

**ATTACHMENT A**  
**FINDINGS FOR AFFORDABLE HOUSING CONCESSION PERMIT #11879**

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**ZONING ADMINISTRATOR RECOMMENDED**  
**FINDINGS FOR AFFORDABLE HOUSING CONCESSION PERMIT #11879**

Affordable Housing Concession Permit – To exceed the maximum FAR and height limit

1. *The concessions or incentives are required in order for the designated units to be affordable.*

Keyser Marston Associates (KMA) prepared a financial evaluation of the development proposal, reviewing and analyzing two development scenarios, the Base Case scenario and the Proposed Project scenario. KMA determined that the net cost associated with providing four very-low income units is estimated at \$2,947,000. The requested density bonus and concessions is valued at \$2,977,000. The value created by the proposed density bonus and the two identified concessions is estimated to exceed the net cost associated with providing four very-low income units by \$30,000. In KMA's opinion, a difference of this magnitude can be considered a breakeven scenario. In their analysis, KMA concludes that there is not sufficient evidence for the City to reject the Height and FAR Concessions requests under the financial evidence requirement parameters imposed by California Government Code Section 65915(d)(1)(A).

2. *The concession or incentive would not have a specific adverse impact on public health, public safety, or the physical environment, and would not have an adverse impact on a property that is listed in the California Register of Historical Resources, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact, or adverse impact, without rendering the development unaffordable to low- and moderate-income households. A specific adverse impact is a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.*

The Department of Transportation (DOT) prepared a Traffic Impact Analysis for the project. The study evaluated the effect the project would have on existing neighborhood traffic volumes along the street segment of Madison Avenue between Walnut Street and Union Street and intersections within the vicinity of the project (Madison Avenue at Walnut Street and Madison Avenue at Union Street). A field observational survey was also conducted along Madison Avenue between Walnut Street and Union Street to document existing pedestrian and bicycle quality conditions. This is recognized as the Pedestrian Environmental Quality Index (PEQI) and Bicycle Environmental Quality Index (BEQI). Vehicle traffic features (i.e., number of lanes, vehicle speed, etc.) as well as street quality features (i.e., sidewalk widths and impediments, driveway cuts, land use characteristics, etc.) were collected for the east and west sides of the street. Environmental quality of non-vehicular modes must be improved when assessment of project study street segments and intersections reveal less than average conditions. DOT also

conducted a separate analysis (referred to as the CEQA Evaluation) of the City's five vehicular and multimodal performance measures that assess accessibility of different modes of travel when evaluating a project's impact, as well as the project's transportation impact to its community using adopted transportation performance measures that relate to vehicle miles traveled (VMT), vehicle trips (VT), proximity and quality of the bicycle network, proximity and quality of the transit network, and pedestrian accessibility.

The analyses concluded that the project is not expected to exceed adopted intersection caps or street segment caps and that there should be adequate transit capacity to have no significant transit impacts. The resulting PEQI score adjacent to the project is "high" while the BEQI score is "average." Therefore, the project would not cause a significant impact on the existing bicycle network or access to transit facilities. Further, the analyses determined that the project would not exceed the City's significance thresholds for Vehicle Miles Traveled (VMT) per Capita, or Vehicle Trips (VT) per capita. It was also determined that the project would not cause a significant impact on the existing bicycle network, existing transit network, or proximity and quality of the pedestrian environment. As it relates to vehicular traffic, there would be no adverse impact on public health, public safety, or the physical environment.

An acoustical study to evaluate the potential noise and vibration impacts was prepared. The analysis found that 1) construction of the project will not exceed the City's construction noise standards; 2) operation of the project will not exceed the City's traffic or operational stationary source noise standards; and 3) the project will not result in the generation of excessive ground-borne vibration or groundborne noise levels from construction or operational activities. Thus, the project will not result in a substantial temporary or periodic increase in noise, will not result in a substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project. The project and impacts will be less than significant will result in a less-than-significant impact from ground-borne vibration and ground-borne noise.

In addition, cumulative construction noise levels will be intermittent, temporary, and will cease at the end of the respective project construction periods. It is not likely that maximum construction noise impacts from related projects will occur simultaneously as the proposed project since construction noise levels vary from day to day depending on the construction activity performed that day and its location on the development site. Although there will be an increase in temporary ambient sound levels, each construction project will be expected to comply with the City's Noise Ordinance with construction equipment operating between the hours of 7:00 A.M. to 7:00 P.M. Monday through Friday, and 8:00 A.M. to 5:00 P.M. on Saturday. As a result, the project's contribution to cumulative construction impacts will not be cumulatively considerable, and impacts will be less than significant. The increase in operational cumulative impacts is estimated to be up to a maximum of 1 dBA. A change in noise level of 1 dBA is not perceptible by the human ear in a non-



controlled environment, such as in an urban environment. Therefore, when the related projects' traffic noise levels are combined with the proposed project's traffic noise levels, the cumulative traffic noise level increase will be less than 3 dBA, and, therefore, cumulative traffic noise impacts will be less than significant. The analysis also concluded that cumulative stationary source noise impacts related to stationary noise sources (i.e., fixed mechanical equipment, parking structure, and loading dock), will be less than significant. As it relates to noise and vibration, there will be no adverse impact on public health, public safety, or the physical environment and the proposal complies with the requirements needed to make the findings to be granted a concession.

An air quality assessment was prepared evaluate the potential air quality impacts associated with construction activities, mobile sources, building energy demand, and other aspects of project construction and operations that have the potential to generate criteria air pollutant emissions. The analysis found that 1) the incremental increase in emissions from construction and operation of the project will not exceed the regional daily emission thresholds set forth by the South Coast Air Quality Management District (SCAQMD). Thus, the project will not result in a regional violation of applicable air quality standards or jeopardize the timely attainment of such standards in the South Coast Air Basin (the Air Basin); 2) the incremental increase in on-site emissions from construction and operation of the project will not exceed the localized significance thresholds set forth by the SCAQMD. Thus, the Project will not result in a localized violation of applicable air quality standards or expose off-site receptors to substantial levels of regulated air contaminants; 3) emissions from the increase in traffic due to operation of the project will not have a significant impact upon 1-hour or 8-hour local carbon monoxide (CO) concentrations due to mobile source emissions; 4) project construction and operations will not result in significant levels of odors; and 5) the project will be consistent with air quality policies set forth by the City of Pasadena, the SCAQMD, and the Southern California Association of Governments (SCAG). The project will not result in a significant cumulative air quality impact. The analysis also determined that the project's contribution to cumulatively significant construction impacts to air quality will not be cumulatively considerable, and cumulative impacts will be less than significant for regional and localized criteria pollutants during construction. They also found that the project will not exceed the SCAQMD regional daily significance thresholds. Therefore, the project's incremental contribution to long-term emissions, considered together with cumulative projects, will not be cumulatively considerable, and, therefore, the cumulative impact of the project will be less than significant. As it relates to air quality, there will be no adverse impact on public health, public safety, or the physical environment and the proposal complies with the requirements needed to make the findings to be granted a concession.

A Greenhouse Gas (GHG) emissions assessment was prepared to quantify the potential GHG emissions associated with construction activities, mobile sources, building energy demand, and other aspects of project construction and operations that have the potential to generate GHG emissions. The analysis found that 1) the

project will be designed to meet the California Green Building Standards (CALGreen) Code, as adopted and amended by the City of Pasadena, through the incorporation of green building techniques and other sustainability features, including those within the City of Pasadena Green Building Code, where applicable. GHG emissions associated with the project will be consistent with the applicable portions of the City of Pasadena's qualified CAP as the project will meet the applicable GHG per service population efficiency target. Thus, the project's GHG emissions will be consistent with regulatory schemes intended to reduce GHG emissions; 2) the project will be consistent with local regulations for reducing GHG emissions in accordance with the City of Pasadena's qualified CAP. Therefore, the project will be consistent with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions; 3) The project will implement green building measures that will reduce the project's direct and indirect GHG emissions. The project's consistency with applicable regulatory plans and policies to reduce GHG emissions demonstrate that the project will substantially comply with or exceed the GHG reduction actions and strategies outlined in the City of Pasadena CAP and Green Building Code. The project will also incorporate characteristics that will achieve reductions in vehicle miles traveled (VMT), as it is sited in a location that is well-served by multi-modal transportation choices. In addition, the project's GHG efficiency will be below the GHG efficiency threshold provided in the Climate Action Plan. The analysis calculated the project's GHG efficiency in its opening year at 4.37 metric tons per year per service person, where the threshold is 4.56 metric tons per year per service person. As it relates to GHG emissions, there will be no adverse impact on public health, public safety, or the physical environment and the proposal complies with the requirements needed to make the findings to be granted a concession.

A cultural resources assessment and survey of the project site were conducted. The existing building on the subject property (Madison Professional Building) was evaluated for listing in the National Register, California Register, and for local designation, and is not eligible. As such, it does not qualify as historical resources under CEQA and the project would not result in a direct impact to historical resources. Further, no impacts are anticipated to adjacent historical resources. The proposed project would not constitute a substantial adverse change to the Ford Place Historic District resource resulting in it no longer being able to convey its significance. The proposed project would not alter any of the character-defining features identified in the nomination of the Ford Place Historic District and it would remain an eligible resource. The proposed project would not result in a substantial adverse change to the Blinn House, and would not materially impact its integrity. The acoustical study prepared for the project considered noise and vibration impacts to the historic buildings located on the Fuller Theological Seminary campus directly west of the project site (inclusive of the Blinn House property). The study applied the most stringent vibration threshold, which is 0.12 inches-per-second PPV (peak particle velocity). The peak level represents the maximum instantaneous peak of the vibration signal. Vibrations can be measured in the vertical, horizontal longitudinal, or horizontal transverse directions. Ground vibrations are most often greatest and



can damage buildings, when they propagate in the vertical direction. Therefore, the analysis of ground-borne vibration associated with the project was evaluated in the vertical direction. The 0.12 PPV threshold applies to extremely fragile historic buildings, ruins, and ancient monuments. Noise and vibration impacts to sensitive receptors, including the historic buildings located on the Fuller Theological Seminary campus directly west of the project site (inclusive of the Blinn House property) would be less than significant. Notwithstanding, the project will adhere to a vibration management plan, which includes: 1) no use of vibratory rollers, pile drivers, pavement breakers, or blasting; and 2) the project will observe the 3', 11', 18' and 20' restrictions for small bulldozers, jackhammers, loading trucks, and large bulldozers respectively measured from nearest structures in Ford Place. Further, the Pasadena General Plan for the City of Pasadena includes a Mitigation Monitoring and Reporting Program (MMRP) in fulfillment of Section 21081.6 of the State of California Public Resources Code that required the City to adopt a reporting or monitoring program, as part of the adopted General Plan and certified Environmental Impact Report, to mitigate or avoid significant environmental effects (City of Pasadena, 2015). Mitigation Measure (MM) 4-1 provided for cultural resources in the MMRP addresses cultural resource discovery. To implement MM 4-1 of the General Plan and comply with the General Plan MMRP, conditions of approval have been incorporated requiring cultural resources sensitivity training and steps to be taken in the event of the discovery of archaeological materials. As it relates to historic resources, and with the incorporation of the abovementioned conditions, there will be no adverse impact on a property listed on the California Register of Historic Places and the proposal will comply with the requirements needed to make the findings to be granted a concession.

Based on the analysis, there is no evidence in the record to demonstrate that the concessions would have any specific adverse impacts (as defined by State law) on public health, safety, or the physical environment or on any real property that is listed in the California Register of Historical Resources.

3. *The concession or incentive would not be contrary to state or federal law.*

The requested concession will be granted consistent with the procedures and requirements established by California Government Code Sections 65915 (Density Bonuses and Other Incentives) and will not be contrary to any federal laws.

Private Tree Removal Permit – To remove a Brush Cherry tree (*Syzygium paniculatum*)

4. *Describe how/why the project includes a landscape design plan that emphasizes a tree canopy that is sustainable over the long term by adhering to the adopted replacement matrix.*

This specimen tree exceeds the minimum protection size and therefore, is protected. Removal is proposed to accommodate the mixed-use project. The applicant's landscape design plan includes 36-inch box replacement trees that adhere to the

adopted replacement matrix. This specimen tree will be replaced with specimen trees, an option provided by the matrix. The type and location of replacement trees exhibit characteristics that support a sustainable canopy over the long term. Trees will be located in planter beds with a soil mix designed to benefit trees growing in in areas near paving. All trees will be provided with adequate soil volume and soil depth that in the opinion of the landscape architect, will allow the trees to perform and survive for the long term. Trees located within proximity of the structure are up-reaching, and narrow spreading, allowing for them to survive for the long term.

Private Tree Removal Permit – To remove a Silver Dollar Gum tree (Eucalyptus polyanthemos)

5. *Describe how/why the project includes a landscape design plan that emphasizes a tree canopy that is sustainable over the long term by adhering to the adopted replacement matrix.*

This mature tree exceeds the minimum protection size and therefore, is protected. Removal is proposed to accommodate the mixed-use project. The applicant's landscape design plan includes 36-inch box replacement trees that adhere to the adopted replacement matrix. The type and location of replacement trees exhibit characteristics that support a sustainable canopy over the long term. Trees will be located in planter beds with a soil mix designed to benefit trees growing in in areas near paving. All trees will be provided with adequate soil volume and soil depth that in the opinion of the landscape architect, will allow the trees to perform and survive for the long term. Trees located within proximity of the structure are up-reaching, and narrow spreading, allowing for them to survive for the long term.

Private Tree Removal Permit – To remove a Ribbon Gum tree (Eucalyptus viminalis)

6. *Describe how/why the project includes a landscape design plan that emphasizes a tree canopy that is sustainable over the long term by adhering to the adopted replacement matrix.*

This mature tree exceeds the minimum protection size and therefore, is protected. Removal is proposed to accommodate the mixed-use project. The applicant's landscape design plan includes 36-inch box replacement trees that adhere to the adopted replacement matrix. The type and location of replacement trees exhibit characteristics that support a sustainable canopy over the long term. Trees will be located in planter beds with a soil mix designed to benefit trees growing in in areas near paving. All trees will be provided with adequate soil volume and soil depth that in the opinion of the landscape architect, will allow the trees to perform and survive for the long term. Trees located within proximity of the structure are up-reaching, and narrow spreading, allowing for them to survive for the long term.

Private Tree Removal Permit – To remove a Silver Dollar Eucalyptus tree (Eucalyptus polyanthemos)

- 7. Describe how/why the project includes a landscape design plan that emphasizes a tree canopy that is sustainable over the long term by adhering to the adopted replacement matrix.*

This mature tree exceeds the minimum protection size and therefore, is protected. Removal is proposed to accommodate the mixed-use project. The applicant's landscape design plan includes 36-inch box replacement trees that adhere to the adopted replacement matrix. The type and location of replacement trees exhibit characteristics that support a sustainable canopy over the long term. Trees will be located in planter beds with a soil mix designed to benefit trees growing in areas near paving. All trees will be provided with adequate soil volume and soil depth that in the opinion of the landscape architect, would allow the trees to perform and survive for the long term. Trees located within proximity of the structure are up-reaching, and narrow spreading, allowing for them to survive for the long term.