

SUPPLEMENTAL HISTORICAL ARCHITECTURE ASSESSMENT REPORT: Central Fire Station, CFS:
Proposed Dual-Branded AC/Marriott Hotel at 3420-3582 Mission Inn Avenue, Riverside CA

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This Supplemental Historical Architecture Assessment Report (“Report”) builds on two previous documents submitted for the City’s review: the Historical Structure Evaluation/Assessment Report dated 13 January 2021, and the Downtown Specific Plan Review Supplement dated 15 July 2021. This Report is being submitted in response to public comment to establish that (1) the construction of the dual branded hotel (the proposed “Project”) need not emulate the Spanish Baroque revival style design of the First Congregational Church across the street from the proposed Project; and (2) the proposed Project will not result in a substantial adverse change to any of the character defining features of the Central Fire Station structure.

1. The proposed Project need not emulate the Spanish Baroque revival style design of the First Congregational Church.

Public comment has suggested that the proposed Project should emulate the Spanish Baroque revival style design of the First Congregational Church. Yet, neither the California Environmental Quality Act (“CEQA”) nor the Secretary of the Interior’s Standards require such emulation, and indeed such emulation would be non-conforming with and run afoul of the Secretary of the Interior’s Standards.

The State CEQA Guidelines provide that compliance with the Secretary of the Interior’s Standards ensure a less than significant impact to a historic resource. (State CEQA Guidelines, § 15064.5(b)(3).) Likewise, the City’s Downtown Specific Plan recognizes that compliance with the Secretary of the Interior’s Standards “*helps preserve the distinctive character of an historic building and its site, while allowing for reasonable change to meet new needs.*” (Downtown Specific Plan, § 15.5.1, p. 15-16.) And the City of Riverside Municipal Code section 20.25.050(G) provides that a Certificate of Appropriateness is properly applied where, among other things, the “project is consistent with the principles of the Secretary of the Interior’s Standards for the Treatment of Historic Properties.” (City of Riverside Municipal Code (“CRMC”), § 20.25.050(G).)

The proposed Project has been designed to be consistent with the Secretary of the Interior’s Standards. Notably, the proposed Project site includes a historical resource—the Central Fire Station, constructed in 1957, reflecting the distinctive character of the Modern/International Style design. This structure is listed on the California Register of Historic Resources, and accordingly is a significant historical resource under CEQA. (State CEQA Guidelines, § 15064.5(a)(1).) Consistent with the Secretary of the Interior’s Standards

and the City's Downtown Specific Plan, the proposed Project preserves the distinctive character of the Central Fire Station and its site, while allowing for reasonable change to meet new needs. (Downtown Specific Plan, § 15.5.1, p. 15-16.) The proposed Project is thus referential to the Modern-era design principles embodied in the unique style of the Central Fire Station. The Central Fire Station was designed by the same architects who created the Public Library across Mission Inn Avenue. The design approach taken by both these structures and the proposed Project represents and continues the wide stylistic diversity of building designs located within the overlapping Mission Inn and Seventh Street Historic Districts.

To preserve the distinctive character of the Modern/International Style design of the historic Central Fire Station located on the Project site, the Project cannot be required to emulate the Spanish Baroque revival style of the First Congregational Church. The Secretary of the Interior's Standard No. 3 provides:

Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

(See Downtown Specific Plan, § 15.5.1, p. 15-17, Standard No. 3.)

If the proposed Project design were revised to reflect the Spanish Baroque revival style of the First Congregational Church rather than the Modern/International Style design of the Central Fire Station, the proposed Project would be inconsistent with the Secretary of the Interior's Standard No. 3, as this would create a false sense of historical development and improperly mimic design elements from other historic properties. (Downtown Specific Plan, § 15.5.1, p. 15-17, Standard No. 3.) As designed, the proposed Project is consistent with the Secretary of the Interior's Standard No. 3: the Project is compatible with the Modern/International Style design of the Central Fire Station located on the Project site, the rehabilitation of which is a part of the Project. Indeed, as set forth in earlier reports, the Project is consistent with the Secretary of the Interior's Standards set forth in the Downtown Specific Plan. (See, e.g., Historic Resource Evaluation: Riverside Downtown Specific Plan Review Supplement dated 15 July, 2021, pp. 32-37; see also Downtown Specific Plan, § 15.5.1, p. 15-17.) Accordingly, the proposed Project will have a less than significant impact on historic resources. (State CEQA Guidelines, § 15064.5(b)(3).)

2. The proposed Project would not result in a substantial adverse change in any of the Central Fire Station's character defining interior or exterior features.

The Secretary of the Interior's Standard No. 5 provides that "[d]istinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved." (See Downtown Specific Plan, § 15.5.1, p. 15-17, Standard No. 5.) Consistent with this standard, the proposed Project does not seek to alter or destroy the Central Fire Station's character defining features or to emulate the First Congregational

Church. Rather, the proposed Project preserves the character defining interior and exterior features of the Central Fire Station.

A. The Central Fire Station's Character Defining Interior Features

Under CEQA, impacts to the interior of a privately-owned structure – like the Central Fire Station here – do not qualify as a significant impact to the environment. (*Martin v. City and County of San Francisco* (2005) 135 Cal.App.4th 392, 404-405.) Regardless, the proposed Project would retain the significant, character-defining interior features of the Central Fire Station, including the following features:

- Fire fighter's poles
- Apparatus and fire engine room clear span steel roof trusses
- Front lobby stairway to second floor, including detailing of stair and handrail
- Various roof mounted skylights

The proposed Project would thus not impact any significant, character-defining interior features of the Central Fire Station.

B. The Central Fire Station's Character Defining Exterior Features

As set forth in the Historic Resource Evaluation Downtown Specific Plan Assessment Supplement dated July 15, 2021, the proposed Project would retain the significant, character-defining exterior features of the Central Fire Station, including the following features:

- The north, east, and south exterior façades of the Central Fire Station in their entirety.
- The spatial interconnectivity and interlocking volumetric compositions in the original massing scheme.
- The Central Fire Station façade design stylistic vocabulary of fenestration, composition, and minimal-decorative detail elements.
- Minimal, horizontal, flush cornice of the Central Fire Station structure.
- Seven Brise-soliel sun shade devices of various sizes at the west façade.
- One continuous Brise-soliel over ganged windows at the south façade.
- Original façade composition of the Central Fire Station brick and plaster façades and steel framed individual and ganged windows.
- Flat roof with a minimal coping detail.

The character-defining features of the Central Fire Station structure will be retained *in situ* and remain as part of the design on site consistent with the Secretary of the Interior's Standard No. 5. Consistency with the Secretary of the Interior's standards ensures a less than significant impact on historical resources. (State CEQA Guidelines, § 15064.5(b)(3).)

3. Conclusion.

This Report, the Report dated January 13, 2021, and the Report dated July 15, 2021 establish that the proposed Project will comply with the Secretary of the Interior's

Standards and that the proposed Project will not result in a substantial adverse change in the significance of a historical resource under CEQA.

End of Historical Assessment Report Summary Narrative

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