8.0 MITIGATION MONITORING AND REPORTING PROGRAM

Public Resources Code, Section 21081.6 requires that mitigation measures identified in environmental review documents prepared in accordance with CEQA are implemented after a project is approved. Therefore, this Mitigation Monitoring and Reporting Program has been prepared to ensure compliance with the adopted mitigation measures during the pre-construction, construction, and post-construction phases of the proposed Las Encinas Hospital 2007 Master Development Plan Project.

The City of Pasadena (City) is the agency responsible for implementation of the mitigation measures identified in the EIR. This Mitigation Monitoring and Reporting Program provides the City with a convenient mechanism for quickly reviewing all the mitigation measures including the ability to focus on select information such as timing. The Mitigation Monitoring and Reporting Program includes the following information for each mitigation measure:

- the phase of the project during which the required mitigation measure must be implemented;
- the phase of the project during which the required mitigation measure must be monitored;
- the enforcement agency; and
- the monitoring agency.

The Mitigation Monitoring and Reporting Program also includes a checklist to be used during the mitigation monitoring period. The checklist will verify the name of the monitor, the date of the monitoring activity, and any related remarks for each mitigation measure.

TABLE 8-1 MITIGATION MONITORING AND REPORTING PROGRAM

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
AIR QUALITY							
Impact AIR-1	**AIR-A** During construction, the construction contractor shall only use paint that contains no more than 0.22 pounds/gallon (100 grams/liter) of volatile organic compounds.	City of Pasadena Planning Division review of plans. Applicant's mitigation monitoring supervisor to verify in the field.	Review plan specifications prior to issuance of building permits for Phases 2 (Bldgs. 32, 34, 39) and Phase 5 (Bldg 35).	Field verification during construction. Verification to be demonstrated in monthly mitigation monitoring report sumitted to the City's Mitigation Monitoring Coordinator.			
BIOLOGICAL RESOURCES							
Impact BIO-1	**BIO-A** Should tree or other vegetation clearance and/or construction work need to occur during the breeding season for migratory non-game native bird species (generally March 1-September 1, as early as February 1 and as late as September 15 for raptors), weekly bird surveys shall be performed to detect any protected native birds in the trees to be removed and other suitable nesting habitat within 300 feet of the construction work area (500 feet for raptors). The surveys shall be conducted 30 days prior to the disturbance of suitable nesting habitat by a qualified biologist with experience in conducting nesting bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. If a	City of Pasadena Planning Division to review report prepared by applicant's qualified biologist with experience in conducting nesting surveys Project applicant's construction manager during construction shall instruct construction personnel on sensitivity of the area.	Prior to vegetation clearance and/or prior to issuance of building and grading permits related to all phases of construction.	Beginning 30 days prior to vegetation clearance and/or prior to issuance of building permits, on a weekly basis, with the last survey no more than 3 days prior to initiation of clearance.			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
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	protected native bird is found, the construction contractor shall delay all clearance/construction disturbance activities in suitable nesting habitat or within 300 feet of nesting habitat (within 500 feet for raptor nesting habitat) until August 31 or continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) shall be postponed until the nest is vacated, juveniles have fledged, and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest shall be established in the field by a qualified biologist with flagging and stakes or construction fencing. Construction personnel shall be instructed on the sensitivity of the area. The results of this measure shall be recorded to document compliance with applicable state and federal laws pertaining to the protection of native birds.						
Impact BIO-5	**BIO-B** During construction, no grading, trenching, material storage, or equipment parking shall be permitted within the tree protection zone. Tree protection zones shall be fenced using a 6-foot tall chain link fence. On each fenced tree protection zone a sign shall be hung noting which trees are located within the area. The Arborist of Record shall be responsible for establishing the tree protection zones. Construction fencing shall be installed prior to demolition activities around the trees to be preserved.	Implementation and monitoring by certified arborist retained by project applicant Applicant's mitigation monitoring supervisor shall monitor tree protection zones and install fencing per tree protection plan. Onsite inspection by City of Pasadena Code Compliance Division to verify installation of fencing prior to approval	Fencing to be installed prior to demolition permit issuance.	Verification during construction. Continual compliance to be demonstrated in monthly mitigation monitoring report sumitted to the City's Mitigation Monitoring Coordinator.			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
		of demolition permit.					
Impact BIO-5	**BIO-C** During construction, the Arborist of Record shall conduct regular meetings with the construction contractor to assure compliance with Tree Protection Specifications. The Tree Protection Specifications shall be developed by the Arborist of Record and shall include a schedule of different tree protection and maintenance activities, such as mulch application, supplemental watering, and root protection to be employed and maintained throughout the duration of construction. The Tree Protection Specifications shall be approved by the City prior to the receipt of a tree removal permit.	Implementation by certified arborist retained by Project Applicant. City of Pasadena Planning Division to ensure compliance through monthly mitigation monitoring reports.	The tree protection plan shall be submitted to the Planning Division with the related plan check submittals for each phase of development. The applicant shall show compliance with the measures in the tree protection plan prior to issuance of grading permits, demolition permits and building permits within or directly adjacent to tree protection zones.	Verification during construction. Continual compliance to be demonstrated in monthly mitigation monitoring report sumitted to the City's Mitigation Monitoring Coordinator.			
CULTURAL RESOURCES							
Impact CUL-1	**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 within two years of approval of the 2007 Master Development Plan.	City of Pasadena Design and Historic Preservation Section to monitor compliance. Applicant to submit nomination application.	Within two years of approval of the 2007 Master Development Plan.	City of Pasadena Design and Historic Preservation Section			
Impact CUL -1	**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.	Third-party architectural/ historic preservation expert retained by project applicant for photo documentation. City of Pasadena Design and Historic Preservation Section to ensure submittal prior to issuance of permits.	Prior to issuance of any demolition permits of or directly adjacent to the buildings noted in CUL-B	City of Pasadena Design and Historic Preservation Section			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
Impact CUL -1	**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.	City of Pasadena Design and Historic Preservation Section will ensure compliance. Third-party architectural/ historic preservation expert retained by project applicant for photo documentation.	The proposed location shall be shown on design review submittals for phase three (buildings 36) and all subsequent building plans. HABS documentation shall be submitted prior to permits being issued for moving the structure. The rehabilitation's compliance with Secretary of Interior's standards shall be reviewed prior to plan check submittal and in compliance with City Municipal Codes.	Final plans and specifications.			
Impact CUL -1	**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.	City of Pasadena Design and Historic Preservation Section to determine compliance Third-party architectural/ historic preservation expert retained by project applicant to ensure compliance with Secretary of Interior standards.	Prior to issuance of building and grading permits plans shall be reviewed by City of Pasadena Planning Division for compliance with this mitigation measure.	Final Plans and Specifications			
Impact CUL -1	**CUL-E** The applicant shall submit a landmark designation application for the oak tree and the water tank house located 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.	City of Pasadena Design and Historic Preservation Section.	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.	Final Plans and Specifications			
Impact	**CUL-F** A Research Design and Data	Planner Manager or	Prior to the issuance of a demolition or	Final Plans and			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
CUL -2	Recovery 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 Research Design and Data Recovery 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	designee shall approve the plan. Qualified Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61) shall prepare the plan and report.	grading permit within Areas 1, 2, and 6.	Specifications			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	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.						
Impact CUL -2	**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.	Qualified archaeological monitor supervised by a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61).	Plan shall be prepared prior to issuance of a demolition permit or grading permit within areas 1, 2, and 6.	Monitoring during demolition of buildings and structures, grading, trenching, utilities relocations and installations, the construction of fencing, and tree removal and plantings within areas 1, 2, and 6.			
Impact CUL -2	**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.	Qualified archaeological monitor supervised by a Principal Investigator or Project Manager certified by the Register of Professional Archaeologists (qualifications derived from 36 CFR Part 61).	If objects are found during the testing and data recovery phase, a curation agreement shall be executed prior to a demolition permit.	During the recovery phase and all construction activity.			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
NOISE							
Impact NOISE-1	**NOISE-A** Prior to the start of construction of the adolescent psychiatry facility (Building 33), the applicant shall vacate Building 3 (Las Flores). If use of Building 3 is deemed necessary to the functioning of the hospital, the applicant shall seek approval of an alternative means of mitigating construction noise levels. An alternative mitigation measure must be reviewed and approved by the Planning Division.	City of Pasadena Planning Division	Prior to the issuance of a building permit for building 33	Construction			
Impact NOISE-1	**NOISE-B** Prior to the start of construction of the psychiatric hospital (Building 35), the construction contractor shall install a temporary eight-foot wood wall along the perimeter of the construction site where a direct ground level line of sight exists between the construction area and the sensitive receptors located in the adolescent psychiatry facility (Building 33).	Implementation by City of Pasadena Planning Division. Continual existence confirmed by applicant's construction manager.	Prior to the issuance of a building permit for building 35	Continual compliance to be demonstrated in monthly mitigation monitoring report sumitted to the City's Mitigation Monitoring Coordinator.			
Impact NOISE-1	**NOISE-C** During construction, the construction contractor shall equip all mobile construction equipment with properly operating mufflers or other noise reduction devices.	Applicant's construction manager	Construction	Continual compliance to be demonstrated in monthly mitigation monitoring report sumitted to the City's Mitigation Monitoring Coordinator.			
Impact NOISE-1	**NOISE-D** During construction, the contractor shall schedule activities to avoid operating several pieces of equipment simultaneously, which causes high noise levels.	Applicant's construction manager	Construction	Continual compliance to be demonstrated in monthly mitigation monitoring report sumitted to the City's Mitigation Monitoring Coordinator.			
Impact	**NOISE-E** Prior to the start of construction,	Applicant's construction	Pre-Construction	Construction			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
NOISE-1	the construction contractor shall notify residences immediately adjacent to the project site (e.g., via flyers). The notices shall include a telephone number to the Pasadena Health Department for referral to determine if a violation of the City's Noise Ordinance is occurring.	manager					
PUBLIC SERVICES AND UTILITIES							
Impact PS-3	**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-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).	City of Pasadena Planning Division	Plans and submittals verifying compliance shall be submitted prior to finalizing permits for Buildings 36 and Building 1	Plumbing permits required in order to complete this reduction shall be finalized before permits for Buildings 36 and Building 1 are finalized.			
Impact PS-3	**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	City of Pasadena Design and Historic Preservation Section.	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. Compliance shall be determined prior to certificate of occupancy.	Compliance with final landscape plan shall be determined by City of Pasadena Planning Division, prior to Certificate of Occupancy.			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	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 sensitively designed landscape plan for the historically eligible landscape features.						
TRANSPORTATION AND TRAFFIC							
Impact TRANS-1	**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 non-residential 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.	City of Pasadena Transportation Department	Prior to the issuance of a building permit for phase 1.	Final Plans and Specifications			
Impact TRANS-1	**TRANS-B** 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 one 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	City of Pasadena Department of Transportation	Prior to the issuance of a building permit for phase 1.	Final Plans and Specifications			

Impact	Mitigation Measure	Responsible Implementation Party/Monitor & Reporter	Time Frame/Monitoring Milestone		Verification of Compliance		
			Implementation Phase	Monitoring Phase	Initial	Date	Remark
	of Transportation staff.						
Impact TRANS-1	**TRANS-C** 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.	City of Pasadena Department of Transportation	Prior to the issuance of a building permit on Phase 1	Final Plans and Specifications			

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