

*City of Arts & Innovation*

# City Council Memorandum

**TO: HONORABLE MAYOR AND CITY COUNCIL      DATE: FEBRUARY 1, 2022**

**FROM: OFFICE OF COUNCILMEMBER      WARD: 2**  
**CLARISSA CERVANTES**

**SUBJECT: CULTURAL HERITAGE BOARD REQUEST TO SUBMIT A COMMENT LETTER  
IN RESPONSE TO THE RIVERSIDE COUNTY TRANSPORTATION  
COMMISSION'S DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
RIVERSIDE-DOWNTOWN METROLINK STATION IMPROVEMENTS PROJECT**

## **ISSUE:**

Approve a request by the Cultural Heritage Board to submit a comment letter in response to the Riverside County Transportation Commission's Draft Environmental Impact Report for the Riverside-Downtown Metrolink Station Improvements Project.

## **RECOMMENDATION:**

That the City Council approve a request by the Cultural Heritage Board to submit a comment letter in response to the Riverside County Transportation Committee's Draft Environmental Impact Report for the Riverside-Downtown Metrolink Station Improvements Project.

## **CULTURAL HERITAGE BOARD RECOMMENDATION:**

On January 19, 2022, the Cultural Heritage Board (CHB) unanimously voted (9 ayes and 0 noes) to receive and approve the CHB Subcommittee's report and take the necessary steps to permit the CHB to incorporate the report into a comment letter on the Riverside-Downtown Metrolink Station Improvements Project Draft Environmental Impact Report (Attachments 1).

## **BACKGROUND:**

At the December 16, 2020, October 20, 2021 and November 17, 2021 Cultural Heritage Board (CHB) Meetings, Riverside County Transportation Commission (RCTC) presented the Riverside-Downtown Metrolink Station Improvements Project to provide CHB an opportunity to ask questions and provide input and concerns related the demolition of the former Food Machinery Corporation (FMC) Plant #1, 3033 – 3091 Twelfth Street, on the northwest corner of Twelfth Street and Howard Avenue. The FMC complex was designated as City Landmark #102 on May 12, 1996. RCTC is the lead agency on the project.

At the October 20, 2021 presentation, RCTC reported that they received concurrence from the State Historic Preservation Officer (SHPO) on the National Register evaluation completed for the building, as part of the Section 106 review. The evaluation found that the building was eligible for National Register of Historic Places under all four criteria. RCTC also reported that they were working with the SHPO to obtain concurrence on proposed avoidance alternatives to complete the Section 106 review. Because the project falls under the purview of the SHPO, any proposed demolition or alteration of the existing building does not require CHB or Historic Preservation Officer approval.

At the November 17, 2021 meeting, RCTC staff presented additional project details, answered questions, and stated that the Draft Environmental Impact Report (DEIR) for the project would be released for a 60-day review on December 3, 2021. They also clarified that the 60-day public review period provides more review time than the standard 45-day review required under the California Environmental Quality Act statutes. CHB requested that a workshop be set for the December 15, 2021 meeting to provide an opportunity for the CHB Members to discuss initial comments on the DEIR with the understanding that CHB members would have limited time to review the documents between the public release of the DEIR and the meeting date.

At the December 15, 2021 meeting, the CHB expressed a desire to provide written comments directly to RCTC on the project. Staff recommended the CHB draft a letter and request that a City Council member include this on a future City Council agenda as the CHB requires authorization from the City Council to submit the letter as a Board. The CHB established a Subcommittee of three members to work with staff in drafting a letter that would be reviewed by the full CHB at the January 19, 2022, meeting. The Subcommittee requested that the Ward 2 Councilmember place the item on the February 1, 2022 agenda for full City Council consideration.

## **DISCUSSION:**

Title 20 of the Riverside Municipal Code does not expressly provide that the Cultural Heritage Board (CHB) has the authority to submit official comments, as a Board, on the Riverside County Transportation Commission Draft Environmental Impact Report. To submit a letter representing the full CHB, City Council approval is required.

The CHB Subcommittee reviewed the DEIR for the proposed project and drafted a comment letter for review by the CHB (Attachment 2). At the January 19, 2022, CHB meeting, the letter was reviewed and discussed with the identified DEIR concerns. The CHB agreed that the Subcommittee prepared letter addressed the concerns of the members. By a unanimous vote, CHB approved the Subcommittee letter as presented.

The CHB requested that staff work with the Ward 2 Council Member to include this on the February 1, 2022, agenda for City Council consideration and approval.

## **STRATEGIC PLAN ALIGNMENT:**

This item contributes to the Envision Riverside 2025 City Council Strategic Priority 5 – High Performing Government and specifically, Goal 5.1 - Enhance communication and collaboration

with community members to improve transparency, build public trust, and encourage shared decision-making. This item also aligns with the following Cross-Cutting Threads:

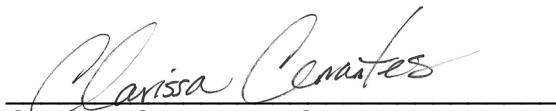
1. *Community Trust* – The process to prepare and agree on the CHB prepared comment letter, and the request for City Council approval to submit the letter as a Board, is consistent with transparent decision making based on sound policy, inclusive community engagement, and involvement of City Boards & Commissions.
2. *Equity* – The process to prepare and agree on the CHB prepared comment letter, and the request for City Council approval to submit the letter as a Board, is consistent with providing equitable access community benefits as it will provide the the City Council appointed CHB opportunity to comment on an outside agency project that involves a City Landmark.
3. *Fiscal Responsibility* – The process to prepare and agree on the CHB prepared comment letter, and the request for City Council approval to submit the letter as a Board, will not have any fiscal impacts for the City.
4. *Innovation* – The process to prepare and agree on the CHB prepared comment letter, and the request for City Council approval to submit the letter as a Board, encourages an innovative approach to commenting on the proposed RCTC project to ensure that considerations on preserving the historic building are considered and analyzed.
5. *Sustainability and Resiliency* – The process to prepare and agree on the CHB prepared comment letter, and the request for City Council approval to submit the letter as a Board, encourages RCTC to examine the reuse of the existing historic building.

### **FISCAL IMPACT:**

There is no fiscal impact to the General Fund to granting the CHB authorization to submit the comment letter on the Riverside County Transportation Commission Draft Environmental Impact Statement for the Riverside-Downtown Metrolink Station Improvements Project.

Approved as to form: Phaedra A. Norton, City Attorney

Submitted by:



Clarissa Cervantes, Councilmember  
Ward 2

Attachments:

1. Draft Cultural Heritage Board Minutes – January 19, 2022
2. Cultural Heritage Board Comment Letter