

**October 14, 2021**

**To:** City of Riverside, Planning Department

**From:** GREENS Group

**Prepared by:** SAGECREST planning+environmental

**Subject:** Response to Comments Memo for the Marriott AC/Residence Inn and Minor Revision to Project Description

Case Numbers:

P19-0563 Certificate of Appropriateness

P19-0560 Conditional Use Permit, P19-0561 Variance, P19-0562 Variance

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**Summary**

A Class 32 Infill Development Checklist was prepared for the Greens Group Marriott AC/Residence Inn Project (Proposed Project) and made available for public review with the staff report for the Proposed Project that was published on the City of Riverside website in advance of its Planning Commission Meeting on April 15, 2021 at 9am, the Cultural Heritage Board Meeting on April 21, 2021, the Land Use, Sustainability, and Resilience Committee on July 12, 2021, and the City Council Meeting on August 17, 2021. The Planning Commission voted 8-1 to approve and issue a Class 32 Categorical Exemption for the Proposed Project on April 15, 2021. The Cultural Heritage Board did not approve the certificate of appropriateness and did not issue a Class 31 Categorical Exemption for the Proposed Project on April 21, 2021, with a tie vote of 4-4. The Land Use, Sustainability, and Resilience Committee voted unanimously to refer the Proposed Project to City Council with a recommendation of approval of the Certificate of Appropriateness and issuance of a Class 31 and Class 32 Categorical Exemptions for the Proposed Project on July 12, 2021. At the August 17, 2021, City Council meeting, the Proposed Project was continued to the October 12, 2021, City Council meeting. The Applicant requested the Proposed Project be rescheduled for the November 16, 2021, City Council meeting.

A total of 26 comment letters were received by City Staff prior to the August 17, 2021, City Council hearing. The Applicant prepared a response to comments document, which is included as an attachment to the November 16, 2021, City Council agenda packet. Three additional comments letters, for a total of 29, were received by the Applicant team after the August 17, 2021, City Council Hearing, and are included here as Attachment G – *Additional Comment Letters*. These letters do not raise any new information not previously addressed in the *Response to Comments* prepared by the Applicant.

**Table 1 – Additional Comment Letters**

<b>ID</b>	<b>Commenting Organization, Person, or Public Agency</b>	<b>Date</b>
AA	Elizabeth Ayala	August 16, 2021
BB	Rhonda Chatham	August 16, 2021
CC	Old Riverside Foundation	August 13, 2021

The Applicant requested the continuance to respond to specific comments raised in the comment letters regarding cultural resources, transportation, noise, and general plan and zoning consistency (Attachments A – F). Table 2 provides a summary of the specific public comments grouped by environmental resource topic. The comment number includes an alpha-prefix that corresponds to the annotated comment letter (i.e., Comment Letter A, Comment Letter B, etc.). The name of the commenter is provided and may reference supplemental documentation provided as part of a public comment letter. Finally, the page number corresponds to the internal numbering within the August 17, 2021, *Response to Comments* unless otherwise specified.

**Table 2 – Supplemental Responses to Public Comments**

<b>Comment No.</b>	<b>Name of Commenter</b>	<b>August 17, 2021 Response to Comments</b>	<b>Attachment w/Response</b>
<i>Cultural Resources</i>			
A13	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 10	Attachment B
A14	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 11	Attachment A Attachment E
A17	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 12	Attachment A
A18	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 12	Attachment A
A22	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 13	Attachment B Attachment E
A25	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	pp. 14-15	Attachment B
A26	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 15	Attachment B Attachment E
A32	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 17	Attachment E
A33	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 17	Attachment B Attachment E
A34	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	pp. 17-18	Attachment B Attachment E
A35	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 18	Attachment B Attachment E
A36	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	pp. 18-19	Attachment B
A38	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 19	Attachment A Attachment B Attachment E
A42	First Congregational Church Trustees – GPA Consulting	pp. 24 - 25	Attachment A Attachment B
A44	First Congregational Church Trustees - GPA Consulting	pp. 27-28	Attachment A Attachment B

A45	First Congregational Church Trustees - GPA Consulting	p. 28	Attachment A
D10	Jill Johnson Young	p. 85	Attachment E
K4	Eric Lesser	p. 127	Attachment A Attachment E
Z3	Mission Inn/Rutan & Tucker	pp. 177 - 178	Attachment A Attachment E
Z9	Mission Inn/Rutan & Tucker	pp. 183-185	Attachment E
N/A	Mission Inn/Rutan & Tucker – Exhibit A, Terra Nova Planning & Research Analysis	pp. 7 - 8 of analysis	Attachment E
N/A	Mission Inn/Rutan & Tucker – Exhibit B, Jenna Snow Historic Preservation Consulting	pp. 3 – 4, 8-11 of analysis	Attachment A Attachment E
<b>Noise</b>			
D10	Jill Johnson Young	p. 85	Attachment E
E7	Louzeau Drury	pp. 98-99	Attachment C
Z3	Mission Inn/Rutan & Tucker	pp. 177 - 178	Attachment E
N/A	Louzeau Drury – Exhibit B, Wilson Ihrig Noise and Vibration Analysis	pp. 1 – 6 of analysis	Attachment C
N/A	Mission Inn/Rutan & Tucker – Exhibit A, Terra Nova Planning & Research Analysis	p. 7 of analysis	Attachment E
N/A	Mission Inn/Rutan & Tucker – Exhibit B, Jenna Snow Historic Preservation Consulting	pp. 7-8 of analysis	Attachment E
N/A	Mission Inn/Rutan & Tucker – Exhibit C, Inconsistencies with Plan Objectives and Policies	p. 1 of analysis	Attachment E
<b>Transportation</b>			
A29	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 8	Attachment D
A30	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 8	Attachment D
N/A	Louzeau Drury – Attachment A: Exhibit B, Wilson Ihrig Noise and Vibration Analysis	p.2 of analysis	Attachment D
N/A	Mission Inn/Rutan & Tucker – Attachment B: Exhibit A, Terra Nova Planning & Research Analysis	p. 7 of analysis	Attachment D
<b>General Plan &amp; Zoning Consistency</b>			
A24	First Congregational Church Trustees - Chatten-Brown, Castens & Minter	p. 14	Attachment E Attachment F
E1	Louzeau Drury	p. 95	Attachment E Attachment F
Z2	Mission Inn/Rutan & Tucker	pp. 176-177	Attachment F
Z4	Mission Inn/Rutan & Tucker	pp. 178-180	Attachment F
Z8	Mission Inn/Rutan & Tucker	pp. 182-183	Attachment F
N/A	Mission Inn/Rutan & Tucker – Exhibit C, Inconsistencies with Plan Objectives and Policies	pp. 442-448	Attachment E Attachment F

Conclusion: Although CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.) do not explicitly require a lead agency to provide written responses to comments received on a proposed Class 31 Historical Resources Restoration/Rehabilitation Categorical Exemption or a Class 32 Infill Development Categorical Exemption, the lead agency may do so voluntarily.

All comment letters received prior to the August 17, 2021, City Council meeting are responded to within the *Response to Comments* document, with respect to CEQA. The comments listed in Table 1, received by the Applicant team after the August 17, 2021, City Council meeting, do not raise any new information not previously addressed in the *Response to Comments* document. The comments listed in Table 2 are further responded to within this memo's attachments. The comments submitted do not invalidate the findings of the Class 31 and Class 32 Categorical Exemptions or require additional analysis or mitigation to be incorporated. No new information, new impacts, or deficiencies are identified that have not been addressed by the Class 32 Infill Development Checklist. Therefore, the Class 31 Historical Resources Restoration/Rehabilitation and Class 32 Infill Categorical Exemptions remain the appropriate and reasonable determination as determined by the Lead Agency.

### **Revised Project Description in Response to Comments**

Expanded View Deck (8<sup>th</sup> Floor): In response comments received at the Land Use, Sustainability and Resilience Committee Meeting on July 12, 2021, the Applicant has since made minor changes to address the committee members interest in expanding the proposed view deck area on the 8<sup>th</sup> floor. The Proposed Project would include an expanded view deck to enhance the community benefit to the general public, as the intent of the deck is for public use. The proposed view deck change would increase the view deck area from 620 SF to 2,850 SF, providing for an additional hotel amenity by allowing for a bar and more area for guest and public interaction. The proposed view deck would include interpretive boards that would convey the history of the City's skyline and would provide different vantage points for the public to interact with historic assets, as well as experience stunning views. The expansion of the view deck would provide more permeability on the building's corner to capture additional views of the First Congregational Church's bell tower from Mission Inn Avenue. By expanding the view deck, the corner tower would be pushed back, and the view corridor expanded. In addition to a passive viewing area, the revised view deck area would provide amenities that engage and provide learning opportunities for patrons and the general public.

Room Keys: In addition to the expanded view deck change, the Applicant re-evaluated the proposed room count to determine if additional efficiencies were feasible. Working with Marriott, the Applicant has revised the floor plan to retain the 226 rooms by shifting to a Residence Inn Narrow Bay room product for a small portion of those keys.

Attachments:

**Attachment A** – *Supplemental Historical Architecture Assessment Report*, George Taylor Loudon AIA, October 2021

**Attachment B** – *Impact Assessment for the Development of AC/Marriott Residence Inn Dual Branded Hotel, Riverside, California*, ICF, August 2021

**Attachment C** – *Marriott AC/Residence Inn Hotel Noise Assessment*, Urban Crossroads, September 2021

**Attachment D** – *AC Marriott Traffic and Parking Study Response to Comments*, Trames Solutions Inc., September 2021

**Attachment E** – *Response to Comments*, Best, Best and Krieger, September 2021

**Attachment F** – *Revised Variance Findings*, Best, Best and Krieger, September 2021

**Attachment G** – *Additional Comment Letters*, August 2021