbound and 27 outbound) and 75 PM peak hour trips (37 inbound and 38 outbound) (Transportation Analysis, p 46) **How does the Planning Dept assess the impact**

of this on pedestrian and bicycle activity? How will this impact the “Potential Mid-Block Crossing” located at the southern edge of 1224 S Winchester? (Urban Village Plan, Figure 4-1, p35) This is an impediment to pedestrian enjoyment and safety.

10. COMPATIBILITY OF BUILDING HEIGHT, PLACEMENT AND SCALE One of the major elements of the Urban Design Framework Placement and Scale (Urban Village P.51).

a) Although a 6 story 65 ft structure requires a 40 ft setback next to residential properties, the Winchester Hotel Plan reduces the height by 5 inches to move 50% closer to the rear fence, now a 20-foot setback.

b) Rear/Side setbacks apply when located adjacent to Residential/Neighborhood or Urban Residential land use designations. Because the Urban Village Plan changed the Land Use Designation along this section of Winchester to Neighborhood/Community Commercial, the hotel plan is being allowed a 6 ft side setback next to the family next door. They have owned their home over 30 yrs. (Urban Village Plan, p.64) **Therefore, we believe that this project does have environmental effects, which will cause substantial adverse effects on human beings, directly or indirectly.**

11. DISINCENTIVE FOR NEW ROOFTOP SOLAR ON ADJACENT HOMES – See Season Shade Diagrams (Winchester Hotel Plan, p. A.28, A.29) “Response N2: The California Solar Rights Act (AB 3250, 1978) and the Solar Shade Act (AB 2321, 1978) only protect existing solar panels and solar easements from trees and shrubs planted after installation of the solar panels. There is no guaranteed solar access as it pertains to new building construction...” (Project Documents, Response to Comment, Response N2, p.38) **Therefore, with regard as to whether solar panels would be possible for adjacent neighbors, we believe this project has substantial adverse effects on human beings, either directly or indirectly.**

12. IMPACT OF 91% IMPERVIOUS COVERAGE ON GROUNDWATER RETENTION (Impervious Surface: A surface on a developed parcel that prevents the land’s

natural ability to absorb and infiltrate rainfall/stormwater. Definition San Jose Council Policy 6-29, Revised 10/4/11, p.6) See “Response to Santa Clara Valley Water District” questions, one of which referenced the Valley Water 2016 Groundwater Management Plan. (Public Comments, P. 8); See Table 2 of Environmental Checklist showing Impervious Site Coverage at 91% (Initial Study, p. 12); See Winchester Hotel Plan, p. C3.0 to C4.2, regarding Grading, and Utility Plan, Draining, Stormwater Control Plan, Media Filtration Details. Details include information on operation and maintenance of the Contech Catch Basin Storm Filter. **With significant yearly droughts becoming more frequent, we believe that 91% impervious coverage does have significant negative impact on lost ground water. Is there any information stating how much water the engineered storm drain system would drain from the site?**

We appreciate your consideration of this matter and look forward to a positive response to our objections to the negative environmental impact of the hotel plan on our neighborhood. We hope to participate in a process that results in an appropriate development that fulfills the vision of the Winchester Boulevard Urban Village, a project that meets the City’s economic and tax base growth objectives, an acceptable outcome for the Developer and the creation of appropriate smaller commercial businesses with a strong connection to, and provide services and amenities for, the community.

Sincerely,

Gaz Salihue & Shehana Marikar, [REDACTED]

Tom & Gail Morman, [REDACTED]

Hal Stone, [REDACTED]

Jeffrey and Jacqueline Williams, [REDACTED]

Brian & Helen Matsumoto, [REDACTED]

Mike & Galina Drabkin, [REDACTED]

Mabel Cheng, [REDACTED]

ATTACHMENTS

1. Gaz Salihue & Shehana Marikar
2. Jeff Williams
3. Mabel Cheng
4. Brian & Helen Matsumoto

On-Line Sources

1. Winchester Boulevard Urban Village Plan [government/departments/planning-building-code-enforcement/planning-division/citywide-planning/urban-villages/approved-urban-village-plans](http://www.sanjoseca.gov/your-government/departments-planning-building-code-enforcement/planning-division/citywide-planning/urban-villages/approved-urban-village-plans)
2. Initial Study labeled "1212 S Winchester Blvd Hotel Project IS MND" in Project Documents
3. Project Documents:
<https://www.sanjoseca.gov/your-government/departments-offices/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/negative-declaration-initial-studies/1212-1224-south-winchester-boulevard-hotel-project>
4. Mercury News article "Santana Row fire facts" :
<https://www.mercurynews.com/2012/08/18/santana-row-fire-facts>
5. OSHA, Fire Service of Buildings and Fire Protection Systems, p14 <https://www.osha.gov/sites/default/files/publications/OSHA3256.pdf>

1 April 2022

To: San Jose Planning Commission

Subject: Appeal of Special Use Permit

Ref. Planning Director Hearing on Wednesday March 23, 2022, Agenda Item #4 (SP20-016)

1212-1224 S. Winchester Blvd., San Jose

Dear Mr. Chairperson and Members of the San Jose Planning Commission

We are residents of the Hamann Park neighborhood that would be impacted by this project. Many of us worked with the City in developing the Winchester Boulevard Urban Village Plan and were supportive of this engagement. We are aware of the City's economic goals and tax base objectives and very much support the City's efforts to attain some balance in the tax base/services delivery.

We also support hotel development, but this site stands out as inappropriate. This site has smaller, shallow parcels that will have a negative environmental impact on the neighborhood.

Our concerns with many of the Municipal Code Findings listed below are addressed in the attached documents.

Per San Jose Municipal Code 20.100.820 Findings:

- A. In addition to any findings required by any other section of this title, the director, planning commission or city council as appropriate, may issue a special use permit only if all the following findings are made:
 - 1. The special use permit, as approved, is consistent with and will further the policies of the general plan and applicable specific plans and area development policies; and
 - 2. The special use permit, as approved, conforms with the zoning code and all other provisions of the San José Municipal Code applicable to the project; and
 - 3. The special use permit, as approved, is consistent with applicable city council policies, or counterbalancing considerations justify the inconsistency; and
 - 4. The proposed use at the location requested will not:
 - a. Adversely affect the peace, health, safety, morals or welfare of persons residing or working in the surrounding area; or
 - b. Impair the utility or value of property of other persons located in the vicinity of the site; or
 - c. Be detrimental to public health, safety, or general welfare; and

5. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this title, or as is otherwise required in order to integrate the use with existing and planned uses in the surrounding area; and
 6. The proposed site is adequately served:
 - a. By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate; or by other forms of transit adequate to carry the kind and quantity of individuals such use would generate; and
 - b. By other public or private service facilities as are required.
 7. The environmental impacts of the project, including but not limited to noise, vibration, dust, drainage, erosion, storm water runoff, and odor which, even if insignificant for purposes of the California Environmental Quality Act (CEQA), will not have an unacceptable negative affect on adjacent property or properties.
- B. The director, planning commission, or city council as appropriate, shall deny the application where the information submitted by the applicant and/or presented at the public hearing fails to satisfactorily substantiate such findings.

We appreciate your consideration of this matter and look forward to a positive response to our objections to insufficient findings for the hotel permit in our neighborhood. We hope to participate in a process that results in an appropriate development that fulfills the vision of the Winchester Boulevard Urban Village, a project that meets the City's economic and tax base growth objectives, an acceptable outcome for the Developer and the creation of appropriate smaller commercial businesses with a strong connection to, and provide services and amenities for, the community.

Sincerely,

Gaz Salihue & Shehana Marikar, [REDACTED]

Mabel Cheng, [REDACTED]

Mike & Galina Drabkin, [REDACTED]

Brian & Helen Matsumoto, [REDACTED]

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Attachments:

1. Gaz Salihue & Shehana Marikar
2. Jeff & Jackie Williams
3. Mabel Cheng
4. Brian & Helen Matsumoto
5. Tom & Gail Morman
6. Mike & Galina Drabkin
7. Cover Letter for the Environmental Appeal (without attachments)

1 April 2022

To: San Jose Planning Commission

Subject: Appeal of Special Use Permit

Ref. Planning Director Hearing on Wednesday March 23, 2022, Agenda Item #4 (SP20-016) 1212-1224 S. Winchester Blvd., San Jose

Dear Members of the Planning Commission:

We are the residents of the Hamann Park neighborhood that would be impacted by this project. Many of us worked with the City in developing the Winchester Boulevard Urban Village Plan and were supportive of this engagement. We are aware of the City's economic goals and tax base objectives, and very much support the City's efforts to attain some balance in the tax base/services delivery.

We request the Commission's attention to review several problematic aspects of the Special Use Permit, which was approved last week for demolition and subsequent construction at this site. We appeal to the Commission to properly and promptly address these issues before considering any additional permit requests for this site. These issues were raised in writing and in public comments at the Director's hearing reference above.

Special Use Permit (page 3)

Attractive City Policy CD-1.1:

Require the highest standards of architectural and site design, and apply strong design controls for all development projects, both public and private, for the enhancement and development of community character and for the proper transition between areas with different types of land uses.

The construction of a 6 story project adjacent to a residential neighborhood does not enhance or develop community character.

Compatibility Policy CD-4.9:

For development subject to design review, ensure the design of new or remodeled structures is consistent or complementary with the surrounding neighborhood fabric (including but not limited to prevalent building scale, building materials, and orientation of structures to the street).

Analysis: *The project would facilitate the redevelopment of an underutilized site with a commercial land use designation. The hotel is designed to be compatible with the established neighborhood to the east as well as the commercial corridor along South Winchester Boulevard. The building massing is oriented towards South Winchester Boulevard. The building is set back 20 feet from the rear property line. Additionally, the building would incorporate a setback at a height of 35 feet to reduce shadows and maintain the privacy of the adjacent residences. Blank walls would be mitigated with variations in color and materials as well as the addition of landscaping to the perimeter of the site. Materials would be varied, including natural wood paneling, architectural glazing, white sand stucco, and exposed gray concrete. The project would also include a 49 percent parking reduction and alternative parking arrangement (vehicle stackers). The parking reduction would be supported by a TDM plan to reduce vehicle trips and encourage multimodal transportation*

This proposed 6 story structure is not consistent or complementary with the surrounding neighborhood especially in building scale in terms on the surrounding one and two story single family homes. The planning staff have repeatedly ignored our concerns as the family that lives in the single family residence north of the proposed project with a mere 5 foot side setback. This setback is in violation of the **San Jose Municipal Code 20.40.270 - Side setback - Exceptions, interior lot.**

Notwithstanding the provisions of Section 20.40.200, in the CP commercial district, a building side setback shall be required for interior lots on that side of each such lot which abuts on the side of a lot situated in a residence district, in which case the side setback requirements shall be a minimum of ten feet.

The comments by the planning department staff in their analysis talks about the 20 foot setback from the residences to the east of the project and the setback at 35 feet to reduce shadows on the same residences but there are no mitigation measures for the shadow that will be cast on the property to the north in the autumn and winter months.

Special Use Permit (Page 4)

4. Winchester Boulevard Urban Village Conformance

Land Use Designation

The Winchester Boulevard Urban Village was adopted by City Council on August 8, 2017 (Resolution No. 78306). The subject site has a land use designation of Neighborhood/Community Commercial on the land use plan of the Winchester Boulevard Urban Village. This designation is applied to smaller, shallow parcels fronting Winchester Boulevard and abutting single-family residences. Given the size of the parcels, parking requirements in the zoning code and the urban design step down policies, these properties are appropriate for the location of smaller commercial businesses. Neighborhood/Community Commercial uses should have a strong connection to, and provide services and amenities for, the community. These uses should be designed to promote this connection with an appropriate urban form that supports walking, transit use and public interaction. Also, this designation supports the neighborhood servicing retail and small businesses along Winchester Boulevard.

Land use designation of Neighborhood/Community Commercial is supposed to be for small commercial businesses that would serve the surrounding community. This hotel does not fit the land use designation for this location based on the Winchester Urban Village Plan.

Special Use Permit (Page 8)

Structures

o Transitions between existing and new buildings should be gradual. The height and mass of new projects should not create abrupt changes from those of existing buildings.

There is no gradual change in height or mass associated with this project. When one single story and one two story building is replaced with a six story building that does create a huge and abrupt change for the neighborhood of mostly residences.

o Loading areas, access and circulation driveways, trash, and storage areas and rooftop equipment should be located as far as possible from adjacent residences and should

never be located next to residential properties without fully mitigating their negative effects.

Analysis: The rear of the building would be set back 20 feet from the residential area to the east. Additionally, the building would incorporate a stepback at a height of 35 feet to reduce shadows and maintain the privacy of the adjacent residences. Blank walls would be mitigated with variations in color and materials as well as the addition of landscaping to the perimeter of the site. Materials would be varied, including natural wood paneling, architectural glazing, white sand stucco, and exposed gray concrete. All loading and trash facilities would be located in an enclosed loading and service area located at the southern end of the building along South Winchester Boulevard.

Based on the project diagrams (Appendix A Project Plans) trash facilities are located to the north of the proposed project adjacent to a single-family residence. There are no mitigation measures in place for trash facilities that would be located adjacent to a single-family residence with a 5 foot setback. There are health and hygiene concerns that have not been addressed by the planning staff about the placement of trash facilities adjacent to a residence. How large are the dumpsters that would need to be rolled out to the street for trash pick up? What are the mitigation measures for the noise created by rolling the dumpster to the street for trash pick up?

Is there sufficient setback to roll these dumpsters out? Would they impede the fire hose paths that are to be located on the property? We would urge the Planning Commission to follow up on all of these issues before letting this project move forward as proposed.

Special Use Permit (Page 9)

Landscaping

o All areas not covered by structures, service yards, walkways, driveways, and parking spaces should be landscaped.

o The perimeter of the site should be landscaped to provide parking lot screening, a buffer for adjacent uses, and an attractive view from the street.

o A mixed planting of trees, shrubs, and groundcover in the area between buildings and the sidewalk should be included

Analysis: The project includes a detailed landscaping plan. Nine existing trees would be preserved on-site. An additional 46 new trees would be planted on site. Street trees would be planted along the project frontage along Winchester Boulevard and trees would be planted along the perimeter of the site to further soften the transition between the existing residences and the hotel.

The setback to the north is 5 feet and 6 feet to the south. So the analysis provided by the planning department staff is either inaccurate or misleading as there is no space for trees. None of the project drawings show trees along the north and south of the proposed project. There is no softening of a transition especially for the single family residence to the north of the hotel.

10. Special Use Permit Findings. Chapter 20.100 of Title 20 of the San José Municipal Code

d. The proposed use at the location requested will not:

i. Adversely affect the peace, health, safety, morals, or welfare of persons residing or

working in the surrounding area; or

Can the city guarantee this hotel project would not impact the peace, health, safety, morals or welfare of persons residing or working in the surrounding area? It is a monumental claim considering the multiple concerns that have been brought by the neighbors about the negative impacts of this project in terms of peace, health, safety and welfare of the surrounding community.

ii. Impair the utility or value of property of other persons located in the vicinity of the site;

What metrics were used by the city staff to make this arbitrary judgment? Did the city staff consult with an expert in this area to make this conclusion? If so, we would like to see those reports. It is a bold statement made with no facts or figures to back it up.

iii. Be detrimental to public health, safety, or general welfare; and

The traffic that this hotel would create is a public safety issue for the pedestrians and bicyclists who use Winchester Blvd. The inadequate parking at the hotel will create overflow of vehicles to the surrounding neighborhood and impact public safety of the students at Castlemont Elementary and residents alike.

10. Special Use Permit Findings. Chapter 20.100 of Title 20 of the San José Municipal Code

e. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this title, or as is otherwise required in order to integrate the use with existing and planned uses in the surrounding area; and

Analysis: As discussed above, the project site is adequate in size and shape to accommodate the development features in order to integrate the hotel use with the surrounding area as well as the planned uses and building forms as envisioned in the South Winchester Urban Village Plan

The proposed site is not adequate considering it lacks the minimum 10 foot side setback required to the single-family residence to the north, as required in the ***San Jose Municipal Code 20.40.270 - Side setback - Exceptions, interior lot.***

17.12.120 - Local Amendments to the 2019 California Fire Code.

The provisions of this Chapter shall constitute local amendments to the cross-referenced provisions of the 2019 California Fire Code and shall be deemed to replace the cross-referenced sections of the 2019 California Fire Code with the respective provisions set forth in this Chapter.

Findings

The amendments set forth in 17.12 are reasonably necessary because of the following local geological, topographical and climatic conditions:

I.

The City of San José is located within a very active seismic area. Severe seismic action could disrupt communications, damage gas mains, cause extensive electrical hazards, and place extreme demands on both private fire protection systems and equipment. The limited and widely dispersed resources of the Fire Department could result in failure to meet and provide the fire protection and life safety needs of the community.

II.

The local geographic, topographic and climatic conditions pose an increased hazard in the acceleration, spread, magnitude, and severity of potential fires in the City of San José, and may cause disruptions in operation of private fire protection systems and equipment and delayed fire response time, allowing for further fire growth and spread.

The lack of a report from the San Jose Fire Department prior to the approval of the Special Use Permit, shows the disregard of the Planning Department in terms of the safety of the surrounding residences and the larger community. Considering the local geography and San Jose being a very active seismic area.

We appreciate your attention to these concerns.

Gaz Salihue & Shehana Marika

1204 S. Winchester Blvd, San Jose

1 April 2022

Subject: Appeal of Special Use Permit
Regarding: Planning Director Hearing of Wednesday March 23, 2022,
Agenda Item #4 (SP20-016) 1212-1224 South Winchester Boulevard Hotel Project

Dear Members of the Planning Commission:

We are submitting this letter of appeal on behalf of the residents of the Hamann Park neighborhood that would be impacted by this proposed hotel. Please note that in submitting this appeal we strongly support one of the key tenets of the Winchester Boulevard Urban Village Plan that "New development within the Urban Village should be well integrated within, and respectful of, and compatible with adjacent existing neighborhoods".

The lack of parking and whether the project is truly in compliance with the City of San Jose Parking Code (Special Use Permit, Page 6) are significant areas of concerns for us. We are specifically concerned that the calculation for the reduction in the required off-street vehicle parking spaces, referred to in the Project documents as the "TDM Reduction Request", has not received the appropriate amount of independent analysis and verification. Up until now the Planning Department has relied on the Developer's representation in the project's Operations Plan to corroborate the number of workers on-site that was used in the TDM Reduction calculation. However, we have made the Planning Department aware on more than one occasion (See Attached Letters) that the Developer's Operations Plan 1) does not include a shuttle driver (that is listed in the planning documents), 2) only includes one valet, not the 2-3 valets Hexagon indicated would be required to mitigate traffic issues, 3) the total number of housekeepers included (6) which industry experts have told us is insufficient to support this 119 room hotel and 4) the shifts for the housekeeping staff were set to keep workers on-site during any shift to no more than ten, which was clearly stated by the Developer in the Operations Plan, and is not reflective of hotel industry operating norms and standards. Therefore, we strongly believe the Developer's Operations Plan as submitted understates the number of workers on-site. If that is the case, **the submitted TDM Reduction calculation of 49% is incorrect.**

The gist of the responses we have received addressing the Operations Plan deficiencies noted above have been that the Planning Department solely relies on the Developer's representations and that there is a TDM Plan in place. Even after being made aware of our concerns, they have not addressed the fundamental question - Is the number of workers on-site that was used for the TDM Reduction calculation correct?

As stated in Section 20.90.220 of the San Jose Parking Code a TDM Reduction Request can be "up to fifty percent". (49% would then be the maximum allowable) So, if the TDM Reduction calculation is greater than the amount allowable under the Code the project could not be approved. However, if the TDM Reduction request is 21% to 49%, then a TDM Plan is required for the project to be approved. Therefore, following the Parking Code requirements, the required first step is that a TDM Reduction calculation be completed to determine if the project qualifies for a reduction in the required off street parking spaces.

Only then if the project does qualify for a reduction in the required off-street vehicle parking spaces, a TDM Plan has to be developed and implemented that mitigates the project's reduced amount of parking. The TDM Plan outlines the mitigation actions that deal with the parking and transportation issues resulting from projects with a 21% to 49% TDM Reduction Request and only comes into play after the TDM Reduction calculation is completed. The TDM Plan actions should not be taken into account when determining the maximum number of workers on-site during any shift when the TDM Reduction calculation is prepared. For example, even if a valet, housekeeper or shuttle driver is dropped off to work his/her shift, they are on-site and should be included in the TDM Reduction calculation. A worker physically at the hotel during any shift is a worker on-site, and all workers on-site should be counted when preparing the TDM Reduction calculation. Not counting them would be akin to saying that since a hotel guest may arrive in an Uber, the number of hotels rooms used in the TDM Reduction calculation could be reduced.

So, we ask - Doesn't the Planning Department have a fiduciary responsibility to the citizens of San Jose to thoroughly investigate our concerns with the deficiencies in the Developer's Operations Plan to ensure that the TDM Reduction request calculation is accurate and in compliance with the City of San Jose Parking Code prior to approving this project?

We request the Planning Commission delay the approval of the Special Use Permit for this project and require that the Planning Department complete a thorough and independent analysis of the validity and accuracy of the Developer's Operations Plan. We also request that the results of analysis be presented to the neighborhood and the Planning Commission before any decision is made to approve any permit related to this project.

We appreciate your attention to these concerns.

Respectfully,

Jeffrey Williams
Jacqueline Williams
1216 Castlemont Avenue, San Jose

Concerned Residents and Neighbors of the Hamann Park Neighborhood

March 10, 2022

Regarding: 1212-1224 South Winchester Boulevard Hotel Project
File Nos. C19-031 & SP20-016
Subject: TDM Reduction Request

To Chris Burton the Director, Planning, Building & Code Enforcement
of the City of San José, California:

We the Residents and Neighbors of the Hamann Park neighborhood need to make you aware of critical concerns we have regarding the validity and accuracy of the calculation of the TDM Reduction Request and the related marketability of the Proposed Hotel Project at 1212-1224 South Winchester Boulevard ("Hotel Project").

To be clear, we support the Winchester Boulevard Urban Village Plan and the land use designation of the shallow plots located at 1212 & 1224 South Winchester Boulevard as Neighborhood/Community Commercial. We also feel very strongly that any development of those properties should meet the essence of their land use designation description of being appropriate for the location of smaller commercial businesses that have a strong connection to, and provide services and amenities for, the community. And that any development of those aforementioned properties, especially for a purpose-built building, be developed to comply with common industry operating standards and provide the opportunity for a successful business operation.

For this hotel project to proceed, the developer is asking for the maximum TDM Reduction of 49% that is allowable under the City of San Jose Parking Code, Section 20.90.220.A.1. To achieve that TDM Reduction number of 49%, the developer has committed in the Project Plans (as noted on Sheet A.02 Project Information and Tables) and in the Project Operating Plan (see Attachment A to this document) to having no more than 10 employees on site at any time. **With 119 rooms and only 66 parking spaces in the Project Plan, a maximum of 10 employees is the key number that allows the Developer to achieve a TDM Reduction calculation of 49% and meet the requirements of the City of San Jose Parking Code.**

The developer of this Hotel Project has repeatedly told us that to actually operate this hotel he is targeting Marriott, Hyatt, Hilton, etc. However, we believe that the Project Operating Plan that the developer has submitted to support the TDM Reduction calculation, in which he clearly stated "Employee staffing plan above is intended to minimize employee parking to no more than 10 parking spaces.", is seriously flawed and will not allow the any of above-named hotel operators to successfully run the hotel with a maximum of only 10 employees on site at any time. Based upon independent research, which is discussed below, and after reviewing the 1212 South Winchester Hotel Development Transportation Analysis ("Transportation Analysis") and the Transportation Demand Management Plan ("TDM Plan"), both of which were prepared by Hexagon Transportation Consultants, Inc. ("Hexagon") specifically for this project, we believe **the Project Operating Plan is deficient in the following areas:**

Housekeeping

First, after independently consulting housekeeping staffing specialists Hospitality Staffing Solutions, LLC and Cappstone, Inc., as well as reviewing published Rooms/Housekeeper guidelines, the average high-end hotel cleaning expectation is **15 rooms per housekeeper per shift**. 119 rooms divided by 15 rooms per person **means that 8 housekeepers are required for this property**. (In addition to servicing guestrooms, Housekeeping must maintain the laundry, lobby area, fitness center and locker rooms, lobby bathroom, jacuzzi area, employee break room and lockers, restaurant area after breakfast hours and other common areas available to guests and staff.) The submitted Project Operating Plan **only** includes 6 housekeeping staff. and is **understated by 2**.

Second, the Project Operating Plan has the 6 housekeeping staff that are included split across two shifts with 3 housekeepers working during the 6:00 AM to 3:30 PM time frame and 3 working from 3:00 PM to 12:30 AM. The **common industry standard** is housekeeping staff work from 7:00 AM to 4:00 PM, give or take one hour, and that **all rooms are serviced by 4:00 pm**. The Developer's housekeeping shift allocations would have a significant number of **rooms being serviced between 8:00 PM and Midnight which is way outside industry norms adhered to by companies such as Marriott, Hyatt, Hilton, etc.**

To bring the Project Operating Plan into compliance with standard industry norms **2 additional housekeeping** staff need to be added to the 6:00 AM to 3:30 PM time frame and the **3 housekeepers working the 3:00 PM to 12:30AM shift need be moved to the day shift.**

Parking Valets

On page 49 of the Transportation Analysis (see Attachment B), Hexagon recommended that “..a **minimum of two to three valets** be present during the peak arrival/departure periods for the hotel.” Since this Hotel Project will have 100% valet parking, Hexagon's recommended staffing level will allow the hotel to meet the demands for car retrieval during the AM go to work/checkout hours as well as during the PM hours to help prevent cars from blocking traffic lanes as guests return and/or check-in.

After reading Hexagon's recommendation we contacted ABM Parking Services to validate Hexagon's recommendation. ABM indicated that the stacked parking systems being used in this project take much longer for valets to park and retrieve guest vehicles. Therefore, to prevent long morning wait times for guest cars to be retrieved and to prevent cars from backing up and blocking traffic in the late afternoon/evening, they too recommended that **at least 2 Valets**, possibly 3, be on staff during those critical times.

The Project Operating Plan **ignores Hexagon's recommendation** and **has only has 1 Valet on site at any time. This is clearly insufficient.**

Guest Shuttles

The TDM Plan commits, on page 13 (see Attachment C), that as part of the developer's mitigation measures the proposed project would offer free shuttles to guests. The Project Operating Plan provided by the Developer **does not include any Shuttle Drivers and does not comply with the submitted TDM Plan**. In order to deliver on the free shuttles as stated in

the TDM Plan the hotel will **need at least 1 shuttle driver, most likely 2**, available during the morning and evening rush periods, especially for airport runs.

In summary the submitted Project Operating Plan is **deficient in three significant areas**.

1. The **number of housekeepers** provided for in the Project Operating Plan is **insufficient and the split across two shifts that it has them working does not meet common hotel industry standards**.
2. The developer **is not following the recommendations for the number of parking valets** made in the 1212 South Winchester Hotel Development Transportation Analysis ("Transportation Analysis").
3. The developer **is not providing staff for the Guest Shuttle Service** as committed to in the Transportation Demand Management Plan ("TDM Plan").

We believe that in order for companies such as Marriott, Hyatt, Hilton, etc., or frankly any reputable hotel operator, to successfully run this proposed hotel within industry norms the hotel operator will need move to 3 Housekeepers from the night shift to the 6:00 AM to 3:30 PM shift and add 2 additional Housekeepers, bringing the total up to 8 during the day shift. Also, they will have to add at least 1 additional Valet to fulfill the minimum parking staff required in the morning and evening. They will also need to add at least 1 Shuttle Driver to the 6:00 AM to 2:30 PM shift and the evening shift to meet the TDM mitigation measure that has been committed to in the TDM Plan. Making these required staffing adjustments means there **will be at least 17 employees on site during the day, not 10** as per the submitted Project Operating Plan. **Therefore, the actual TDM Reduction that would be required for this project which has 119 rooms and only 66 parking spaces is at least 52%** which exceeds the percentage of reduction allowable under Section 20.90.220.A.1 of the City of San Jose Parking Code. As such, we can only conclude the marketability of this project as submitted by the developer is seriously at risk, if not unfeasible.

Please note that in addition to the staffing concerns discussed above, we are still unclear as to how the Developer plans to handle positions supporting security, accounting and the TDM Coordinator specifically noted in the TDM Plan. If any of these services require additional personnel on-site the TDM Reduction for this Hotel Project will only increase.

Additionally, we are very concerned that an unintended consequence of this deficient Project Operating Plan is that the City will incur legal risk if the Hotel Project is approved. It is clear that a key factor at the heart of this issue is the amount of parking that this Hotel Project is proposing. When we have brought this point up to the developer, he responds by telling us that the City Planning Department doesn't want parking. When we bring up the staffing issues listed above, he says the Planning Department has reviewed everything and supports his TDM Reduction Request calculation, as evidenced by the past submission to the City Council Agenda. We have also proposed that perhaps the developer consider an alternative project such as neighborhood friendly retail with condos above that might fit better with the shallow lot parking challenges. His response is that the City Planning Department wants a hotel, not retail/commercial with housing above.

Our neighborhood group considers the concerns that we have with the validity and accuracy of the calculation of the TDM Reduction Request to be of such a critical nature that we respectfully request to have a written response explaining why the above listed issues were not taken into account when the Planning Department reviewed and validated the TDM Reduction Request calculation. Please send the written response to tom.r.morman@gmail.com our neighborhood point person.

Additionally, as the Project Operating Plan for this proposed hotel is such a critical factor which not only affects the calculation of the TDM Reduction Request and its compliance with the City of San Jose Parking Code, but also has a significant impact on the marketability and successful operation of this purpose-built building, we ask that the Planning Department not approve this Hotel Project as submitted. We also request that any resolution of the aforementioned issues discussed above be openly presented to the community at least 30 days prior to considering this project for approval.

In the spirit of full transparency, please note that we are copying the Mayor's office and the office of our District 1 City Council member to inform them of our critical concerns regarding the Project Plan deficiencies and the questionable accuracy of the related TDM Reduction Request calculation.

We look forward to hearing from you.

Respectfully,

Tom Morman
Gail Morman
1242 Redoaks Drive
San Jose, CA 95128

Vince Navarra, President
Hamann Park Neighborhood Association
915 Harrison Avenue
Campbell, CA 95008

Seshadri Sathyanarayan

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Wayne Lowry
Linda Lowry
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San Jose, CA 95128

ATTACHMENT A

1212-1224 South Winchester Boulevard Hotel Project

Operations Plan

Operations Plan 1212-1224 S. Winchester Blvd Hotel

Days & Hours of Operations: Seven days a week / 24 hours.

Employee Staff/ Shifts: see attached.

Security: Cameras plus security guard (s) as needed.

Alcohol services: On-site only. License ABC-221 General.

Food service: Coffee Shop and Bar. Approximately 750 square feet

Loading & Delivery Operations: Provided adjacent to garage entry City to set permitted hours of operation.

Valet Parking Operations: Located in the basement level. Staff will greet guest and park the hotel guests vehicle, and retrieve guests vehicle for departure.

Rideshare Drivers and Taxis: Pickup and drop off riders is provided on-site. Drivers will enter the garage to the point of turnaround and drop off and pickup.

Noise: The building is 35 feet from the rear residential use with a 59-50 dba measurement.

Trash Operations: Covered trash enclosure and recycle bins are located within the building on the north side and will be wheeled to the street frontage for pick up and return.

Filed 9/27/21

Winchester Hotel Employee Staff

10 Positions - Up to 3 Shifts

Hotel Manager & Assistant - 2 Shifts 5:00 am-1:30pm - Manager 2:00pm - 10:30 pm - Asst. Manager	
Front Desk Reception - 3 Shifts 5:30 am - 2:00pm 2:30pm - 11:00pm 11:30pm - 5:00am	Asst. Manager covers 2:00 - 2:30 pm Manager covers 11:00 - 11:30 pm
Front Desk Reception - 1 Shift 6:00 am - 2:30pm	
Coffee Shop & Bar - 2 shifts 5:00am - 1:30pm 2:00pm - 10:30pm	Closed 1:30 - 2:30 pm
Valet & Bellman - 3 shifts 6:00am - 2:30pm 3:00pm - 11:30pm 12:00pm - 5:30am	Maintenance staff will cover hours of 2:30 - 3:00 pm, 11:30 - 12:00 am & 5:30 - 6:00am
Housekeeping - 2 shifts 6:00am - 2:30pm 3:00pm - 11:30pm	
Housekeeping - 2 shifts 7:00am - 3:30pm 4:00pm - 12:30 am	
Housekeeping - 2 shifts 6:00am - 2:30pm 3:00pm - 11:30pm	
Maintenance Staff - 2 shifts 5:00 am - 1:30pm 2:00pm -10:30pm	
Breakfast Room - 1 shift 5:30am - 12:00pm No room service	Breakfast hours 6:30 - 10:30 am

Notes

Employee staffing plan above is intended to minimize employee parking to no more than 10 parking spaces. However, employee parking will be further reduced by requiring at least 50% of employees using alternative methods of transportation as defined in the project TDM Plan, and enforced by not providing a required employee parking pass.

ATTACHMENT B

Hexagon Transportation Consultants, Inc
1212 South Winchester Hotel Project Development
Transportation Analysis, Page 49

Boulevard project frontage where garbage trucks would perform their operations outside of the development at the curb.

Guest and Valet Drop-off/Pick-up Zone Operations

The project proposes to provide an on-street drop-off and pick-up zone along its frontage on Winchester Boulevard, north of the site driveway. There is currently no on-street parking provided along the project frontage. In addition, the planned complete street improvement of Winchester Boulevard would provide two travel lanes with a Class IV bike lane and no on-street parking along the project frontage. Also, since the guest/valet drop-off/pick-up area will be located on a public street, the area will not be restricted to the use of only the hotel and may not be available for guest/valet use at all times. Therefore, the City may not be supportive of the loading zone along Winchester Boulevard and may require that the loading area be moved on-site. The project should work with the City to determine the feasibility of the proposed passenger loading zone on Winchester Boulevard.

Based on the estimated trip generation, a maximum of 37 inbound trips would need to be served at the proposed guest and valet drop-off/pick-up zone along Winchester Boulevard during the PM peak-hour, or approximately one vehicle every 1.5 minutes. The number of vehicles that can be served at the valet drop-off/pick-up zone will depend on the proposed valet parking operations. However, it is recommended that a minimum of two to three valet staff be present during the peak arrival/departure periods for the hotel. In addition, vehicles should not be retrieved in advance of guests being present at the valet area. Given the limited storage space for valet operations along Winchester Boulevard, the valet area should not be used for transportation network companies (TMCs) such as Uber, Lyft, etc. while waiting for customers.

The site plan does not indicate on-site designated parking spaces for guest check-in or valet drop-off/pick-up areas. The site should provide time restricted parking spaces on-site for guest check-in and a valet drop-off/pick-up area that can accommodate the storing of at least two vehicles.

Twenty-four two car mechanical parking lifts will be provided within the basement parking level. The parking lifts would extend outward onto the drive aisle while parking or retrieving a vehicle from the upper level of the lift. Parking and retrieving vehicles from the mechanical parking lifts would momentarily interfere with vehicular circulation as most of the drive aisle would be blocked by the extended lift. However, all parking operations will be operated by valets who will be familiar with the operations of stacker parking lifts. The project should work with City staff to ensure that specific requirements for the valet operations and mechanical lifts are met.

Recommended Site Access and On-Site Circulation Improvements

Winchester Complete Street Improvements. The Winchester Boulevard Urban Village Plan identifies the following complete street improvements along Winchester Boulevard:

- Protected bike lanes along both sides of Winchester Boulevard. The bike lanes will be physically separated from vehicle travel lanes.
- At least four vehicular travel lanes and two flex lanes for vehicle travel or parking.
- Construction of a raised median with limited breaks.
- In order to close the sidewalk gap on the east side of Winchester Boulevard, it is recommended that the City staff work with the owner of the adjacent property to the north to install a sidewalk per City design standards

ATTACHMENT C

Hexagon Transportation Consultants, Inc

1212 South Winchester Hotel Project Development

Draft Transportation Demand Management (TDM) Plan, Page 13

Recommended TDM Measures

The recommended TDM measures are intended to encourage hotel guests and employees to utilize alternative transportation modes available in the area to reduce single occupancy vehicle trips and parking demand generated by the project. The specific TDM measures that are recommended for the project are described below and are based on the measures specified in Subsections 20.90.220.A.1.c and d. Additionally, the project needs to ensure that the TDM plan will be maintained for the life of the project, which is in compliance with Subsection 20.90.220.A.1.e.

Bicycle Programs (Guests)

Bicycle Storage/Facility

The project will provide adequate bicycle parking per the City of San Jose Parking Code.

On-Site Bicycle Share Program

The proposed project would provide on-site bicycles for visitors to share. The bicycles would be stored in a secured common space that can be checked out by guests. Local destinations such as Westridge Valley Fair, Santana Row, and Winchester Mystery House are a short bicycle ride away from the proposed project. Inclusion of a bike share program would likely reduce the need for guests to use a car.

Guest Shuttle Services (Guests)

The proposed project would offer free shuttles to guests. The shuttle destinations would be determined based on guest preferences. It is initially thought that shuttles would serve the Mineta International Airport and downtown in San Jose. Since the proposed project is a hotel, a portion of the guests would likely be traveling through the airport. With the option of using the free shuttle, the need for a car and a parking space would be reduced. Mineta International Airport is approximately 4.4 miles driving distance from the proposed project. The shuttles may also serve other transit hubs including Diridon Station if deemed necessary by guest demand.

On-Site Car-Share Program (Guests)

The proposed project would provide on-site access to a car-sharing service such as Zipcars for hotel employees and guests. Vehicles will be located on-site allowing hotel employees and guests to come and go at their convenience. Vehicles can be reserved prior to visiting the hotel.

On-Site Paid Parking (Guests)

The project proposes to provide valet-only parking only on-site due to the presence of stacked parking lifts within the parking garage. Use of the valet service will incur an additional fee for guests, which will be added to room billings. Providing only paid parking on-site would encourage guests to utilize alternative modes of travel to the hotel, such as transit or guest shuttle service.

Free VTA Smart Passes (Employees)

The proposed project would offer free annual VTA Smart Passes for employees for the life of the project. Smart Passes would give employees unlimited rides on VTA Bus, light rail transit (LRT), and Express Bus service seven days a week. Smart Pass is deeply discounted below the standard fares, making it an attractive low-cost benefit to employees.

March 24, 2022

Regarding: 1212-1224 South Winchester Boulevard Hotel Project
File Nos. C19-031 & SP20-016

To Robert Manford the Deputy Director, Planning, Building & Code Enforcement
of the City of San José, California:

Thank you for your time at the Planning Director Hearing Wednesday morning and for allowing me the opportunity to speak. Unfortunately, you did not address the question I asked on behalf of residents of the Hamann Park Neighborhood during the staff follow-up time. And the meeting format did not allow me an opportunity to clarify what my actual question was. But, since I read from my written script, I have included it below. I respectfully request that you review my actual question and send me a written answer. I am asking this not only for myself, but also for the residents and other interested parties on the phone call who are extremely disappointed that my question was not addressed by you or your staff.

Planning Hearing question script:

"Thank you for your response to our letter dated March 10th.

I want to re-emphasize the key issue we are concerned about is the **validity and accuracy of the Developer's TDM Reduction request**. We understand that up until now the Planning Department has relied on the Developer's Operating Plan to determine the number of workers on-site when evaluating the TDM Reduction request. However, since you now have been made aware that 1) the number of workers on-site at any point per the Operating Plan may be seriously understated; 2) the Operating Plan is in conflict with the supporting project documents; and 3) the Operating Plan indicates the shift assignments were set to keep employee parking to no more than 10 spaces and those shift assignments are in conflict with hotel industry norms.

Our issues with the Operating Plan are:

1. Why the Operating Plan has not provided for any shuttle service staff that were committed to in the written TDM Plan.
2. Why the Operating Plan has provided for only 1 parking valet, which does not follow the Transportation Analysis recommendation of a minimum of 2 to 3 valets to mitigate traffic back-up.
3. Why the Operating Plan has 3 of its 6 planned housekeeping staff working from 3:00 PM until 12:30 AM, when the industry norm is that all rooms are serviced by 4:00 PM in the afternoon.
4. Why the Operating Plan has a total housekeeping headcount of 2 workers less the industry norm of 8 housekeepers for a 119-room hotel.

Our question is, doesn't the Planning Department have a **fiduciary responsibility** to the citizens of San Jose to thoroughly investigate our concerns **prior to approving this project** and to ensure that the TDM Reduction request calculation is accurate and in compliance with the City of San Jose Parking Code?"

As you can see from my script, I was not asking about the TDM Plan which is what was addressed during staff follow-up time. I was questioning **whether the TDM Reduction request calculation is correct.**

The number of workers on-site is one of the three critical items used in preparing a TDM Reduction calculation (the other two being the number of rooms in the hotel and the number of parking spaces provided) and we strongly feel that the four issues I brought up in my question during the meeting brings the accuracy of the number of workers, 10, used by the developer in their TDM Reduction request calculation into question. Especially since the Developer's TDM Reduction request is 49% and any additional workers on site would make this project exceed the TDM Reduction allowable under the San Jose Parking code and therefore ineligible for approval by the Planning Department.

Since in our March 10th letter you were made aware that 1) the number of workers on-site at any point per the Operating Plan may be seriously understated; 2) the Operating Plan is in conflict with the supporting project documents; and 3) the Operating Plan indicates the shift assignments were set to keep employee parking to no more than 10 spaces and those shift assignments are in conflict with hotel industry norms, again I ask **doesn't the Planning Department have a fiduciary responsibility** to the citizens of San Jose to thoroughly investigate our concerns to ensure that the TDM Reduction request calculation is accurate and in compliance with the City of San Jose Parking Code and not just rely without verification on the Developer's Operating Plan representation? (Especially since the Developer's TDM Reduction request is currently on the cusp of exceeding the amount allowable under the Parking Code)

To be consistent with our letter of March 10th, and in the spirit of full transparency, please note that we are copying the Mayor's office and the office of our District 1 City Council member to inform them of our continuing critical concerns regarding the questionable accuracy of the Developer's TDM Reduction Request calculation and whether further due diligence by the Planning Department will be completed to validate the worker count used.

I look forward to hearing from you.

Respectfully sent for the benefit of the many concerned residents and neighbors in the Hamann Park Neighborhood who signed the aforementioned March 10, 2022 letter sent to Chris Burton,

Jeffrey N. Williams
1216 Castlemont Avenue
San Jose, California

1 April 2022

To: San Jose Planning Commission

Subject: Appeal of Special Use Permit

Ref. Planning Director Hearing on Wednesday March 23, 2022, Agenda Item #4 (SP20-016)

1212-1224 S. Winchester Blvd., San Jose

Dear Members of the Planning Commission:

We are the residents of the Hamann Park neighborhood that would be impacted by this project. Many of us worked with the City in developing the Winchester Boulevard Urban Village Plan and were supportive of this engagement. We are aware of the City's economic goals and tax base objectives, and very much support the City's efforts to attain some balance in the tax base/services delivery.

We request the Commission's attention to review several problematic aspects of the Special Use Permit, which was approved last week for demolition and subsequent construction at this site. We appeal to the Commission to properly and promptly address these issues before considering any additional permit requests for this site. These issues were raised in writing and in public comments at the Director's hearing reference above.

Special Use Permit – General Plan Conformance

Attractive City Policy CD-1.1 (page 3) talks about design controls, applied to all development projects, for "enhancement and development of community character."

The great majority of it consists of one- and two-story single-family homes and two-story apartment buildings. The tallest structure in the immediate vicinity of the proposed project is the 3-story office building at 1245 Winchester Blvd. Hamman Park is a residential neighborhood, whose residents are frequently seen enjoying a leisurely walk or a bicycle ride through our streets. Often, these folks are accompanied by a small child or a pet. Both the award-winning Castlemont elementary school and Monroe middle school are located within a couple of minutes' walks from the project site. Many of the homeowners have lived in this neighborhood for decades.

Given the above, it is extremely difficult to understand how a 6-story hotel would enhance the character of this neighborhood. Quite the opposite, the increased noise and traffic, associated with hotel operations would negatively affect its peace and serenity. With availability of parking not currently an issue in this neighborhood, the residents and their guests would be unduly challenged to find parking spaces due to hotel guests and employees, using the same streets for free and convenient parking. Add to that the fact that as a business, the hotel does not have any connection to the community, and it becomes apparent that the community character indeed will *not* be enhanced by this project.

Special Use Permit – Special Use Permit Findings

Section 10(d) talks about what the proposed use (i.e. the Hotel) will NOT do, such as “adversely affect the peace, health, safety, morals, or welfare”; “impair the utility or value of property”; and “be detrimental to public health, safety, or general welfare” of the residents in the surrounding area. The Planning Department’s analysis that follows more or less just repeats these points, without providing any explanation of how these conclusions were arrived at.

The Hamman Park neighborhood residents strongly disagree with the above statements. In fact, it is precisely because we feel our quality of life, our safety, and values of our homes will be negatively affected by the Winchester Hotel, we have been expressing our opposition to this project for the last two years. The City needs to substantiate these claims by doing proper research and analysis, in order to convince the residents, if the community’s support indeed matters to the City.

Question, raised at the 3/23 Planning Director’s hearing:

Why weren’t Hexagon Consultants’ Traffic Analysis and TDM reports updated after several changes to the project plans, especially to the ground floor plan?

This question was not satisfactorily addressed at the 3/23 hearing. Dr. Askari’s only response was that Hexagon already performed 2 years’ worth of studies, probably implying that they’ve done enough work, and no further analysis is needed. In addition, he mentioned that the hotel operator will probably use outside companies to bring employees to the site and pick them up, and further, he mentioned likely use of QR codes for Uber services and self-driving cars in the future, alluding that this is the vision of the City Council for San Jose 10 years down the line.

Leaving aside the futuristic projections, the issue here is that when some of the main project documents, used to estimate the degree of the project’s impact on the community, are not based on the latest available project plans, the validity of the entire project is brought into question. We urge the Planning Commission to insist that Hexagon or a similar entity complete the studies, using the current project plans.

At the 3/23 Planning Director’ Hearing I specifically asked, but never received an answer, to the following question:

Where would the REPLACEMENT PARKING be in case that the project fails to maintain a TDM program? Why is that location has not been made public?

Hexagon TDM Plan, dated January 27, 2021, page 12:

- e. For any project that requires a TDM program:
- ii. The decision maker for the project application also shall first find that the project applicant will provide **replacement parking** either on-site or off-site within reasonable walking distance for the parking required if the project

fails to maintain a TDM program.

At the 3/23 Planning Director' Hearing I specifically asked, but never received an answer to the following question:

No dedicated Uber drop-off spot(s) indicated on the plans. Why is this issue not being addressed?

I would like to know where the car sharing services will be picking up and dropping off passengers.

Where would these vehicles be located on-site?

In addition, I would like to know where would Guest shuttle park? See the requirement from page 13 of Hexagon TDM study (currently, there is no location indicated on the project plans).

Hexagon TDM Plan, dated January 27, 2021, page 13:

On-Site Car-Share Program (Guests)

The proposed project would provide **on-site** access to a car-sharing service such as Zipcars for hotel employees and guests. Vehicles will be located **on-site** allowing hotel employees and guests to come and go at their convenience. Vehicles can be reserved prior to visiting the hotel.

I would very much appreciate the answers to the above questions, as those issues will affect the Winchester Hotel project. If not addressed, the above-mentioned problems will negatively affect the parking situation in the surrounding neighborhood, as overflow cars, ride-share services, and shuttles will all vie for spots on the adjacent streets.

Sincerely,
Mike & Galina Drabkin
1234 Redoaks Dr.
San Jose, CA 95128

April 1, 2022

To: San Jose Planning Commission

Subject: Appeal of Special Use Permit Appeal

Appeal of Planning Director Hearing: Wednesday, March 23, 2022

Agenda Item #4 (SP20-016) 1212-1224 S. Winchester Blvd, San Jose

Dear Honorable Chair and San Jose Planning Commission Members:

I would like to call attention to Fire Safety and related concerns.

Fire safety and mitigation is of utmost importance to the community with regards to any proposed project at the 1212-1224 S Winchester Blvd address.

On page 27 of the 'SP20-016 SPECIAL USE PERMIT_approved_Planning Director Hearing_03.23.2022' document, item 39, Bureau of Fire Department Clearance for Issuing Permits, states: Prior to the issuance of a Building Permit, the project must comply with the California Fire Code as adopted or updated by the city.

In the Planning Director Public Hearing meeting on March 23, 2022 for SP20-016, it was clearly stated that a Fire Variance is necessary for this project.

However the fire safety plan / Fire Variance is only considered at the building permit approval phase.

According to OSHA, "The options available for attacking a fire increase when a building's perimeter becomes more accessible to fire apparatus...ideally the full perimeter would be accessible; however, this is not always feasible." Developments on appropriately sized lots along Winchester have clearly marked fire lanes for fire truck access: A Grace

Subacute, 1250 S. Winchester; Lynhaven Apartments, 919 S. Winchester; Villa Cortina, 801 S. Winchester.

As noted, the North and South access of this project is 5'6" and 6' 0" respectively. Fire-fighting with the aid of a truck is limited to frontal aerial coverage. A fire at the mid to lower levels in the rear of the building will not be accessible with only frontal aerial coverage. Are the side setbacks of 5' or less sufficient for fire fighters to navigate with ladders and devices from the front access to the back of the structure? Also, the access would need to be maintained to always be clear.

In addition, the document "1) Initial Study_1212-1224 S Winchester Blvd Hotel PROJECT " dated May 2021, on page 148, section 4.15.4, discusses the Impact for the need of new or physically altered fire protection facilities.

It is stated, paragraph 1, "The proposed project would replace two commercially-used buildings with a 119-guestroom hotel. Development of the site would incrementally increase the need for fire protection services but would not significantly impact the response time or require construction of new facilities."

Paragraph 2, "Construction of the proposed project would be required to comply with applicable **Fire Code standards**". However, the Fire Variance has not been submitted to be approved yet. The community has raised concerns in regards to the fire-fighting capabilities especially in the rear of the bldg.

Paragraph 3, "The General Plan EIR evaluated the need for **new fire stations** with buildout of the General Plan and concluded that implementation of the general plan would result in an increase in calls for fire protection services but would not result in the need for construction of fire stations in excess of those **currently planned**."

This clearly outlines that additional fire stations are **currently planned** to support this project and others in the Urban Village Plan. As this is a necessary step for a comprehensive fire safety and protection, the additional fire stations will need to be in service and functional prior to any high rise construction project. Commencement and completion of a high rise project without the necessary number of fire fighting facilities/stations, would place not only the project but also the surrounding neighborhoods at risk. This will result in a gross negligence for fire safety.

As fire safety is a concern not only for the occupants/guests in this project but also for the general public. Fire safety is also an integral part of the General Plan EIR. The Fire Variance should be addressed and made public as part of the initial design and **prior** to the Special Use Permit approval. This would allow for corrections to address any building design deficiencies related to the project and necessary access surrounding the building for fire fighting equipment.

In addition we believe that the **currently planned** additional fire stations need to be addressed and made public as to the scheduled timeline of when these are to be operational. This is essential to provide the additional fire fighting capabilities with the increase in building size of this project from the current existing two smaller structures.

Respectfully,

Brian and Helen Matsumoto
1247 Redoaks Dr, San Jose

March 31, 2022

To: San Jose Planning Commission Chair Rolando Bonilla,
Vice Chair George Casey and Planning Commission Members
Subject: Appeal of Planning Director Hearing: Wednesday, March 23, 2022
Agenda Item #4 (SP20-016) 1212-1224 S Winchester Blvd, San Jose

Dear Mr. Bonilla and Planning Commission Members

Addressing the Draft Special Use Permit SP20-016,
Item 3: **General Plan Conformance**

- 1) "The project site has an Envision San Jose 2040 General Plan Land Use/Transportation Diagram designation of Neighborhood/Community Commercial." P2, Draft Special Use Permit
- 2) Winchester Urban Village Plan:
Neighborhood/Community Commercial Land Use Designation (3.3-1):
"This designation is applied to smaller, shallow parcels fronting Winchester Boulevard and abutting single-family residences. Given the size of the parcels, parking requirements in the zoning code and the urban design step down policies, these properties are appropriate for the location of smaller commercial businesses. Neighborhood/Community Commercial uses should have a strong connection to, and provide services and amenities for, the community. These uses should be designed to promote this connection with an appropriate urban form that supports walking, transit use and public interaction. Also, this designation supports the neighborhood servicing retail and small businesses along Winchester Boulevard."
- 3) Winchester Urban Village Plan:
Urban Village Commercial Land Use Designation (3.3-1)
"The Urban Village Commercial Land Use designation is applied to properties on Winchester Boulevard and Moorpark adjacent to, and on the south side of Interstate 280. This area was identified as an opportunity for new commercial development that could build off the success in the

adjacent Santana Row/Valley Fair Urban Village. This designation supports commercial activity that is more intensive than that of the N/CC land use designation. Appropriate uses in this designation include a variety of commercial uses, mid-rise office buildings and hotels...

- 4) The **Staff Analysis** states (p3, Draft Special Use Permit):
The site is in close proximity to Santana Row, a large employment and shopping destination located to the north of the subject site. The hotel use would provide a necessary service for existing and future demand from business travelers and visitors.
- 5) We concur with the Staff Analysis that hotel use would do exactly that, which is why the hotel belongs where the land use designation is Urban Village Commercial Land.
- 6) We wholeheartedly support the Envision San Jose 2040 General Plan and the Winchester Urban Village Plan. We ask that the Neighborhood/Community Commercial Land Use designation be implemented so that the land use conforms to the Winchester Boulevard Urban Village Plan (p19, 3.3-1)
---“appropriate for the location of smaller commercial businesses”
---“uses should have a strong connection to, and provide services and amenities for, the community”
---“These uses should be designed to promote this connection with an appropriate urban form that supports walking, transit use and public interaction”
---“this designation supports neighborhood servicing retail and small businesses along Winchester Boulevard.”

Respectfully submitted,

Tom & Gail Morman
1242 Redoaks Dr, San Jose

1 April 2022

To: San Jose Planning Commission

Subject: Appeal of Special Use Permit

Ref. Planning Director Hearing on Wednesday March 23, 2022, Agenda Item #4 (SP20-016) 1212-1224 S. Winchester Blvd., San Jose

Dear Members of the Planning Commission:

We are the residents of the Hamann Park neighborhood that would be impacted by this project. Many of us worked with the City in developing the Winchester Boulevard Urban Village Plan and were supportive of this engagement. We are aware of the City's economic goals and tax base objectives, and very much support the City's efforts to attain some balance in the tax base/services delivery.

We request the Commission's attention to review several problematic aspects of the Special Use Permit, which was approved last week for demolition and subsequent construction at this site. We appeal to the Commission to properly and promptly address these issues before considering any additional permit requests for this site. Let us draw your attention to the topics listed on the following pages, according to the sections of the Special Use Permit. These issues were raised during the meeting referenced above, but were not directly or adequately addressed. Most importantly, the current project plans are in violation of municipal code 20.40.270.

We appreciate your attention to these concerns.

Mabel Cheng, 1235 Redoaks Dr, San Jose

Special Use Permit, Facts and Findings (numbering corresponds to that of the SUP)

- 5. Zoning conformance, side setback

Please reference the following municipal codes:

- Municipal code 20.40.200 - Development standards
Table 20-100
Zoning district CP (Commercial Pedestrian)
Minimum setback, side, interior:
none; or as established in approved Urban Village Plan
- Municipal code 20.40.270 - Side setback - Exceptions, interior lot.
Notwithstanding the provisions of Section 20.40.200, in the CP commercial district, a building side setback shall be required for interior lots on that side of each such lot which abuts on the side of a lot situated in a residence district, in which case the side setback requirements shall be a minimum of ten feet.

The project site and the residential property to the north are both interior lots, which means one side faces the street, and the other 3 sides are shared with neighboring properties. Municipal code 20.40.270 clearly requires a side setback of at least 10 ft between a commercial building and a neighboring residential property line. However, the project plans currently indicate a side setback of only 5 ft 6 in. This inconsistency needs to be addressed immediately. Correction of this oversight will also improve the fire department access to the side and rear of the building.

- 8. Environmental Review:

See separate Environmental Determination appeal filed 28 March 2022

- (9. Site Development Permit Findings:)

- 9a. *"the hotel would be consistent with the General Plan and Winchester Boulevard Urban Village Land Use Designation of Neighborhood Community Commercial."*

We take issue with the claim that the hotel would be consistent with the Winchester Urban Village NCC land use. The proposed hotel would not "have a strong connection to, and provide services and amenities for, the community."

- 9b. *"The Site Development Permit, as approved, conforms with the Zoning Code and all other provisions of the San José Municipal Code applicable to the project"*

The hotel plans do not conform with the minimum 10 ft required side setback on the north side of the property facing residential homes per municipal code 20.40.270.

- 9e. *"The orientation, location and elevation of the proposed buildings and structures and other uses on the site are compatible with and are aesthetically harmonious with adjacent development or the character of the neighborhood."*

We strongly disagree that a 6 story hotel located 5.5 ft from a single story residential home can be deemed "aesthetically harmonious" and "compatible with the character of the neighborhood".

- 9f. Environmental impact

Please see separate Environmental Determination appeal filed 28 March 2022.

- 9g. *"trash facilities are sufficient to maintain or upgrade the appearance of the neighborhood."*
 - Due to the inadequate building setback on the north side of the planned hotel, in violation of municipal code 20.40.270, there is no room for a commercial trash collection service vehicle. Thus there would be an unsightly, malodorous dumpster positioned at the curb one day per week in a Commercial Pedestrian zone. At best, this is certainly not an "upgrade to the appearance of the neighborhood". At worst, this may be a safety issue, should it interfere with automobile, bicycle, and/or pedestrian traffic.
 - City dumpster trucks have lifting forks positioned at the front of the truck. When the dumpster is in proper position to be lifted by the truck driving northbound on Winchester Blvd., the dumpster will be occupying one of the 3 active driving lanes (post-expansion). Weekly positioning of the trash dumpster in an active lane of Winchester Blvd. would be in direct violation of municipal code 13.24.010, which concerns removal of obstructions.
 - Winchester Blvd. is designated to be a Grand Boulevard in the Winchester Urban Village Plan, which requires:
 - *High standards of design, cleanliness, landscaping, gateways, and wayfinding*
 - *If there are conflicts, transit has priority*

Locating a dumpster in the vehicle roadway, on a Grand Boulevard, near an Active Node of the Winchester Urban Village, does not satisfy high standards of design.
 - Further, there are logistical issues with rolling a heavy dumpster into the street. Project plans indicate no ramp at the sidewalk. Rolling a dumpster over a standard-height curb would (1) generate loud dumpster noises during overnight hours, which would create a public nuisance, and (2) endanger the employee(s) tasked to do so.

- 9h. *"Traffic access, pedestrian access, and parking are adequate."*

Traffic access for pick-up, drop-off, and regular guest use is solely accessible via the valet-only parking garage. This will be a bottleneck during peak hours, and will endanger the safety of pedestrians along Winchester. The claim that parking is adequate is not justifiable. The developer has not provided a realistic staffing and parking plan for the hotel. For example, it is not reasonable to expect that a security contractor's employer will drop off and pick up a security guard for every hotel shift, in order to avoid the need to provide adequate parking for such employees.

- (10. Special Use Permit Findings:)

- 10.d.ii. *"The proposed use at the location requested will not... Impair the utility or value of property of other persons located in the vicinity of the site."*

Simply stating that "the project would not impair the utility or value of property... in the vicinity of the site" is, on its face, not credible. This cannot simply be stated without substantiation or justification. The negative impact of this project on the fair market value of adjacent homes should be determined by a neutral assessor who is neither employed by the hotel nor the pro-business City planners, and injured parties should be justly compensated. As part of assessing the fair market value impact on adjacent homes, planners should render realistic views of the hotel from the backyards, pools, patios, dining rooms and upstairs bedrooms of these adjacent properties.

- 10.e. *"The proposed site is adequate in size to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this title, or as is otherwise required in order to integrate the use with existing and planned uses in the surrounding area"*

This would only be true if the property were larger and/or the hotel were smaller.

- 10.g. *“Demolition of the existing commercial structures and the construction of the hotel project would not have an unacceptable negative affect on adjacent property or properties as it complies with the General Plan, Zoning Ordinance, and Urban Village use, standards and policies.”*

The claim that there would be no unacceptable negative vibration effect on adjacent properties stands in stark contradiction with IS/MND section 4.13.6b, which plainly states that expected vibration levels at adjacent residential structures due to demolition and construction would exceed the City’s 0.2 inch per second PPV limit by more than a factor of 6. As the owner of one of said adjacent residential structures, we find this completely "unacceptable".

Further, building plans show excavation to a depth of at least 14’ 6” on the northern and southern property lines. This does not even include additional excavation to lay footings and drive pilings to support the building foundation structural members. Typically, such concrete retaining walls require additional excavation outside of the final retaining wall to position temporary concrete forms during construction. How would the builder propose to perform these excavations inside the boundary of the neighboring property? How does the City justify disturbing the soil that supports the neighboring residential home at 1204 S. Winchester to this extent? How does the City propose to guarantee that the foundation and structure of this home will not incur substantial damage as a result of demolition and construction activities? We understand that this residence includes a basement, which would make it especially susceptible to damages from vibration and adjacent excavation.

We will recommend that the property owner at 1204 S. Winchester respond to project-related property permissions with the following levels of hospitality:

- Pre-demolition structural inspections and subsequent follow-up inspections to assess damages to their home resulting from construction-related activity should be welcomed.
- Any workers or machines that trespass onto the property for the purpose of excavation and construction should be escorted off the premises by local law enforcement.
- If any property damages are incurred during demolition or construction, a cease and desist letter should be delivered to the foreman on site immediately.

Special Use Permit, APPROVED SUBJECT TO THE FOLLOWING CONDITIONS:

1. Page 17, Item 5, Conformance to Plans

"The development of the site and all associated development and improvements shall conform to ... the San José Building Code (San José Municipal Code, Title 24)."

Please ensure that approved plans are in compliance with all municipal codes prior to issuing associated demolition or construction permits.

2. Page 19, Item 13, Conformance with Municipal Code

"No part of this approval shall be construed to permit a violation of any part of the San José Municipal Code."

Project plans are currently in violation of municipal code 20.40.270 (Side setback - Exceptions, interior lot). Please ensure that approved plans are in compliance with all municipal codes prior to issuing associated demolition or construction permits.

3. Page 19, Item 18, Refuse

"All trash and refuse storage areas shall be effectively screened from view and covered and maintained in an orderly state to prevent water from entering into the trash or refuse container(s). Trash areas shall be maintained in a manner to discourage illegal dumping."

Due to insufficient side setback, which is not in conformance with municipal code 20.40.270 (Side setback - Exceptions, interior lot), the current hotel design will not "effectively screen from view" the trash dumpster at the curb on trash day. Thus, the hotel developer's refuse plan will not satisfy this condition which is required by the City Special Use Permit. See also item 9g above regarding other inadequate aspects of the refuse plan for the proposed hotel.

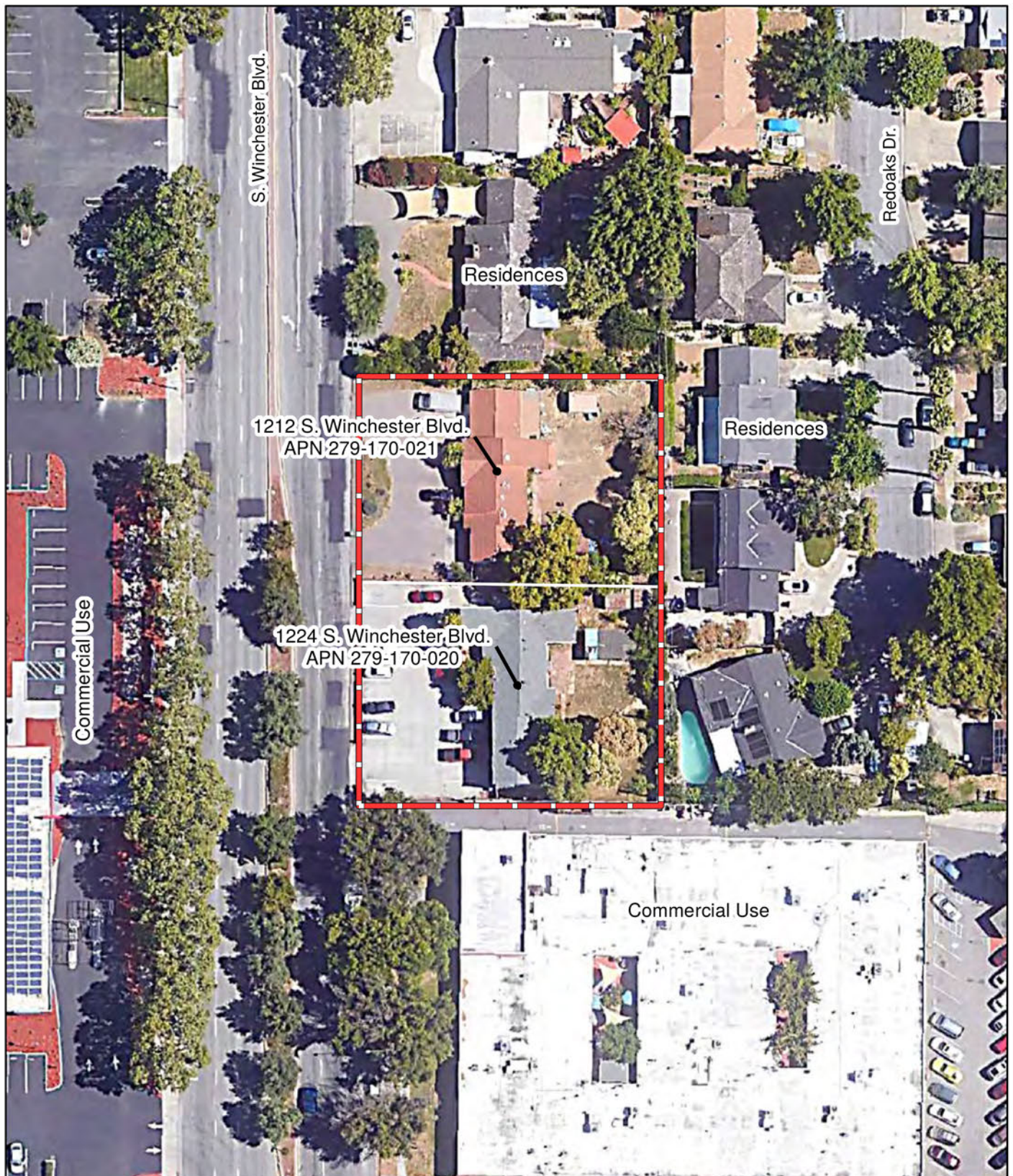
4. Page 27, Item 39, Bureau of Fire Department Clearance for Issuing Permits.

"Prior to the issuance of a Building Permit, the project must comply with the California Fire Code as adopted or updated by the city."

In light of the expected variances required to comply with fire code, we request that the City defer issuance of (1) this Special Use Permit, (2) the demolition permit, and (3) the construction permit, until the fire department has thoroughly reviewed and responded to the design proposal.

5. Page 27, Item 40, Building Division Clearance for Issuing Permits, Construction Plan Conformance
"Prior to the issuance of any Building permit... a project construction plan conformance review by the Planning Division is required."

We believe that this plan conformance review should be brought forward and conducted as early as possible. The hotel project plans are currently in violation of municipal code 20.40.270 (Side setback - Exceptions, interior lot). Plan modifications to correct this violation will reduce the footprint of the proposed hotel, and most likely reduce the number of guest rooms. The current 119 room hotel proposal is already believed to be near or below the minimum number of guest rooms for economic viability (the developer has stated that this threshold is approximately 120 rooms). Further reduction will likely cause potential investors to lose interest, which will result in a failed major project at the key southern Active Node of the Winchester Urban Village. The City should consider completion of this plan conformance review a high priority, for the purpose of risk reduction for the Winchester Urban Village Plan.



Source: Santa Clara County GIS 2017, Google Earth 2018

Figure 2

Aerial Photograph

1212-1224 S. Winchester Boulevard Hotel Initial Study



0 100 feet



Project Boundary

