



Land Use, Sustainability, and Resilience Committee

City of Arts & Innovation

TO: LAND USE, SUSTAINABILITY, AND RESILIENCE COMMITTEE **DATE: JULY 12, 2021**

FROM: COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT **WARD: 1**

SUBJECT: P19-0563 CERTIFICATE OF APPROPRIATENESS – ON BEHALF OF GREENS EHRENBURG, LLC - AN APPEAL OF A DENIAL BY THE CULTURAL HERITAGE BOARD FOR THE INFILL CONSTRUCTION OF A HOTEL WITHIN THE MISSION INN AND SEVENTH STREET HISTORIC DISTRICTS AND THE ADAPTIVE REUSE OF THE FORMER CENTRAL FIRE STATION – LOCATED AT 3420 – 3482 MISSION INN AVENUE, SITUATED ON THE SOUTH SIDE OF MISSION INN AVENUE BETWEEN LEMON AND LIME STREETS

ISSUE:

Consider the appeal request by Greens Ehrenberg, LLC, of the Cultural Heritage Board's denial of a Certificate of Appropriateness for the infill construction of a hotel within the Mission Inn and Seventh Street Historic Districts and the adaptive reuse of the former Central Fire Station.

RECOMMENDATIONS:

That the Land Use, Sustainability, and Resilience Committee refer the case to City Council and recommend that the City Council:

1. Determine that the project is exempt from the California Environmental Quality Act (CEQA) pursuant to Sections 15331 (Historic Resource Restoration/Rehabilitation) and 15332 (Infill Development Projects), as it constitutes an infill and rehabilitation project that is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties; and
2. Uphold the appeal by Greens Ehrenberg, LLC and approve Planning Case P19-0563 Certificate of Appropriateness, based on the findings outlined in the Cultural Heritage Board Staff report and subject to the recommended conditions of approval.

CULTURAL HERITAGE BOARD DETERMINATION:

On April 21, 2021, the Cultural Heritage Board (CHB) denied the Certificate of Appropriateness for the proposed project, as recommended by staff, by a vote of 4 ayes, 4 noes, and 1 abstention (Attachment 1).

BACKGROUND:

The 0.94-acre project site, located at 3420 – 3482 Mission Inn Avenue, consists of three contiguous parcels and is developed with the former Central Fire Station and a surface parking lot. In 2008, the former Central Fire Station was listed in the California Register of Historic Resources.

The applicant requested approval of a Certificate of Appropriateness for plot plan and building elevations for the construction of an eight-story, approximately 215,350 square foot hotel and the adaptive reuse of the former Central Fire Station. The Certificate of Appropriateness consists of two components:

1. Construction of an eight-story, 226 room, dual-branded hotel on the existing parking lot at the corner of Lemon Street and Mission Inn Avenue; and
2. Adaptive reuse of the former Central Fire Station into an office space.

DISCUSSION:

In hearing this appeal, the Land Use, Sustainability, and Resilience Committee will make a determination and agreed upon findings based on the applicable Riverside Municipal Code provisions.

In the staff report dated April 21, 2021, staff made findings (Attachment 2 – Page 4) in support of the Certificate of Appropriateness (COA). These include consistency with the Downtown Specific Plan Raincross District Design Guidelines, the Secretary of the Interior Standards for the Treatment of Historic Properties (SOIS), and Title 20 of the Riverside Municipal Code. Following the staff presentation, a majority of the CHB did not vote to approve the COA, so the application was denied.

The applicant filed a timely appeal of the CHB denial of the proposed project (Attachment 3). The applicant's appeal is based on the following: 1) the CHB did not make findings supporting any denial of the COA; 2) Planning staff recommended approval of the COA; 3) the project design is consistent with the principles of the SOIS; 4) the project is consistent with the Downtown Specific Plan; and 5) the project is categorically exempt from CEQA. A summary of the applicant's grounds for appeal and staff's response includes:

1. Comment: The CHB did not make findings supporting any denial of the COA.

Response: The CHB denial of the COA request occurred due to the failure to pass a motion to approve the project with a split vote of four ayes, four noes, and one abstention. With members of the CHB both in favor of and opposition to the granting of the COA, the Board discussion serves as the basis for denial (Attachment 2).

2. Comment: Planning staff recommended approval of the COA.

Response: Per the attached CHB Staff Report (Attachment 2), staff found the project to be consistent with Title 20, the Downtown Specific Plan – Raincross District Design Guidelines, and the SOIS for Rehabilitation and recommend approval of the COA.

3. Comment: The project design is consistent with the principles of the SOIS.

Response: The SOIS provides standards and guidelines within four different treatments – Preservation, Restoration, Rehabilitation, and Reconstruction. As an adaptive reuse and infill project, the Standards for Rehabilitation apply to the proposed project. The applicant submitted a SOIS consistency analysis (Attachment 2 – Exhibit 4) completed by George

Taylor Loudon, a regional historic architect qualified under the Secretary of the Interior Professional Qualifications. The analysis found the project consistent with the SOIS. Staff concurs with the analysis and finds the project consistent with the SOIS as follows:

- The proposed design is clearly differentiated from the historic fire station while being compatible with the massing, volumes, and materials of the historic structure.
- Alterations to the exterior of the historic fire station do not destroy historic materials or spatial relationships.
- The proposed project is considered to embody the “reversibility” concept, as there will be no impact to the essential form, nor the material and physical integrity of the historic fire station.

4. Comment: The project is consistent with the Downtown Specific Plan.

Response: The SOIS consistency analysis by Loudon (Attachment 2 – Exhibit 4) also analyzed the project for consistency with the Downtown Specific Plan – Raincross District principles and design guidelines and found the project to be consistent, and staff concurs, as follows:

- The rooftop patios at the northwest corners of the pool deck and eighth floor create an observation deck allowing unique views of adjacent historic buildings. Fulfilling DSP policy HP-1-2: “Promote community appreciation for the history of Riverside.”
- The proposed hotel will be a contemporary interpretation of the Central Fire Station’s International Style of architecture, without mimicking it exactly. The proposed project hotel design uses similar mass articulation and solid/void patterns found on the fire station.
- The proposed hotel is consistent with the height and massing of other historic buildings and recently approved infill projects.
- The proposed project, with the storefront windows on the hotel and the replacement of vehicular doors on the fire station, will create an emphasis at the street level and continue the mixed-use character of nearby buildings.

5. Comment: The Project is categorically exempt from CEQA.

Response: The project qualifies for the infill exemption as it is consistent with the General Plan, Zoning Code, and the Downtown Specific Plan, as determined by the Planning Commission. The project also qualifies for the historic resource rehabilitation exemption, as the project has been found consistent with the Secretary of the Interior Standards for Rehabilitation. As previously discussed, a SOIS analysis was submitted with the application and found the project to be consistent with the SOIS for Rehabilitation. Staff concurred with the analysis and summarized the findings in the attached CHB Staff Report.

Public Comments

Following the publication of the CHB staff report, staff received twenty-five comment letters regarding the proposed project: sixteen letters in opposition, eight letters in support, and one neutral letter (Attachment 4). The applicant submitted to CHB a letter in response to comments received (Attachment 5).

The following summarizes the concerns expressed about the proposed project in written comments received after publication of the CHB staff report. A response by Staff is provided with each topic of concern:

1. **Concern:** The height of the project in relationship to the bell tower of the adjacent First Congregational Church.

Response: According to records, the height of the bell tower is approximately 114 feet and 4 inches. The height of the tower of the Riverside Municipal Auditorium is approximately 70 feet. The proposed eight-story hotel will be approximately 93 feet and 4 inches in height. The height of the proposed project will fall between the height of these two adjacent Cultural Resources.

2. **Concern:** The project's compatibility with the setbacks of adjacent properties and the Mission Inn and Seventh Street Historic Districts.

Response: The project proposes a one-foot setback. Building setbacks along Mission Inn Avenue range from zero to thirty-five feet, with the former downtown library being an irregularity at approximately 140 feet. Several historic buildings along Mission Inn Avenue exhibit a zero-foot setback, including the Mission Inn, the Loring Building, the former Sears Building, the former Stalder Building (now the Mark), the Fox Theater, and the adjacent former Central Fire Station. With the wide variety of setback dimensions along Mission Inn Avenue, and the incorporation of the Central Fire Station as part of the project, the one-foot setback of the proposed hotel is compatible with the character of the Mission Inn and Seventh Street Historic Districts.

3. **Concern:** The project's compatibility with the character-defining features of adjacent National Register listed structures and potential to impact these structures.

Response: The proposed project incorporates the former Central Fire Station, which is listed in the California Register of Historic Resources. The project site is also adjacent to five buildings listed in the National Register of Historic Places, including the First Congregational Church, Universalist Unitarian Church, Riverside Municipal Auditorium, the former YWCA (Riverside Arts Museum), and the former Riverside-Arlington Heights Fruit Exchange Building (Heroes Restaurant). The proposed project will not alter these adjacent National Register listed structures, nor will the project impair the historical significance of these structures from being expressed.

A noise and vibration study was also completed for the project and found that the vibration from the proposed caisson drilling is below standard thresholds and will not impact adjacent unreinforced masonry buildings.

As the proposed project includes the adaptive reuse of the International Style former Central Fire Station, it is necessary for the proposed hotel to be compatible with the character-defining features of the historic fire station. The proposed hotel references several of the character-defining features of the fire station, such as the block-like massing, projecting volumes, metal louvers, and brick material at the street level. The adjacent National Register listed structures each exhibit different architectural styles, including Spanish Colonial Revival, Richardsonian Romanesque, Mission Revival, and Mediterranean Revival. Each of these structures and architectural styles has a unique variety of character-defining features that are not found on the other structures.

Because of this wide variety of character-defining features, identification of character-defining features, which are common among the historic structures, was required. The main commonality found is a strong street presence with the primary façade of the buildings facing

onto Mission Inn Avenue. The street presence is exhibited in a wide variety of ways, such as the grand staircase of the Riverside Municipal Auditorium, the arcade of the First Congregational Church, and enhanced entry at the former YWCA building. This allows the proposed project to exhibit a unique street presence. The proposed project creates a strong street presence by fronting onto Mission Inn Avenue and draws influence from the Central Fire Station through the use of large expanses of glass and a slightly projecting second story.

4. Concern: The proposed project does not meet the requirements for categorical exemption from the provisions California Environmental Quality Act (CEQA) review pursuant to Sections 15331 (Historic Resource Restoration/Rehabilitation) and 15332 (Infill Development Projects) as expressed in the staff report.
5. Response: As previously discussed, the project qualifies for the infill and historic resource rehabilitation exemptions because it is consistent with the General Plan, Zoning Code, the Downtown Specific Plan, and SOIS.

Based on the analysis above and the facts for finding contained in the CHB staff report, Staff finds the proposed adaptive reuse and infill project is compatible with the massing, size, scale, materials, and use of architectural features of the adjacent historic Central Fire Station and the Mission Inn and Seventh Street Historic Districts as follows:

1. Proposed materials on the hotel, such as stucco cladding, brick veneer, and metal louvers and canopies, will be similar in design to the former Central Fire Station. Brick and Stucco materials can be found throughout the Seventh Street and Mission Inn Historic Districts.
2. The proposed hotel will have an articulation of massing similar to that of the former Central Fire Station. The U-shaped plan of the hotel above the first floor reduces the overall massing to that of the building and sets the majority of the building back from the property line, similar in design to the Mission Inn Hotel.
3. The proposed eight-story hotel will be consistent with the height of surrounding historic buildings, as well as previously approved infill projects. The height of the hotel will fall between the maximum height of the adjacent Riverside Municipal Auditorium and First Congregational Church.
4. The hotel setback will be consistent with the varying setbacks of the existing buildings within the Mission Inn and Seventh Street Historic Districts, which include buildings with zero-foot setbacks.

FISCAL IMPACT:

There is no fiscal impact associated with this action since all costs are borne by the applicant.

Prepared by: David Welch, Community & Economic Development Director
Certified as to
availability of funds: Edward Enriquez, Chief Financial Officer/City Treasurer
Approved by: Rafael Guzman, Assistant City Manager
Approved as to form: Kristi J. Smith, Interim City Attorney

Attachments:

1. Cultural Heritage Board Minutes – April 21, 2021
2. Cultural Heritage Board Reports – April 21, 2021
3. Applicant Appeal Request – April 28, 2021
4. Comment Letters
5. Applicant Response to Comment Letters
6. Presentation