

October 7, 2021

Atman Kadakia
Greens Group
9289 Research Dr.
Irvine, CA 92618

Subject: AC Marriott Traffic and Parking Study Response to Comments (JN 0232-0003)

Dear Mr. Kadakia:

Trames Solutions Inc. is pleased to submit the following responses to comments on the traffic and parking studies previously prepared for the proposed AC Marriott/Residence Inn & Creative Office at the Historic Fire Station project. The project was evaluated as a 219 room business hotel with a 12,000 sf office building. The site is located south of Mission Inn between Lemon and Lime Street in the City of Riverside.

A Vehicle Miles Traveled evaluation was included in the traffic study based on the City of Riverside's draft guidelines for screening projects within transit priority areas (TPA). Since the completion of the traffic study, the City has finalized the guidelines. There were no changes to the VMT methodology that would affect the findings determined in the traffic study.

The following identifies the comments that were provided for the project, followed by our responses.

Comment 1

There is already significant traffic congestion on and around Mission Inn Avenue, particularly during the Mission Inn's Festival of Lights, held November through January, and during the many occasions throughout the year when the City closes Mission Inn Avenue for street festivals. When there are existing adverse impacts, even a small addition to the ongoing problem is an adverse impact requiring environmental review and mitigation. (Los Angeles Unified School Dist. v. City of Los Angeles (1997) 58 Cal.App.4th 1019, 1025; Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 718.) The City has failed to analyze the traffic impacts of the Project on Mission Inn Avenue and surrounding one-way streets, including Lemon Street. Thus, the City lacks substantial evidence to support a claim that the Project does not have significant traffic effects.

Response 1

The traffic study was prepared in accordance with the City's Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment. City staff has reviewed and approved the findings/recommendations included in the traffic study. The study area included the intersections adjacent to the proposed project including Lemon St/Mission Inn Ave. Based on the findings of the traffic study, no significant traffic impacts were identified.

The traffic study evaluated the hotel with 219 rooms. The current proposal is for 226 rooms. Based on the additional traffic due to the 7 rooms (3 AM trips, 2 PM trips, and 28 Daily trips), the findings and recommendations included in the traffic study would not change.

Comment 2

The significant under-parking of the Project would also exacerbate existing traffic impacts. Vehicles that are unable to park in the limited parking provided by the hotel will be forced to drive around the area looking for parking, creating traffic impacts and traffic hazards for pedestrians and bicyclists. Lack of adequate parking in this area of the City has been problematic and will be made worse by the sale of two existing City parking structures on Orange Street, which will be torn down and replaced with uses that also require parking.

Response 2

A parking study has been prepared for the proposed project. The project will be a business hotel that anticipates the majority of the visitors arriving from the Ontario Airport and attending events/meetings at the nearby convention centers, government offices, and medical facilities. Based on the findings of the study, adequate parking will be available for the hotel patrons due to the close proximity to the intended destinations, convenient public transit, and ride-sharing opportunities.

Comment 3

July 2020 occurred during the COVID-19 pandemic which affected traffic in many areas of California, and there is no discussion in the traffic report (Appendix B) or in the Technical Report regarding this effect.

Response 3

The traffic counts were collected in January 2020 while schools were still in session and prior to the Covid-19 shutdown.

Comment 4

The analysis goes on to consider traffic, noise, air quality and water quality. In its analysis of traffic impacts, the two sentences of analysis of construction traffic impacts state that there will be impacts associated with construction, but that this impact will be temporary and will therefore be less than significant. No evidence of how the impact will be less than significant is presented, nor does the traffic impact analysis appended to the analysis address construction traffic. CEQA does not allow an impact to be written off on the sole basis that it is temporary. One cannot ascertain the level of impact, since no evidence is provided, but the mere fact that an impact is declared causes the exemption to fail.

Response 4

A traffic control plan will be prepared prior to the initiation of construction activities. City staff will review and approve the plan to ensure that the construction traffic will not have a significant impact. If needed, the hours of operation can be shifted to before or after the peak hours. The following provides a summary of the anticipated construction traffic schedule.

Months 1-6: 31,600 CY of earthwork will be excavated. Will utilize truck & transfers at a load capacity of 10CY/Truck so 3,160 truck trips over 6 months of workdays, or 27 trucks a work-day. This works out to approximately 3 to 4 trucks/hour, or one truck every 17 minutes. There should never be any more than 1-2 trucks in a queue. At the time of grading permit, a site will be selected that has an approved earthwork import plan and a Truck Haul Plan will be created and submitted to the City's Public Works Department. The City will review this plan, along with an adjacent jurisdiction of the receiving site is outside of the incorporated area, and final traffic impact will be reviewed and approved at that time.

Months 6-14: Concrete/Forming phase, this will include construction of the 3 lower parking levels and the 3 levels above grade. This phase will include concrete trucks delivering material to the site. The projected material for this is approximately 12,550 CY of concrete. Each concrete truck transports 10 CY/load so 1,255 concrete trucks over 9 months, or an average of 7 trucks a work-day. Unlike the excavation phase, concrete truck traffic will not be consistent and will be scheduled on "pour days". These days and times are strategically scheduled to avoid peak a.m. and p.m. traffic times and consist of approximate pours of 600 CY or less (½ floor). On an average pour day this would work out to 60 trucks over the course of 6 hours, or 10 trucks an hour. There would be at least 2-4 concrete trucks staged at any one time during these days.

The two above mentioned construction phases will consist of the most heavy truck traffic related activities. All other trades will consist of typical construction traffic activities that consist of both labor parking and material drop-off/delivery. The General Contractor will be required to secure nearby parking arrangements for their sub-contractors and there are many parking opportunities within a few blocks of walking. A few lots that would be considered would be the Life Arts parking on the N'W'ly COR of University and Lemon and also the old Lube and Tune, Arts Bar and Grill and the Pizza Hut lots across Lime Street. There should be a time of use difference between each of those uses and the project's construction crews.

The fire station will be utilized for material drop-offs and staging. The existing bays can be configured to accept truck traffic from Mission Inn Avenue, with a drive-thru and exit onto the S'ly alley and then a right turn onto Lime Street. The ability to utilize the fire station for this is a great asset not usually enjoyed by other developments in dense urban cores and should mitigate typical construction traffic related issues associated with projects like these.

As indicated above, the most intensive truck activity would occur during the earthwork excavation that anticipates up to 4 trucks per hour (4 truck trips inbound and 4 truck trips outbound). Assuming a conservative passenger car equivalency (PCE) factor of 4.0 (1 truck having a similar impact as 4 passenger cars; a PCE value of 3.0 is typical values for large trucks), the site would experience approximately 16 PCE trips inbound (16 PCE trips = 4 trucks inbound x 4.0 PCE) and 16 PCE trips outbound for a total of 32 PCE trips during an hour. Since the project was analyzed with 123 trips during the AM peak hour and 85 trips during the PM peak hour, the construction related traffic would be less than the project related traffic. Therefore, it is anticipated that the construction related traffic would have less of a traffic impact than the traffic due to the project.

If you have any questions, please contact me directly at (949) 244-2436.

Respectfully submitted,

Trames Solutions Inc.

A handwritten signature in black ink that reads "Scott Sato". The signature is written in a cursive, flowing style.

Scott Sato, P.E.

Vice President