



T 510.836.4200
F 510.836.4205

1939 Harrison Street, Ste. 150
Oakland, CA 94612

www.lozeaudrury.com
michael@lozeaudrury.com

By E-mail

May 7, 2020

Mayor David Haubert
Vice Mayor Arun Goel
Councilmember Melissa Hernandez
Councilmember Jean Josey
Councilmember Shawn Kumagai
City Council
City of Dublin
100 Civic Plaza
Dublin, CA 94568
council@dublin.ca.gov

Marsha Moore, City Clerk
City of Dublin
100 Civic Plaza
Dublin, CA 94568
Marsha.moore@dublin.ca.gov

Re: Appeal of Decision of the Planning Commission Approving the Site Development Review Permit and Minor Use Permit for the Cambria Hotel (PLPA-2019-00020, PLPA-2019-00044).

Dear Mayor Haubert, Vice Mayor Goel, Honorable Councilmembers Hernandez, Josey, and Kumagai, and Ms. Moore:

I am writing on behalf of the **Laborers International Union of North America, Local Union No. 304 ("LIUNA")** and its members living and/or working in or around the City of Dublin ("City") regarding the Planning Commission's decision of April 28, 2020 to approve the Site Development Review permit and Minor Use permit for the Cambria Hotel project ("Project"). This appeal is filed pursuant to Municipal Code section 8.136.050, is timely filed within 10 days of the Planning Commission's decision, and is accompanied by the required filing fee of \$208. LIUNA is concerned the Planning Commission did not adequately address its comments, including but not limited to the following:

1. The Project is not consistent with the Downtown Dublin Specific Plan because the Downtown Specific Plan and its accompanying EIR did not address, and expressly deferred, specific project-level impacts, including that individual projects be subject to project-level BAAQMD emission thresholds and a project-by-project analysis of greenhouse gas emissions;
2. There is substantial evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Downtown Dublin Specific Plan EIR was certified as complete showing the Project will have a significant health risk impact from its indoor air quality that was not discussed in the Downtown Dublin Specific Plan EIR;

3. There is substantial evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Downtown Dublin Specific Plan EIR was certified as complete showing the Project will have a significant impact on biological resources that was not discussed in the Downtown Dublin Specific Plan EIR;
4. There is substantial evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Downtown Dublin Specific Plan EIR was certified as complete showing the Project will have a significant impact on air quality from construction emissions that was not discussed in the Downtown Dublin Specific Plan EIR;
5. There is substantial evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Downtown Dublin Specific Plan EIR was certified as complete showing the Project will have significant health risk impacts that were not discussed in the Downtown Dublin Specific Plan EIR;
6. There is substantial evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Downtown Dublin Specific Plan EIR was certified as complete showing the Project will have significant greenhouse gas impacts that were not discussed in the Downtown Dublin Specific Plan EIR; and
7. There are substantial changed circumstances requiring major revisions to the Downtown Dublin Specific Plan EIR due to a substantial increase in the severity of previously identified transportation and circulation significant effects.

LIUNA's previous comments to the Planning Commission are attached and incorporated by reference in this appeal to City Council.

Sincerely,



Paige Fennie

LOZEAU DRURY LLP