

## 5.0 ALTERNATIVES

CEQA requires that an EIR objectively evaluate a “reasonable” range of alternatives. According to the CEQA Guidelines Section 15126.6(a), “an EIR shall describe a range of reasonable alternatives to the proposed project, or to the location of the proposed project, which would feasibly attain most of the basic objectives of the proposed project, but would avoid or substantially lessen any of the significant effects of the proposed project, and evaluate the comparative merits of the alternatives.” The CEQA Guidelines also state that an EIR need not consider every conceivable alternative nor consider alternatives that are infeasible. Under CEQA, the factors that can determine feasibility are site suitability, economic limitations, availability of infrastructure, General Plan consistency, other plan or regulatory limitations, and jurisdictional boundaries. An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The alternatives analysis must also include a comparative evaluation of the No Project Alternative per Section 15126.6(e) of the CEQA Guidelines. Through comparison of the alternatives, the advantages and disadvantages of each alternative compared with the proposed project can be weighed and analyzed. Consequently, the No Project Alternative is described below.

### 5.1 PROJECT OBJECTIVES

The primary objectives of the Las Encinas Hospital 2007 Master Development Plan include the following:

- 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.

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- 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.

## 5.2 ALTERNATIVES CONSIDERED BUT REJECTED

Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered by the lead agency, but were 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.

### 5.2.1 ALTERNATIVE SITE

Section 15126.6(f)(2) of the CEQA Guidelines requires that an EIR consider alternative locations to the proposed project site. The City of Pasadena is almost entirely built out and there are few remaining vacant parcels left in the City. None of the existing vacant parcels are of a comparable size to the proposed project site. Development within Pasadena primarily occurs from the recycling of developed properties at a higher intensity of use, such as the proposed project. However, there are no other sites located in Pasadena or the surrounding area that are owned or controlled by the applicant. Further, the

proposed project site has been the location of Las Encinas Hospital for over 100 years. There are no other sites within the City that contain an existing behavioral facility of a comparable size or with the character of the Las Encinas Hospital site. In addition, redevelopment of a similarly sized property elsewhere within Pasadena or the surrounding area could create greater impacts than the proposed project because they would have to be redeveloped from scratch with behavior health and senior care uses; whereas the proposed project represents an expansion of existing uses on a site that has contained a behavior health hospital for over 100 years and is designated for institutional uses. Thus, development of a comparable alternative site within the vicinity of Pasadena is considered infeasible and was eliminated from further consideration.

### **5.2.2 NO TREE REMOVAL ALTERNATIVE**

During the scoping process, the City of Pasadena Planning Commission requested an alternative that would maintain all of the existing trees onsite. As discussed in Chapter 2.0, Project Description, the project site contains approximately 1,032 trees, of which approximately 276 trees qualify for protection under the City of Pasadena Tree Protection Ordinance. The trees onsite include a mix of native and non-native species measuring 6 inches DBH or higher; many of the trees were not planted as part of a well thought out or designed landscape plan. In addition, the undeveloped portion of the project site is unmaintained and considered feral. As part of the proposed project, approximately 250, or 24 percent, of existing trees would be removed from the project site; according to the certified arborist, their removal would positively contribute to the health and aesthetic value of the remaining canopy (see Chapters 3.1, Aesthetics and 3.3, Biological Resources for a detailed discussion of these topics). Of the trees to be removed, approximately 61 qualify as protected by the City of Pasadena Tree Protection Ordinance. As shown on Figure 2-3, existing trees are spread throughout the project site. Avoiding all trees, including protected trees, would severely constrain any development on the site such that it would make implementation of the proposed project and attainment of nearly all of the project objectives infeasible. Thus, this alternative was eliminated from further consideration.

### **5.2.3 HYBRID ALTERNATIVE**

During the Draft EIR comment period, the City of Pasadena Design Commission and Planning Commission requested an alternative that would reduce the size of the project to reduce the impact on trees, the viewshed, and historic resources. The project site contains approximately 1,032 trees, of which approximately 276 trees qualify for protection under the City of Pasadena Tree Protection Ordinance. By rearranging the proposed new buildings on the project site, the Hybrid Alternative would reduce the number of trees to be removed by 106, 22 of which qualify as protected. This alternative would result in the removal of approximately 143 trees, 38 of which are protected. In order to retain more trees compared to the proposed project, the footprint of the following three buildings would be modified: independent living facility (Building 34), behavioral healthcare (Building 33), acute psychiatric hospital (Building 35), the detached independent living buildings (Building 36), and the assisted living facility (Building 32). The acute psychiatric hospital (Building 35) would be reduced by 12 percent in size from 77,500 square feet (proposed project) to 68,500 square feet and 40 percent in capacity, from 120 beds to 72 beds. The behavioral healthcare (Building 33) would be reduced 29 percent in size, from 10,560

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square feet (proposed project) to 7,500 square feet and 32 percent in capacity, from 28 beds to 19 beds. Figure 5-1 shows the site plan under the Hybrid Alternative.

As shown, the assisted living facility (Building 32) would be reconfigured with a smaller footprint compared to the proposed project, protecting most of the trees surrounding the building. Reducing the footprint of the assisted living facility would allow for the preservation of or reuse of the Las Palmas (Building 15) and the Lodge (Building 16), located on El Nido Avenue. The acute psychiatric hospital (Building 35) would be constructed toward the center of the project site, with the southeast wing of the building modified to accommodate the preservation the men's dormitory (Building 25). The barn (Building 27) would also be adaptively reused and moved to an area south of the Millicent Way cul-de-sac. The independent living facility's (Building 34) northwest wing would be reduced in size to allow for preservation of the men's dormitory (Building 25). The eastern wing of the independent living facility (Building 34) would be foreshortened to accommodate the new design of the assisted living building (Building 32). Functional problems would be created from the reduced size of the independent living facility (Building 34), acute psychiatric hospital (Building 35), and the men's dormitory (Building 25). Table 5-1 shows the proposed square footage of the buildings in the Hybrid Alternative compared to the proposed project. All other components of this alternative would be the same as the proposed project.

**TABLE 5-1 COMPARISON OF THE HYBRID ALTERNATIVE AND THE PROPOSED PROJECT**

Building		Proposed Plan			Hybrid Alternative			Difference		
Use/Name	No.	Square Footage	Units	Beds	Square Footage	Units	Beds	Square Footage	Units	Beds
Assisted Living	32	32,000	-	52	28,660		40	-3340		-12
Behavioral Healthcare	33	10,560	-	28	7,500		19	-3060		-9
Independent Living (Attached)	34	147,750	100	-	93,960	72		-53790	-22	
Acute Psychiatric Hospital	35	77,500	-	120	68,500		72	-9000		-60
Detached Independent Living Units	36	51,200	30	-	48,000	28		-3200		-2
Las Palmas	15	Remove			1,809		-	1809		-
The Lodge	16	Remove			1,246	1		1246	1	
Men's Dormitory	25	Remove			3,092	3		3092	3	
Barn	27	Remove			2,300		-	2300		-
<i>Total</i>		319,010	130	200	255,067		225	-63943	-18	-83

The Hybrid Alternative would conflict with the following objectives of the Las Encinas Hospital 2007 Master Development Plan:

- Retain behavioral healthcare as the core business while improving the current living environment for behavioral health patients.

- 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.

Because the Hybrid Alternative would result in reductions in the acute psychiatric hospital (Building 35) and behavioral healthcare (Building 33) fewer services would be provided at the hospital and behavioral healthcare. The reduction in size of the independent living facility (Building 34) from 100 units to 72 units would create a significant decrease in the amount of expected revenue which is necessary to fund the development of the Las Encinas Hospital 2007 Master Development Plan. Under this alternative vehicular circulation would be compromised due to the location of the men's dormitory (Building 25). In addition, the men's dormitory (Building 25) presents massing issues, as it would be located between two three-story buildings, thereby conflicting with the objective to maintain the aesthetic character of the existing campus. Also, the new four-story assisted living facility (Building 32) would not complement the surrounding structures and would result in similar massing issues as with the men's dormitory (Building 25). Thus, development of the Hybrid Alternative was eliminated from further consideration.

### **5.3 ALTERNATIVES CARRIED FORWARD FOR DETAILED ANALYSIS**

Three alternatives have been carried forward for detailed analysis in this EIR, including the "No Project" alternative as required by CEQA. Based on the environmental analysis conducted for the proposed project, significant impacts requiring mitigation have been identified regarding air quality, biological resources, cultural resources, noise, public services and utilities, and transportation and Traffic. The EIR also identifies less than significant impacts for aesthetics and hydrology and water quality. Significant and unavoidable impacts were identified for cultural resources.

The alternatives carried forward for detailed analysis in this section include:

- No Project Alternative
- Building Mitigation Alternative
- Tree Mitigation Alternative

#### **5.3.1 OVERVIEW OF ALTERNATIVES AND IMPACTS**

Table 5-1 at the end of this chapter provides a comparison of the alternatives to the proposed project. In accordance with the CEQA Guidelines Section 15126.6(d), each alternative was evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the proposed project.



### **5.3.2 NO PROJECT ALTERNATIVE**

#### **NO PROJECT/NO BUILD ALTERNATIVE**

According to the CEQA Guidelines Section 15126.6(e)(3)(b), the No Project Alternative is defined as the “circumstance under which the proposed project does not proceed.” The purpose of describing and analyzing the No Project Alternative is “to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Under the No Project/No Build Alternative, the proposed project would not be constructed and the site would remain in its existing condition. The existing Las Encinas Hospital campus would continue to operate as under existing conditions. No new structures would be constructed and no structures would be demolished. The environmental characteristics would be the same as those described in the environmental setting sections of Chapter 3.0.

Construction impacts related to air quality, biological resources, cultural resources, hydrology and water quality, utilities, and noise associated with the proposed project would be avoided because no development would occur on the project site under the No Project/No Build Alternative. The existing structures would not be demolished and the existing uses would continue to operate in their current capacity and function.

Operational impacts associated with aesthetics, public services, and transportation and traffic would be avoided because no changes to the project site would occur. The number of vehicles trips to/from the project site would be similar to the existing conditions. Thus, no substantial increase in mobile emissions or vehicular noise would be expected to occur. This alternative would not achieve any of the objectives of the proposed project.

#### **NO PROJECT/ EXISTING MASTER PLAN ALTERNATIVE**

According to the CEQA Guidelines Section 15126.6(e)(3)(b), the No Project Alternative is defined as the “circumstance under which the proposed project does not proceed.” The impacts of the No Project Alternative shall be analyzed “by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.” The purpose of describing and analyzing the No Project Alternative is “to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Under the No Project Alternative, the existing Master Development Plan would remain in effect at the proposed project site. The Las Encinas Master Development Plan was approved by the City on October 10, 1986. This Master Development Plan allowed replacement of obsolete patient care units, consolidation of administrative and support functions within one site, and the provision of services and programs which address current needs, including care for the elderly. The previously approved Master Development Plan covers the following activities:

1. Construction of 125,808 square feet of new facilities and remodeling of 167,150 square feet in existing buildings; of the existing buildings, 15,793 square feet would be adaptively reused.

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2. The addition of 291 parking spaces on-site.

The only buildings that were constructed as part of the 1986 Master Plan were two medical office buildings (Buildings 18 and 23) totaling 8,800 square feet.

The No Project Alternative would involve the adaptive reuse of Acacia (Building 2) for a pharmacy, and Gables (Building 7), Las Flores (Building 3), Villa (Building 6), and 2810 Del Mar Residence (Building 8) for medical office for outpatient behavior health care. The 1904-portion of the main building (Building 1) would be demolished. The remainder of this building would be adapted to accommodate administrative functions, 12 psychiatric care beds, and community service facilities. A new 59-bed nursing home would be constructed on El Nido Avenue, requiring the removal of Las Palmas (Building 15), the Lodge (Building 16), and La Vista (Building 17). Approximately 138 psychiatric care beds would be provided in the southern and central portion of the main campus in three separate buildings. Construction of new psychiatric care beds would require removal of Mariah (Building 14), maintenance buildings (Buildings 24, 24a, 24b, 24c, and 24d, 26, and 28), Nash House (Building 29), and the men's dormitory (Building 25). The barn (Building 27) would be adapted for use as a maintenance building. A total of 447 parking spaces would be provided on-site, including new surface parking lots located along the southern boundary of the project site and south of the Gables (Building 7). The No Project Alternative would retain the single-family residences located along San Gabriel Boulevard as residences. No construction would occur within the undeveloped portion of the site near San Gabriel Boulevard. All new structures would be single-story.

### **AESTHETICS**

Substantially less development would occur under the No Project Alternative than is contemplated as part of the proposed project. Because the majority of the project site is not visible from public vantage points located on the surrounding streets, very few people would notice a change in the visual environment as part of the No Project Alternative. All new structures under this alternative would be single-story and would be compatible with existing single-story uses within the project site and in the surrounding neighborhood. These structures would not block views of the San Gabriel Mountains as currently experienced by sensitive viewers located south of the project site. The impacts to aesthetics would be less than significant under the No Project Alternative. Further, compared to the proposed project, the changes on the project site would be less noticeable from public vantage points surrounding the site.

### **AIR QUALITY**

The amount of grading associated with the No Project Alternative would be reduced compared to the proposed project. The No Project Alternative contemplates construction of approximately 117,800 square feet of new buildings compared to approximately 309,012 square feet of new structures under the proposed project, or less than half the total development of the proposed project. Further, none of the new development proposed as part of the No Project Alternative involves subterranean construction. Thus, there would be less ground disturbing activity under the No Project Alternative and the duration of construction activity would be substantially reduced. Compared to the proposed project, the total amount

of emissions generated during construction would be substantially reduced as part of the No Project Alternative. As with the proposed project, construction activities associated with the No Project Alternative would be required to comply with SCAQMD Rule 403 and the same mitigation measures that apply to the proposed project would apply to this alternative in order to minimize emissions generated during construction. Thus, as with the proposed project, construction air quality would not exceed the SCAQMD daily emissions thresholds.

The No Project Alternative would result in the operation of substantially fewer uses, including the number of psychiatric beds, medical office space, and senior living facilities than the proposed project. Fewer people would live and work at the proposed project site under this alternative. Because of the reduced size, air pollutant emissions associated with vehicles trips would be reduced. Energy consumption would be reduced compared to the proposed project because less energy would be required for a smaller development. Similar to the proposed project, operational emissions would not exceed the SCAQMD daily emissions thresholds under the No Project Alternative.

## **BIOLOGICAL RESOURCES**

The 24.7-acre proposed project site consists of Urban/Developed land cover, including buildings, pavement, and landscaped areas. The undeveloped portion of the project site is unmaintained and considered feral. It is dominated by exotic or introduced species. There are no sensitive vegetation communities located within or directly adjacent to the proposed project site. The proposed project site does not contain rare, threatened, endangered, endemic, or sensitive plant species. As such, removal of vegetation during construction would not result in direct or indirect impacts to sensitive plant species or vegetation communities. However, the existing vegetation could provide suitable nesting habitat for migratory birds. Thus, as with the proposed project, construction occurring as part of the No Project Alternative would be required to comply with the Migratory Bird Treaty Act. The impacts to sensitive biological resources would be mitigated to a less than significant level, similar to the proposed project.

Both the proposed project and the No Project Alternative would require removal of mature trees, including those trees protected as part of the City of Pasadena Tree and Tree Protection Ordinance. However, the existing master plan calls for the removal of substantially more trees than the proposed 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. Although both the No Project Alternative and the proposed project would be required to comply with the City's Tree Protection Ordinance, the No Project Alternative would not retain as many protected trees as the No Project Alternative and would not promote a healthy urban forest.

## **CULTURAL RESOURCES**

The main portion of the Las Encinas Hospital qualifies as a National Register eligible historic district. Further, there are a number of independently eligible buildings and landscape features located within the project site. Implementation of the No Project Alternative would involve demolition of a number of the historic buildings that contribute to the historic district at Las Encinas, and more historic structures would

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be demolished under the No Project Alternative than are contemplated as part of the proposed project. The impact to historic resources would be significant and unavoidable, and greater than the proposed project.

The Las Encinas Hospital may contain historic-era archaeological resources in ground deposits. Construction within sensitive areas of the project site may destroy or damage unique historic resources. Although the amount of construction and the areas to be disturbed as part of the No Project Alternative are reduced compared to the proposed project, this alternative could adversely impact archaeological resources. During project construction, if resources are unearthed, the construction contractor would be required to cease construction activity in that area until the find could be evaluated by a qualified archaeologist or Native American monitor. If discovered, excavation of unique archaeological resources would be required in accordance with CEQA Guidelines Section 15064.5. However, the resources could have been damaged during the initial ground disturbing activities such that the find is permanently harmed and its significance and integrity is permanently destroyed. Thus, this alternative has the potential to result in greater impacts to archaeological resources than the proposed project.

### **HYDROLOGY AND WATER QUALITY**

As with the proposed project, construction of the No Project Alternative would involve an increase in impervious surfaces at the project site. However, the increase in impervious surfaces under the No Project Alternative would be substantially less than as part of the proposed project. A large portion of the project site east of San Gabriel Boulevard would be retained in its existing undeveloped condition as part of this alternative. Overall, more of the undeveloped open space would be retained. However, the increase in impervious surface area as a result of the No Project Alternative would increase the rate and amount of storm water runoff generated at the site. This increase could exceed the capacity of the existing storm water drainage system offsite and result in flooding of downstream areas. Thus, as with the proposed project, the No Project Alternative would be required to construct new storm water drainage that would control the rate at which storm water is released into the City storm water drainage system such that the rate of discharge would not increase from existing conditions. This would require filtering and retention of storm water runoff onsite. In this way, the proposed new drainage system would not exceed the capacity of the downstream system and would not result in flooding on- or off-site. As with the proposed project, in accordance with existing regulations, the applicant would be required to develop and implement a SUSMP and the construction contractor would be required to implement construction best management practices to control storm water runoff during construction and operation. Compliance with existing regulations would ensure a less than significant impact.

### **NOISE**

The type of grading and construction activity would be consistent with the proposed project, although the duration of construction and the total amount of construction would be reduced under this alternative compared to the proposed project. Although the No Project Alternative would involve less than half the construction associated with the proposed project, new construction would occur adjacent to existing sensitive receptors located both on- and off-site. Thus, the No Project Alternative would be required to

implement the same construction noise mitigation measures as the proposed project. With implementation of mitigation, the impacts from construction noise would be reduced to a less than significant level.

Operational characteristics of the No Project Alternative would be similar to the proposed project, although fewer people would live and work on-site under this alternative and the number of vehicle trips would be reduced compared to the proposed project. As such, noise levels along affected roadways would be less under this alternative than the proposed project. However, as with the proposed project, operational noise levels would not exceed the City's standards for residential and institutional uses. The impact from operational noise would be less than significant.

## **PUBLIC SERVICES AND UTILITIES**

The No Project Alternative would result in construction and operation of fewer independent living and assisted living units than the proposed project. Further, the No Project Alternative would not result in as large an expansion of behavioral health services as contemplated by the proposed project. As such, the demand for police and fire protection services and recreational amenities would be reduced compared to the proposed project. As with the proposed project, the increase in residential units would not require the construction of new or expanded police or fire facilities in order to maintain acceptable response times. The impact would be less than significant.

As with the proposed project, the No Project Alternative would increase the amount of water used and wastewater generated at the proposed project site compared to the existing uses because it would allow for the expansion of independent living units and a new acute psychiatric hospital. Thus, this alternative would require additional water supply to the project site. However, as with the proposed project, because the No Project Alternative is within the development capacity of the General Plan, PWP has accounted for this increased development. As such, the increase in demand for potable water associated with the No Project Alternative is well within the anticipated future water supply.

As with the proposed project, the No Project Alternative would result in a permanent increase in wastewater generated at the site. Because the No Project Alternative contemplates substantially less development than the proposed project, the amount of wastewater generated at the site would be reduced under this alternative compared to the proposed project. Nonetheless, adequate infrastructure exists to support the increased wastewater generated by either the proposed project or the No Project Alternative.

## **TRANSPORTATION AND TRAFFIC**

The trip distribution patterns under the No Project Alternative would be similar to the proposed project. However, the number of vehicle trips would be reduced because less than half the amount of development would occur as part of the No Project Alternative compared to the proposed project. As with the proposed project, impacts to the area roadway network would be less than significant with implementation of mitigation. The No Project Alternative would provide sufficient parking such that it would not result in an inadequate parking capacity. The traffic impacts would be similar to the proposed project.

### CONCLUSION

Under the No Project Alternative, the project site would be developed according to the existing Master Development Plan, which includes construction of approximately 117,000 square feet of new facilities and remodeling of 167,150 square feet in existing buildings. Compared to the proposed project, the No Project Alternative would result in reduced impacts related to aesthetics, air quality, hydrology and water quality, noise, public services and utilities, and transportation and traffic because less of the project site would be developed and fewer people would live and work on-site. Impacts to biological resources and archaeological resources would be similar to the proposed project and would be mitigated to a less than significant level. As with the proposed project, this alternative would still result in a significant and unavoidable impact to historic resources. However, more structures that contribute to the historic district would be removed under this alternative than the proposed project. Further, this alternative has the potential to permanently destroy unique archaeological resources, should they exist on the project site. In addition, the No Project Alternative would not implement the Las Encinas Hospital 2007 Master Development Plan. As such, it would not meet many of the objectives of the proposed project, including the following:

- 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.
- 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.

The No Project Alternative would provide for expanded senior living facilities and assisted living facilities. However, it would not provide as many units and types of living options as the proposed project. Thus, this alternative would not meet the following project objectives to the same extent as the proposed project:

- 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.
- Increase the number of senior living and assisted living units to accommodate the increasing demand by elderly residents of Pasadena.

### 5.3.3 BUILDING MITIGATION ALTERNATIVE

In order to mitigate for the loss of several historic buildings that contribute to the National Register-eligible historic district at Las Encinas Hospital, the Building Mitigation Alternative was developed. Instead of demolishing the barn (Building 27), the men's dormitory (Building 25), Las Palmas (Building 15), and the Lodge (Building 16), this alternative proposed to retain some of these structures in their current location and relocate other structures elsewhere within the site in such a manner as to retain their historic significance. Las Palmas (Building 15) and the Lodge (Building 16) would be retained in their existing location on El Nido Avenue near the southeast corner of the project site. In order to retain these two structures, a small single-story assisted living facility (Building 32a) would be constructed to the west of Las Palmas (Building 15) and the Lodge (Building 16). The proposed assisted living units (approximately 32,000 square feet) would be moved westward and attached to the independent living building (Building 34). This structure would have a combined size of 179,970 square feet. The building footprint would be expanded compared to the proposed project and the height of the structure would be increased from 1 to 3 stories tall under the proposed project to 2 to 4 stories tall under this alternative. The barn (Building 27) would be relocated to an area west of the acute psychiatric hospital (Building 35). The men's dormitory (Building 25) would still be demolished as part of this alternative. It should be noted that reconfiguration of the site plan to retain historic structures would reduce the number of trees to be removed under this alternative compared to the proposed project. The Building Mitigation Alternative

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would reduce the number of trees removed by 22, 4 of which are protected under the City of Pasadena Tree Protection Ordinance. Compared to the proposed project, the Building Mitigation Alternative would involve the removal of 228 trees. All other components of this alternative would be the same as the proposed project. Figure 5-2 shows the Building Mitigation site plan.

### **AESTHETICS**

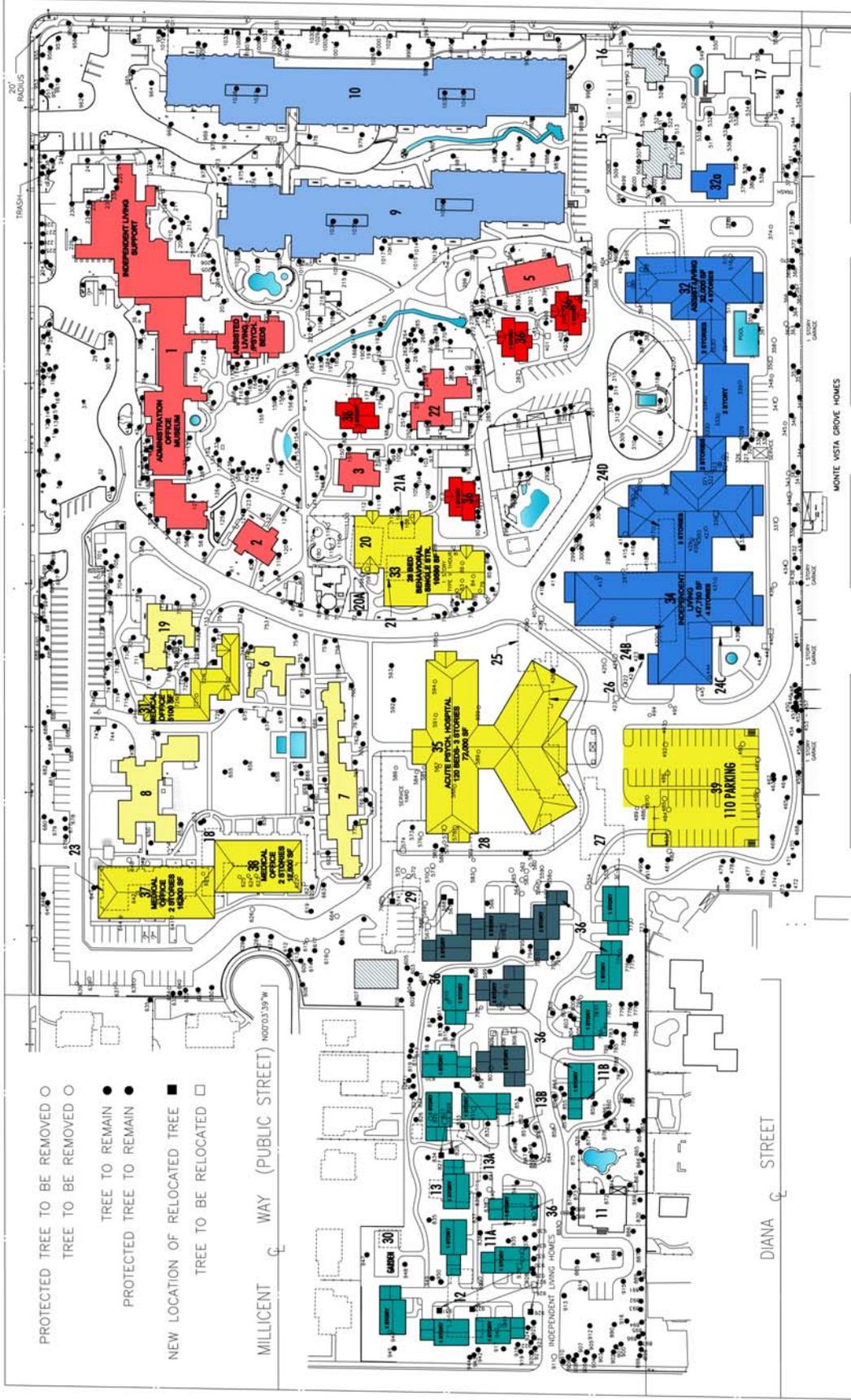
Aesthetic and visual impacts associated with this alternative would be different than those associated with the proposed project. As with the proposed project, the majority of the project site is not visible from public vantage points located on the surrounding streets, and very few people would notice a change in the visual environment. As with the proposed project, new senior cottages would be constructed along San Gabriel Boulevard. Although these cottages would represent new structures, the single-family cottage style of architecture would be consistent with the surrounding single-family residential uses on the rest of this portion of San Gabriel Boulevard. The new medical office buildings (Buildings 31 and 37) would be visible above the perimeter wall on San Gabriel Boulevard. However, these buildings would primarily be viewed by motorists and would not represent a substantial visual change. Differing from the proposed project would be the height of the independent living facility (Building 34). Under the Building Mitigation Alternative, the height of this structure would be increased to 4 stories at the highest point, one story taller than under the proposed project. This facility would not only be visible to the residential uses located south of the project site, it would block views of the San Gabriel Mountains available to sensitive viewers. As such, this alternative would have a greater visual impact than the proposed project and the impacts to a scenic vista would be significant.

### **AIR QUALITY**

The amount of grading and construction associated with the Building Mitigation Alternative would be similar to the proposed project because the Building Mitigation Alternative involves construction of almost all of the same features and total building square footage. As such, the construction air quality impacts would be similar to the proposed project. As with the proposed project, construction activities associated with the Building Mitigation Alternative would be required to comply with SCAQMD Rule 403 and the same mitigation measures that apply to the proposed project would apply to this alternative in order to minimize emissions generated during construction. Thus, as with the proposed project, construction air quality would not exceed the SCAQMD daily emissions thresholds.

The Building Mitigation Alternative would result in almost the same amount of new construction as the proposed project and would be expected to provide the same number of beds and units as the proposed project. Thus, the Building Mitigation Alternative would be expected to generate a similar number of vehicle trips and use approximately the same amount of energy as the proposed project. Thus, similar to the proposed project, operational emissions would not exceed the SCAQMD daily emissions thresholds under the Building Mitigation Alternative.

DEL MAR BOULEVARD (PUBLIC STREET)



- PROTECTED TREE TO BE REMOVED ○
- TREE TO BE REMOVED ○
- TREE TO REMAIN ●
- PROTECTED TREE TO REMAIN ●
- NEW LOCATION OF RELOCATED TREE ■
- TREE TO BE RELOCATED □

MILLICENT WAY (PUBLIC STREET)

DIANA STREET

SAN GABRIEL BOULEVARD

EL NIDO AVENUE (PUBLIC STREET)

MONTE VISTA GROVE HOMES

SAN PASQUAL STREET

Source: Morse Boudreaux Architects (2008)



1 inch equals 180 feet



Figure 5-2 Building Mitigation Alternative Site Plan

### **BIOLOGICAL RESOURCES**

The 24.7-acre project site consists of Urban/Developed land cover, including buildings, pavement, and landscaped areas. The undeveloped portion of the project site is unmaintained and considered feral. It is dominated by exotic or introduced species. There are no sensitive vegetation communities located within or directly adjacent to the proposed project site. The proposed project site does not contain rare, threatened, endangered, endemic, or sensitive plant species. As such, removal of vegetation during construction would not result in direct or indirect impacts to sensitive plant species or vegetation communities. However, the existing vegetation could provide suitable nesting habitat for migratory birds. Thus, as with the proposed project, construction occurring as part of the Building Mitigation Alternative would be required to comply with the Migratory Bird Treaty Act.

Both the proposed project and Building Mitigation Alternative would require removal of mature trees, including those trees protected as part of the City of Pasadena Tree and Tree Protection Ordinance. This alternative would result in the removal of 22 fewer trees than the proposed project, including 4 trees that are protected by the City's Tree Protection Ordinance. Although both the Building Mitigation Alternative and the proposed project would be required to comply with the City's Tree Protection Ordinance to ensure that it would not conflict with local policies or ordinances protecting biological resources, this alternative would have a reduced impact on tree removal compared to the proposed project. The impacts to biological resources would be mitigated to a less than significant level, similar to the proposed project.

### **CULTURAL RESOURCES**

The main portion of the Las Encinas Hospital qualifies as a National Register-eligible historic district. Further, there are a number of independently eligible buildings and landscape features located within the project site. Implementation of the proposed project would involve demolition of 4 buildings that contribute to the historic district at Las Encinas. This alternative would retain Las Palmas (Building 15) and the Lodge (Building 16) in their current location, therefore retaining their original historic significance. The barn (Building 27) would be relocated to west of the acute psychiatric hospital (Building 35). Although this structure would be moved from its original location, relocation to this portion of the project site would not remove it from its historic setting. The Building Mitigation Alternative would be required to implement the same mitigation measures as the proposed project to ensure that new structures built or renovated within the National Register-eligible historic district are constructed or modified in accordance with the Secretary of Interior's standards. Further, retaining Las Palmas (Building 15), the Lodge (Building 16), and the barn (Building 27) would ensure that the key contributors to the National Register-eligible historic district would remain intact. The impact to historic resources would be less than significant under the Building Mitigation Alternative. As such, this alternative would avoid the significant and unavoidable impacts to historic resources that would occur with implementation of the proposed project.

The Las Encinas Hospital may contain historic-era archaeological resources in ground deposits. Construction within sensitive areas of the project site may destroy or damage unique historic resources. Although the amount of construction and the areas to be disturbed as part of the Building Mitigation

Alternative are reduced compared to the proposed project, this alternative could adversely impact archaeological resources. Thus, the Building Mitigation Alternative would be required to implement the same mitigation measures as the proposed project in order to mitigate impacts to a less than significant level.

## **HYDROLOGY AND WATER QUALITY**

As with the proposed project, construction of the Building Mitigation Alternative would involve an increase in impervious surfaces at the project site because approximately 40 percent of the site is not currently developed with structures or pavement. The increase in impervious surface area as a result of the Building Mitigation Alternative would increase the rate and amount of storm water runoff generated at the site. This increase could exceed the capacity of the existing storm water drainage system offsite and result in flooding of downstream areas. Thus, as with the proposed project, the Building Mitigation Alternative would be required to construct new storm water drainage that would control the rate at which storm water is released into the City storm water drainage system such that the rate of discharge would not increase from existing conditions. This would require filtering and retention of storm water runoff onsite. In this way, the proposed new drainage system would not exceed the capacity of the downstream system and would not result in flooding on- or off-site. As with the proposed project, in accordance with existing regulations, the applicant would be required to develop and implement a SUSMP and the construction contractor would be required to implement construction best management practices to control storm water runoff during construction and operation of the Building Mitigation Alternative. Compliance with existing regulations would ensure a less than significant impact.

## **NOISE**

The type of grading and construction activity required, the areas to be disturbed, and the duration of construction to construct the Building Mitigation Alternative would be similar to the proposed project. As with the proposed project, new construction would occur adjacent to existing sensitive receptors located both on- and off-site. Thus, the Building Mitigation Alternative would be required to implement the same construction noise mitigation measures as the proposed project. With implementation of mitigation, the impacts from construction noise would be reduced to a less than significant level.

Operational characteristics of the Building Mitigation Alternative would be similar to the proposed project, including a similar number of staff people, residents, and patients. As such, noise levels along affected roadways would be similar to the proposed project. However, as with the proposed project, operational noise levels would not exceed the City's standards for residential and institutional uses. The impact from operational noise would be less than significant.

## **PUBLIC SERVICES AND UTILITIES**

The Building Mitigation Alternative would have similar operational characteristics as the proposed project, including a similar number of staff people, residents, and patients. As such, the demand for police and fire protection services, water supply, and wastewater would be similar to the proposed project.

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As with the proposed project, the increase in residential units would not require the construction of new or expanded police or fire facilities in order to maintain acceptable response times.

As with the proposed project, the Building Mitigation Alternative would increase the amount of water used and wastewater generated at the proposed project site compared to the existing uses because it would allow for the expansion of independent living, assisted living, and behavioral health care onsite. Thus, this alternative would require additional water. However, as with the proposed project, because the Building Mitigation Alternative is within the development capacity of the General Plan, PWP has accounted for this increased development. As such, the increase in demand for potable water associated with the Building Mitigation Alternative is well within the anticipated future water supply.

As with the proposed project, the Building Mitigation Alternative would result in a permanent increase in wastewater generated at the site. Because the Building Mitigation Alternative contemplates essentially the same amount of development at the site as the proposed project, the amount of wastewater generated would be similar to the proposed project. Nonetheless, adequate infrastructure exists to support the increased wastewater generated by either the proposed project or the Building Mitigation Alternative.

### **TRANSPORTATION AND TRAFFIC**

The trip distribution patterns and number of vehicle trips under the Building Mitigation Alternative would be similar to the proposed project because the Building Mitigation Alternative would have similar construction and operational characteristics as the proposed project, including a similar number of staff people, residents, and patients. As with the proposed project, impacts to the area roadway network would be less than significant with implementation of mitigation. The Building Mitigation Alternative would provide sufficient parking such that it would not result in an inadequate parking capacity. The traffic impacts would be similar to the proposed project.

### **CONCLUSION**

Under the Building Mitigation Alternative, approximately the same amount of new development would occur. However, this alternative would retain Las Palmas (Building 15) and the Lodge (Building 16) in their existing locations on El Nido Avenue. It would relocate the barn (Building 27) to the west of the proposed acute psychiatric hospital (Building 35). Compared to the proposed project, the Building Mitigation Alternative would retain the key buildings that make up the National Register-eligible historic district and result in a less than significant impact to historic resources. As such, the Building Mitigation Alternative would result in reduced impacts related to cultural resources. The impacts to air quality, biological resources, hydrology and water quality, noise, public services and utilities, and transportation and traffic would be similar to the proposed project because essentially the same amount of new development would occur under the Building Mitigation Alternative as is contemplated for the proposed project. While the number trees proposed for removal is reduced under this alternative, the impact is still the same as the proposed project. Unlike the proposed project, this alternative would create a significant visual impact because the height of the independent living facility (Building 34) and assisted living facility (Building 32) would be increased to accommodate the reduced development footprint. The

building height under this alternative would block views of the San Gabriel Boulevard as seen from residential uses located south of the project site and would not be compatible with the surrounding single-story development. The aesthetic impact would be significant and unavoidable under the Building Mitigation Alternative. Thus, this alternative would not meet the following objectives of the proposed project:

- Improve the site by spatially organizing functions within the site and centralizing behavioral healthcare, which is currently dispersed throughout the site.
- 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.
- Minimize the impact of the Master Development Plan to the surrounding neighborhood by improving the perimeter buffering.

This alternative would not maintain the aesthetic character of the existing campus because the heights of the buildings would be increased. Although perimeter landscaping would be added under this alternative, it would not mask the height of the new buildings. Thus, this alternative would not be sensitive to the scale of the surrounding single-family residential neighborhood and would not minimize its impacts on this neighborhood as well as the proposed project. Further, the Building Mitigation Alternative would combine the assisted living and independent living residents in a single structure, which is functionally less desirable for the operation of the project site. The proposed project was designed to organize behavioral healthcare in the central portion of the site and separate these uses from the independent living and assisted living units. The Building Mitigation Alternative would not provide the same buffer between the uses.

#### **5.3.4 TREE MITIGATION ALTERNATIVE**

The project site contains approximately 1,032 trees, of which approximately 276 trees qualify for protection under the City of Pasadena Tree Protection Ordinance. The trees onsite include a mix of native and non-native species measuring 6 inches DBH or higher. Construction of the proposed project would require removal of approximately 61 protected trees, or 5.9 percent, and 189 unprotected trees, or 18.3 percent, and relocation of 26 trees, or 3 percent of existing trees. In order to minimize the loss of trees, the Tree Mitigation Alternative was developed. By rearranging the proposed new building on the project site, the Tree Mitigation Alternative would reduce the number of trees to be removed by 53, 11 of which qualify as protected. This alternative would result in the removal of approximately 197 trees. In order to retain as many trees as possible, the footprint of the following three buildings would be modified: independent living facility (Building 34), the assisted living facility (Building 32), and the adolescent psychiatry unit (Building 33). Figure 5-3 shows the site plan under the Tree Mitigation Alternative.

As shown, the assisted living facility (Buildings 32 and 32a) would be broken into two separate buildings. A small one-story structure (Building 32a) would be constructed behind La Vista (Building 17). A larger four-story assisting living facility (Building 32) would be constructed to the west. This structure would

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have a modest building footprint in order to protect a number of trees currently located in this portion of the project. Similarly, the footprint of the independent living facility (Building 34) would be reduced and the height of the structure increased to 4 stories. The location of this structure would also be moved to the west. Thus, subterranean parking would be located beneath the assisted living facility (Building 34) instead of in a separate surface/subterranean structure. There would be a total reduction in parking of 94 spaces under the Tree Mitigation Alternative than the proposed project. The adolescent psychiatry building footprint would be reduced and the building height would be increased from one to two stories.

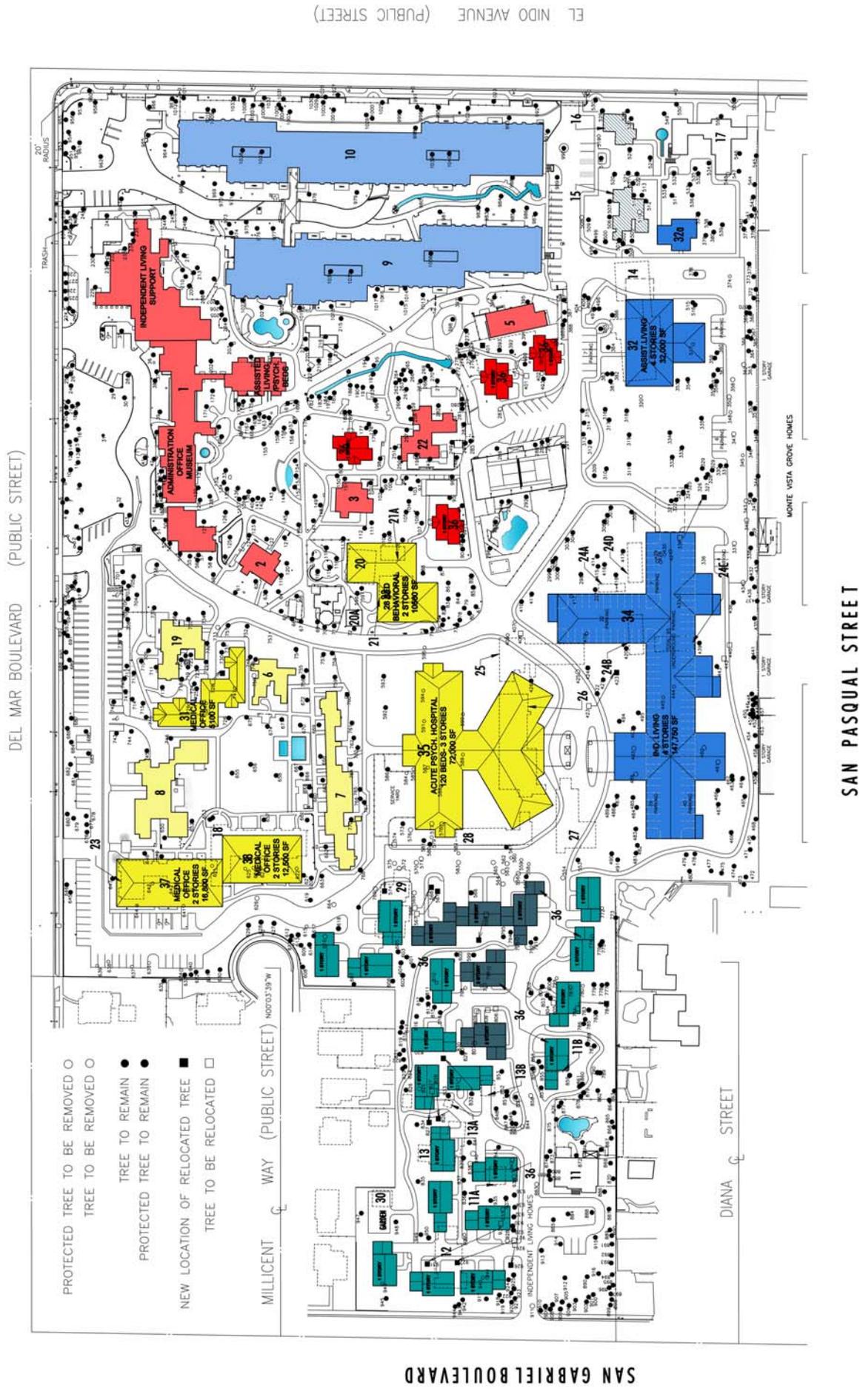
The Tree Mitigation Alternative would retain two historic structures that are proposed to be demolished as part of the proposed project: Las Palmas (Building 15), and the Lodge (Building 16), located on El Nido Avenue. The barn (Building 27) and the men's dormitory (Building 25) would still be demolished as part of this alternative. All other components of this alternative would be the same as the proposed project.

### **AESTHETICS**

Aesthetic and visual impacts associated with this alternative would be different than those associated with the proposed project. As with the proposed project, the majority of the project site is not visible from public vantage points located on the surrounding streets, and very few people would notice a change in the visual environment. New senior cottages would be constructed along San Gabriel Boulevard. Although these cottages would represent new structures, the single-family cottage style of architecture would be consistent with the surrounding single-family residential uses on the rest of this portion of San Gabriel Boulevard. The new medical office buildings (Buildings 31 and 37) would be visible above the perimeter wall on San Gabriel Boulevard. However, these buildings would primarily be viewed by motorists and would not represent a substantial visual change. Differing from the proposed project would be the height of the independent living facility (Building 34), adolescent care building (Building 33), and the assisted living facility (Building 32). Under the Tree Mitigation Alternative, the height of these structures would be increased to accommodate the reduction in building footprint in order to retain trees. The independent living facility (Building 34) and assisted living facility (Building 32) would not only be visible to the residential uses located south of the project site, they would block some views of the San Gabriel Mountains available to sensitive viewers. As such, this alternative would have a greater visual impact than the proposed project and the impacts to a scenic vista would be significant.

### **AIR QUALITY**

The amount of grading and construction associated with the Tree Mitigation Alternative would be similar to the proposed project because the Tree Mitigation Alternative involves construction of almost all of the same features and total building square footage. As such, the construction air quality impacts would be similar to the proposed project. As with the proposed project, construction activities associated with the Tree Mitigation Alternative would be required to comply with SCAQMD Rule 403 and the same mitigation measures that apply to the proposed project would apply to this alternative in order to minimize emissions generated during construction. Thus, as with the proposed project, construction air quality would not exceed the SCAQMD daily emissions thresholds.



1 inch equals 180 feet

0 90 180 270 360 Feet

Source: Morse Boudreaux Architects (2008)

Figure 5-3  
Tree Mitigation Alternative Site Plan

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The Tree Mitigation Alternative would result in almost the same amount of new construction as the proposed project and would be expected to provide the same number of beds and units as the proposed project. Thus, the Tree Mitigation Alternative would be expected to generate a similar number of vehicle trips and use approximately the same amount of energy as the proposed project. Thus, similar to the proposed project, operational emissions would not exceed the SCAQMD daily emissions thresholds under the Tree Mitigation Alternative.

### **BIOLOGICAL RESOURCES**

The 24.7-acre project site consists of Urban/Developed land cover, including buildings, pavement, and landscaped areas. The undeveloped portion of the project site is unmaintained and considered feral. It is dominated by exotic or introduced species. There are no sensitive vegetation communities located within or directly adjacent to the proposed project site. The proposed project site does not contain rare, threatened, endangered, endemic, or sensitive plant species. As such, removal of vegetation during construction would not result in direct or indirect impacts to sensitive plant species or vegetation communities. However, the existing vegetation could provide suitable nesting habitat for migratory birds. Thus, as with the proposed project, construction occurring as part of the Tree Mitigation Alternative would be required to comply with the Migratory Bird Treaty Act. Both the proposed project and Tree Mitigation Alternative would require removal of mature trees, including those trees protected as part of the City of Pasadena Tree Protection Ordinance. Approximately 53 fewer trees would be removed as part of this alternative compared to the proposed project. However, both the Tree Mitigation Alternative and the proposed project would be required to comply with the City's Tree Protection Ordinance to ensure that it would not conflict with local policies or ordinances protecting biological resources. The impacts to biological resources would be mitigated to a less than significant level, similar to the proposed project.

### **CULTURAL RESOURCES**

The main portion of the Las Encinas Hospital qualifies as a National Register-eligible historic district. Further, there are a number of independently eligible buildings and landscape features located within the project site. Implementation of the proposed project would involve demolition of 4 buildings that contribute to the National Register-eligible historic district at Las Encinas. This alternative would retain Las Palmas (Building 15) and the Lodge (Building 16) in their current location, therefore retaining their original historic significance. The barn (Building 27) and the men's dormitory (Building 25), a contributing building to the Las Encinas historic district, would still be removed as part of the Tree Mitigation Alternative. Removal of these buildings would be significant. The Tree Mitigation Alternative would be required to implement the same mitigation measures as the proposed project to ensure that new structures built or renovated within the historic district are constructed or modified in accordance with the Secretary of Interior's standards. However, demolition of the barn (Building 27), a key contributor to the historic district, would detract from the significance of the National Register-eligible historic district. As such, the impact to historic resources would remain significant and unavoidable under the Tree Mitigation Alternative.

The Las Encinas Hospital may contain historic-era archaeological resources in ground deposits. Construction within sensitive areas of the project site may destroy or damage unique historic resources. Although the amount of construction and the areas to be disturbed as part of the Tree Mitigation Alternative are reduced compared to the proposed project, this alternative could adversely impact archaeological resources. Thus, the Tree Mitigation Alternative would be required to implement the same mitigation measures as the proposed project in order to mitigate impacts to a less than significant level.

## **HYDROLOGY AND WATER QUALITY**

As with the proposed project, construction of the Tree Mitigation Alternative would involve an increase in impervious surfaces at the project site because approximately 40 percent of the site is not currently developed with structures or pavement. The increase in impervious surface area as a result of the Tree Mitigation Alternative would increase the rate and amount of storm water runoff generated at the site. This increase could exceed the capacity of the existing storm water drainage system offsite and result in flooding of downstream areas. Thus, as with the proposed project, the Tree Mitigation Alternative would be required to construct new storm water drainage that would control the rate at which storm water is released into the City storm water drainage system such that the rate of discharge would not increase from existing conditions. This would require filtering and retention of storm water runoff onsite. In this way, the proposed new drainage system would not exceed the capacity of the downstream system and would not result in flooding on- or off-site. As with the proposed project, in accordance with existing regulations, the applicant would be required to develop and implement a SUSMP and the construction contractor would be required to implement construction best management practices to control storm water runoff during construction and operation of the Tree Mitigation Alternative. Compliance with existing regulations would ensure a less than significant impact.

## **NOISE**

The type of grading and construction activity required, the areas to be disturbed, and the duration of construction to construct the Tree Mitigation Alternative would be similar to the proposed project. As with the proposed project, new construction would occur adjacent to existing sensitive receptors located both on- and off-site. Thus, the Tree Mitigation Alternative would be required to implement the same construction noise mitigation measures as the proposed project. With implementation of mitigation, the impacts from construction noise would be reduced to a less than significant level.

Operational characteristics of the Tree Mitigation Alternative would be similar to the proposed project, including a similar number of staff people, residents, and patients. As such, noise levels along affected roadways would be similar to the proposed project. However, as with the proposed project, operational noise levels would not exceed the City's standards for residential and institutional uses. The impact from operational noise would be less than significant.

## **PUBLIC SERVICES AND UTILITIES**

The Tree Mitigation Alternative would have similar operational characteristics as the proposed project, including a similar number of staff people, residents, and patients. As such, the demand for police and

## 5.0 Alternatives

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fire protection services, water supply, and wastewater would be similar to the proposed project. As with the proposed project, the increase in residential units would not require the construction of new or expanded police or fire facilities in order to maintain acceptable response times.

As with the proposed project, the Tree Mitigation Alternative would increase the amount of water used and wastewater generated at the proposed project site compared to the existing uses because it would allow for the expansion of independent living, assisted living, and behavioral health care onsite. Thus, this alternative would require additional water. However, as with the proposed project, because the Tree Mitigation Alternative is within the development capacity of the General Plan, PWP has accounted for this increased development. As such, the increase in demand for potable water associated with the Tree Mitigation Alternative is well within the anticipated future water supply.

As with the proposed project, the Tree Mitigation Alternative would result in a permanent increase in wastewater generated at the site. Because the Tree Mitigation Alternative contemplates essentially the same amount of development at the site as the proposed project, the amount of wastewater generated would be similar to the proposed project. Nonetheless, adequate infrastructure exists to support the increased wastewater generated by either the proposed project or the Tree Mitigation Alternative.

### **TRANSPORTATION AND TRAFFIC**

The trip distribution patterns and number of vehicle trips under the Tree Mitigation Alternative would be similar to the proposed project because the Tree Mitigation Alternative would have similar construction and operational characteristics as the proposed project, including a similar number of staff people, residents, and patients. As with the proposed project, impacts to the area roadway network would be less than significant with implementation of mitigation. The Tree Mitigation Alternative would provide sufficient parking such that it would not result in an inadequate parking capacity. The traffic impacts would be similar to the proposed project.

### **CONCLUSION**

Under the Tree Mitigation Alternative, approximately the same amount of new development would occur in terms of total square footage. However, this alternative would reduce the number of trees to be removed by 53, 11 of which are protected under the City's Tree Protection Ordinance. Compared to the proposed project, this alternative would remove 197 trees. Thus, this alternative would result in a reduced impact to biological resources, although implementation of mitigation measures would still be required. Further, Las Palmas (Building 15) and the Lodge (Building 16) would be retained in their existing locations on El Nido Avenue. Compared to the proposed project, only 2 historic buildings that contribute to the National Register-eligible historic district would be demolished (the men's dormitory, or Building 27, and the Barn, or Building 25). As such, the Tree Mitigation Alternative would result in reduced impacts related to cultural resources, although the impact would remain significant and unavoidable under this alternative because the Barn (Building 25), which is a critical component of the historic district, would still be removed. The impacts to air quality, hydrology and water quality, noise, public services and utilities, and transportation and traffic would be similar to the proposed project because essentially

the same amount of new development would occur under the Tree Mitigation Alternative as is contemplated for the proposed project. Unlike the proposed project, this alternative would create a significant visual impact because the height of the independent living facility (Building 35) and assisted living facility (Building 32) would be increased to accommodate the reduced development footprint in order to minimize impacts to trees. The Tree Mitigation Alternative would not meet the following objectives of the proposed project:

- Improve the site by spatially organizing functions within the site and centralizing behavioral healthcare, which is currently dispersed throughout the site.
- 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.
- 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.
- Minimize the impact of the Master Development Plan to the surrounding neighborhood by improving the perimeter buffering.

The building height under this alternative would block views of the San Gabriel Mountains as seen from residential uses located south of the project site. This would create a new aesthetic impact that would not occur as part of the proposed project. Although this alternative would retain as many specimen trees as possible, it would not retain the aesthetic character of the existing campus. The increased building heights to minimize impacts to trees would cause these new structures to be out of place with the existing development. Further, the trees that would be retained under this alternative does not necessarily consist of the best specimens trees that can be retained. Thus, this alternative could compromise the ability of the applicant to provide a healthy urban forest upon completion because some of the nonnative trees that have been randomly planted onsite would be retained. Although perimeter planting would be provided to buffer the adjacent residential uses, these taller buildings would not be in character with the surrounding single-family residential uses. This alternative would also compromise the function of the site. It would not allow the same buffer between the behavior health care uses and the independent and assisting living units. Thus, the Tree Mitigation Alternative would not meet all of the objectives of the proposed project.

## **5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Because the Building Mitigation Alternative would avoid a significant and unavoidable impact to historic resources, it is considered the environmentally superior alternative. However, this alternative would create a new aesthetic impact that would not result with the proposed project. Further, the Building Mitigation Alternative would compromise the project objective to maintain the aesthetic character of the existing campus by designing the new buildings so that they harmonize with and complement the older existing structures. Table 5-1 provides a comparison of the impacts of the alternatives to the proposed project.

TABLE 5-2 COMPARISON OF IMPACTS FOR THE PROPOSED PROJECT AND THE ALTERNATIVES

Impact Area	Proposed Project	No Project/No Build Alternative	No Project/Existing Master Plan Alternative	Building Mitigation Alternative	Tree Mitigation Alternative
Aesthetics	III	IV (Less)	III (Less)	I (Greater)	I (Greater)
Air Quality: Construction	II	IV (Less)	II (Less)	II (Similar)	II (Similar)
Air Quality: Operation	III	IV (Less)	III (Less)	III (Similar)	III (Similar)
Biological Resources	II	IV (Less)	II (Greater)	II (Similar)	II (Similar)
Cultural Resources	I	IV (Less)	I (Greater)	III (Less)	I (Less)
Hydrology and Water Quality	III	IV (Less)	III (Less)	III (Similar)	III (Similar)
Noise/Vibration: Construction	II	IV (Less)	II (Less)	II (Similar)	II (Similar)
Noise/Vibration: Operation	III	IV (Less)	III (Less)	II (Similar)	II (Similar)
Public Services, Utilities and Recreation	III	IV (Less)	III (Less)	III (Similar)	III (Similar)
Transportation and Traffic	II	IV (Less)	II (Less)	II (Similar)	II (Similar)

Notes:

- I: Significant Unavoidable Impact
  - II: Potentially Significant Impact Unless Mitigated
  - III: Less Than Significant Impact
  - IV: No Impact
- Less: Impact is lower in magnitude than impacts of the proposed project  
 Similar: Impact is similar in magnitude to impacts of the proposed project  
 Greater: Impact is greater in magnitude than impacts of the proposed project  
 Mixed: Some impacts are less than, similar to, and/or greater in magnitude than impacts of the proposed project