

Agenda Report

August 15, 2016

TO: Honorable Mayor and City Council
FROM: Planning & Community Development Department
SUBJECT: CONDITIONAL USE PERMIT #6279 TO ALLOW REHABILITATION OF THE HISTORIC YWCA BUILDING AND CONSTRUCTION OF A TWO-TO-SIX-STORY BUILDING FOR USE AS A 179-ROOM HOTEL AT 78 NORTH MARENGO AVENUE

RECOMMENDATION:

Staff recommends that the City Council:

1. Adopt the resolution and the findings in Attachment P certifying the Final Environmental Impact Report for the YWCA/Kimpton Hotel project;
2. Adopt the Mitigation Monitoring and Reporting Program for the project in Attachment C;
3. Adopt the findings in Attachment A and approve Conditional Use Permit #6279 with the conditions of approval in Attachment B:
 - a. Surplus Property declaration and exemption from competitive sale requirement: To determine that real property of the City is not needed for the purpose for which it was acquired or for any other public purpose and to allow the City to enter into a long-term lease with the developer most suited to successfully rehabilitate the YWCA building rather than to the highest bidder;
 - b. Conditional Use Permit: To allow the construction of a non-residential project over 25,000 square feet in size ('Major Project');
 - c. Conditional Use Permit: To allow a 'Lodging - Hotels, Motels' use;
 - d. Conditional Use Permit: To allow the sale of a full line of alcoholic beverages for on-site consumption;
 - e. Minor Conditional Use Permit: To allow the construction of a non-residential project over 15,000 square feet in size within the Transit-Oriented Development (TOD) Area;
 - f. Minor Conditional Use Permit: To allow shared parking;

- g. Minor Conditional Use Permit: To allow reduced parking;
 - h. Variance: To allow the ground floor of the hotel building to be nine feet high where the minimum required ground floor height is 15 feet;
 - i. Variance: To allow one loading space where six loading spaces are required and to modify the required design of the loading space as required in the Zoning Code;
 - j. Public Tree Removal: To allow the removal of 23 public trees in fair to good condition to accommodate the proposed development (The Parks and Natural Resources Division of the Department of Public Works determined that 13 additional trees will be removed due to their poor condition); and,
4. Approve the location, setbacks and general massing of the project presented in the Alternative 2A design study with a maximum of 185 rooms as depicted in Attachment N, with the conditions of approval recommended in Attachment B.

PLANNING COMMISSION RECOMMENDATION:

At its regular meeting of July 13, 2016, the Planning Commission recommended that the City Council approve the project entitlements listed in the staff recommendation above (with the exception of the Public Tree Removal), with the following additional recommended conditions:

1. That the setback from Garfield Avenue be maximized to the greatest extent possible without compromising the design of the project; and
2. That the interior courtyard be open to the public during the day.

Staff has drafted conditions for the City Council's consideration in response to these two recommendations. See Attachment B, recommended conditions 23 and 24.

A number of public comment letters expressing concerns about the project and the Final EIR were submitted to the Planning Commission at the July 13, 2016 meeting. These letters are included in Attachment O, along with written responses prepared by staff.

URBAN FORESTRY ADVISORY COMMITTEE RECOMMENDATION:

At a special meeting on August 3, 2016, the Urban Forestry Advisory Committee (UFAC) voted to recommend that project alternatives that have a lesser impact on public trees, particularly the Sister City Trees, be considered and also continued the consideration of the public tree removals until after the Design Commission reviews the project in order to allow the Committee to review a landscape plan for the project. In addition, UFAC recommended that all trees in fair to good condition that are proposed to be removed be reviewed by a Certified Arborist to determine potential candidates for relocation.

EXECUTIVE SUMMARY:

The applicant, Kimpton Hotel & Restaurant Group, LLC, proposes to rehabilitate the existing approximately 40,570-square-foot historic YWCA building and construct a new two-to-six-story, approximately 87,342-square foot new building, both of which would become an approximately 127,912-square-foot, 179-room Kimpton Hotel with restaurant and banquet facilities on land totaling 1.93 acres. The project site is bound by Garfield Avenue on the east, Union Street on the south, Marengo Avenue on the west and Holly Street on the north. Parking for the proposed project is valet only and would be provided off-site.

The following entitlement applications are required for the project:

- 1) Surplus Property declaration and exemption from competitive sale requirement: To determine that real property of the City is not needed for the purpose for which it was acquired or for any other public purpose and to allow the City to enter into a long-term lease with the developer most suited to successfully rehabilitate the YWCA building rather than to the highest bidder;
- 2) Conditional Use Permit (CUP): for a new non-residential project exceeding 25,000 square feet of gross floor area;
- 3) CUP: to allow use of property in the CD-2 Zoning District for a "Lodging – hotels" use;
- 4) CUP: for the sale of a full line of alcoholic beverages for on-site consumption;
- 5) Minor CUP: for a new commercial project exceeding 15,000 square feet of gross floor area in a transit oriented district (TOD);
- 6) Minor CUP: for shared parking;
- 7) Minor CUP: for reduced parking;
- 8) Variance: for reduced first floor height;
- 9) Variance: for loading spaces (number and design);
- 10) Public Tree Removals: to remove 23 public trees in fair to good condition to accommodate the proposed development (13 additional unhealthy trees will also be removed by the City); and

The City of Pasadena has completed a Final Environmental Impact Report (FEIR) for the proposed project. The FEIR analyzed the following environmental topics: 1) cultural resources; 2) energy; 3) land use and planning; 4) noise and vibration; and 5) transportation and traffic. The FEIR identified potentially significant effects related to the following topics: 1) cultural resources; 2) noise and vibration; and 3) transportation and traffic. With the incorporation of mitigation measures in the Mitigation Monitoring and Reporting Program (MMRP) in Attachment C, the FEIR determined that all potentially significant effects would be reduced to a less than significant level.

Staff finds that the Environmental Impact Report adequately analyzed the potential environmental impacts of the project and that the findings to approve the requested entitlements can be made. Further, staff finds that Alternative 2A, as outlined and evaluated in the EIR, is the most appropriate project to propose for development due to

its clear reinforcement of the vision of the 1925 plan for the Civic Center as prepared by the firm Bennett, Parsons and Frost (Bennett Plan). Staff therefore recommended that the Planning Commission recommend to the City Council the certification of the FEIR; adoption of the MMRP; and approval of the declaration of surplus property, exemption from the competitive sale requirement, CUPs and Variances for Alternative 2A based on the findings in Attachment A and subject to the conditions of approval in Attachment B. Accordingly, all further references to the "project" are to Alternative 2A as conditioned.

BACKGROUND:

City Acquisition and Request for Proposals:

In 2003, after years of decline in the YWCA building's condition, the City began the process of acquiring the building to arrest further deterioration and ensure its future rehabilitation. The owner of the building rejected the City's offer and in the ensuing years brought forward two development proposals, neither of which progressed beyond the early planning phases. These proposals were for work/live units in 2003 and a hotel/residential project in 2005. In 2008, the City offered to pay for the rehabilitation of the building and possibly lease a portion of it but the negotiations were unsuccessful. Given the multi-year history of unsuccessful negotiations with the owner and the continued decline of the building, in 2010 the City Council authorized eminent domain action to acquire the building for the preservation of an historic asset. Rather than continue with costly eminent domain action, both parties agreed to mediation which culminated in a court approved Stipulation Agreement which gave the City ownership in April 2012. The City paid \$8.3 million for the land and building.

Notwithstanding the then current city budget constraints coupled with the elimination of redevelopment funds, the City desired to move forward with rehabilitation of the historic structure by issuing a Request for Proposal (RFP). In June of 2012, staff presented the RFP, as an information item to the Economic Development & Technology Committee (Ed-Tech) of the City Council. Staff outlined the review and selection criteria for proposals, the legal parameters for possible development under the Zoning Code and Central District Specific Plan (CDSP) and a summary of the anticipated public review process for any project proposal. The vacant lot on the north side of Holly Street was also part of the RFP, but it could only be developed if the YWCA were rehabilitated first. The vacant lot could not be developed as a stand-alone project. Moreover, the RFP did not specify a particular land use desired by the City, only that it be consistent with the site's Zoning Code and CDSP designations. An 85' x 100' portion of the landscaped area at the corner of Garfield Avenue and Union Street was specifically identified as being included in the RFP and available for development because it is not dedicated park land, as well as the vacant parcel on the north side of Holly along Garfield. In conclusion staff outlined the goals and objectives of the RFP as follows:

- Preservation of the historic asset for the purpose of rehabilitation (the reason the City bought it)
- Implement a use that is appropriate in the Civic Center
- Serve as an added catalyst for continued economic growth and provide a

- direct economic benefit to the City
- Respond to and respect the architectural and spatial context of the site and surrounding historic district
- The development standards applicable to the subject property are established in the Zoning Code and CDSP and include:
 - Marengo & Union Setback:
 - Non-residential: 0 min., 5' max.
 - Residential: 5' min., 10' max.
 - Holly & Garfield setback: Minimum 10'
 - 60' Maximum height (height averaging not allowed)
 - 2.25 FAR

The RFP also identified a number of concerns that included the Robinson Memorial; the Sister City Trees; the historic nature of the property; and likelihood of extensive community interest in the project and design in relation to these issues and location within the Civic Center. The RFP provided guidance that the setback from Garfield Avenue may need to be increased or the height decreased beyond zoning requirements in order to maintain prominence of City Hall and maintain alignment with existing public buildings, understanding that this is a City project and additional requirements could be imposed.

Open House/Public Discussions

As a follow-up to the June ED-Tech meeting, City staff and Pasadena Heritage held two open houses at the Julia Morgan Building in July 2012 that had a combined attendance of approximately 300 people. Public tours of the building were offered, after which all were invited to hear and participate in a staff presentation in City Council chambers. During the discussion, staff presented the parameters and goals of the RFP (similar to the ED-Tech presentation) and answered many RFP related questions. In addition, staff discussed the City's expectations for the Julia Morgan Building and the types of proposals it expected to receive. The overall main topics of discussion were as follows:

- The City was seeking a viable use that will rehabilitate the building
- Zoning/Setback codes that govern the site
- Clearly identified that the green space is not a dedicated park
- Specific use not identified, but anticipated receiving commercial use proposals
- Only market-rate deal would be entertained
- Would entertain outright sale, but lease is preferred

At the conclusion of the meeting, staff outlined the future steps in the RFP and for selecting a proposal.

In response to the RFP, the City received several proposals; all but one proposed rehabilitating the former YWCA as hotel. An advisory panel that consisted of City staff and representatives of Pasadena Center and Operating Company (PCOC) and

Pasadena Heritage evaluated all of the proposals and recommended to the City Council that the City begin exclusive negotiations with Kimpton Hotels and Restaurants (Kimpton). Subsequent to the advisory panel recommendation, staff received direction from City Council to begin negotiations with Kimpton. On June 10, 2013, the City issued a press release announcing that the City and Kimpton had entered into an Exclusive Negotiation Agreement. The Agreement expires January 2017. In January 2015, Kimpton Hotels & Restaurants was acquired by a subsidiary of Intercontinental Hotel Group (IHG). However, IHG's acquisition did not affect, nor impact Kimpton's plans for the YWCA. The personnel that manage the fund responsible for developing the proposed hotel, KHP III, LP and who originally responded to the RFP has not changed and was not a part IHG's acquisition. Kimpton Management Company will manage the hotel.

Since entering into the ENA the proposed project has been on the agenda of numerous public meetings including:

- December 10, 2013- Design Commission reviewed Kimpton proposed plans in Preliminary Consultation
- March 17, 2014 – Preliminary Plan Review with City Council
- September 23, 2014 - Update Design Commission on status and design changes to the project prior to submittal of entitlement applications as requested during Preliminary Consultation
- March 25, 2015 – Planning Commission conducted EIR Scoping Session
- April 2, 2015 – Planning Commission conducted DEIR workshop
- April 22, 2015 – Planning Commission meeting held and Staff outlined process by which Kimpton was selected
 - Between April and August 2015, five meetings were held with a working group of concerned citizens to identify project alternatives to study in the EIR
- August 11, 2015 – Design Commission plans presented as an information item
- August 12, 2015 – Planning Commission held Design Alternatives Workshop
- February 5, 2016 – April 5, 2016 – DEIR available for public comment
- March 1, 2016 – DEIR presented to the Historic Preservation Commission
- March 8, 2016 - DEIR presented to the Design Commission
- March 9, 2016 - DEIR presented to the Planning Commission
- April 13, 2016 – Planning Commission received information only item on outline of applications that have been submitted and that are required for the project to move forward
- July 13, 2016 – Planning Commission reviewed and made a recommendation to the City Council to certify the Final EIR and approve the requested zoning entitlements for the project
- August 3, 2016 – the Urban Forestry Advisory Committee reviewed the proposed public tree removals associated with the project

Existing Site Characteristics:

The 1.93-acre project site is bound by Garfield Avenue on the east, Union Street on the south, Marengo Avenue on the west and Holly Street on the north. The project site is located within the CD-2 (Central District Specific Plan, Civic Center/Midtown) zoning district, which, pursuant to PMC §17.30.020.B, is “intended to strengthen its role as the symbolic and governmental center of the City, supporting civic, cultural, and public service institutions, while augmenting the character of the area with a complementary mixture of uses.”

The project site is currently developed with an approximately 40,570-square-foot building constructed between 1921 and 1923 and formerly used as a YWCA at the western end of the site, a surface parking lot immediately east of the YWCA building and landscaping and public art (Pasadena Robinson Memorial) at the western and northern edges of the site along Garfield Avenue and Holly Street. The existing building is a city-designated historic monument, is listed in the National Register of Historic Places as a contributing structure to the Pasadena Civic Center Historic District, and has been vacant since 1996. The current Environmental Impact Report for the project also found the building to be eligible for individual listing in the National Register of Historic Places.

The project site is located within the Central District of Pasadena, specifically the Civic Center/Midtown subdistrict, which is an area developed with mostly institutional and governmental uses with some supporting commercial and residential uses. Adjacent uses include the Centennial Place apartments (former YMCA) to the north, City Hall to the east, the main Post Office, a surface parking lot (approved but unbuilt Union Street Condominiums project), a two-story commercial building to the south and First Baptist Church to the west. The Memorial Park Gold Line Light Rail Station is located approximately 0.20 mile west of the project site.

Adjacent Uses:

North – Residential
South – Institutional, Parking, Commercial
East – Institutional
West – Institutional

Adjacent Zoning:

All Directions - CD-2 (Central District Specific Plan, Civic Center/Midtown Subdistrict)

Project Description:

The property, including the existing YWCA building, is proposed to be developed with a hotel use. The hotel would include up to 179 guest rooms and related services (totaling approximately 127,912 square feet, including the rehabilitated YWCA building), a ballroom (approximately 5,630 square feet), conference rooms (approximately 1,989 square feet), and a restaurant (approximately 2,350 square feet and 140 seats), as

shown on the submitted plans. Alternatives analyzed in the EIR for the project indicate a room count up to 185. The proposed floor area ratio (FAR) would be approximately 1.48. The building would range in height from two stories up to a maximum of six stories (60 feet high). No parking is proposed on-site; valet parking is proposed at one of three locations:

- AT&T garage located at 177 East Colorado Boulevard
- Holly Street garage located at 150 East Holly Street
- Ramona Street Garage located at 240 Ramona Street

The new building would be at the eastern half of the site along East Union Street and North Garfield Avenue. The hotel building would be 'L'-shaped, creating a central ground-level courtyard space, and would also include typical hotel amenities such as a lobby, restaurant, meeting space, banquet facilities, a pool area, and a fitness room. Much of this space would be within areas of the historic YWCA that, historically, housed similar uses. The former dining room would become the restaurant, the former lobby would become the hotel lobby, the former entrance would become the hotel entrance, and the gymnasium and pool spaces would become banquet facilities. Due to the proposal for off-site parking, there would be no vehicular access to the site. A vehicular drop-off and valet zone would be established in a turnout from Marengo Avenue to allow for valet operations to be conducted within the public right-of-way. A new sidewalk would be built east of the new drop-off zone. A commercial loading zone would be created along Union Street within the proposed new building.

Entitlements Needed:

The entitlements requested by the applicant are listed on page 3 of this report (Executive Summary). Pursuant to PMC Section 17.60.030 (Concurrent Permit Processing), when a single project incorporates different land uses or features so that multiple land use permit applications are required, the Director may determine that all of the applications shall be filed concurrently, and reviewed, and approved or disapproved, by the highest level review authority. In this case, approval of a declaration of surplus property and exemption from the competitive sale requirement are required actions for which the City Council is the review authority; therefore, the City Council is the review authority for all entitlements required for this project.

Should the City Council approve the required entitlements, the project would then require Design Review approval by the Design Commission prior to issuance of any building permits. A permit from the Department of Transportation to conduct valet operations within the public right-of-way will also be required prior to issuance of a building permit, as recommended in the conditions of approval in Attachment B.

ANALYSIS:

1. Surplus Property Declaration and Exemption from the Competitive Sale Requirement

Surplus Property

PMC Chapter 4.02 establishes procedures for declaring property owned by the City to be “surplus real property,” which is defined as “real property of the city not needed for the purpose for which it was acquired or for any other public purpose.” The City purchased the YWCA and parking lot properties in 2012 for the purpose of rehabilitating and reusing the YWCA so as to halt any “demolition by neglect” and this remains the purpose of the properties; therefore, these properties are not considered surplus property. The L-shaped landscaped parcel was purchased in 1923 along with other properties in the vicinity for “the construction and completion thereon of a building, together with suitable appurtenances, grounds and approaches, for City Hall purposes.” To build the proposed hotel on a portion of this property would require the City Council to declare it surplus property. The information below is provided to assist the Council in understanding the history of these sites in terms of both their acquisition and intended use since 1923 and supports declaring portions of the subject property surplus property for the purposes of constructing the proposed Kimpton Hotel project and, thereby, rehabilitating and reusing the YWCA building.

Municipal Improvement Act

In 1921, the California Legislature enacted an amendment to Section 14 of the Municipal Improvement Act of 1901 to allow any city in California to issue a single bond for a number of municipal improvements in one group, provided that the city’s planning commission has approved the group of municipal improvements as constituting a city plan and the voters also approve. The City of Pasadena’s Planning Commission was created on April 19, 1922 and approved the group of municipal improvements for City Hall, the Public Library and the Civic Auditorium in May 1923 (Resolution 2), followed by voter approval in June 1923 as detailed below. This approval of the City Plan, as defined in the ballot language, was a funding mechanism to purchase and develop property at one time. This was explained by the then-City Attorney James H. Howard in a May 21, 1923 article published in the Pasadena Star-News (Attachment I). The bonds have been used for the purpose for which they were intended, construction of City Hall with appurtenances, grounds, and approaches, and the bonds have been paid. There were no covenants established restricting use of the land in the future.

Bennett Plan & Bond Propositions

In 1922 the City engaged the planning firm of Bennett, Parsons & Frost to develop a “city plan” and a conceptual plan was developed by that firm in January 1923 (Attachment D). In June 1923, two propositions were placed on the ballot to ask voters:

1. Whether the City should “incur a bonded debt of \$3.5 million for the purpose of the acquisition, construction and completion of certain municipal improvements in one group heretofore approved by the City Planning Commission of the City of Pasadena as constituting a City Plan...” which included “a building, together with suitable appurtenances, grounds and approaches” for City Hall, Public Library and Municipal Auditorium and assembly and convention hall purposes; and
2. “Whether the City Plan approved by the City Planning Commission as Resolution 2 on May 11, 1923 should be approved” (Attachment E).

Planning Commission Resolution 2 (also in Attachment E) that is referenced in the ballot language includes a legal description of specific properties to be acquired for the purposes described in the propositions and the landscaped parcels at the corner of Holly Street and North Garfield Avenue were included in this legal description and were acquired following approval of the propositions.

While the January 1923 conceptual plan by Bennett, Parsons & Frost was published in local newspapers leading up to the vote, the plan was not part of the City Plan set forth in Resolution 2 by the Planning Commission, was not part of Ordinance 2116 adopted by the Board of Directors (City Council) authorizing the propositions, and was not on the official ballot. Attachment F includes a map drawn by the lead surveyor in the City's Department of Public Works depicting an aerial photograph of the existing conditions in this area, the configuration of properties and streets at the time of the vote and the limits of properties that were outlined in the legal description in Resolution 2. Also included are two Sanborn Maps from 1910, which also depict the configuration of the properties at the time of the vote.

What is clear from these maps is that the City intended to purchase all of the properties with frontage along Worcester Avenue (later renamed Garfield Avenue) and that the depth of the area to be purchased along the street corresponds to the actual depth of the properties as they existed at that time. The 1923 conceptual plan prepared by Bennett, Parsons & Frost depicts a 50-to-55-foot deep landscaped area along Garfield Avenue, on both the north and south sides of Holly Street, measured from the back of the sidewalk, based on the scalable Bennett Plan architectural drawing hanging in the Permit Center Hearing Room. This dimension is nearly half of the depth of the properties that were purchased in 1923, which corresponds to the existing depth of the landscaped areas and totals approximately 107 feet from the back of the Garfield Avenue sidewalk to the eastern edge of the parking lots that adjoin the two sites on the west.

Subsequent to the passing of the propositions, a competition was held to design the three buildings and, upon the completion of the competition and selection of the building designs in March 1924, Bennett revised the 1923 plan to reflect the selected designs (which, in all three cases, was different than shown on the 1923 conceptual plan) and to modify the spatial relationships of the surrounding properties and rights of way accordingly. Records (a newspaper article and Bennett's diaries, see Attachment G)

show that Bennett visited the City in December 1924 to meet with the Planning Commission and the architects of the three buildings. This visit resulted in Bennett's more detailed March 1925 plan, which more closely matches the existing conditions and identifies the landscaped parcels as "automobile space (future bldg site)" behind a dimensioned 25-foot setback from the back of the North Garfield Avenue sidewalk (Attachment H). In staff's opinion, identifying these areas as future building sites suggests that the City Council either intended to build additional City buildings on this land or to declare it surplus property for private development in the future. The plan was further refined with the final revision occurring in April 1926 (see Attachment H).

Between the 1923 and 1926 versions of the Bennett Plan, the amount of landscaped area shown along Garfield Avenue was between 51% and 77% shallower than what exists today. It appears that the only reason this entire 107-foot-deep area is currently landscaped is because the City purchased the entire properties, as they were configured at that time, and did not build on any portion of them, despite clearly intending to do so as depicted in the 1923, 1925 and 1926 versions of the Bennett Plan.

Beaux Arts Planning

In the course of public meetings that have been held related to this project, public comments have been made regarding the Beaux Arts planning principles on which the design of the Civic Center was based and these comments have been used as arguments for opposing the proposed project and several of the alternatives that were outlined in the Draft EIR. Staff has extensively researched city records, newspaper articles and the Bennett archives in the Art Institute of Chicago and evaluated these arguments and has concluded that they in fact fully support Alternative 2A (the 30/40-Foot Setback Alternative) that was studied in the Draft EIR.

The fundamental principles of Beaux Arts planning include balance and symmetry and it has been clearly demonstrated by the applicant team that the 30/40-Foot Setback Alternative results in a balanced proportion of space between the west façade of City Hall and the east façade of the proposed Kimpton Hotel building (Attachment J). The applicant team has also demonstrated that a line extending from the center of the angled façade of the proposed building facing northeast toward the intersection of Holly Street and North Garfield Avenue would converge with a similar line drawn from the center of the west façade of City Hall in the center of Centennial Plaza. Bennett clearly intended to create this balance surrounding City Hall based on the 1925-1926 plans, which include a similar diagram, and, thus, the 30/40-Foot Setback Alternative is clearly consistent with Bennett's Plan for the Civic Center.

All Civic Center planning efforts that have occurred since this time have contemplated construction of a building on the landscaped areas, at varying levels of setback from Garfield Avenue. These planning efforts include the following adopted planning documents:

- Pasadena Central District Improvement Program, 1971

- Civic Center Mall Design Study, 1978
- Civic Center Specific Plan, 1990 & 1994
- Civic Center/Midtown Programming Effort Report, 1998
- Civic Center/Midtown Design Project, 2001 & 2003
- Central District Specific Plan, 2004

The above information demonstrates that the declaration of surplus property over the land to be occupied by the proposed Kimpton Hotel is appropriate and consistent with current and past planning efforts in the Civic Center including the 1923, 1925 and 1926 versions of the Bennett Plan.

Competitive Sale Requirement

PMC Chapter 4.02 also prescribes procedures for sale of surplus property, which, unless the sale is exempt, “may be sold only after an open and competitive bidding process to the highest bidder.” This section of the Code states that the City Council may, at least 60 days prior to sale (which, as previously stated, includes long-term leases as is proposed for this project), hold a public hearing and make findings that “an extraordinary and overriding public benefit will be achieved” by the sale and that “such public benefit may relate to the provision of public parking, low-cost housing, a public service facility, or a museum or other cultural or artistic institution, or the economic and public well-being of other properties in the immediate vicinity.”

Staff recommends that the City Council determine that the long-term lease proposed is exempt from the competitive bidding process based on the finding that the lease will improve the economic and public well-being of other properties in the immediate vicinity. This finding would be based on the fact that the project will create a new, active use in the Civic Center by rehabilitating a long-derelict and decaying building and will bring jobs as well as hotel guests, restaurant patrons, and banquet attendees to the area, resulting in increased economic and public well-being for all properties in the immediate vicinity. The City does not have the funds to rehabilitate the building; therefore, this project is needed to ensure that this will be done. Making this finding to exempt the project from the competitive bidding process will allow the City to enter into a long-term lease with the developer most suited to successfully rehabilitate the YWCA building rather than to the highest bidder.

In conclusion, staff recommends approval of a declaration of surplus property for the area of parcel 3 on which the proposed new building would be constructed, as well as exemption from the competitive sale requirement to allow the City to enter into a long-term lease with Kimpton based on the findings in Attachment A and subject to the conditions of approval in Attachment B. In particular, a condition of approval is recommended to require recording of a Lot Line Adjustment to ensure that the surplus property declaration only apply to land needed to construct the proposed new building. With this condition, the remaining landscaped area would not be affected by the proposed lease agreement. Staff also recommends that a condition be established

requiring design and construction of a new, more formal Sister City Garden within the remaining area of the project site along Garfield Avenue.

2. Conditional Use Permit: To allow the construction of a non-residential project over 25,000 square feet in size ('Major Project').

Section 17.61.050.J.2 (Major Construction) of the Zoning Code requires the approval of a Conditional Use Permit (CUP) for the construction of a nonresidential project, or a nonresidential portion of a mixed use project, that exceeds 25,000 square feet of gross floor area. In order to approve a CUP, it is necessary that six specific Findings of Fact (Attachment A) be made as required by the Zoning Code. These findings concern the project's compliance with the goals and policies of the General Plan and Central District Specific plan, its compatibility with the existing development in the vicinity, and its potential effect on the health, general welfare, and public safety of persons residing and working in the neighborhood.

The property is within the Civic Center/Midtown sub-district of the Central District Specific Plan as shown on 'District-wide Map 9: Sub-district Concept'. As stated in the Specific Plan, the objective of the Civic Center/Midtown sub-district is to, "...strengthen its role as the symbolic and governmental center of the City, encouraging the presence of civic, cultural, and public service institutions, while augmenting the character of the area with a supportive mix of uses."

The proposed hotel ('Lodging - Hotels, Motels') requires the approval of a CUP (see CUP#2 below). The project is consistent with a number of objectives of the General Plan including Policy 1.2 Targeted Growth; Goal 2 Land Use Diversity; Goal 3 Compatible Land Uses; Goal 4 Elements Contributing to Urban Form; Goal 5 Pedestrian-Oriented Places; Goal 6. Character and Scale of Pasadena; Goal 7. Architectural Design and Quality; Goal 8 Historic Preservation; Goal 9 Public Art; Goal 10 A City Sustained and Renewed; Policy 10.12 Urban Open Spaces; Goal 11 Job Opportunities; Goal 12 Shopping and Dining; Goal 14 Visitors; Goal 15 Sound Local Economy; Goal 18 Land Use/Transportation Relationship; Goal 19 Parking Availability; Goal 20 Information and Participation; and Goal 31 Central District.

As previously stated, staff is recommending that Alternative 2A be approved. Staff finds that this alternative is an improvement over the originally proposed project because it more clearly responds to the vision of the Bennett Plan; however, staff recognizes that there are certain aspects of the Alternative 2A design that need improvement. One concern is that the angled façade facing Centennial Plaza extends approximately five feet into the area that defines the site of the Pasadena Robinson Memorial (i.e., the inner sidewalk edge surrounding the Memorial). In addition, given the sensitivity of the location of the project and the need to ensure that the building does not overwhelm the historic YWCA, the height of the building along Union Street should be further studied to provide a more appropriate height configuration that would create lower building volumes adjacent to the YWCA building. This could also include fully attaching the new building to the historic building rather than leaving a gap as is currently proposed, in

order to recoup lost building area that would result from lowering the building height. In addition, due to the greater height of City Hall, it would also be appropriate for the highest portion of the building to be along Garfield Avenue rather than along Union Street.

Staff has discussed these concerns with the applicant, who has conducted a design study of Alternative 2A to attempt to address these concerns. This study is in Attachment N to this report and is one way to address these concerns. Staff also understands that the applicant has reviewed this plan with Pasadena Heritage, which had expressed similar concerns in its comments on the Draft EIR, and that they are in support of this design direction. Since this is a design exercise, staff has recommended a condition of approval requiring further study of the Alternative 2A building height configuration to ensure compatibility with the historic YWCA, subject to review and approval by the Design Commission as part of the required design review process. The condition allows the Design Commission flexibility, beyond the limitations outlined in Zoning Code §17.61.030.1.5.a, with regard to building heights, except that the Commission could not require, without the applicant's consent, height reduction that would result in fewer than the 185 hotel rooms proposed in this alternative, above-ground square footage less than 135,000 (for both existing and proposed structures) or greater setbacks than those shown in the conceptual plans for Alternative 2A, other than to address the condition regarding the Robinson Memorial. As part of this review, the Commission should also consider means of ensuring that the building massing articulates in conjunction with changes in building height.

Development Standards

Below is a table containing an analysis of the project's compliance with the development standards in the Zoning Code, including the original project, Alternative 2A which staff recommends be approved, and the original proposal in response to the City's RFP:

Zoning Code Requirement	Original Project	Alternative 2A (Recommended for Approval)	RFP Proposal
Floor Area Ratio (FAR):			
Maximum 2.25 FAR:	127,912 square feet	131,570 square feet	129,690 square feet
<ul style="list-style-type: none"> • 189,159 square feet (full site) • 134,260 square feet (site adjusted per recommended condition 11) 	<ul style="list-style-type: none"> • 1.52 FAR • 2.14 FAR 	<ul style="list-style-type: none"> • 1.56 FAR • 2.21 FAR 	<ul style="list-style-type: none"> • 1.54 FAR • 2.17 FAR
Number of Hotel Rooms			
No requirement	179	185	150

Zoning Code Requirement	Original Project	Alternative 2A (Recommended for Approval)	RFP Proposal
Setbacks (Non-Residential)			
Marengo Avenue: • 0' minimum; • 5' maximum	N/A – existing building	N/A – existing building	N/A – existing building
Holly Street: 10' minimum	82'-114'	Approximately 30' minimum	Substantially larger than the original project and alternative 2A
Garfield Avenue: 10' minimum	20'3"	30'-40'	10'
Union Street: • 0' minimum; • 5' maximum	0'-3'	0'-3'	0'-3'
Height			
60'	33'6"-60'	Appx. 40'-60'	Maximum 66' with a portion matching the height of the YWCA
Parking			
240	0 on-site 136 off-site	0 on-site 136 off-site	41 on-site; undetermined amount off-site
Loading			
6	1	1	1
First Floor Height			
Minimum 15'	Minimum 9'	Minimum 9'	Minimum 9'

Further discussion of some of these development standards is provided below:

Setbacks

Alternative 2A, which was studied in the EIR and which staff is recommending be approved, slightly encroaches into the area designated as the site for the Pasadena Robinson Memorial, which is defined by the sidewalks that surround it. Staff recommends a condition of approval requiring all construction related to the project to be outside of this defined area. Staff has discussed this with the applicant, who has verbally indicated that this requirement will not impact the building program. The Alternative 2A design study in Attachment N (and described further below) complies with this recommended condition.

Height

The drawings provided do not provide sufficient information to determine that the height of the building is measured from the lowest point of existing grade; therefore, staff has recommended a condition of approval requiring more detailed drawings demonstrating this prior to submittal of an application for Concept Design Review.

Parking, Loading and First Floor Height

The applicant has requested entitlements to deviate from Zoning Code requirements related to parking, loading and first floor height. See further discussion of parking starting on page 19 under 6. *Minor Conditional Use Permits*, of loading starting on page 21 under 8. *Variance*, and of first floor height starting on page 20 under 7. *Variance*.

In conclusion, staff recommends approval of the CUP for the construction of a non-residential project over of 25,000 square feet in size (Major Project) based on the findings in Attachment A and subject to the conditions of approval in Attachment B.

3. Conditional Use Permit: To allow a 'Lodging - Hotels, Motels' use.

Section 17.80 (Glossary of Specialized Terms and Land Use Types) of the Zoning Code defines 'Lodging - Hotels, Motels' as: "A commercial establishment offering overnight visitor accommodations, but not providing room rentals on an hourly basis. These uses include facilities available to the general public, including without limitation meeting and dining facilities, provided these are an integral part of the hotel or motel operations." Table 3-1 (Allowed Uses and Permit Requirements for CD Zoning Districts) in Section 17.30.030 (CD District Land Uses and Permit Requirements) of the Zoning Code permits a new hotel or motel in the CD-2 zoning district through the approval of a CUP.

The CUP process is intended to allow for activities and uses which may be desirable in the applicable zoning district and compatible with adjoining land uses, but whose effect on a site and its surroundings cannot be determined before being proposed for a particular location. The procedures for a CUP provide for the review of the configuration, design, location, and potential impacts of the proposed use in order to evaluate the compatibility of the proposed use with surrounding uses, and the suitability of the use to the site.

Regardless of the CUP requirement, Section 17.50.150 (Lodging - Hotels and Motels) has a number of specific requirements for hotels and motels including a minimum lot size for hotels/motels outside the Central District, parking for a hotel in the Central District must be underground or in an above-ground parking structure, as many as 60 percent of the guest rooms may have a kitchen, and rooms in a hotel or motel shall not be provided on a less than daily basis. Conditions of approval are recommended in Attachment B to ensure compliance with these standards. In this case, the site is within the Central District so the lot size requirement is not applicable; the parking will occur in an existing off-site above-ground parking structure.

As noted above in *2-Conditional Use Permit*, the proposed project meets the applicable development standards for Floor Area Ratio, building setbacks, and height. The proposed deviations from loading requirements and ground floor height are discussed below in Variance items 7 and 8. In addition, the proposed parking arrangement whereby parking will be reduced and shared amongst the other uses in the selected off-site parking structure are discussed below in *6-Minor Conditional Use Permits*.

The hotel developer has a number of goals and intents for the hotel project, due to the site's close proximity to Paseo Colorado, the Central District, and the Pasadena Convention Center. The hotel is also within easy walking distance of Paseo Colorado, Plaza las Fuentes, Old Pasadena and the Playhouse District, thereby providing an even greater number of restaurant, retail, and entertainment options.

The hotel itself will provide food and beverage service and will have meeting space, banquet facilities, a restaurant, a pool deck, and a fitness center. Due to the inclusion of banquet facilities, it is likely that the hotel will market itself as a location for weddings, wedding receptions, or similar gatherings. The type of guest the hotel is aiming for are business and leisure travelers to Pasadena.

In conclusion, staff recommends approval of the CUP for the construction of a hotel ("Lodging - Hotels, Motels") based on the findings in Attachment A and subject to the conditions of approval in Attachment B.

4. Conditional Use Permit: To allow the sale of a full-line of alcoholic beverages for on-site consumption.

The sale of alcoholic beverages requires approval of a CUP. Zoning Code Section 17.50.040 provides standards for the sale of alcoholic beverages including avoiding contributing to an undue proliferation of alcoholic beverage sales businesses in an area where additional ones would be undesirable, with enhanced consideration given to the area's function and character, problems of crime and loitering, and traffic problems and capacity and avoiding any adverse impact on adjacent or nearby parks (e.g., public parks or recreation centers), playgrounds (e.g., public or parochial), religious facilities, or schools (e.g., public, parochial, or private elementary, junior high, or high schools).

The applicant has provided a list of establishments that sell alcohol within 250 feet of the site which indicates that there are two such locations: Eden Garden Bar & Grill at 175 Holly Street (on-site full alcohol) and Oz Sushi at 245 E. Colorado Boulevard (on-site beer & wine). Despite the few alcohol sales locations in the immediate vicinity, information from the Department of Alcoholic Beverage Control (ABC) indicates that there is an overconcentration of alcohol sales within the larger census tract, which extends from the 210 and 710 freeways on the north and west to Colorado Boulevard on the south (only properties on the north side are included) and Los Robles Avenue to the east (only properties on the west side are included). The census tract boundaries

include a large segment of Old Pasadena, which has many restaurants and other establishments that serve alcoholic beverages.

The sale of alcoholic beverages on the site is not likely to result in an effect on loitering or crime in the area, as sales will be in conjunction with the restaurant and banquet facilities on-site. Alcohol sales will also be available from room service and at the pool area. Although the census tract has been determined to have an overconcentration of alcohol sales, there are few locations selling alcohol within the immediate vicinity of the property. First Baptist Church is directly across Marengo Avenue from the project site, multi-family residential uses (Centennial Place) is directly across Holly Street from the project site, and Memorial Park is within ¼ mile. The on-site sale of alcoholic beverages with meals or within the banquet facilities is not expected to impact these adjacent sensitive uses. Conditions of Approval will ensure that the sale of alcoholic beverages will be conducted in a manner consistent with other similar facilities in the City.

In conclusion, staff recommends approval of the CUP for the sale of a full-line of alcoholic beverages for on-site consumption based on the findings in Attachment A and subject to the conditions of approval in Attachment B.

5. Minor Conditional Use Permit: To allow the construction of a non-residential project over 15,000 square feet in size within the Transit-Oriented Development (TOD) Area.

The Zoning Code section on Transit-Oriented Development (17.50.340) requires that any commercial or industrial project that is more than 15,000 square feet in size that is located within ¼ mile of a light-rail station platform, or within the designated Central District Transit-Oriented Area (Section 17.30.030, Figure 3-5), be reviewed through the Minor CUP process. The site is located within both of these areas.

The development standards of the TOD section provide for a, "...mixture of commercial, high-density residential, mixed-use, public, and semi-public uses in close proximity to light rail stations, encouraging transit usage in conjunction with a safe and pleasant pedestrian-oriented environment." Further, "...these standards emphasize intensification of development and reduced reliance on motor vehicles."

In order to approve such a Minor CUP, it is necessary that three specific TOD Findings of Fact be made, in addition to the six findings required for a CUP. The findings unique to the TOD use include that the project: 1) consists of a use, or mix of uses, that encourage transit use and is oriented toward the transit user; 2) is designed to enhance pedestrian access and/or other non-motor vehicle modes of transportation to public transit; and 3) encourages pedestrian activity and/or other non-motor vehicle modes of transportation and reduces dependency on motor vehicles.

The project includes a ground floor restaurant use, hotel lobby and gathering space and banquet facilities oriented toward Marengo Avenue and Holly Street and encourages

pedestrian activity by locating these uses, as well as hotel rooms, adjacent to pedestrian sidewalks. Further, the design of both the proposed project and Alternative 2A allows for pedestrian access to Garfield Avenue, Union Street and Holly Street. The close proximity of the building to other uses such as retailers, offices and restaurants in the vicinity provides an opportunity for hotel guests and residents to access these businesses without driving an automobile, furthering the goals of the TOD.

In addition to the required TOD findings, the project also complies with several transit and pedestrian-oriented policies, goals, and objectives of the General Plan including Guiding Principle 5; Goal 1 Sustainable Growth; Policy 2.6; Goal 4 Elements Contributing to Urban Form; Goal 5 Pedestrian-Oriented Places; Policy 11.3; Goal 18 Land Use/Transportation Relationship; Goal 19 Parking Availability; and Goal 31 Central District. In addition, the project meets several planning objectives in the Central District Specific Plan including #25 (Promote Transit Usage), and #26 (Make Downtown Walkable). Finally, this project is required to comply with the City's Transportation Demand Management and Trip Reduction Ordinance requirements, as managed by the City's Department of Transportation. This ordinance requires carpooling, information dissemination on alternative transportation options, and other techniques to reduce trips to the site. Staff has recommended a condition of approval to require bicycle parking to be provided in accordance with the Zoning Code regulations.

In conclusion, staff recommends approval of the Minor CUP for a project in the Central District Transit-Oriented Area based on the findings in Attachment A and subject to the conditions of approval in Attachment B.

6. Minor Conditional Use Permits: To allow shared & reduced parking.

Section 17.46.050 (Shared Parking) of the Zoning Code permits the sharing of parking between multiple uses, with the approval of a Minor CUP, when it can be shown that the hours of operation between the uses can occur without conflict and subject to a maximum walking distance requirement of 1,000 feet for patrons and 1,500 feet for employees measured from the nearest corner of the parking facility to the entrance of the use served via the shortest pedestrian route. In order to approve such a Minor CUP, it is necessary that two specific shared parking Findings of Fact be made, in addition to the six findings required for a CUP. These additional findings are: 1) the spaces would be available as long as the uses requiring the spaces exist; and 2) the quality and efficiency of the shared parking would equal or exceed the level that is otherwise required.

Related to the MCUP for reduced parking, a parking demand study was completed by Raju Associates in June 2015 to determine the parking demand for the project and staff of the Department of Transportation (DOT) reviewed and accepted this analysis in August 2015. These documents are in Attachment K. The analysis evaluated the project's parking demand based on Urban Land Institute shared parking methodology and concluded that, rather than the 240 parking spaces required by the Zoning Code, peak demand would be for 136 parking spaces. A Shared Parking Plan would be

required to be submitted to DOT for review and approval prior to issuance of a building permit for the project. In addition, a Parking Demand Plan would also be required to address potential increased parking demand associated with special events. Based on this study, the mix of uses in the project will result in the need for fewer parking spaces than required by the Zoning Code, in addition to the assertion in the report that the City's minimum parking requirement for hotels is significantly higher than is necessary to accommodate a typical urban hotel use in the vicinity of transit. The Department of Transportation has reviewed and accepted the study provided and, as such, staff believes that the request for reduced parking meets the findings required to approve the required Minor CUP.

As previously indicated, parking is proposed to be off-site in one of three locations. Negotiations with property owners for these off-site spaces are ongoing. Upon reaching a successful negotiation with a property owner for off-site parking spaces, a study will be required to be submitted to demonstrate that the parking structure has sufficient parking to accommodate the proposed additional use by this project. Staff has recommended a condition of approval requiring an agreement for off-site parking and a shared parking study of the selected location to demonstrate that there is adequate parking to comply with DOT requirements prior to issuance of a building permit.

For many hotels it is not uncommon to offer the option of valet parking for hotel guests. In this case valet parking is proposed to be conducted within the public right-of-way in a dedicated valet zone along Marengo Avenue. Because this would occur in the public right-of-way it is subject to the review of the Department of Transportation, not the Planning & Community Development Department. The Department of Transportation will require submittal of a valet parking plan (including a plan for special events) for review and approval prior to issuing a permit for valet operations within the public right-of-way. This will ensure that the valet parking operation does not have unintended consequences, such as vehicles queuing onto Marengo Avenue and blocking traffic. A condition of approval to this effect is included in the recommended conditions of approval in Attachment B.

In reviewing the required findings (Attachment A) staff finds that reduced and shared parking: are allowed with a Minor CUP and comply with the special purposes of both the Civic Center/Midtown) zoning district and Transit-Oriented District; will allow for a more efficient use of existing parking facilities; will meet a number of goals of the General Plan by encouraging transit-oriented and pedestrian-oriented development; shared parking will also meet several planning objectives of the Central District Specific Plan such as reducing auto-dependency, promoting transit usage, and making downtown more walkable; and will not have significant environmental impacts.

Based on the analyses and conclusions in the parking demand study, and the findings in Attachment A, staff recommends approval of the Minor CUPs to allow shared and reduced parking subject to the conditions of approval in Attachment B.

7. Variance: To allow the ground floor of the hotel building to be less than the minimum ground-floor height of 15 feet.

The Central District Specific Plan requires the ground floor of all non-residential buildings to be a minimum of 15 feet high as measured from the floor of the first story to the floor of the second story. Sheet 13 of the submitted plans depicts the first floor with a minimum height of nine feet. As such, a Variance is required to deviate from the minimum first floor height requirement. The applicant has indicated that this Variance is necessary due to sloping conditions of the site and the need to align the first floor of the new building with the first floor of the existing YWCA.

As shown on sheets 11 and 12 of the submitted drawings, the exterior of the proposed new building is designed to appear to have a two-story base by joining the windows of the first and second floor with a decorative spandrel panel between, thereby creating taller window openings at the base, similar to those of City Hall. This gives the appearance of a double-height first floor while technically being two separate floors on the interior. In addition, to address the sloping conditions of the site, the building will have a solid base or foundation below the first floor windows, which will also contribute to an appearance of greater ground-floor height on the exterior. Additional architectural treatments could be required during design review to ensure appropriate articulation of the double-height base component proposed. For example, portions of the façades of the alternatives studied in the EIR include banding features at the ground floor. With these design features in place to ensure that the building appears to have a taller base floor than those above, and based on the property and use constraints that would limit the ability to provide a taller first floor, staff believes that the findings to support a Variance from the minimum first-floor height requirement can be met.

It should also be noted that the Pasadena Police Department building at 207 N. Garfield Avenue (1990, Robert A.M. Stern) has a similar condition at its northeast corner.

In conclusion, staff has analyzed this Variance request and has made the findings to approve the application, as shown in Attachment A, and subject to the conditions of approval in Attachment B.

8. Variance: To allow fewer loading spaces than required and loading design that does not comply with the requirements of the Zoning Code for screening and backing movements within the public right-of-way.

Nonresidential uses of 20,001 square feet or greater are required to provide one loading space for every 20,000 square feet or fraction thereof, with a maximum of six. For the proposed 127,912 square foot hotel, a total of six loading spaces are required. The submitted plans indicate one loading space along Union Street and the applicant has submitted a Variance application for this deviation.

In addition, loading spaces are required to comply with Section 17.46.260 of the City's Zoning Code. Specifically, all loading spaces shall be designed and maintained so that

vehicles do not back in from, or onto, a public street. Loading spaces are also required to comply with the minimum size and turning radius as described in Section 17.46.260 of the City's Zoning Code (the first loading space shall be a minimum of 12 feet by 30 feet, with 14 feet of vertical clearance; all additional loading spaces shall be a minimum of 10 feet by 20 feet, with 12 feet of vertical clearance). The dimensions of the loading space proposed for the project are unclear in the submitted drawings but appear to be approximately 10 feet by 20 feet. Vertical clearance is unknown as the submitted elevation drawings are not to scale. Staff has recommended a condition of approval requiring submittal of these details prior to issuance of a building permit. The loading space provided is designed to require backing movements within the public right-of-way. The applicant has indicated that the majority of vehicles that would make deliveries to the site would be small enough to maneuver within the loading area without requiring backing movements onto or from the public right-of-way; however, the Department of Transportation (DOT) has reviewed the plans and has indicated that this does not appear to be the case. As such, the submitted Variance application includes a request to deviate from the required design of the spaces as well as the number. DOT has reviewed the proposed loading design and, in the context of the Draft EIR, has recommended the following mitigation measure (MM TRAFFIC-4 in the Draft EIR) to address the potential safety hazard associated with the proposed loading space design:

All loading spaces shall be designed and maintained so that the maneuvering, loading, or unloading of vehicles does not require backing movements onto or from any public street. If the applicant is unable to provide an on-site loading zone which does not prevent backing onto or from a public street, or an on-street loading area is unavoidable, the applicant is limited to the following:

- If an on-street commercial loading zone is proposed, the hours of operation for the on-street loading zone shall be limited to 2:00 AM to 5:00 AM every day of the week.
- If proposed, the on-street commercial loading zone along Union Street shall provide and maintain a lane closure throughout the hours of operation.
- Prior to issuance of the first building permit, the applicant shall provide a traffic control plan to the Department of Transportation for review and approval of the lane closure associated with the on-street commercial loading zone. The plan shall identify measures to direct oncoming traffic onto remaining traffic lanes that would not be blocked by loading activity.
- The above-mentioned traffic management plan shall be prepared by a registered professional

engineer in California.

- All lane closures shall be implemented in accordance with the WATCH Manual, 2012 Edition.

With these conditions in place, and based on the analysis set forth above related to the Variance for a reduced number of loading spaces, staff believes that the findings for Variances for the design of loading spaces can also be met.

Due to the unique circumstances of the site (primarily the limited space based on constraints created by the historic YWCA building and the location in the Civic Center), staff believes that the findings for the Variance related to the number of loading spaces can be met. Mitigation Measure TRAFFIC—4 in the FEIR will ensure that the design of the loading space will not have an adverse impact on the safety of vehicles, motorists and pedestrians.

In conclusion, staff recommends approval of the Variances to allow one loading space designed to require backing movements onto or from a public street based on the findings in Attachment A and subject to the conditions of approval in Attachment B.

9. Public Tree Removals: To remove 23 public trees in fair to good condition on the project site to accommodate the proposed development.

Because the City owns the entire project site, all of the trees on the site are therefore defined as protected trees as defined in the City's Tree Protection Ordinance. A total of 36 public trees are proposed to be removed; 13 have been determined to be dead, dying or hazardous and will be removed by the Department of Public Works (DPW) based on their condition, and 23 to accommodate the proposed development (See Attachment R). The Table below outlines the reasons for removal of these 23 trees:

Number of Trees	Locations	Reason for Removal
2	Marengo Avenue parkway	Valet lane (existing trees are also not compliant with Master Street Tree Plan)
13	Along perimeter of existing YWCA building along Holly Street and within the interior courtyard	Trees are growing extremely close to the building foundation and require removal to adequately rehabilitate the foundation and building walls. Note that all alternatives studied in the EIR require removal of these trees.
8	Eastern edge of parking lot (3) and within landscaped area between the parking lot and Garfield Avenue (5, all of which are Sister City Trees)	Trees are within the proposed footprint of the new building. Per recommended condition #19, Sister City Trees may be relocated to or replaced within a new required Sister City Garden to be created between the new building's east façade and Garfield Avenue, subject to review by the Sister City Committee.

It should be noted that of the 33 trees outside of the public right-of-way that are proposed to be removed, seven would be considered protected under the Tree Protection Ordinance if this project were a private, rather than public, development and that the trees on the YWCA property and the adjacent parking lot property became public trees when the City purchased those properties in 2012.

The Urban Forestry Advisory Committee (UFAC) reviewed the proposed tree removals at a special meeting on August 3, 2016. The Committee expressed concern that its review was premature because a landscape plan has not yet been developed for the project. Staff explained that the purpose of the review was to give the UFAC an opportunity to submit a recommendation related to the tree removals associated with the proposed project prior to City Council consideration. UFAC voted to recommend that project alternatives that have a lesser impact on public trees, particularly the Sister City Trees, be considered and also continued the consideration of the public tree removals until after the Design Commission reviews the project in order to allow the Committee to review a landscape plan for the project. In addition, UFAC recommended that all trees in fair to good condition that are proposed to be removed be reviewed by a Certified Arborist to determine potential candidates for relocation.

Staff has recommended conditions of approval that require installation of trees along Marengo Avenue and Union Street (#71) and creation of a new Sister City Garden space that could include relocated Sister City Trees (#19). As previously stated, the Design Commission will review this project after the City Council has taken action on the project entitlements and may delegate its review of the project's landscape plan to the UFAC pursuant to PMC §2.80.135.

When the Planning Commission reviewed the project on July 13, 2016, staff had recommended a condition of approval requiring UFAC review and recommendation of public tree removals (#73 in Attachment B); however, since that review has already occurred, no further review appears necessary, unless the Design Commission delegates to the UFAC its review of the project's landscape plan. As such, staff recommends that the City Council remove this previously proposed condition of approval in light of the likelihood that, if the City Council approves the project, it will also approve the public tree removals associated with it, sufficient conditions of approval have been recommended by staff to address replacement or relocation of those public trees that are not associated with the YWCA and parking lot properties (i.e., the trees along Marengo Avenue and the Sister City Trees) and the UFAC's review of a landscape plan for the project is dependent on the Design Commission's determination that such review is necessary.

Comments from City Departments and Divisions:

Comments and conditions on the project were received from several City Departments: Planning Division, Building Division, Cultural Affairs Division, Fire Department, Public Works Department, Department of Water & Power and Transportation Department. These comments and conditions have been included in the Attachment B to this report.

COUNCIL POLICY CONSIDERATION:

Following is a detailed analysis of the project's consistency with the General Plan and Central District Specific Plan, which are the adopted land use plans governing the project site.

Policies and Objectives

The General Plan Land Use Diagram (adopted by the City Council on August 17, 2015) identifies the density and intensity of development for each land use category depicted on the diagram. The Zoning Map and adopted Specific Plans then designate uses for all parcels at a greater level of specificity with allowable maximum densities falling within the range shown on the Land Use Diagram. Densities defined for parcels on the Zoning Map and Specific Plan may be less than what is prescribed in the General Plan. However, they may not exceed those shown on the Land Use Diagram without an amendment to the General Plan.

The designation of the property on the General Plan Land Use Diagram is Medium Mixed Use. This designation allows new development between 0 and 2.25 FAR and residential density from 0 – 87 dwelling units per acre. The intent of this land use designation is:

...to support the development of multi-story buildings with a variety of compatible commercial (retail and office) and residential uses. Development is characterized by shared open spaces, extensive landscaping, small to medium separations between buildings, and shared driveways and parking. Sites may be exclusively commercial or exclusively residential, or with buildings vertically integrating housing with non-residential uses... Where buildings face the street frontage, they shall be designed to enhance pedestrian activity with transparent facades for retail uses and distinctive entries for housing. Parking shall be located below or to the rear of the street. Projects constructed at Medium Mixed Use densities may be required to develop pedestrian-oriented streetscape amenities along their primary street frontages, consistent with the improvement concepts and plans defined by the City.

The proposed project is exclusively commercial and has an FAR of 1.48; residential density limitations do not apply. As such, the proposed project is consistent with the land use designation of the property

In addition, the project is consistent with the goals of the General Plan by furthering the following Goals and Policies: Policy 1.2 Targeted Growth; Goal 2 Land Use Diversity; Goal 3 Compatible Land Uses; Goal 4 Elements Contributing to Urban Form; Goal 5 Pedestrian-Oriented Places; Goal 6. Character and Scale of Pasadena; Goal 7. Architectural Design and Quality; Goal 8 Historic Preservation; Goal 9 Public Art; Goal 10 A City Sustained and Renewed; Policy 10.12 Urban Open Spaces; Goal 11 Job Opportunities; Goal 12 Shopping and Dining; Goal 14 Visitors; Goal 15 Sound Local Economy; Goal 18 Land Use/Transportation Relationship; Goal 19 Parking Availability; Goal 20 Information and Participation; and Goal 31 Central District.

The project also meets the following Planning Objectives of the Central District Specific Plan: 2 (Identify Growth Areas); 3 (Develop Urban Land Patterns); 6 (Reinforce District Character); 11 (Provide Economic Opportunity); 12 (Diversify Downtown Economy); 13 (Encourage Business Retention); 14 (Promote Job Growth); 15 (Maintain Fiscal Health); 22 (Reduce Auto Dependency); 25 (Promote Transit Usage); and 26 (Make Downtown Walkable).

Central District Specific Plan: District-wide Urban Design Concept

The Central District Specific Plan establishes goals and policies for development of the Central District of the City which extends roughly from Pasadena Avenue on the west, the 210 freeway on the north, Lake Avenue on the east and California Boulevard on the south. The plan includes a policy document and an implementation component within the Zoning Code. The policy document establishes general goals, policies and design guidelines for the entire Central District and also further divides the Central District into subdistricts and the subdistricts into precincts. The property is within the Civic Center/Midtown Subdistrict and Civic Center Core Precinct.

The Civic Center/Midtown Sub-District Character is identified in the plan as follows:

Civic Center/Midtown is the symbolic heart of the City, and should be a place that is accessible to and welcomes all of the City's residents... The objective of this subdistrict is to strengthen its role as the symbolic and governmental center of the City, encouraging the presence of civic, cultural and public service institutions, while augmenting the character of the area with a supportive mixture of uses.

In addition, the Civic Center Core Precinct character is described in the plan as follows:

This precinct in particular functions as the City's symbolic and public center, and features a distinguished grouping of

civic buildings that includes City Hall and the Central Library. The design of all buildings and public spaces in this precinct should reflect the highest quality, respect the prominence of civic landmark buildings, and reinforce the vision of the Bennett Plan.

Urban Design Concept Components

The Central District Specific Plan makes recommendations for specific urban design concepts for the Central District (Section 6 of the Central District Specific Plan). These components, Downtown Linkages, The Public Realm, The Public-Private Interface, and The Private Realm directly influence the, "...physical design character for the Central District..." Further, these concepts and strategies are intended to create a, "...mixed-use urban center..." that places importance on the safety and comfort of pedestrians.

Through the Design Review process, the Design & Historic Preservation staff and Design Commission will utilize these concepts as part of their review of the project. However, the following brief summaries, and how the proposed project addresses them, have been included for the City Council.

Downtown Linkages

The Civic Center/Midtown area is specifically highlighted in the discussion of Downtown Linkages as one of downtown's principal activity centers and "public improvements that reinforce the significance and grandeur of the Bennett Plan's axial arrangement are recommended." The Specific Plan encourages this area to be highly accessible and emphasize its status as the, "...public heart of the community." District-wide Map 21 (Linkage Concept) identifies Holly Street and Garfield Avenue as Civic Promenades, Union Street as a Multi-Modal Corridor with Commercial Character with a strong pedestrian orientation and Marengo Avenue as a multi-modal corridor with a strong pedestrian orientation. The intersection of Garfield Avenue and Holly Street is identified as a Civic Plaza and City Hall is identified as a Civic Landmark.

The proposed project would not impinge on the axial configuration of Holly Street and Garfield Avenue or the important vistas to Civic Landmarks at the termini of those streets. It would reinforce the arrangement of buildings envisioned in both the 1923 and 1925-1926 versions of the Bennett Plan as discussed in detail in *1. Surplus Property Declaration...*, above. Constructing a new building with frontage along Union Street and a restaurant at the corner of Union Street and Marengo Avenue will also create a more pleasant and more active pedestrian experience along Union Street.

The Public Realm

This design concept focuses on publicly accessible open spaces that include large public park and recreation facilities, civic plazas and smaller urban outdoor spaces/pocket parks. Centennial Plaza is identified as a "valuable opportunity to create

the City's major public and symbolic gathering space." Urban outdoor spaces are recommended within private development projects, including public accessibility where possible. Due to the high cost of land acquisition in the Central District, smaller "pocket parks" are recommended for development to serve "Downtown populations currently lacking a public park within convenient walking distance." District-Wide Map 22: Public Open Space Concept identifies Memorial and Central Parks as the only public parks within the Central District, identifies civic plazas adjoining City Hall, the Central Library and the Civic Auditorium and calls out the northeastern portion of the Central District as an area of significant park need. The proposed project includes urban open spaces in the form of private courtyards for use of hotel guests and visitors, consistent with this concept. Alternative 2A includes an open loggia space at the northeast corner of the site that would be publicly accessible.

The Public-Private Interface

The Public-Private Interface concept is intended to reinforce the connection between, "...human-scale buildings and occupiable outdoor spaces." This is accomplished by situating buildings such that they are focused toward streets and activate the sidewalk. This would support the development of urban land patterns, reinforce the character of the Central District, and promote walkability. To achieve these goals, the Central District Specific Plan, through the Zoning Code, establishes street setbacks throughout the Central District with the goal of reinforcing the building street wall by locating building consistently at or near the sidewalk.

As noted earlier, new construction on this site along Union Street is required to be located at the property line, while new buildings along Garfield Avenue must be set back at least ten feet. As also noted earlier, the new building will be located at the property line along Union Street and is proposed to have a 20'3" setback from Garfield Avenue. Alternative 2A would have a varying setback between 30 feet and 40 feet from Garfield Avenue. The building would also incorporate step-backs at higher levels to create visual interest and transitions to historic buildings.

The Private Realm

Height limits in conjunction with floor area ratios (FAR) work to guide private sector development and regulate building envelopes in the Private Realm concept. Through the implementation of the Zoning Code, these limits are intended to balance the sometimes competing interests of economic growth and vitality, and protecting historic buildings and residential neighborhoods. The FAR maximums in the Central District Specific Plan are aimed at allowing greater size along Colorado Boulevard to reinforce its place as, "...the City's preeminent street." Further, the development of a, "...broad mixture of uses, emphasizing commercial and mixed uses" is recommended to be accommodated.

As noted earlier in the CUP discussion, new construction on this site is limited to a FAR of 2.25 and this project will result in a FAR of 1.48. Further, this site also has a height

limit of 60 feet. This height maximum is a part of the Private Realm concept and enforced through the Zoning Code.

Central District Specific Plan: Civic Center/Midtown Sub-District

The project site is located in the Civic Center/Midtown sub-district of the Central District Specific Plan. Within the Specific Plan, sub-district character is defined along with the character of individual precincts within each sub-district. Each sub-district also includes linkage concepts and proposals for the sub-district. These characteristics and proposals are summarized below.

Sub-district & Precinct Character

As stated in the Central District Specific Plan, the objective of the Civic Center/Midtown Sub-district is to, ...”strengthen its role as the symbolic and governmental center of the City, encouraging the presence of civic, cultural, and public service institutions, while augmenting the character of the area with a supportive mixture of uses.”

The project site is within the Civic Center Core precinct (B-1), which is described as follows:

This precinct in particular functions as the City’s symbolic and public center, and features a distinguished grouping of civic buildings that includes City Hall and the Central Library. The design of all buildings and public spaces in this precinct should reflect the highest quality, respect the prominence of civic landmark buildings, and reinforce the vision of the Bennett Plan.

Linkage Concept

The “Civic Center/Midtown Linkage Concept” map identifies Holly Street and Garfield Avenue as Civic Promenades, while Union Street is shown as a “Multi-modal Corridor” with a priority on the streetscape and strong pedestrian orientation and Marengo Avenue as a Primary Pedestrian Connection with a priority on the streetscape. The intersections of Union Street with Garfield and Marengo Avenues and of Holly Street with Marengo Avenue are identified as Important Pedestrian Crossings and the intersection of Holly Street and Garfield Avenue is shown as a Civic Plaza.

Civic Center/Midtown Proposal

Relevant to the project, the Civic Center/Midtown Proposal encourages: 1) civic identity, including a complementary mix of commercial and residential uses to add to the vitality of the public uses in the area; 2) realization of the “City Beautiful” Vision through preservation of historically significant buildings, requirements for complementary new buildings and reintegration of the Beaux-Arts axial plan; 3) investment in public spaces

including Centennial Plaza, the forecourts of the Civic Auditorium and Public Library and other recommendations from the Civic Center/Mid-Town District Design Project (which does not identify specific, permanent requirements for the two existing landscaped areas at the northwest and southwest corners of Garfield Avenue and Holly Street; landscape designs were proposed as place-holders until development of the two sites); 4) visual and physical connections to ensure public accessibility to the area, particularly treating Garfield Avenue as the major civic promenade and Holly Street as a ceremonial entrance to the Civic Center; and 5) civic-minded architecture to ensure that new buildings exhibit permanence, quality, and monumentality, define streets, and allow for courtyards and open spaces interior to the block.

Conclusion

The YWCA/Kimpton Hotel Project, specifically Alternative 2A studied in the EIR, meets the goals of the precinct by providing a new supportive use to the existing commercial, residential, civic and institutional uses in the vicinity. The project would revitalize a vacant historic building and provide a new building that defines the streets, reinforces the vision of the Bennett Plan and infuses life into the district by providing a destination hotel for visitors and guests to the area. The development would define the Union Street edge and the building will exhibit permanence, quality and monumentality, which will be refined through the design review process. The visual axes of Holly Street and Garfield Avenue would remain uninterrupted and no dedicated open space or parkland would be eliminated from the area. Significant areas of landscaping would remain along Garfield Avenue and Holly Street, similar in depth to both the 1923 and 1925-6 versions of the Bennett Plan.

ENVIRONMENTAL ANALYSIS:

In accordance with the requirements of the California Environmental Quality Act (CEQA), an Initial Environmental Study ('Initial Study') was prepared in order to identify and analyze the project's potential impacts on the environment. The Study was made available for public review and comment from March 5, 2015 through April 6, 2015 and determined that an Environmental Impact Report (EIR) would be required to evaluate potential environmental impacts of the project on Cultural Resources, Energy, Land Use and Planning, Noise and Vibration and Transportation and Traffic. A Draft EIR was prepared and circulated for public review from February 5, 2016 to April 5, 2016 for a total of 60 days of public review. The Historic Preservation Commission provided comments on the Draft EIR at its March 1 and 15, 2016 meetings; the Design Commission provided comments at its March 8, 2016 meeting and the Planning Commission provided comments at its March 9, 2016 meeting.

Of the topic areas that were analyzed in the Draft EIR, potentially significant impacts were identified in the areas of Cultural Resources, Noise and Vibration and Transportation and Traffic, but that these impacts could be reduced to a less than significant level because mitigation measures will be incorporated into the project. A

series of nine alternatives to the project was studied including the required “no project” alternative, seven variations of enlarged setback alternatives and an alternate land use alternative. A Mitigation Monitoring and Reporting Program was also prepared. The analysis of the project’s potentially significant impacts and their mitigation measures are described further below.

Comments on the Draft Environmental Impact Report

During the public comment period, written and verbal comments were received from the following two public agencies, two organizations, members of three Commissions and 18 individuals.

Public Agencies

- California Department of Transportation (Caltrans)
- County Sanitation Districts of Los Angeles County

Organizations

- Civic Center Coalition (prepared by Chatten-Brown & Carstens, LLP)
- Pasadena Heritage

Commissions

- Historic Preservation Commission (including written comments from Commissioners Darrell Cozen and Laura Rodriguez)
- Design Commission (including written comments from Commissioner John Byram, Architect)
- Planning Commission

Individuals

- Nina Chomsky
- Dale Brown, AIA
- Matthew G. Dillhoefer
- Jonathan Edwards
- Lambert M. Giessinger
- Meena Pennington
- Steven A. Preston
- Marsha V. Rood
- Ann Scheid
- Jill Shook
- Ana Marie Whitaker
- David Whitehead
- Claire Bogaard

- David Gaines
- Ken McCormick
- Stefanos Polyzoides
- Avram Gold
- Chris Fedukowski

As required by CEQA, responses to all comments received on the Draft EIR have been prepared and incorporated into the Final EIR. A complete and detailed list of comments and responses to comments are found in Section 3.0 of the Final EIR document. The comments received and subsequent responses prepared did not trigger any of the situations listed in the CEQA guidelines for requiring recirculation of the Draft EIR. As such, a Final EIR has been prepared and was provided to the City Council on June 8, 2016.

Summary of Topic Areas and Conclusions:

Cultural Resources: Impacts Less than Significant with Mitigation Measures Incorporated

The EIR determined that the project has the potential to significantly impact cultural resources, including historic resources, but those impacts could be reduced to a less than significant level with the incorporation of mitigation measures. This conclusion is based on a *Historic Resources Technical Report*, prepared by Historic Resources Group for this project and included as Appendix B to the DEIR. The report determined that while the site on which the project is proposed is within the Pasadena Civic Center Historic District, and is near several significant historic resources, namely City Hall, the U.S. Post Office and the YMCA, it will not impact any of these resources. The individual historic resources in the vicinity and on the project site, as well as the historic district, would retain the physical characteristics that result in their eligibility for listing in the National or California Registers or for historic designation by the City of Pasadena. Because the rehabilitation of the YWCA has the potential to remove character-defining features that are important in conveying its significance, mitigation measures are recommended to ensure that the project will comply with the Secretary of the Interior's Standards for Rehabilitation, including retention of a historic preservation consultant during design and construction to oversee the project. In addition, an on-site interpretive display commemorating the history of the YWCA and its historic significance is recommended as well as archival photo-documentation of the building. Mitigation measures are also recommended to ensure protection of any archaeological resources that may be found on the site during construction.

Energy: Impacts Less than Significant

The Energy analysis in the EIR found that the project would not result in potentially significant impacts. Specifically, the project would be consistent with adopted energy conservation plans, would not use energy resources in a wasteful and inefficient manner and would not require the construction of new energy facilities or expansion of

existing facilities. Calculations of projected energy use to support these conclusions are included in Appendix C to the DEIR. As such, the project will have less than significant impacts and no mitigation measures are required.

Land Use and Planning: Impacts Less than Significant

The Land Use and Planning analysis in the EIR found that the project would not result in potentially significant impacts. The project is consistent with the land use and zoning designations of the site and complies with most of the development standards that apply to the property. Those with which it does not comply may be approved through a Variance process for which appropriate applications have been submitted and will be considered by the review authority for the project which, in this case, is the City Council. The Variances that are requested are for lower than required first floor height and the number and design of loading spaces. Applications for CUPs have also been submitted for less than required parking and shared parking as well as for the size of the building and the nature of the land use. Appendix D to the DEIR also includes an analysis of General Plan and Central District Specific Plan goals that may have been adopted for the purpose of avoiding or mitigating an environmental effect and concludes that the project would not conflict with any of these goals. As such, the project will have less than significant impacts and no mitigation measures are required.

Noise and Vibration: Impacts Less than Significant with Mitigation Measures Incorporated

The Noise analysis in the EIR found that the project would not result in significant permanent impacts from traffic-generated noise or other on-site stationary sources, the latter of which would be regulated by the City's Noise Ordinance. The EIR found that the project could result in temporary significant impacts from construction of the project and from groundborne vibration during construction. Mitigation measures are included that will mitigate these impacts to a less than significant level.

In particular, to address construction noise impacts, construction hours will be limited, noise reduction equipment will be required on construction equipment and stationary equipment, and staging will be required to be as far as reasonably possible from noise-sensitive receptors (Centennial Place and First Baptist Church). To reduce impacts related to groundborne vibration, consultation with a structural engineer and historical architect will be required to survey the conditions of the adjacent buildings, ensure that measures are taken that would ensure that vibration levels would be maintained below 0.12 ppv in/sec (the level of vibration that could cause structural damage to extremely fragile historic buildings, ruins, ancient monuments) and to survey the adjacent buildings after construction to identify and repair any damage caused to the buildings as a result of construction of the project. In addition, there is a potential for cumulative vibration impacts if this project and the Union Street Condominiums project at 254 E. Union Street are simultaneously under construction and a mitigation measure is recommended to ensure that activities that have the potential to generate cumulatively significant vibration (i.e., grading and compaction) not occur simultaneously on both project sites.

Transportation and Circulation: Impacts Less than Significant with Mitigation Measures Incorporated

The Transportation Impact Analysis for the project was prepared by Pasadena Department of Transportation in August 2015. The study analyzed the project against the transportation thresholds of significance adopted by the City Council, which are:


- The project's incremental contribution to existing citywide VMT per Capita is greater than 22.6
- The project's incremental contribution to existing citywide VT per Capita is greater than 2.8
- A decrease in the percentage of the City's existing service population located within one-quarter of a mile of levels 1 and 2 bicycle facilities, which is currently 31.7 percent
- A decrease in the percentage of the City's existing service population located within on-quarter of a mile of levels 1 and 2 transit facilities, which is currently 66.6 percent
- A decrease in the citywide Pedestrian Accessibility score, which is currently 3.88

The study found that the project would not result in an increase of any of these performance measures beyond the thresholds of significance. In the Final EIR, further analysis was conducted to include valet trips and with the inclusion of these trips, this conclusion did not change. The EIR also found that the project would not conflict with adopted plans and policies related to public transit, bicycle or pedestrian facilities or congestion management. Due to the design of the loading area, which requires backing movements onto or from the public right-of-way, the project could result in a traffic safety hazard and a mitigation measure has been incorporated to reduce this potential impact to a less-than-significant level. As previously described, this mitigation measure requires redesign of the loading space to avoid backing movements onto or from the public right-of-way, but allows for a series of alternative measures that would allow on-street loading during early-morning hours and with proper travel lane closure, a traffic control plan and compliance with the WATCH Manual, 2012 Edition.

FISCAL IMPACT:

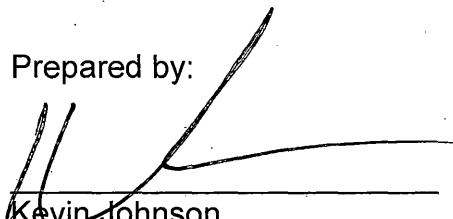
The total project cost to the developer is estimated to be approximately \$71.7 million and includes the approximately \$14-\$16 million that will be used to rehabilitate the city owned historic YWCA Building and the construction and operation of a new building, both of which would become a 179-room hotel. At stabilization, year three of operations, the project will generate approximately \$2.1 million (present valued at \$1.8 million discounted at 5%) to the General Fund from transient occupancy tax, sales tax, property tax, and lease payments. Over a 20 year period the City will receive approximately \$51.5 million (present valued at \$30.7 million when operations begin discounted at 5%) to the City's General Fund.

Respectfully submitted,



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Kevin Johnson
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Reviewed by:



Leon E. White
Principal Planner

Approved by:



STEVE MERMELL
City Manager

Attachments (18):

- A. Specific Findings for Approval
- B. Conditions of Approval
- C. Mitigation and Monitoring Reporting Program
- D. 1923 Bennett Plan
- E. Ordinance 2116 (Including Planning Commission Resolution 2)
- F. Map of Legal Descriptions from Resolution 2 & 1910 Sanborn Maps
- G. Records of Bennett's Civic Center Work Subsequent to Building Design Competition
- H. 1925 & 1926 Bennett Plans
- I. May 21, 1923 Pasadena Star-News Article (City Attorney Opinion)

- J. Symmetry Diagrams of Alternative 2A
- K. Parking Study & DOT Acceptance Letter
- L. Applicant Submittals
- M. Plans, Elevations, Renderings & Sections
- N. Alternative 2A Design Study
- O. Public Comments Submitted to Planning Commission and Staff's Responses
- P. Findings Certifying the EIR for the YWCA/Kimpton Hotel Project
- Q. Financial Analysis of Project
- R. Aerial Map of Proposed Public Tree Removals