

January 14, 2020

City of Riverside
Community Development Department – Planning Division
Mr. Brian Norton, Senior Planner
3900 Main Street, Third Floor
Riverside, California 92522

Re: Marriott AC Residence Inn and Historic Fire Station Parking Variance Justification

Dear Mr. Norton,

Please find the following questions and answers to justify the parking variance request for the mixed-use Marriott dual flagged hotel and creative office within the historic fire station.

Question No. 1:

Yes, the strict application of the provisions of the Zoning Regulations for this parcel will result in practical difficulties and unnecessary hardships.

Yes, the strict application of the provisions of the Zoning Regulations pertaining to parking requirements will result in practical difficulties and unnecessary hardships to the viability of this project. The City's antiquated and suburban reflective parking requirements in no way represent the true need of an urban mixed-use project and their strict application in this setting will actually cause the project to become unbuildable due to multiple reasons, including constructability and cost. In addition, it has been proven that over parking development projects is an irresponsible use of valuable land and resources.

Since the City does not have a process to understand the true parking requirements of a mixed-use project, it requires this project to seek a variance. Obviously, this in and of itself puts this project in a precarious position that if this discretionary approval is not granted, the project cannot move forward, regardless of the true parking demand. The existing zone expects an additive parking count that reflects suburban parking trends and is silent as to complimentary parking demands by land uses.

City code would dictate that 226 hotel spaces and 48 office spaces be required, which we have found to be excessive and wasteful for a myriad of reasons, including the setting of the project (downtown urban environment), provision/proximity to the public

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opportunities, ride hailing opportunities and “sharing” of parking space due to the peak parking demands occurring at different times of the day. Additionally, because a portion of this project is on the State Historic Registry, it is subject to those parking codes which dictate that the existing number of parking stalls be maintained.

Question No. 2:

Yes, there are exceptional circumstances and conditions applicable to this property and the intended use which do not generally apply to other property in the same zone and neighborhood.

- *The historic Fire Station, which by State Historic Registry Code, dictates that current parking numbers be maintained.*
- *Being a mixed-use project split between hotel and office space, peak parking demands for each use will occur at opposite times of day, creating a great deal of capacity during the day for each respective use at different times.*
- *City parking code does not differentiate between the various hotel types nor where they are located. For example, a resort/family hotel may require more parking spaces than a business hotel sine renting a passenger vehicle may be more economical/convenient for a family on vacation as opposed to a ride hailing service.*

Question No. 3:

No, the granting of these variances will **not** prove materially detrimental to the public welfare or injurious to the property or improvements within the immediate neighborhood.

On the contrary, granting this variance will prove beneficial to the property while having an arguably positive impact on public welfare. Granting this variance not only recognizes the true parking needs of this project but also limit community impact associated with the additional construction of building additional subterranean levels of parking. Allowing the property to be utilized in a more efficient manner through granting this variance provides more than enough parking without severely harming the potential productivity of this project. Additionally, the alternatives to parking are arguably more cost efficient than parking a personal car/renting a car. Uber/Lyft provide on-demand transportation at reasonable costs. The approximate fee for service from Ontario Airport to the AC Marriot Hotel is \$40. Once at the hotel, guests can continue using Uber/Lyft, utilize Riverside Transit Agency’s services, including route 1, which accounts for 23% of RTA’s county-wide ridership, or simply take advantage of the pedestrian friendly environment fostered by Riverside’s downtown area.

Question No. 4:

No, the granting of this request will **not** be contrary to the objective of the General Plan.

This development proposal and specifically the requested variance is not contrary to the objective of the General Plan. The General Plan and the Downtown Specific Plan, both encourage this exact type of development but without the benefit of the appropriate parking metrics.

As always, I appreciate your assistance with this process and please let me know if you have any questions or comments in regard to the requested variances.

Respectfully Submitted,
Overland Development Company

Andrew Walcker
President

