

Similarly, during Phase 5 of construction, construction activities would occur approximately 65 feet from the adolescent psychiatry facility (Building 33) constructed in Phase 1, which would result in the generation of noise levels of 83 dBA Leq at the nearest noise sensitive receptor. In order to ensure that noise remains below the threshold of significance and to minimize noise impacts associated with construction of the acute psychiatric hospital (Building 35) on sensitive receptors located in the adolescent psychiatry facility (Building 33), the applicant would be required by mitigation measure NOISE-B to install a temporary 8-foot tall wood wall around the perimeter of the construction site where there is a direct line-of-sight between the construction site and the acute psychiatry facility (Building 35) (see mitigation measure NOISE-B). This will ensure that the noise level experienced by sensitive receptors at the adolescent psychiatry facility (Building 33) will remain around approximately 77 dBA Leq. Finally, in addition to compliance with the City's noise ordinance, mitigation measures NOISE-C through NOISE-E will serve to further reduce noise generated on-site and to minimize the nuisance to off-site sensitive receptors. Accordingly, the noise impact during construction would be less than significant. (EIR, pp. 3.6-11 and 15.)

Construction traffic is anticipated to result in a noise level increase of less than 2 dBA Leq along all affected roadways. Additionally, all construction deliveries would occur between the hours of 7:00 a.m. and 7:00 p.m., the least noise sensitive time of the day. Thus, noise generated by construction traffic will be less than significant. (Id.

at p. 3.6-11.) Finally, the Project will not cause ground-borne vibrations that would be significant. (Id. at p. 3.6-14.)

Operational Impacts

The Project is consistent with the City's noise/land use compatibility guidelines. Although the Project will locate seven senior living bungalows within the 60 CNEL noise level contour of San Gabriel Boulevard (three of these bungalows would also be located within the 65 dBA CNEL noise level contour), the City's exterior noise level standard for hospitals and multi-family residential uses, such as the proposed bungalows, is 65 dBA CNEL under the "clearly acceptable" category. Accordingly, the Project land uses will not exceed the City's noise/land use compatibility guidelines. In any event, typical wood frame construction, with windows in the closed position, would provide 20 dBA noise level reductions for exterior noise levels, so interior noise levels under future conditions would be on the order of 40 to 45 dBA CNEL. (EIR, pp. 3.6-12 and 13.)

On-site noise from Project operation will come from typical noise sources associated with hospital and residential land uses, such as vehicles arriving and leaving, and landscape maintenance machinery. The mechanical equipment would be required to comply with Section 9.36.030, of the noise ordinance, which limits noise levels from on-site noise sources at the property boundary. Therefore, compliance with existing regulations would ensure that on-site noise sources remain at less than significant levels. (Id. at pp. 3.6-13 and 15.)

With regard to traffic noise generated by the Project, the first item to consider is the volume of traffic that will be generated. Under the existing plus project condition, the Project would generate a 7 percent increase in traffic over existing volumes along Del Mar Boulevard, a 7 percent increase along Madre Street, a 3 percent increase along San Gabriel Boulevard, and a 1 percent increase along San Pasqual Street and El Nido Avenue. These increases will represent a barely perceivable change in the future noise conditions with the Project and would not represent a significant impact. (EIR, pp. 3.6-13 and 15.)

Cumulative Impacts

Due to the localized nature of noise impacts, the analysis of cumulative noise impacts focused on the related projects in Table 4-1 located within a 1/4-mile radius of the site. Construction of Phase II of the Monte Vista Grove project is expected to overlap with construction of Phase 3 of the Project. Given the distance between the two construction sites and the decrease in noise levels with distance, construction activities associated with the related projects when considered together within the proposed project would not be cumulatively considerable. Further, the Project and construction at Monte Vista Grove (as well as all projects on the list of related projects) would be required to comply with the City's Noise Ordinance, which establishes limits to noise during construction. With regard to vibration impacts, individual project impacts associated with construction activities are extremely localized because they are groundborne. As such, ground vibration associated with the Project would not be

heightened due to the related projects because of the distance between them. Consequently, no cumulative impacts from vibration would result. Finally, the future noise levels discussed in the EIR consider the noise levels produced by ambient growth plus the Project's and the related projects' traffic. When considered together, the Project and the related projects would not create a significant cumulative impact on permanent ambient noise levels in the vicinity of the Project area. (EIR, p. 4-11.)

f. PUBLIC SERVICES

i. Potential Significant Impacts

- PS-1:** The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.
- PS-2:** The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.
- PS-3:** There would be sufficient water supplies to serve the Project from existing entitlements and resources.¹ No new or expanded entitlements would be needed.
- PS-4:** The Project would not exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

ii. Proposed Mitigation

- PS-A** Water usage of buildings to be retained shall be reduced by 20 percent. In order to demonstrate this reduction, the applicant shall use Worksheet WS-1 and WS-

¹ The EIR at p. 3.7-22 states "PS-3: There would not be sufficient water supplies to serve the project from existing entitlements and resources. No new or expanded entitlements would be needed." The "not" in the sentence should have been stricken in the Final EIR, based on the analysis and conclusions reached in the EIR and as set forth herein.

2, in Chapter 11 of the California Green Building Code entitled “Baseline Water Use” and “20% Reduction Water Use Calculation Table.” Plumbing permits required in order to complete this reduction for the Oaks (Buildings 9 and 10) shall be finalized prior to a certificate of occupancy being released on Buildings 36. Plumbing permits required in order to complete this reduction for all other buildings (such as Buildings 1, 8, 19, 6 and 37) shall be finalized prior to permits being finalized for the proposed rehabilitation of Building 1 (Phase 5).

PS-B The applicant shall submit a detailed landscape plan that proposes the planting of “California Friendly” plants and the use of high efficiency irrigation technology. Landscape and irrigation plans shall be submitted for review with each phase of the proposed project and shall be reviewed by the Design Commission in combination with building plans. Areas of the acute psychiatric hospital (Building 35) that are not tied into the phasing plan (such as the areas to the north and south of Building 1) shall be completed with the improvements in Phase 3. The project’s landscape architect shall work with a historical consultant to develop a landscape plan for the historically eligible landscape features.

iii. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or Project alternatives identified in the Final EIR.

iv. Supporting Explanation

The Project will not significantly impact fire and police services. Las Encinas will continue to staff the site with personnel trained in CPR, first aid, Automatic External Defibrillators, and contract with a private ambulance service. As a result of new on-site population in the independent living units and assisted living units and 309,012 square

feet of net new site structures, the Project could result in the potential for a corresponding increase in response calls to the project site from the Fire Department. However, the Fire Department average response time of 5 minutes will remain the same even with the increased demand from the Project. The applicant will have to comply with all City and state building and fire regulations, for a more up-to-date fire protection system onsite, and to provide a water flow report to ensure that there is sufficient water pressure within the site for fire protection. (EIR, p. 3.7-21.)

As part of the site functions, Las Encinas would continue to use a private security team, a guard station would be maintained, and visitors would continue to be required to check-in at the main desk. The site would continue to be secured with walls and gates to secure driveways when not in use. The Pasadena Police Department provides police protection services for the site and the vicinity, and existing staffing levels are adequate to serve the existing uses. In addition, the Project would comply with the police protection requirements of the Police Department, including defensible design, lighting, and landscaping. The impact would be less than significant. (Id. at pp. 3.7-21 and 22.)

The City is well aware of the current water shortage facing public entities throughout the State, and the EIR sets forth an as up-to-date as possible picture of this ever-changing situation as of the circulation date for the Draft EIR. However, even after circulation of the Draft EIR began, the City continued to take action to address the shortage at the local level as changing circumstances dictate. (See staff report dated September 21, 2009.) The City Council finds that none of the actions or events

summarized in the staff report impact the adequacy of the water supply analysis in the EIR or constitute new information that would trigger recirculation or further CEQA analysis.

At buildout of the 2007 Master Development Plan, there would be a permanent increase in water demand in the City as a result of the Project by approximately 25,972 gpd, or 29.1 af/yr. PWP is planning to supply enough water to meet future projected water demand based on population projections at buildout of the City's General Plan. Because the Project is within the development capacity of the General Plan, PWP has accounted for and can supply this increased demand. However, due to the uncertain nature of future water supplies and the current drought being experienced in California, the Project would be required to reduce water consumption in order to reduce the increased demand on PWP supplies. New buildings constructed on site must comply with the City's green building ordinance, which requires new structures to comply with LEED's 20% reduction in water usage. In addition, implementation of mitigation measures PS-A and PS-B would be required to reduce the amount of water required for operation of the Project. With implementation of mitigation, the impact of the Project to future water supply would be less than significant. (Id. at pp. 3.7-22, 24.)

With regard to wastewater, at buildout the Project would be expected to generate a net increase in wastewater of 22,801 gpd, or 25.4 af/yr. The City's wastewater system in the Project vicinity is not presently deficient and the addition of wastewater generated by the Project would not exceed the capacity of the City's wastewater

system. However, because the Project would increase the amount of wastewater discharged into the City's sewer network, the Project would be required to pay the City's Sewer Facility Charge of approximately \$232,477 to fund improvements to the City's sewer infrastructure. Compliance with existing City regulations would ensure that the City has adequate capacity to serve the Project's projected demand in addition to existing commitments. The impact to the City's sewer system would be less than significant. (Id. at p. 3.7-23.) Sewage generated by the Project would be treated at the existing regional facilities serving the City of Pasadena and operated by LACSD, specifically the San Jose Creek Water Reclamation Plant. This plant has a design capacity of 100 million gpd and currently processes an average flow of 86.3 million gpd. The Project would contribute an additional 0.02 million gpd to this facility, which is within the capacity of LACSD. The impact to the regional wastewater treatment system would be less than significant. (Ibid.)

Cumulative Impacts

The Project and each cumulative project listed in Table 4-1 would incrementally increase demand for police and fire protection services within the City and could potentially increase emergency response times. Each project is evaluated as it is proposed, and this Project's incremental effect is not cumulatively considerable. Based on a review of this Project and other projects, it was determined that new or expanded police or fire facilities would not be required. (EIR, pp. 4-11 and 12.)

The Project and the related projects would be expected to increase demand for water in the City, as is projected in the City's Urban Water Management Plan. Future water demand is based on population projections at buildout of the City's General Plan. Because the proposed project and the related projects are within the development capacity of the General Plan, PWP has accounted for this increased development. As indicated in the EIR and in tables 3.7-1 through 3.7-3, water supplies are adequate over a 20-year planning horizon in single dry year, multiple dry year and average years to serve projected development increases. (EIR, pp. 3.7-2 to 18; 6-2 to 6-15.) Further, the related projects would be required to implement similar water conservation measures to reduce new demand for potable water supplies as the Project. There may be periods when local and regional plans to curtail water usage are implemented to offset reduced supplies during shortage periods. However, conservation programs, plans and policies at the regional and local level, and development of additional diversified supplies – all of which are ongoing in the City at this time – will allow the City to continue meeting future water demand. With mitigation, compliance with the City's Green Building Ordinance, and standard water saving conditions, the cumulative impact to water supply would be less than significant. (Id. at p. 4-12.) The Project and the related projects would be required to pay the City's Sewer Facility Charge and other connection fees in order to offset the increased demand for wastewater services. (Ibid.)

g. TRANSPORTATION

i. Potential Significant Impacts

- TRANS-1** The proposed project would result in an increase in traffic that would create a substantial change in relation to the existing traffic load and capacity of the street system or cumulatively exceed a level of service standard established by the City of Pasadena. (Id. at p. 3.8-14.)
- TRANS-2** The proposed project would not exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways. (Id. at p. 3.8-23.)
- TRANS-3** The proposed project would not result in inadequate parking supply. (Id. at p. 3.8-24.)

ii. Proposed Mitigation

- TRANS-A** Prior to the issuance of a building permit, the applicant shall be required to comply with the provisions of the City of Pasadena Transportation Demand Management Ordinance. The Transportation Demand Management Ordinance requires developers of nonresidential projects to submit and implement a Transportation Demand Program. This plan is used to implement measures that would reduce the number of vehicular trips by persons traveling to the site by offering specific facilities, services, and actions designed to increase the use of alternative transportation modes (e.g., walking, bicycling, transit, etc.) and ridesharing.

iii. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or Project alternatives identified in the Final EIR.

iv. Supporting Explanation

The EIR approach to traffic analysis is standard in the industry, and provides a conservative analysis. The EIR traffic study assumed that construction of the Project would be completed in 2018. To measure the Project's impacts, the traffic study first projected year 2018 future without Project conditions, consists of existing traffic plus ambient traffic growth, or general background regional growth, plus growth in traffic generated by specific cumulative, or related, projects expected to be completed in 2018. (EIR, pp. 3.8-14 to 16.) Without the Project, future traffic is expected to cause a majority of the studied intersections to drop below the next level of service. (See Table 3.8-9: compare "existing" with "future without Project" columns.) Traffic expected to be generated by the Project was then added to the analysis, to assess the Project's incremental and cumulative impacts. (Id. at pp. 3.8-17 to 23.) The EIR concluded that the Project does not contribute traffic at studied intersections that would trip the City's thresholds of significance. (Id. at pp. 3.8-22 and 23, see Table 3.8-9, compare "future without Project" to "future with Project".)

With regard to street segment impacts, the Project would increase ADT volumes on El Nido Avenue north of Del Mar Boulevard by approximately 3.2 percent, which requires soft mitigation measures pursuant to City policy (e.g., transportation demand management measures). Similarly, the Project is forecast to increase ADT volumes on El Nido Avenue south of Del Mar Boulevard by approximately 2.9 percent, which also requires soft mitigation measures. The Project is forecast to increase ADT volumes on

San Pasqual Street between San Gabriel Boulevard and El Nido Avenue by approximately 1.1 percent, which requires Department of Transportation staff review. With implementation of mitigation measures TRANS-A through TRANS-C, impacts would be reduced to a less than significant level. (EIR, p. 3.8-23, Table 3.8-10.)

The Planning Commission recommended the imposition of Condition 71, which reads: "El Nido Exit: The applicant shall prohibit ingress and limit egress out of the southern El Nido Avenue gate to residents of the independent living units, the shuttle providing services to these residences, and to utility vehicles. Access may be limited by technologies such as key cards or other tools deemed satisfactory by the Zoning Administrator." With the imposition of this Project condition, the street segment impacts at El Nido are reduced to below a level of significance. After review of this condition, the Department of Transportation concluded that the nexus between the Project's impacts and the need for mitigation measures TRANS-B² and TRANS-C³ is no longer present. The City Council thus finds that those mitigation measures are no longer legally feasible, and instead Condition 71 will be imposed.

² Mitigation measure TRANS-B formerly read: "Prior to the issuance of a building permit, the applicant shall be required to fund the installation of a closed-circuit TV (CCTV) camera at 1 of the study intersections to allow the City to monitor traffic at this intersection. It is recommended that the traffic signal be upgraded with a CCTV camera at one of the following 3 intersections: 1) San Gabriel Boulevard/Del Mar Boulevard, 2) San Gabriel Boulevard/San Pasqual Street, or 3) Madre Street/Del Mar Boulevard. The intersection to be modified with a CCTV camera shall be determined in consultation with City of Pasadena Department of Transportation staff."

³ Mitigation measure TRANS-C formerly read: "Prior to the issuance of a building permit, the applicant shall be required to fund the installation of pedestrian crossing push buttons as part of the traffic signal control for the following 2 intersections: 1) San Gabriel Boulevard/San Pasqual Street, and 2) Madre Street/Del Mar Boulevard."

The intersection of Rosemead Boulevard/Foothill Boulevard is the only County Congestion Monitoring Program arterial monitoring intersection within the study area, and the only CMP freeway monitoring location is located at I-210/Rosemead Boulevard. The Project does not add enough trips at either intersection to trigger further review under the CMP. (Id. at p. 3.8-23.) Pursuant to the CMP, the Project's impacts on mass transit were studied and determined to be less than significant. (Id. at pp. 3.8-23 and 24.) Finally, pursuant to City requirements, the Project must provide 513 parking spaces, for a less than significant impact. (Id. at pp. 3.8-23 and 24, Table 3.8-11.)

Cumulative Impacts

The traffic methodology described above is standard in the industry and incorporates an analysis of cumulative traffic growth, both with and without the Project. Related project trips were estimated and also assigned to the street system. Resulting cumulative traffic volumes and street segment impacts (with and without the Project) are presented in the EIR. (EIR, pp. 3.8-14 to 23, Table 3.8-9.) Traffic associated with the Project would incrementally increase delays at study intersections at a less than significant level. While the Project's segment impacts require soft mitigation, post-mitigation conditions do not rise to the level of significance requiring physical mitigation and thus do not incrementally contribute to a potentially significant effect. (EIR, p. 4-12.)

After the close of the comment period, the question of whether the City urgent care project should have been part of the cumulative impact analysis for traffic was

raised by the Planning Commission on August 26, 2009. City staff responded that the urgent care project was not a “reasonably foreseeable” project at the time the NOP for the Project was circulated. Nonetheless, in the traffic study for the urgent care project, the instant Project was included in the list of related projects, and the two projects combined with the other list of related projects did not rise to a level of a potentially significant cumulative impact. The City Council hereby incorporates the urgent care traffic study and its conclusions into the administrative record. The City Council finds that none of the other information provided in the Responses to Comments or at the Planning Commission meeting regarding any traffic issues triggers recirculation of the EIR.

IV. RESOLUTION REGARDING ENVIRONMENTAL IMPACTS UNABLE TO BE MITIGATED TO BELOW A LEVEL OF SIGNIFICANCE

The City Council finds that, although mitigation measures have been identified in the Final EIR which reduce the following potentially significant environmental impacts of the Project, the impacts cannot be mitigated to below a level of significance.

a. CULTURAL RESOURCES

i. Potential Significant Impacts

- CUL-1** The Project would cause a substantial adverse change in the significance of a historical resource. (EIR, p. 3.4-11.)
- CUL-2** The Project would cause a substantial adverse change in the significance of an archaeological resource. (Id. at p. 3.4-13.)

ii. Proposed Mitigation

- CUL-A** The applicant shall prepare and submit to the California Office of Historic Preservation a nomination application for listing the Las Encinas Sanitarium/Hospital in the National Register of Historic Places. Preparation and submittal shall be completed prior to issuance of building permits for phase one or within two years of approval of the 2007 Master Development Plan, whichever comes first.
- CUL-B** The applicant shall complete black-and-white archival-level photo-documentation of all buildings constructed between 1910 and 1929 (Buildings 21, 21A, 26, 28, 24A, 24B, 24C, and 24D) defined as non-contributors and proposed for demolition. The photo documentation shall be completed prior to issuance of demolition permits for the project. Photo-documentation shall be submitted to the City of Pasadena Design and Historic Preservation Section and the Pasadena Public Library.
- CUL-C** The windmill water tank house located at 310 S. San Gabriel Boulevard shall be preserved either in its current location, or moved to another location on the project site or moved to a location off of the project site. If it is moved off site, the applicant shall submit HABS photographic documentation of the structure prior to moving the structure. HABS documentation shall be submitted to the City of Pasadena Design and Historic Preservation Section and the Pasadena Public Library. Rehabilitation shall comply with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.
- CUL-D** Rehabilitation, additions and new construction pursuant to the Las Encinas Hospital 2007 Master Development Plan that is located in the National Register-eligible Las Encinas Sanitarium historic district shall comply with the Secretary of the Interior's Standards and Guidelines for Rehabilitating Historic Buildings. Prior to the issuance of a demolition permit, the applicant shall hire a qualified historic preservation consultant or restoration architect to ensure compliance with the Secretary of the Interior's Standards.
- CUL-E** The applicant shall submit a landmark designation application for the oak tree and the water tank house at 310 South San Gabriel (Building 13A) reasonably concurrent with the Design Commission submittal for Phase 1 or within 2 years of the adoption of the 2007 Master Development Plan, whichever comes first.
- CUL-F** A Research Design and Data Recovery Plan (Plan) for Areas 1, 2 and 6 shall be prepared by a Registered Professional Archaeologist and approved by the Planner Manager (or designee) prior to the issuance of a demolition permit. The Plan shall include 2 parts: a testing program and a

data recovery program. The testing program shall be directed at determining the spatial distribution of historical resources to identify the extent of anticipated project-related impacts. The results of the testing program shall be documented in a technical report. If the testing program indicates the proposed project would not impact historical resources, the data recovery program is not required. If the testing program indicates historical resources would be impacted by the proposed project, the technical report documenting the results shall be accompanied by a letter addressed to the City of Pasadena, indicating whether the Plan adequately addresses the resource-types encountered during the testing program. If resource-types not addressed in the Plan were encountered during testing, the Plan shall be revised accordingly prior to the commencement of the data recovery program. The data recovery program shall be aimed at the recovery of scientifically consequential information contained in the historical resources. The results of the data recovery program shall be documented in an Archaeological Data Recovery Report. The preparation of the Plan and the testing and data recovery programs shall be carried out by a qualified Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61) with experience pertaining to the history and prehistory of the Los Angeles area.

CUL-G

All ground-disturbing activities associated with the proposed project (aside from any areas cleared by the Principal Archaeologist as a result of the testing and data recovery) shall be monitored by a qualified archaeological monitor. Prior to the issuance of a demolition permit, an Archaeological Monitoring and Discovery Plan shall be prepared outlining archaeological monitoring procedures and appropriate treatment of discoveries, should any be made. Archaeological monitors shall be under the direct supervision of a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61). Ground-disturbing activities to be monitored include, but are not limited to, the demolition of buildings and structures, grading, trenching, utilities relocations and installations, the construction of fencing, and tree removal and plantings.

CUL-H

Unique archaeological materials (as that term is defined in CEQA, Public Resources Code Section 21083.2(g)) recovered during the investigation and archaeological monitoring shall be curated for posterity and access by future researchers at an accredited curational facility. A curation agreement shall be executed prior to the issuance of a demolition permit.

iii. Findings Pursuant to CEQA Guidelines Section 15091

Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or Project alternatives identified in the Final EIR.

iv. Supporting Explanation

The Project as proposed in the EIR requires demolition of approximately 20 existing buildings, including four that contribute to the eligible National Register district: the Lodge (Building 16), Las Palmas (Building 15), men's dormitory (Building 25), and the barn (Building 27). This is a potentially significant impact. (EIR, p. 3.4-11.)

Implementation of mitigation measures CUL-A through CUL-E would reduce the impact, but not to below a level of significance. (EIR, p. 3.4-12.)

The Planning Commission recommended amendment to the timing of completion of mitigation measure CUL-A to protect the National Register eligible district at the earliest opportunity. This amendment is required by Project condition 70. The City Council finds that this amendment strengthens the mitigation measure, and therefore

mitigation measure CUL-A set forth above shall replace the measure as set forth in the EIR.⁴

All other cultural resource impacts can be mitigated to below a level of significance. Relocation of the water tank house at 310 South San Gabriel (which is eligible for designation as a local landmark) is also a potentially significant effect because the structure would be removed from its historic context. This impact can be reduced to below a level of significance with the implementation of mitigation measure CUL-C. (Ibid.) With regard to rehabilitation and adaptive reuse of other structures that are historically significant pursuant to CEQA (Buildings 1, 3, 5, 6, 7, 17, 19, and 22), all alterations would be constructed in accordance with the Secretary of Interior's Standards as required by mitigation measure CUL-D. As a result, the physical impact to historic structures would be reduced to a less than significant level. (Ibid.)

New buildings are proposed in the vicinity of three of the National Register-eligible historic district's contributing historic resources. A two story medical office building would replace an existing 1-story medical office building to the west of this grouping and a one story medical office building would be sited between the Bungalow (Building 19) and Villa (Building 6). While these new buildings would be separated physically from the historic resources, the Project would nonetheless place new buildings within the eligible National Register district and potentially alter the character

⁴ Mitigation measure CUL-A formerly read: "The applicant shall prepare and submit to the California Office of Historic Preservation a nomination application for listing the Las Encinas Sanitarium/Hospital in the National Register of Historic Places. Preparation and submittal shall be completed within 2 years of approval of the 2007 Master Development Plan."

of the district. However, the proposed new construction in the Project must be compatible with the historic structures on the site in terms of massing, size, scale, and architectural features. Thus, the design of the new construction would borrow the concept of the massing and character-defining features of other buildings in the National Register district. Further, all new construction would incorporate building materials that are similar to the National Register-eligible historic district's contributing buildings, specifically such that new materials would maintain the residential treatment and spa feeling of the district. Compliance with the Secretary of Interior's Standards as required by mitigation measure CUL-D would ensure that new construction does not detract from or alter the significance of the National Register-eligible historic district. As mitigated, this impact becomes less than significant. (Id. at pp. 3.4-12 and 13.)

The Project preserves contributing landscape features on the site. Construction of one new 1-story senior living cottage (Building 36) on the south lawn (Landscape Feature 3) would not have a significant adverse impact on this feature. Similarly, although some modifications are required to the interior site roadways, none of those changes would significantly impact the original historic alignment of the circular drive in front of Building 1 (Landscape Feature 1), or the landscaped area directly to the north of the main building (Landscape Feature 2). These changes would be considered less than significant because they would not affect the status of this landscape feature as a contributor to the National Register-eligible historic district. Similarly, no changes are proposed that would impact Landscape Feature 4, or the fern grotto northeast of Briar

(Building 22). All changes to these landscape features would be subject to design review and compliance with the Secretary of the Interior's Standards. (Id. at p. 3.4-13.)

With regard to archaeological resources, the site is known to contain materials that are likely to yield information important to the history or prehistory of California (California Register Criterion 4). Based on the information provided in the Phase I Archaeological Resources Assessment, the City is taking the conservative approach and is assuming that the archaeological resources likely to be on site are "historically significant." Destruction or damage to these resources during construction would constitute a significant impact. Mitigation measures CUL-F through CUL-H are required to reduce the level of impact to less than significant by recovering significant archaeological resources from the site prior to the start of construction activities. (EIR, pp. 3.4-13 and 14.) Therefore, this impact is reduced to less than significant.

Cumulative Impacts

The potential construction of all of the projects on the list of related projects is not anticipated to create a potentially significant cumulative historic impact. Four of the existing site structures that are proposed to be removed qualify for listing as historic resources and contribute to the National Register-eligible historic district located at Las Encinas Hospital. This district is confined to the Project site, and is also not open to the public. The Project's incremental effect therefore is not cumulatively considerable. (EIR, p. 4-10.)

Portions of the Project site contain strong surface and historical evidence that there may be archaeological sites of historic significance onsite, but again, these resources are expected to be contained entirely within the boundaries of the site and recovery of materials would be required prior to the start of project construction. As with the Project, all related projects in the vicinity would be required to comply with CEQA Section 15064.5, would separately be studied for their potential to contain archaeological resources, and mitigation measures similar to those imposed on the Project would be required. As such, the Project would not contribute to a significant cumulative impact to archaeological resources. (Ibid.)

V. RESOLUTION REGARDING ALTERNATIVES

The City Council declares that the City has considered and rejected as infeasible the alternatives identified in the Final EIR as set forth herein. CEQA requires that an EIR evaluate a reasonable range of alternatives to a project, or to the location of a project, which: (1) offer substantial environmental advantages to the proposed project, and (2) may be feasibly accomplished in a successful manner within a reasonable period of time considering the economic, environmental, social and technological factors involved. An EIR must only evaluate reasonable alternatives to a project which could feasibly attain most of the basic project objectives, and evaluate the comparative merits of the alternatives. In all cases, the consideration of alternatives is to be judged against a rule of reason.

The lead agency is not required to choose the environmentally superior alternative identified in the EIR if the alternative does not provide substantial advantages over the proposed project, and (1) through the imposition of mitigation measures the environmental effects of a project can be reduced to an acceptable level, or (2) there are social, economic, technological or other considerations which make the alternative infeasible.

The Final EIR identified the objectives for the Project as follows:

- Construct a new hospital which will permit its patients to be treated in a facility that is constructed to current codes and provides the needed activity and treatment spaces. Locate the hospital in a central portion of the site isolated from residential neighborhoods.
- Retain behavioral healthcare as the core business while improving the current living environment for behavioral health patients.
- Expand existing outpatient behavioral health services by adding medical office units to the existing campus.
- Provide for expanded life/care facilities that allow for a continuum of care from independent living in detached structures to assisted living.
- Accommodate additional assisted living units that will provide a transition from the more challenged elderly residences, allowing senior residents an alternative form of care without having to leave the campus.
- Within the life/care facility, offer several additional living options to seniors by providing small, independent living bungalows fronting San Gabriel Boulevard for intimate residential living within a neighborhood context.
- Increase the number of senior living and assisted living units to accommodate the increasing demand by elderly residents of Pasadena.
- Improve the site by spatially organizing functions within the site and centralizing behavioral healthcare, which is currently dispersed throughout the site.
- Phase the project in a manner that is financially viable.
- Enhance the privacy and safety of the patient and neighborhood by providing psychiatric services in 1 structure in the center of the site.
- Provide a sufficient level of parking at convenient locations so as to minimize the impact of the hospital on the surrounding neighborhood.
- Maintain the aesthetic character of the existing campus by designing the new buildings so that they harmonize with and complement the older existing

structures. Respect and maintain as many specimen trees as possible without destroying the viability of the site development.

- Improve the sustainability of the urban forest by planting species that thrive in the region without excessive irrigation, fertilizers, pruning requirements, or other undue maintenance, and remove/prevent growth of invasive species.
- Create an engaging site by creating a play between open spaces and more densely planted areas, and integrate pathways and resting areas into the senior living environment.
- Minimize the impact of the Master Development Plan to the surrounding neighborhood by improving the perimeter buffering. (EIR, pp. 2-8 to 10; 5-1 and 2.)

The alternatives analyzed in the EIR represent a reasonable range of alternatives based on the applicable provisions of the CEQA Guidelines.

a. Alternatives Rejected From Consideration

Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts.

Here, the City rejected alternative sites, a no tree removal alternative, and a hybrid alternative. The alternative site was rejected primarily because this site has contained the Las Encinas Hospital for over 100 years, and redevelopment of a similarly sized property elsewhere within Pasadena or the surrounding area could create greater impacts than the Project because they would likely have to be redeveloped from scratch. (EIR, pp. 5-2 and 3.) The no tree removal alternative was rejected because it

would severely constrain any development on the site such that it would make implementation of the Project and attainment of nearly all of the Project objectives impossible (Id. at p. 5-3.) Finally, a “hybrid alternative” focused on reducing the impact on trees, the viewshed, and historic resources was rejected primarily because it would result in the reduction of beds at the overall hospital facility, jeopardize funding of the Project, compromise internal vehicular circulation, present potentially significant aesthetic (massing) impacts, and would conflict with two of the main Project objectives. (Id. at pp. 5-3 to 5-5.)

The City Council finds that the City properly rejected analysis of additional reduced density alternatives, such as a 50% or 75% reduced-density alternative. (See EIR, p. 7-7 to 7-8.) The City does not typically evaluate permutations of alternatives (such as various densities) in an EIR unless the permutations avoid significant effects beyond those already analyzed in other alternatives. These alternatives would not avoid any significant environmental impacts of the Project beyond what has already been addressed by the alternatives set forth below. Consequently, if the City were to want to analyze those additional alternatives for land use planning purposes, it would be appropriate to do so in the staff report, but not in the CEQA document. Furthermore, such alternatives would not achieve the basic objectives of the Project and could undermine the economic feasibility of the Project.

b. Alternative 1: No Project Alternative

Pursuant to Guidelines Section 15126.6, the EIR discussed a No Project Alternative. The No Project Alternative has two parts for this particular site: a no project/no build option and a no project/construction under the existing master plan alternative. Under the no build option, continued operations of the site in its current format would occur. There would not be any environmental effects from this alternative, but it would not achieve any of the Project objectives and is rejected for that reason. (EIR, p. 5-7.) Under the existing master plan option, the buildout of the 1986 master plan was assumed, which is substantially less than under the Project. Both the Project and the existing master plan would require removal of mature trees, however the existing master plan calls for the removal of substantially more trees than the Project and does not require that the design of the site be sensitive to the location of trees protected by the City's Tree Protection Ordinance. (Id. at p. 5-9.) Implementation of the 1986 master plan would also involve demolition of a number of the historic buildings that contribute to the historic district at Las Encinas, and the demolition of more historic structures than under the Project. It also has the potential for the same or greater archaeological impacts as the Project. (Id. at pp. 5-9 and 10.) In all other resource areas, the 1986 master plan impacts are similar to or reduced from those of the Project. (Id. at pp. 5-8 to 12.)

The City Council finds that either option under the No Project Alternative would not achieve most of the basic objectives of the Project. Primarily, it would not result in