

**ATTACHMENT A**  
**FINDINGS FOR ZONING MAP AMENDMENT, ADOPTION OF A PD DISTRICT AND PD PLAN, VARIANCE FOR HISTORIC RESOURCES**

Zoning Map Amendment to reclassify the Project site from CD-6 to PD-39, adoption of a PD zoning district and accompanying PD Plan

1. *The proposed amendment is in conformance with the goals, policies, and objectives of the General Plan.*

The Project site is designated High Mixed Use (0.0-3.0 FAR, 0-87 du/ac) on the General Plan Land Use Diagram, which is intended to support the development of multi-story mixed-use buildings with a variety of compatible commercial (retail and office) and residential uses. Development is characterized by shared open spaces, landscaping, and small to minimal separations between buildings, and shared driveways and parking. Sites may be exclusively commercial, but not exclusively residential. Mixed-use development projects containing housing shall incorporate amenities contributing to a quality living environment for residents including courtyards, recreation facilities, and similar elements. 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 High 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 Project is in conformance with the High Mixed Use designation because development consists of multi-story buildings that will include a mix of uses (medical office, assisted and independent living, ground floor commercial, multifamily housing), shared open spaces, landscaping, shared driveways and subterranean parking. The accompanying PD Plan that will regulate implementation of the Project, specifies a maximum FAR up to 2.89 and 87 du/acre, consistent with the intensity and density of development prescribed by the General Plan Land Use Element. The PD zoning district is consistent with all land use classifications of the General Plan.

The proposed amendment that will facilitate the Project is in conformance with the goals, policies and objectives of the General Plan as described herein.

*Guiding Principle 1. Growth will be targeted to serve community needs and enhance the quality of life. Higher density development will be directed away from residential neighborhoods and into the Central District, Transit Villages, and Neighborhood Villages. These areas will have a diverse housing stock, job opportunities, exciting districts with commercial and recreational uses, and transit opportunities. New*

*development will build upon Pasadena's tradition of strong sense of place, great neighborhoods, gardens, plazas, parks, and trees.*

The proposed amendment will facilitate high density development consisting of medical office, assisted living and independent living (senior housing), ground floor commercial uses, and/or housing. These uses are acutely needed when considering an aging population, are employment generating, and will leverage existing transit opportunities. The resulting Project will serve community needs and enhance quality of life, not limited to seniors, for residents of Pasadena and beyond.

*Guiding Principle 2. Pasadena's historic resources will be preserved. Citywide, new development will be in harmony with and enhance Pasadena's unique character and sense of place. New construction that could affect the integrity of historic resources will be compatible with, and differentiated from, the existing resource.*

Historic resources within the Project site will be preserved and integrated into the Project. Historic resources located outside of the Project site will not be physically altered, will retain all character-defining features and historic materials, and will retain their existing relationship within their respective settings. Implementation of a Mitigation, Monitoring and Reporting Program will ensure new construction does not affect the integrity of historic resources.

*Guiding Principle 3. Pasadena will be an economically vital City by providing jobs, services, revenues, and opportunities. A diverse economic base with jobs for Pasadena residents will be fostered; existing businesses will be encouraged to stay or expand; affordable housing will be provided for the labor pool; the continued fiscal health of the city will be ensured.*

Construction of the Project and Project uses will be employment- and revenue generating. Medical office uses, assisted and independent living uses, and ground floor commercial uses will provide services to the community. These uses will complement existing uses in the vicinity and in the case of residential dwelling units in Building A, will expand the economic base and encourage existing business to stay and expand. As such, the Project provides opportunities for both potential employees and existing and future residents of the City.

*Guiding Principle 4. Pasadena will be a socially, economically, and environmentally sustainable community. Safe, well designed, accessible and human-scale residential and commercial areas will be provided where people of all ages can live, work and play. These areas will include neighborhood parks, urban open spaces and the equitable distribution of public and private recreational facilities; new public spaces will be acquired. Human services will be coordinated and made accessible to those who need them.*

Providing adequate care and housing is a critical component of being a socially sustainable community. The higher density of land uses on the Project site compared to the existing condition is both economically and environmentally sustainable, particularly due to the site's proximity to bus and light rail transit facilities. The urban public spaces proposed as part of the Project invite gathering on the site in an aesthetically pleasing and safe environment whereas the existing site conditions are disjointed and do not provide open spaces for gathering not associated with a restaurant. The proposed building facades incorporate numerous window openings to provide views and to avoid blank, massive-looking building faces. The facades will also be articulated with patios, window shades, and varying surface treatments to provide variation and break up the surface of the buildings. The Project will incorporate varying building setbacks and recesses to allow for building articulation, and to create space for streetside plazas, patios, and building entrances. Portions of both proposed buildings will be set back from the widest part of the building envelope and some portions of the buildings will extend only to Level 4 and Level 6. Additionally, the ground floor will be slightly taller than the remaining levels, at 15 feet high. This will act to differentiate the ground floor and, combined with some unique architectural features for this level, create a human-scale and pedestrian-friendly environment.

Construction and operation of the Project will not result in wasteful, inefficient, or unnecessary construction of energy resources, nor conflict with or obstruct the applicable State or local plans for renewable energy and energy efficiency. The EIR concluded that the Project will be consistent with State, regional, and City plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

*Guiding Principle 5. Pasadena will be a City where people can circulate without cars. Specific plans in targeted development areas will emphasize a mix of uses, pedestrian activity, and transit; public and private transit will be made more available; neighborhood villages and transit villages will reduce the need for auto use.*

The Project proposes high density development in an area that is intended for the type of intensities and densities proposed. While the development provides new subterranean parking, it includes a mix of uses that complement existing uses along Arroyo Parkway. The development supports the guiding principle because the additional opportunities and services provided by the Project will build upon the City as a destination, further encouraging pedestrian and transit activity. Two light rail stations are within one-quarter mile and the site is served by bus lines. Employees, customers, and residents of the site can shop for groceries, attend medical and other service related appointments, dine, and shop without a car. The mix of uses proposed and the existing ability to access other restaurant, dining, entertainment destinations proximate the site without a car support this guiding principle.

*Guiding Principle 6. Pasadena will be a cultural, scientific, corporate, entertainment, and educational center for the region. Long-term growth opportunities will be provided*

*for existing institutions; a healthy economy will be fostered to attract new cultural, scientific, corporate, entertainment and educational institutions.*

Proposed medical office uses, assisted living and independent living uses support the objective of this area of the City being a corporate center for the region. These uses have the potential to support scientific research and will support the growing health/medical cluster immediately to the west along Raymond Avenue and South Fair Oaks Avenue. Project uses including housing will contribute to the economic base and provide long term growth for existing and new institutions. Project uses, transit accessibility, and proximity to other dining and shopping will encourage a healthy economy and foster other institutions.

*Guiding Principle 7.* *Community participation will be a permanent part of achieving a greater City. Citizens will be provided with timely and understandable information on planning issues and projects; citizens will directly participate in shaping plans and policies for Pasadena's future.*

The City has provided the public with timely and understandable information on the Project and multiple opportunities for citizens to directly participate. The City's environmental review process for the Project has met the requirements in CEQA for scoping and noticing. The City held two scoping meetings, including one with the Planning Commission. The City held a study session with the Planning Commission to receive input on the Draft EIR. These informational meetings allowed for direct citizen participation. As per City standards, the public hearings for the Project will be open to the public, and allow for direct citizen participation.

*GOAL 1. Sustainable Growth.* *Sustainable growth and change in orderly and well-planned developments within targeted areas that allow for higher density development in an urban core setting and in close proximity to transit that provides for the needs of existing and future residents and businesses, ensures the effective provision of public services, and makes efficient use of land, energy, and infrastructure.*

The Project is located within an area of the City that is targeted for higher density development (Central District). The setting is part of the urban core of the City and the Project site is proximate to light rail and bus lines (or routes). The intensity and density of development proposed is consistent with the High Mixed Use Land Use designation. New construction will infill underutilized property predominantly occupied by one or two-story buildings and surface parking, with a dense, mixed development, making more efficient use of land, energy, and infrastructure. Therefore the Project's conformance with Policies 1.1 (Basic Growth Policy), 1.2 (Targeted Growth) and 1.3 (Development Capacities) carries-out Goal 1.

*GOAL 2. Land Use Diversity.* *A mix of land uses meeting the diverse needs of Pasadena's residents and businesses, fostering improved housing conditions, offering*

*a variety of employment and recreational opportunities, and supporting a healthy population while protecting the environment.*

The Project provides a mix of uses that will meet the needs of residents and businesses. Independent living for seniors and multi-family residential units will contribute in addressing the community's fair share of housing needs and enable residents to live close to businesses and employment. Opportunities for medical office uses, assisted living, and other commercial uses will serve both local and regional needs, capturing a greater share of local spending and offering a diversity of employment opportunities. Further, these uses will capture the economic value induced by the presence of transit stations and accommodate needed health facilities that are transit and pedestrian accessible. Therefore the Project's conformance with Policies 2.1 (Housing Choice), 2.2 (Senior Housing), 2.3 (Commercial Businesses), 2.5 (Mixed Use), 2.6 (Transit-Related Land Uses), and 2.11 (Health Facilities) carries-out Goal 2.

*GOAL 3. Compatible Land Uses.* *A mix and distribution of land uses characterized by their compatibility.*

The mix of uses proposed will complement existing uses in the area and expands the distribution of land uses in the area. The Project will address a range of needs, from fully assisted living or memory care to fully independent living. Development of the Project will permit the City's senior population to be more integrated into the area, close to transit, grocery stores and other retail opportunities, service providers, and medical care. Therefore the Project's conformance with Policy 3.2 (Care Facilities) carries-out Goal 3.

*GOAL 4. Elements Contributing to Urban Form.* *A safe, well-designed, accessible City with a diversity of uses and forms. These diverse forms include distinct, walkable districts, corridors, and transit and neighborhood villages and cohesive, unique single and multi-family residential neighborhoods and open spaces where people of all ages can live, work shop and recreate.*

The proposed Project will maintain and enhance the City's urban form by offering additional choices that will serve community values, need, and varying demographics. The transition from low density development to a high density development continues the theme of an active Central District and continues to reinforce the area as a vital, pedestrian-oriented place that is focal to community identity, business activity, employment, and living. Locating dense development close to Metro stations, and in particular the highest of intensities near the Del Mar and Fillmore stations is a desired policy in the Land Use Element. The Project will improve underused parcels and strengthen a significant corridor by locating intensity towards a major intersection and stepping back intensity between major intersections. Therefore the Project's conformance with Policies 4.2 (A Diversity of Places), 4.3 (An Active Central District),

4.4 (Transit Villages), 4.5 (Transit Villages in Context), 4.7 (Strengthen Major Corridors), 4.13 (Planned Developments) carries-out Goal 4.

*GOAL 5. Pedestrian-Oriented Places. Development that contributes to pedestrian vitality and facilitates bicycle use in the Central District, Transit Villages, Neighborhood Villages, and community corridors.*

The Project contributes to pedestrian vitality and promotes pedestrian activity by placing entries on the street, incorporating transparent facades, open space and opportunities for dining areas, while locating parking underground. The Project will provide bicycle parking and reduce the number of existing driveways, allowing for less disruption to pedestrian and bicyclists. Therefore the Project's conformance with Policy 5.2 (Pedestrian-Oriented Development), carries-out Goal 5.

*GOAL 6. Character and Scale of Pasadena. A built environment that evolves while maintaining Pasadena's unique sense of place, character, and the urban fabric.*

The Project will help the area establish a more consistent and identifiable character as a visually appealing entrance corridor through its pedestrian- and transit-oriented character, mix of uses, and integration of residential opportunities. The Project along with the existing nearby Del Mar Station project will collectively contribute to the sense of place. The Project is designed to respect examples of modern commercial design, and commercial design by a prominent local architecture firm through the preservation and reuse of two historic structures. Incorporation of these unique elements as well as adding street-fronting uses ("eyes on the street"), adequate lighting, will cultivate a sense of community ownership. Therefore the Project's conformance with Policies 6.1 (Sense of Place and History), 6.7 (Public Safety and Community Design) carries-out Goal 6.

*GOAL 8. Historic Preservation. Preservation and enhancement of Pasadena's cultural and historic buildings, landscapes, streets and districts as valued assets and important representations of its past and a source of community identity, and social, ecological, and economic vitality.*

The Project will retain historic structures on the site and reuse for commercial purposes. Available City processes such as a Variance for Historic Resource that are intended to accommodate historic resources undergoing development or change in use, incentive preservation. City support and assistance in pursuing designation of resources, and an equitable process based on adopted evaluation criteria will also contribute to preserving the historic assets. Therefore the Project's conformance with Policies 8.1 (Identify and Protect Historic Resources), 8.2 (Historic Designation Support), 8.3 (Preservation Efforts), 8.4 (Adaptive Reuse) carries-out Goal 8.

GOAL 10: City Sustained and Renewed. Development and infrastructure practices that sustain natural environmental resources for the use of future generations and, at the same time, contribute to the reduction of greenhouse gas emissions and impacts on climate change.

The Project will be consistent with the City's Climate Action Plan (CAP), SCAG's 2020–2045 RTP/SCS Connect SoCal, the California Air Resources Board (CARB), California's Climate Change Scoping Plan (Scoping Plan), and Statewide GHG reduction goals for 2030 or 2050 identified in Executive Order (EO) S-3-05 and Senate Bill (SB) 32. As discussed in Section 3.3, Energy, of the EIR, construction and operation of the Project would not result in wasteful, inefficient, or unnecessary construction of energy resources, nor conflict with or obstruct the applicable State or local plans for renewable energy and energy efficiency. The Project will involve the most energy-efficient buildings required under the current Title 24 Energy Efficiency Standards and will promote energy efficient transportation options by developing within a High Quality Transit Area (HQTA) and Transit Priority Area (TPA). The Project will incorporate electric vehicle parking and charging, and provide for recycling. Infrastructure will be designed, constructed, and maintained based on the most current standards and best practices that will reduce impacts to the natural environment. The Project will retain and reuse structures as a means of supporting environmental sustainability. The Project will include 38 new trees and be required to plant new street trees as a condition of approval. Project implementation will result in a net gain in the urban forest. Therefore the Project's conformance with Policies 10.1 (Environmental Quality and Conservation), 10.2 (Land Uses Supporting Sustainability), 10.4 (Sustainable Building Practices), 10.6 (Adaptive Reuse), 10.13 (Urban Forest), 10.16 (Infrastructure) carries-out Goal 10.

GOAL 11: Job Opportunities. Provide land use capacities that accommodate a diversity of job opportunities for Pasadena's residents.

Project uses will provide for, and accommodate diverse job opportunities. Medical office uses and assisted living use will provide employment opportunities in research and outpatient care, in conjunction with the expanding medical cluster around Huntington Hospital. Other ground floor commercial uses to be provided by the Project also represent job opportunities. The Project presents an opportunity to attract new establishments that are complimentary to the Central District area and transit village. Therefore the Project's conformance with Policy 11.1 (Business Expansion and Growth), 11.3 (New and Complementary Businesses) carries-out Goal 11.

GOAL 12. Shopping and Dining. Diversity of shopping opportunities enabling Pasadena's residents to acquire desired goods and services in the City, as well as attracting customers from surrounding communities.

The Project will provide employment generating uses and housing opportunities. It will also attract customers and visitors from within the community and surrounding communities because of the diversity of opportunities within and around the site. The revitalization of the Project site will support other businesses nearby because those working, residing, or visiting the site will pursue their services and goods due to proximity. In addition, the new development will attract businesses, and positively enhance the corridor. Therefore the Project's conformance with Policies 12.2 (Business Attraction), 12.4 (Revitalization of Commercial Areas) carries-out Goal 12.

*GOAL 15. Sound Local Economy. A sound local economy which attracts investment, increases the tax base, creates employment for Pasadena residents and generates public revenues.*

The Project will attract investment, increase the tax base, create employment, and generate revenues. The Project represents a significant investment in the local community. Therefore the Project's conformance with Policy 15.1 (Local Investment) carries-out Goal 15.

*GOAL 16. Superior Services. A superior level of services meeting the needs of Pasadena's diverse residents including schools, hospitals, parks, child and senior facilities and programs, libraries, shelters, public auditoriums, health facilities, social clubs and recreation centers*

The Project will provide assisted living and independent living for seniors, which are acutely needed in the City and wider region as the U.S. population is generally living longer and a greater proportion of the population is considered senior or elderly. Providing health related facilities and opportunities addresses and anticipates needs of the community. Further, locating these types of uses near transit and within proximity to other health related facilities such as Huntington Hospital improves the accessibility of these services. Therefore the Project's conformance with Policies 16.3 (Anticipated Needs), 16.6 (Accessible Services) carries-out Goal 16.

*GOAL 18. Land Use/Transportation Relationship. Pasadena will be a City where there are effective and convenient alternatives to using cars and the relationship of land use and transportation is acknowledged through transit-oriented development, multi-modal design features, and pedestrian and bicycle amenities in coordination with and accordance with the Mobility Element.*

The inclusion of medical offices, assisted and independent living, and/or residential units at the Project site brings a mix of uses that are not currently well represented along Arroyo Parkway. Patrons, employees, and residents of the development will benefit from access to nearby resources such as the Whole Foods Market on site and several restaurants and other amenities in the vicinity. This will be in addition to potential medical office appointments or visits to those being cared for. All will benefit



from convenient access to two Metro stations within a ¼ mile of the site, and bus service. The mix and density of uses will induce a greater share of walking, bicycling, and transit use as an alternative to the automobile. In addition, in placing assisted living and independent living uses at this particular site, the Project has considered the mobility needs of the disabled, and especially seniors. Therefore the Project's conformance with Policies 18.1 (Development Mix and Densities), 18.2 (Mobility) carries-out Goal 18.

*GOAL 19. Parking Availability. The supply of parking will reflect Pasadena's objective to protect residential neighborhoods; create a vital, healthy, and sustainable economy; establish Pasadena as a leader in environmental stewardship; encourage physical activity and a commitment to health and wellness; and encourage walking, biking, and transit. The supply of parking in an area will also reflect the type, mix, and density of uses; the availability of shared facilities; and the proximity to transit.*

The Project removes all surface parking and replaces with subterranean parking, which reduces the land lost to parking. The location of the Project and mix of uses within and outside of the site provides an opportunity for residents, patrons, visitors, and employees to park once and visit many destinations. This will encourage a greater share of physical activity by encouraging walking, biking, and transit use to access other nearby destinations. Therefore the Project's conformance with Policies 19.3 (Parking Management), 19.4 (Park Once) carries-out Goal 19.

*GOAL 20. Information and Participation. All Pasadena communities will be uniformly aware and participate in land use planning, entitlement processes, and decision-making processes through the communication of clear and understandable information and engagement opportunities*

The review of the Project, including the environmental analysis, requires a public process and public involvement. Public notification through the use of new technology (ie. virtual meetings), mail, and the City's website have enabled the public to provide input in decision making. Printed materials have also been made available at various City sites. Additionally, there have been multiple opportunities for public involvement. The city held two informational scoping meetings during a 30-day public review period of the Initial Study to solicit comments and inform agencies and the public of the Project and the upcoming preparation of an Environmental Impact Report. The City held an information study session during a 45-day public period of the Draft Environmental Impact Report to solicit comments and inform the public of the Project. Publicly noticed meetings before the Planning Commission and City Council are additional opportunities that enable the public to provide input. Therefore, the Project's conformance with Policies 20.1 (Neighborhood Meetings), 20.2 (Brochures and Notices), 20.3 (Public Involvement and Proposed Projects), 20.5 (Public Discussion) carries-out Goal 20.

*GOAL 28. Places to Live, Work, Shop and Recreate. A diversity of well-designed corridors and villages containing an integrated mix of commercial uses and/or housing that enable Pasadena's residents to live close to businesses, services and employment.*

The Project enables residents to live close to services, shopping, or work. The development of the property with a mix of uses that serve community needs, particularly in the Central District area and in proximity to Metro stations expands opportunities to reduce automobile use and actively engage and enhance pedestrian and transit activity. Therefore, the Project's conformance with Policy 28.1 (Land Use Mix) carries out Goal 28.

*GOAL 29. Transit Villages. Moderate to high density mixed-use clusters of residential and commercial uses developed in an integrated 'village-like' environment with buildings clustered on common plazas and open spaces in proximity to Metro Gold Line stations capitalizing on their induced market demands and land values, facilitating ridership, and reducing automobile use while increasing walkability*

The Project accommodates a mix of uses that are acutely needed and not well represented along Arroyo Parkway. The clustering of medical office uses and care uses in proximity to other health related facilities in proximity to Metro stations will facilitate ridership, increase walkability, and better aligns with the City's desire for transit villages. Therefore, the Project's conformance with Policies 29.1 (Mix of Uses) carries-out Goal 29.

*GOAL 31. Central District. The primary civic, business, financial, retail, entertainment, and cultural center of Pasadena with supporting housing enabling residents to live close and walk to these uses and access regional transit.*

The Project is a high density development in proximity to Metro stations with opportunities for medical office, assisted and independent living, restaurant, and/or housing. This growth is targeted to an area where growth and intensity of development is emphasized. The development will expand the customer base for business, both new and existing, and support Metro ridership. It will strengthen the Central District's economic vitality and expand economic opportunities. Therefore the Project's conformance with Policies 31.1 (Focus Growth), 31.3 (Del Mar, Memorial Park and Lake Transit Villages), 31.7 (Expanded Economic Opportunities) carries-out Goal 31.

2. *The proposed amendment would not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.*

The proposed amendment will reclassify the Project site from CD-6 to PD-39 and facilitate the construction of the Affinity Project. The resulting Project will not be detrimental to public interest but instead will reinforce and strengthen Arroyo Parkway

as a major corridor, provide jobs, services, revenues, and opportunities that will support Pasadena as an economically vital city and allow for continued fiscal health. The Project will improve Pasadena's infrastructure and urban form through modernized buildings that are energy- and water-efficient. The Project will provide assisted living and independent living facilities for seniors that are acutely needed in the City and wider region because the U.S. population is living longer and a greater proportion of the population is considered senior or elderly. Medical office uses are employment-generating and will be located proximate to health care related land uses in the vicinity providing efficient synergy. These types of uses are in the public interest because they serve community needs and enhance quality of life for residents of Pasadena and beyond, and are not limited to seniors. Further, providing adequate care and multi-family housing (where constructed in Building A) for the community is a critical component of being a socially sustainable community. The higher density of land uses on the Project site compared to the existing condition is both economically and environmentally sustainable, particularly due to the site's proximity to bus and light rail transit facilities. The Project will retain and reuse existing historic structures, which is in the public interest.

Implementation of the Project will not result in the need for new or expanded fire protection, police protection, library service, or parks and recreation facilities that could otherwise present a detriment to the health, safety, convenience or general welfare of the City. An Environmental Impact Report (EIR) was prepared to identify, analyze, and mitigate, to the extent feasible, the potential environmental effects associated with implementation of the Project facilitated by the amendment. The EIR considered several environmental topics and identified potentially significant environmental impacts related to the following topics: Cultural Resources, Noise, and Tribal Cultural Resources. However, through the incorporation of mitigation measures, identified significant impacts would be reduced to a less than significant level.

Implementation of the Project pursuant to the PD Plan, conditions of approval, and Mitigation Monitoring and Reporting Program will ensure approval of the amendment and adoption of the PD zoning district, and accompanying PD Plan will not be detrimental to the public interest, health, safety, convenience, or general welfare of the City.

Variance for Historic Resources to allow building heights up to 93'6" where the maximum allowed is 50' or 65' with height averaging

- 3. The Variance for Historic Resource is necessary to facilitate the appropriate use of an existing historic structure.*

The buildings at 501 and 523 South Arroyo Parkway were previously recommended as eligible for the local register based on evaluations that occurred in 1989 and 2000. In 2010, the City Council upheld a 2009 decision by the Design Commission which

found that both buildings are eligible for designation as landmarks because they retain historic integrity and meet the California Register of Historical Resources (CRHR) Criterion C. The building at 501 South Arroyo Parkway is a two-story Moderne style warehouse and office building that was constructed in 1940 and is identified as the Market Basket Warehouse Offices. It has been noted as “one of two or three best intact examples of 1940s Moderne design in the Arroyo Parkway Industrial Area” and “as an example of World War II era Modern vernacular commercial design.” The building at 523 South Arroyo Parkway, is a single-story brick masonry commercial building that was constructed in 1922 and is identified as the former Lewis Iron Building. It is noted as “an example of commercial design by the prominent local architecture firm of Marston and Van Pelt.” Through preparation of a Historical Resources Assessment for the Project, no changes were observed that would compromise their historic integrity. The buildings remain eligible for the Local Register under CHRH Criterion C. The resources embody the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic value. Both buildings are also historical resources for the purposes of CEQA.

The Variance for Historic Resources to allow an increase in building height is necessary to preserve and integrate the two historic resources into the Project. To facilitate their continued use for commercial purposes and to avoid compromising their historic integrity or distinctive characteristics, the design approach concentrated development intensity around, and behind, as opposed to above, in a manner that frames the historic buildings. Through this approach, the historic buildings maintain prominence and their lower scale, pedestrian centric appearance. Allowing the additional height reduces risk of resource loss, deterioration of integrity, or loss of prominence that may result if development intensity were located above or over the historic buildings.

*4. The Variance for Historic Resource would not adversely impact property within the neighborhood or historic district.*

Properties within the neighborhood would not experience any noticeable change as a direct result of allowing an increase in building height. An increase in allowed building height would not adversely impact historical resources in the vicinity of the Project site that include historic and landmark districts. Historic resources located outside of the Project site will not be physically altered, will retain all character-defining features and historic materials, and will retain their existing relationship within their respective settings. Further, the additional height would not prohibit or unreasonably restrict the use of solar energy systems on adjacent structures or create an adverse change in shade. Therefore, the additional building height granted through this Variance for Historic Resources would not adversely impact property within the neighborhood or historic district.

5. *Granting the Variance for Historic Resource application would be in conformance with the goals, policies, and objectives of the General Plan and the purpose and intent of any applicable specific plan.*

A Guiding Principle of the Land Use Element of the General Plan is that Pasadena's historic resources will be preserved. Goal 8 (Historic Preservation) of the General Plan seeks the preservation and enhancement of Pasadena's cultural and historic buildings as valued assets and important representations of its past. The adaptive reuse of the historic buildings will ensure the preservation of a surviving early example of a particular building design and work of a prominent local architectural firm. Policy 10.6 (Adaptive Reuse) of the General Plan encourages adaptive reuse of structures, including non-historic structures, as a means of supporting environmental sustainability. The project site includes eligible historic resources that will be adaptively re-used as part of the proposed Project. This approach respects the General Plan's goals of not only protecting historic resources, but restoring and enabling continued economic and environmental value of such resources. The proposed project will allow the existing resource to be appropriately modernized and reused to reduce the risk of deterioration that may otherwise occur. Finally, the design of the Project demonstrates architectural sensitivity to the historic buildings in its approach to height, massing, and modulation through the location of development intensity around, and behind, as opposed to above, in a manner that frames the historic buildings. Granting the Variance will allow the Project to satisfy a desire of the subdistrict, by raising the visual appeal of the site and corridor through dense development, and maintaining an attractive pedestrian- and transit-oriented character at the street.