

**Buchanan, Rita**

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**Subject:** FW: DPNA Letter - General Plan EIR - Transportation Metrics  
**Attachments:** EIR with new Transp Metrics.pdf

**From:** Jonathan Edwards [<mailto:jedwards@gmail.com>]  
**Sent:** Monday, July 21, 2014 9:37 AM  
**To:** Bogaard, Bill; district1; Morales, Margo; Sullivan, Noreen; De La Cuba, Vannia; Gordo, Victor; Robinson, Jacque; Madison, Steve; Suzuki, Takako; Tornek, Terry  
**Cc:** Dock, Fred; Yamarone, Mark; Beck, Michael; Bertoni, Vince; Jomsky, Mark; Rivera, Paulina; [larry.wilson@sgvn.com](mailto:larry.wilson@sgvn.com); [dpnalist@gmail.com](mailto:dpnalist@gmail.com) Neighborhood Association; cityclerk  
**Subject:** DPNA Letter - General Plan EIR - Transportation Metrics

Dear Mayor Bogaard, Council, and City Staff,

Please find attached a letter regarding tonight's very important agenda item, consideration of the General Plan schedule and reform of Transportation Metrics.

We strongly believe that this is a critical issue and urge you to consider the recommendations enumerated in the attached letter, which was drafted and approved by the DPNA's Board of Directors. Please distribute and make a part of the record.

Thank you!

**Jonathan Edwards • DOWNTOWN PASADENA NEIGHBORHOOD ASSOCIATION**  
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GENERAL PLAN EIR  
MUST BE CONDUCTED USING REFORMED TRANSPORTATION METRICS



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The Downtown Pasadena Neighborhood Association (“DPNA”) supports the staff recommendation to adopt **option #3**, to continue reform of Pasadena’s transportation performance metrics, and to use those reformed metrics to conduct the traffic study of the General Plan EIR.

**The current metric (“Auto Level of Service” or “LOS”) is problematic.** Pasadena’s Department of Transportation initiated reform because Auto Level of Service is not compatible with the Guiding Principles and adopted Goals and Policies of both the existing and the updated General Plan. LOS conflicts with these principles and policies because:

- **LOS only measures automobile traffic, and ignores multi-modal alternatives.**

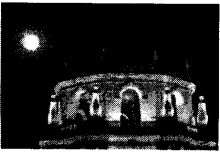
Guiding Principle #5 and the entirety of the Mobility Element require a metrics that *take into consideration non-auto modes*.

- **Not only does LOS ignore non-auto modes, it impedes them,** because the mitigation measures that result from an LOS analysis typically make conditions *worse* and *more unsafe* for pedestrians, cyclists, and transit users. Mitigation of a project’s traffic impacts too often results in intersections that are wider (added right turn lanes, for example), less convenient (longer wait times for a crosswalk signal), and/or more dangerous for non-auto modes (wider intersections that encourage speeding during non-peak hours, increasing fatality rates for vulnerable road users) . LOS results in streets that may be unsafe for pedestrians and cyclists because the design impetus is directed by the imperative to mitigate impacts to Auto Level of Service.

For these reasons and others, DOT determined that reform was necessary.

**The State of California also recognized that LOS is problematic and mandated reform with the passage of SB 743.** LOS is at odds with “...modern state goals such as emission reductions, development of multimodal transportation network for motor vehicles, infill development, and even optimization of the roadway network for motor vehicles.”

Therefore, we should continue with reform.



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## GENERAL PLAN EIR MUST BE CONDUCTED USING REFORMED TRANSPORTATION METRICS

We must also analyze the General Plan Update using the reformed metrics. We should *not* put reform on hold or use the existing problematic metrics.

**At a broad level, the State's imminent future actions regarding replacement metrics are relatively obvious, and Pasadena's proposed reform metrics are likely to match the state's.** SB 743 has *already* established, without uncertainty, the following:

- Auto Level of Service (LOS) "*shall not* be considered a significant impact on the environment" for use within Transit Orientated Districts (TODs).
- Replacement metrics to be considered *shall* include VMT (Vehicle Miles Traveled) and VT (Vehicle Trips).

The OPR's "Preliminary Evaluation" of December 2013 listed VMT and VT<sup>1</sup> as the first two metrics in its report, and identified problems with all other possibilities. VMT and VT are extremely likely to be named as the state's replacement metrics, and a decision was due on July 1<sup>st</sup>.

**Using the existing problematic metrics for the General Plan's EIR would produce an inadequate result and may require every future project, large or small, to conduct an EIR in order to compensate for the inadequacy of the General Plan EIR.**<sup>2</sup> Once the state's CEQA guidelines are adopted, it is likely that all projects will have to be analyzed using VMT and VT. If the city's General Plan EIR is conducted using VMT and VT (and LOS, outside of TODs), then the traffic impacts of particular projects may possibly be ascertained from the General Plan's program EIR, and developers of small-scale projects may avoid being unduly burdened with the prohibitive costs of conducting an EIR. If the General Plan EIR is *not* conducted using VMT and VT, then those small developers *will be* prohibitively burdened. As the staff report states on page 4,

*"...the more that the City's performance measures are different that those ultimately adopted by the State, the more likely it would be that each new project coming forward would require an EIR or Mitigated Negative Declaration. If the City's performance measures are too different than those adopted by the State [as they will be if existing problematic metrics are used] and if the City Council would like to establish a more streamlined environmental review process, the City would have to readopt the Land Use and Mobility Elements and prepare an Addendum, Subsequent, or Supplemental EIR."*

**Reform of Pasadena's Transportation Metrics is a realistic step towards implementing the Principles and Policies of the General Plan and Mobility Element; that we have not yet achieved the goals envisioned by the plan is no reason to hesitate in implementing the plan.** The current metric is a hindrance to achieving the General and Mobility Plan's goals. It yields results that are subtly antagonistic to the city's goals and vision, and when applied on a project-by-project basis over the course of many years, would considerably slow progress, if

<sup>1</sup> The Preliminary Evaluation used the term "ATG" or Auto Trips Generated instead of "VT" Vehicle Trips. VT and ATG are functionally equivalent.

<sup>2</sup> Or declare a Mitigated Negative Declaration.



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not set the city up to fail. When applied to the General Plan's EIR, the current metric will distort analysis and decision-making. The current metric is *inconsistent* with the Goals and Principles, and it will therefore skew evaluation of the Land Use Element towards a result that is *inconsistent* with the Goals and Principles.

The General Plan and Mobility Plan envision a city in which auto use is de-emphasized and in which Public Transit, Bike, and Pedestrian networks are robust and viable options for residents of all ages. Those alternative networks will not come online overnight, nor will the de-emphasis of auto travel occur overnight, resulting in sudden auto traffic congestion. Both the improvement of alternative networks and de-emphasis of auto travel will occur simultaneously, and indeed *must* occur simultaneously, because a system in which auto use is *not* de-emphasized on some streets *prohibits* the development of robust and viable Public Transit, Bike, and Pedestrian networks. Trade-offs are involved.

Therefore, to demand that alternative networks be fully established before *beginning* the process of auto de-emphasis is to demand that the city realize its vision before beginning to actually take the individual actions necessary to realize that vision. We should not delay the gradual de-emphasis of auto travel because a robust Public Transit system has not been fully achieved. **The realistic way to achieve a transformation is to take the small, individual steps of gradual transformation. We will only achieve the city envisioned by the General Plan if we actually set about the task of implementing the General Plan.** Reform of transportation metrics is one of those steps.

Please continue that course by approving staff's recommendation for Option #3; continue to reform our transportation metrics and hold the General Plan EIR in order to use those reformed metrics.

Thank you for your attention in this matter.

Jonathan Edwards, President

**DOWNTOWN PASADENA NEIGHBORHOOD ASSOCIATION**

GENERAL PLAN EIR  
MUST BE CONDUCTED USING REFORMED TRANSPORTATION METRICS

## **ATTACHMENT**

# **HIGHLIGHTED STAFF REPORT**

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## REVISED TRANSPORTATION PERFORMANCE MEASURES AND THRESHOLDS OF SIGNIFICANCE FOR CEQA

When a project has been determined to be subject to CEQA, the project must be analyzed to determine whether or not it will have a significant effect on the environment. In relation to traffic and transportation, the City has specific measures and thresholds that determine whether the impact created by a project is significant. The City's current thresholds of significance examine a project's impact on an intersection's level of service and on a specific segment of a street. Both of these performance measures – level of service and the segment impact – only examine the impact a project will have on car traffic; they do not explore a project's impact on pedestrians, bicyclists and transit users.

Staff is proposing three new performance measures that would be used to determine significant impacts under the CEQA. These new performance measures are reflective of Guiding Principle No. 5 and closely related to changes in State law that will prohibit the use Auto Level of Service:

- Vehicle Miles Traveled Per Capita
- Vehicle Trips Per Capita
- Auto Level of Service (outside of designated High Pedestrian Activity Areas)

In addition, three additional measures are proposed:

- Proximity and Quality of the Bicycle Network
- Proximity and Quality of the Transit Network
- Pedestrian Accessibility

These other additional measures would guide system-wide bike and local transit improvements in the General Plan and guide pedestrian improvements in Specific Plan updates. The bike and transit improvements identified would be included in a nexus study to the update of the Traffic Reduction and Transportation Improvement Fee (TRTIF) following the adoption of the Land Use and Mobility Element updates. An analysis at the project level of impacts to the various citywide networks is not necessary because projects would address their proportionate impacts in these areas by paying their fees.

## CONSISTENCY WITH STATE GUIDELINES

According to State CEQA Guidelines, when program EIRs are prepared, such as the General Plan EIR, future projects that are proposed must be examined in the light of the program EIR to determine whether additional environmental documentation must be prepared. If a subsequent project would have effects that were not examined in the program EIR, a new Initial Study would be required, which would lead either a new EIR or Mitigated Negative Declaration. If no new effects would occur, an agency may approve the activity as being within the scope of the project covered by the program EIR and no new environmental document would be required.

Therefore, the closer Pasadena's performance measures are to those ultimately adopted by the State, the more likely it would be that future projects that are consistent with the updated General Plan would not be subject to a new EIR. Conversely, the more that the City's performance measures are different than those ultimately adopted by the State, the more likely it would be that each new project coming forward would require an EIR or Mitigated Negative Declaration. If the City's performance measures are too different than those adopted by the State and if the City Council would like to establish a more streamlined environmental review process, the City would have to readopt the Land Use and Mobility Elements and prepare an Addendum, Subsequent, or Supplemental EIR.

#### PROCESS/ADVISORY COMMISSIONS

Due to the inconsistency between policy, practice and planned changes to State law, staff has sought to develop new transportation performance measures with the same collaboration exhibited throughout the General Plan Update process. Staff has brought the revised performance measures and CEQA thresholds of significance to multiple meetings of the Community, the Transportation Advisory Commission (TAC), and the Planning Commission (See Attachment 2, Commission Reports). The TAC unanimously passed a motion recommending approval of the performance measures and thresholds proposed by staff with some minor technical revisions. Although there has been significant discussion and support regarding the inclusion of measures to analyze the quality of Bicycle and Transit Networks and Pedestrian Accessibility, the Planning Commission has not yet been able to reach consensus on the proposed performance measures. At its meeting of June 25<sup>th</sup>, the Planning Commission directed staff to continue this item to July 23<sup>rd</sup>, pending an anticipated release of revised draft guidelines by the State. The issue has now been compounded by a delay in the State's release of draft revised guidelines which were originally scheduled to be released on July 1, 2014. As of this writing, there is no anticipated release date from the State.

#### **ANALYSIS:**

In light of the fact that new performance measures have not yet been adopted by City Council, staff has identified the following three options to completing the Transportation Performance Measures and Thresholds of Significance for CEQA and the corresponding General Plan Update.

#### **Option One: Wait for the State's Adoption of Revised Guidelines**

In this first option, once the State adopts new guidelines, staff would develop revised performance measures consistent with the State guidelines and bring these forward to the Transportation Advisory Commission, Planning Commission and to the City Council for adoption. The General Plan EIR would be delayed until after the adoption of the revised thresholds. It is currently anticipated that the State would adopt revised guidelines in the Spring of 2015, which would result in an anticipated General Plan EIR adoption by the City Council in December 2105. This would ensure consistency with

future State law but would result in an approximate one-year delay in adopting the General Plan.

Option Two: Conduct the Traffic Study of the EIR based on Existing Performance measures

In this second option, staff would immediately complete the traffic study of the General Plan EIR based on the City's existing metrics and thresholds (excluding street segment analysis, which is a measure of project level impacts, not program level such as General Plan land use). Under this scenario, it is anticipated that the General Plan update would be adopted prior to December 31, 2014. Once the State adopts revised CEQA guidelines, staff would take the necessary steps, if any, needed to amend the City's transportation performance measures and CEQA thresholds of significance for consistency with State law, including the required CEQA documentation.

Option Three: Finalize and Use the Proposed Performance Measures

In this third option, staff would continue to pursue revisions to performance measures along the current course. Performance measures recommended by staff and supported by TAC are attached as Attachment 1. As currently scheduled, staff would bring the issue back to the Planning Commission on July 23<sup>rd</sup>, albeit, at this point, without the benefit of the State's revised guidelines. Depending on how long the adoption process takes, the updated General Plan would likely be adopted in early 2015. If additional meetings by the Planning Commission or City Council are required to complete the adoption of the proposed performance measures, the General Plan adoption would more likely be Spring of 2015. Subsequently, upon adoption of revised guidelines by the State, staff would take the necessary steps needed, if any, to amend the performance measures for consistency with State law and undertake the appropriate CEQA process, which would most likely result in an Addendum, Subsequent or Supplemental EIR.

Staff is recommending Option Three as this will allow for the EIR to be based on transportation measures and thresholds that are reflective of the draft policies that have been adopted by City Council, with the support of the community, Commissions and Council. Advancing a vision for Pasadena that offers alternatives to motor vehicles and a walkable, pedestrian friendly environment is an important consideration, irrespective of the ultimate revisions to the State's Guidelines.

Staff is further recommending Option 3 as it would allow for an alignment of the City's environmental review process with the type of development envisioned by the City's updated General Plan Land Use and Mobility Elements. Each new project would still be evaluated under CEQA Guidelines, but the proposed transportation measures would help to attract the type and scale of projects that the City is interested in attracting.

**NEXT STEPS:**



## City of Pasadena Transportation Planning Memorandum

**DATE:** July 18, 2014

**TO:** Mayor & City Council  
Planning Commission  
Department of Transportation

**FROM:** Vince Farhat, Planning Commissioner

**RE:** NEW TRANSPORTATION PERFORMANCE MEASURES FOR TRANSPORTATION  
IMPACT ANALYSIS AND THRESHOLDS FOR CEQA

### INTRODUCTION:

The City of Pasadena Department of Transportation (DOT) wants to revise Pasadena's traffic impact guidelines as part of the General Plan update. DOT is to be commended for recommending three new traffic metrics that embrace Pasadena's vision of bike-friendly, pedestrian-friendly, and environmentally sustainable "smart growth".<sup>1</sup> As Pasadena transitions to smart growth planning, however, the City Council should not ignore the reality that automobiles remain a primary mode of transportation for many Pasadena residents and visitors to our City. Therefore, the City should enact DOT's three proposed new metrics in combination with more traditional vehicle traffic measures aimed at achieving better traffic flow on our streets.

In addition to adopting DOT's three new smart growth metrics, the City Council should retain "Street Segment" analysis in Pasadena's traffic impact guidelines for the review of future development projects. Street Segment analysis is an important tool in providing public notice of potential traffic impacts. Street Segment helps assess traffic volume growth impacts and potentially traffic safety issues.

DOT wants to move forward now with adopting new "vehicle miles traveled" and "vehicle trips" performance metrics as alternatives to more traditional "level of service" traffic measures. But the recent California state law that inspired this change (SB 743) is still being debated and the State is not expected to finalize the implementing guidelines until next year. The City should delay adoption of these proposed metrics until the State finalizes the new guidelines. This would give DOT time to develop additional implementation case studies, and afford the City the opportunity to conduct an independent analysis of the potential economic impacts of downtown traffic gridlock that could result from these proposals.

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<sup>1</sup> The following three new performance metrics will better measure non-auto mobility impacts for future development: (1) Proximity and Quality of Bicycle Network; (2) Proximity and Quality of Transit Network; and (3) Pedestrian Accessibility.

**BACKGROUND:**

On July 23, 2014, the City of Pasadena Planning Commission will review and comment on proposed new mobility performance measures for transportation impact analysis and thresholds for California Environmental Quality Act (CEQA) analysis (hereinafter "Proposed Mobility Measures"). The Proposed Mobility Measures are being considered as part of the ongoing update of the City of Pasadena General Plan.<sup>2</sup>

The City of Pasadena has a tradition of progressive transportation planning that encourages public transportation, promotes walking and biking, and protects residential neighborhoods from traffic, noise, and pollution. Our General Plan is "aspirational" in promoting long-term policies that encourage non-auto travel and "smart growth" principles. But the City's public transportation system is not yet at a point where the majority of Pasadena residents can easily get around town without a car. The automobile remains, for better or worse, a primary mode of transportation in Pasadena.

In updating the General Plan, City Hall should adopt mobility performance measures that reflect both Pasadena's enthusiastic smart growth spirit and the reality of vehicle traffic. Traffic studies for the General Plan update and future real estate development projects should be accurate, robust, and reflect both our aspirational values and on-the-ground realities. Accordingly, DOT should adopt progressive, non-auto mobility performance metrics in combination with more traditional auto metrics that evaluate potential traffic impacts for future development. Only by employing a balanced and inclusive system can we adequately and responsibly address our City's layered needs.

**RECOMMENDATIONS:**

During Pasadena's transition to becoming a truly "green" community, City Hall should adopt new mobility performance measures that strike a careful balance between the use of environmentally-friendly smart growth metrics and traditional vehicle metrics geared toward

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<sup>2</sup> Staff originally informed the Planning Commission that DOT would present the Proposed Mobility Measures to the City Council after the Commission's July 23 meeting. However, yesterday the City posted a joint Planning Department / DOT staff report for the City Council's July 21, 2014 meeting. In that report, DOT recommends the City Council finalize and use the Proposed Mobility Measures at the July 21 meeting. The City Council should delay consideration of this issue until after the Planning Commission makes a recommendation at its July 23 meeting. If not, the City Council should direct DOT to use the existing transportation performance measures for the General Plan EIR.

achieving acceptable traffic flow on our streets. In striking this balance, we should do the following:

- The City Council should adopt DOT's three new proposed performance metrics that measure non-auto transportation impacts. DOT should be applauded for their creativity in developing these forward-thinking smart growth mobility measures.
- DOT should modify the proposed "per capita" Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) performance metrics to make them more meaningful to the public and policymakers. Instead of measuring VMT and VT per capita across the entire City, for example, DOT could measure a project's traffic impacts per capita over a smaller geographic area surrounding the project.
- At a minimum, DOT should re-run their "case studies" using modified VMT and VT metrics before the City Council makes any final decision on the use of these measures.
- The City Council should retain Street Segment analysis for CEQA review of the General Plan and individual development projects. All development projects and all streets should be analyzed under this metric.
- While keeping Street Segments as a CEQA metric, DOT and the Planning Commission should undertake a review of current impact thresholds with the goal of proposing a selective modification to the Street Segment metric that addresses the concern that the current thresholds are overly-sensitive.
- DOT's proposal to affirmatively accept traffic "failure" as Pasadena's new traffic standard<sup>3</sup> violates the General Plan's objectives and policies of promoting a livable and economically strong community, protecting neighborhoods, and managing multimodal corridors.
- We should re-commit ourselves to these General Plan principles by rejecting the idea that Pasadena should settle for traffic "failure" within TOD areas and the Central District.
- At a minimum, the City should conduct a rigorous and independent analysis of the potential economic impacts of "failure" traffic conditions before accepting the premise that "planning for gridlock" is an acceptable public policy.

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<sup>3</sup> See DOT Staff Report dated June 25, 2014, p. 6; see also DOT Staff Report dated June 11, 2014, p. 5 at Table 1 ("Up to and including LOS will be accepted inside designated HPA"); *Id.*, p. 7 (LOS F would not be a significant impact).

- We should not use recent (and still evolving) changes in California CEQA law as an excuse to abandon realistic and balanced traffic planning. The potential impacts of SB 743 are far from clear, and the State is not expected to finalize new CEQA guidelines for at least another year.
- The City Council should delay implementation of VMT and VT metrics until the State finalizes the new CEQA guidelines. This would give City staff time to develop additional VMT/VT case studies, and to conduct an independent analysis of the potential economic impacts of Central District traffic gridlock.

#### **PROPOSED NON-AUTO MOBILITY PERFORMANCE MEASURES:**

On April 9, 2014, DOT first presented the Proposed Mobility Measures to the Planning Commission. As part of its proposal, DOT wants to add three new performance metrics to better measure non-auto transportation impacts: Proximity and Quality of Bicycle Network; Proximity and Quality of Transit Network; and Pedestrian Accessibility.<sup>4</sup>

The City Council should immediately adopt these new non-auto performance metrics. These non-auto performance metrics are an important and necessary step forward in achieving our goal of making it easier for people to get around town without a car. However, current reality is such that we must deal not only with what we wish, but what is.

#### **OTHER PROPOSED MOBILITY PERFORMANCE MEASURES:**

In addition to the new non-auto performance metrics, DOT proposes to adopt “per capita” VMT and VT performance measures for new automobile trips within Pasadena’s citywide traffic model.<sup>5</sup> DOT also wants to eliminate Pasadena’s existing “Street Segment” traffic analysis from CEQA consideration.<sup>6</sup> Finally, DOT seeks to adopt a new City policy that vehicle Level of Service (LOS) ratings of “F” (failure) are acceptable within the City’s Transit Oriented Development (TOD) areas.<sup>7</sup>

DOT contends the proposed VMT, VT and diminished LOS performance measures, together with the elimination of Street Segment CEQA analysis, are consistent with the objectives and

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<sup>4</sup> See DOT Staff Report dated June 11, 2014, p. 5 (summary table) and pp. 7-9 (narrative description of Proposed Mobility Measures).

<sup>5</sup> *Id.*, at p. 6

<sup>6</sup> See DOT Staff Report dated June 25, 2014, p. 3 (summary table) and pp. 5-6.

<sup>7</sup> *Id.* In addition to VMT, VT and LOS, DOT has proposed a Corridor Travel Time General Plan performance metric that would use the Dynamic Traffic Assignment (DTA) model to forecast auto travel times for significant arterial streets. See DOT Staff Report dated June 11, 2014, pp. 8-9.

policies in the draft update to Pasadena's General Plan.<sup>8</sup> As shown below, however, these proposals disregard important General Plan principles by "planning for gridlock" in the Central District and Playhouse District. Planning for downtown Pasadena traffic gridlock would be bad for business, the environment, and neighborhood quality of life.

**A. The Proposed VMT and VT "Per Capita" Performance Measures are Illusory**

The VMT Per Capita measure sums the miles traveled for trips within DOT's citywide traffic model. The Citywide VMT is then divided by the City's total service population (population plus the number of jobs) per capita.<sup>9</sup> The VT Per Capita metric measures motor vehicle trips associated with the City by summing trips with origins and destinations within Pasadena as generated by the citywide traffic model.<sup>10</sup> Therefore, VMT and VT would measure a real estate development project's potential traffic impacts on a per person basis across the entire City.

Tellingly, none of the projects studied by DOT in their staff report "case studies" had significant traffic impacts under the VMT and VT Per Capita performance measures. This should come as no surprise given that a project's traffic impacts would be so diluted that this would be reflected as less than a mere "drop" in the citywide traffic "bucket". Indeed, DOT staff conceded at the June 11, 2014 Planning Commission meeting that it would be almost impossible for a single project to trigger the impact thresholds under citywide per capita parameters.

The proposed VMT and VT Per Capita metrics are illusory. They would result in virtually every future project getting a "free pass" from CEQA traffic analysis and mitigation. Future project environmental impact reports (EIRs) would effectively skip meaningful public traffic review since it would be virtually impossible for individual projects to trigger VMT and VT thresholds. The transportation "experts" would tell Pasadena residents time and again that large development projects do not create "significant" traffic impacts for adjacent residential and commercial neighborhoods. But it would strain common sense to say that large projects, even those adjacent to transit, have no significant traffic impacts.

To have any credibility, the proposed VMT and VT performance metrics should be modified to make them more meaningful to the public and policymakers. Instead of measuring VMT and VT per capita across the entire City, DOT should measure a project's traffic impacts per capita over a smaller geographic area surrounding the project. One approach would be to measure the per capita traffic impacts within a quarter- or half-mile radius of the proposed project. At a

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<sup>8</sup> DOT Staff Report dated June 25, 2014, p. 1-2 (new performance measures developed to "better align" how DOT determines transportation impacts with the proposed General Plan Land Use and Mobility Element objectives and policies).

<sup>9</sup> DOT Staff Report dated June 11, 2014, p 6.

<sup>10</sup> *Id.*

minimum, before the Planning Commission makes a recommendation, DOT should re-run their three case studies using such modified VMT and VT metrics.

**B. Street Segments Should Be Retained in CEQA Analysis**

DOT has traditionally focused on promoting smart growth and enhancing neighborhood quality of life. Toward that end, the General Plan Mobility Element built upon the foundation of the 1994 General Plan in adopting important neighborhood protection principles for transportation planning. These principles include “de-emphasized” streets<sup>11</sup>, Neighborhood Traffic Management Programs (NTMP),<sup>12</sup> and “Street Segment” traffic analysis for CEQA review of proposed development projects.<sup>13</sup>

The Street Segment metric studies the amount of new auto trips a development project will add to adjacent streets.<sup>14</sup> It is a sensitive traffic performance metric with a low impact threshold that identifies changes to vehicle volumes on all streets, including residential streets.<sup>15</sup>

DOT originally sought to eliminate Street Segment analysis altogether.<sup>16</sup> On June 25, 2014, in response to comments from Planning Commissioners, DOT revised its position and proposed that a modified type of Street Segment analysis be utilized in connection with project-specific neighborhood protection programs.<sup>17</sup> However, DOT wants to exclude Street Segments from CEQA analysis for both the General Plan update and future development projects.<sup>18</sup> In addition, DOT proposes to exempt multifamily residential projects from Street Segment analysis and wants to limit such analysis to only “access” and “neighborhood connector” streets.<sup>19</sup>

DOT acknowledges that the current Street Segment metric identifies changes to vehicle volumes on all streets, but contends that the metric is not consistent with the land use

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<sup>11</sup> See 2004 General Plan Mobility Element § 4.1.3.1

<sup>12</sup> *Id.* § 3.2.3

<sup>13</sup> See DOT Staff Report dated June 11, 2014, p. 9.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> See DOT Staff Report dated April 9, 2014, pp. 2-4 (describing new performance measures without any reference to Street Segments); DOT Staff Report dated June 11, 2014, pp. 9-10 (describing purported disadvantages of Street Segment analysis).

<sup>17</sup> See DOT Staff Report dated June 25, 2014, p. 5 & Attachment 4.

<sup>18</sup> *Id.*

<sup>19</sup> June 25 Report, Attachment 4. DOT also seeks to revise the impact threshold that would require neighborhood traffic calming measures. As discussed below, I agree the current impact threshold should be revised, but would defer that topic to upcoming Planning Commission meetings.

densities identified in the General Plan, that auto trips associated with some residential projects are not *per se* cut-through traffic, and that sometimes Street Segment traffic impacts cannot be mitigated.<sup>20</sup> During public comment at a recent Planning Commission meeting, a local architect argued for the elimination of Street Segment analysis because the metric sometimes triggers EIRs for otherwise compliant development projects and such EIRs are an “unreasonable burden” for infill development.<sup>21</sup> But it is precisely for infill development that this measurement is of great value, since built-up areas may be most affected from an increased traffic burden.

Experience has taught us that Street Segment analysis is an important tool in the CEQA process to give public notice of potential traffic impacts. Street Segment analysis has been appropriately applied to both large projects such as Westgate and smaller, neighborhood-oriented projects such as Desiderio. It is not an “unreasonable burden” to require Street Segment traffic analysis for important projects of citywide significance in a community such as Pasadena that is committed to sustainable development and neighborhood protection. Street Segment analysis is an important tool in assessing traffic volume growth impacts, and potentially also a valuable tool to ensure traffic safety. Bikers and walkers can look to Street Segment traffic impacts to help understand a project’s potential impacts on their activities.

DOT’s argument that some Street Segment impacts cannot be mitigated is a red-herring. Numerous development projects have been approved by the City Council through Statements of Overriding Consideration as permitted by CEQA. If the Council determines that the benefits of a project outweigh the traffic impacts, the Council can certify the final EIR and the project will go forward. Without Street Segment analysis, however, the public and policymakers will lose a critical insight into the potential and collateral traffic impacts of future development.

The City should not limit Street Segment analysis to only two types of streets; potential traffic impacts on all streets, including commercial corridors, should be evaluated. Nor should DOT exclude multifamily residential projects from Street Segment analysis. Multifamily and mixed-use development incorporating housing constitutes a very large percentage of recent and currently-proposed development projects. “Carving-out” multifamily residential from General Plan and project-specific analysis would undercut the public’s and policymaker’s ability to measure and evaluate citywide traffic impacts during the CEQA process.

The City should retain Street Segment analysis in Pasadena’s Traffic Impact Guidelines for CEQA review of the General Plan and individual development projects. All development projects and all streets should be analyzed under this metric. However, DOT and the Planning Commission should undertake a review of current impact thresholds with the goal of proposing a selective

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<sup>20</sup> See DOT Staff Report dated June 25, 2014, p. 10 & Attachment 1.

<sup>21</sup> June 11, 2014 Planning Commission meeting, MP4 Audio File, at 1:21:04 - 1:25:02, accessible at [http://cityofpasadena.net/Media/Commission\\_Meetings/](http://cityofpasadena.net/Media/Commission_Meetings/).

modification to the Street Segment metric that addresses the legitimate concerns expressed by staff and the business community that the current thresholds are overly-sensitive.

**C. Planning for Traffic Failure and Gridlock is Bad Public Policy**

DOT seeks to modify the current vehicle LOS performance metric to incorporate the definitions contained in the Transportation Research Board's *Highway Capacity Manual (HCM) 2010* and to eliminate LOS thresholds for the City's TOD areas.<sup>22</sup> In addition, DOT wants to adopt a new City policy that vehicle LOS ratings of "F" (failure) are acceptable within TOD areas.<sup>23</sup> Together with eliminating Street Segment CEQA analysis and the illusory VMT/VT Per Capita metrics, all meaningful impacts are effectively diluted and rendered insignificant. DOT's embrace of "failure" traffic conditions amounts to an endorsement of traffic "gridlock" in downtown Pasadena. With these proposed policies, DOT is literally "planning for gridlock".

Although some limits to LOS will be necessary to comply with recent changes in state law<sup>24</sup>, planning for downtown traffic gridlock would be indefensible public policy. Endorsing "failure" traffic conditions would be bad for Pasadena business, and detrimental to the environment and neighborhood quality of life.

**1. Endorsing "Failure" Would be Bad for Pasadena Business**

Extreme traffic gridlock would be bad for business. One does not need to be a traffic engineer to know that gridlocked traffic conditions would deter some Pasadena residents living outside the Central District from coming downtown to shop and eat. Gridlocked traffic also would discourage out of town customers from patronizing businesses located in the Central District. Notably, DOT has done no analysis of the potential negative economic impacts of gridlocked traffic conditions in the Central District.

Some publically-available research studies have concluded that increased traffic congestion can have negative economic impacts. For example, a study by economist Kent Hymel appeared in

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<sup>22</sup> See DOT Staff Reports dated June 11 and June 25, 2014. I have no objection to adopting the HCM 2010 LOS definitions.

<sup>23</sup> June 25, 2014 Staff Report, p. 6; *see also* DOT Staff Report dated June 11, 2014, p. 5 at Table 1 ("Up to and including LOS will be accepted inside designated HPA"); *Id.*, p. 7 (LOS F would not be a significant impact).

<sup>24</sup> On September 27, 2013, Governor Brown signed Senate Bill (SB) 743. Among other things, SB 743 creates a process to change analysis of transportation impacts under CEQA. SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the State's CEQA Guidelines shifting the focus of transportation analysis away from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses. See DOT Staff Report dated April 9, 2014, pp. 4-5 & Attachment 1.



the *Journal of Urban Economics* which linked traffic congestion to slower employment growth.<sup>25</sup> Hymel examined traffic congestion and employment growth in 85 metropolitan areas between 1990 and 2003 and found evidence of rising regional traffic congestion depressing employment growth. According to Hymel, a 50 percent reduction in congestion could boost employment by 10 to 30 percent in America's top 10 most congested cities. For Los Angeles, the most congested city in the U.S. in several measures according to the Texas Transportation Institute, a 10 percent increase in regional congestion reduced employment growth by 4 percent, according to Hymel's estimates. Hymel writes, "congestion has a broad negative impact on economic growth."<sup>26</sup>

Admittedly, traffic congestion's localized impacts may not be as negative for certain types of neighborhoods. The actual economic impacts of traffic congestion can differ by metropolitan area, depending on its economic profile and business location pattern.<sup>27</sup> One of the keys is analyzing the difference between regional "through traffic" and localized congestion in a specific community. On the block level, congestion may be a sign of economic success, but the congestion itself still inhibits mobility and circulation; congestion still has a negative impact.<sup>28</sup> In light of the complexity of these issues, the City Council should insist that the Planning Department conduct a **rigorous and independent economic analysis** of the potential impacts of Central District traffic conditions before accepting the premise that "planning for gridlock" is an acceptable public policy.

With respect to the debate over recent changes in CEQA law, we should not use SB 743 as an excuse to abandon realistic and balanced traffic planning. First, SB 743 was intended primarily to benefit moneyed special interests, not local businesses and residents.<sup>29</sup> Second, local cities

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<sup>25</sup> See Staley, *Traffic Congestion and the Economic Decline of Cities*, Reason Foundation (2012) (discussing Hymel's research).

<sup>26</sup> *Id.*

<sup>27</sup> Weisbrod, Vary & Treyz, *Measuring the Economic Costs of Urban Traffic Congestion to Business*, Transportation Research Board Annual Meeting (2003) at p. 11.

<sup>28</sup> See Samuel R. Staley, Ph.D., *Traffic Congestion and the Economic Decline of Cities: How Traffic is Costing People Jobs and Stifling Economic Growth*, Reason Foundation (January 2012).

<sup>29</sup> SB 743 was the "brainchild" of California State Senator Darrell Steinberg (D-Sacramento). Senator Steinberg's primary objective was to deliver on a promise to NBA Commissioner David Stern to streamline approval of the Sacramento Kings arena project. See <http://www.highbeam.com/doc/1G1-344041341.html>. "[W]hile many will be disappointed that SB 743 does not completely overhaul CEQA, certain project proponents will benefit tremendously from the new rules." *Id.* Notably, not a single environmental group backed AB 743. During the Legislature's consideration of AB 743, "the leader of one environmental group wrote in a personal email, 'By cherry-picking one provision, LOS, underserved communities are again getting the short end of the stick in order for wealthy NBA owners to have an easier time

such as Pasadena still retain considerable discretion under SB 743 to set parameters for CEQA metrics.<sup>30</sup> Third, many of the criticisms of LOS underlying the changes in SB 743 simply do not apply to Pasadena. For example, critics of LOS contend it promotes auto-centric planning policies such as street widening, but our City has a firm policy **against** street widening. Critics of LOS also often assume the availability robust non-auto transit modes, but our City's public transportation system is not yet at a point where most residents can easily get around town without a car. Therefore, Commissioners and City Councilmembers should reject the argument that SB 743 compels us to "plan for gridlock".

In any event, the potential impacts of SB 743 are far from clear, and the State is not expected to finalize new CEQA guidelines for at least another year. If Commissioners and City staff cannot reach consensus quickly, the City Council should delay implementation of VMT and VT metrics until the State finalizes the new CEQA guidelines. This would give City staff the time to develop additional VMT/VT case studies, and to conduct an economic analysis of the potential impacts of Central District traffic gridlock.

## **2. Endorsing "Failure" Would be Detrimental to the Environment and Neighborhood Quality of Life**

Traffic gridlock is bad for the environment. It is undisputed that trucks and automobiles emit more pollution when they are idling in stopped traffic. Gridlocked traffic conditions would therefore add to pollution and increase greenhouse gases.<sup>31</sup> It is documented that five minutes of idling per day/per vehicle emits 220 lbs. of carbon dioxide per year.<sup>32</sup> Are we ready to add to our environmental particulate and toxic gas burden by increasing idling autos on our streets that will emit additional pollution into our air? Will this not also be detrimental to pedestrians and bicycle riders as well?

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building a stadium." <http://www.santamonicanext.org/ceqa-reform-passes-senate-for-los-basketball-team/> .

<sup>30</sup> See The Atlantic Citylab ("There will be room for technical derivatives—say, VMT per capita for a residential building, or VMT per employee for an office—and ultimately local governments set the precise parameters for CEQA metrics. In other words, cities themselves decide how many vehicle miles constitute a project failure. But if the current direction holds, a new CEQA metric with VMT at its core will be adopted sometime in 2015."), <http://www.citylab.com/commute/2014/07/transit-projects-are-about-to-get-much-much-easier-in-california/374049/>.

<sup>31</sup> *Attention drivers! Turn off your idling engines: Reducing vehicle idling will cut pollution and save you money*, <http://www.edf.org/transportation/reports/idling>.

<sup>32</sup> See *Idling Vehicle Emissions for Passenger Cars, Light-Duty Trucks, and Heavy-Duty Trucks*, U.S. Environmental Protection Agency Office of Transportation and Air Quality, EPA420-F-08-025 (October 2008).

Traffic gridlock is bad for neighborhood quality of life. Vehicle traffic is like water; it follows the path of least resistance. Gridlocked traffic conditions in the Central District and Playhouse District would have negative “spillover” impacts as drivers cut-through adjacent residential neighborhoods in order to avoid clogged downtown streets. Protecting residential neighborhoods from spillover traffic intrusion is a core principle of our General Plan.<sup>33</sup>

Not only is planning for gridlock bad public policy, it flouts well-documented community concerns about traffic and overdevelopment. During the General Plan Update outreach process, City staff heard from approximately 3,000 residents from across Pasadena. Staff notes reflect that “one of the greatest concerns for the community is centered around growth and density of future development and the potential impacts it could have on existing community character.”<sup>34</sup> Indeed, the largest contingent of residents who participated in the General Plan outreach process were very critical of recent trends in Pasadena traffic and development:

The largest number of comments, nearly half of those recorded, stated that the City was too dense already and was suffering from negative impacts such as traffic congestion, loss of open space and views, loss of small-town character and problems with air quality and noise. Participants frequently used the term “over developed” and often said they thought there were too many condominium and apartment buildings. Some went so far as to say there should be a moratorium on new development.<sup>35</sup>

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<sup>33</sup> See 2004 General Plan Mobility Element §3.2.3 (recognizing the need to address traffic safety within residential neighborhoods, the City Council “approved measures to protect neighborhoods from traffic intrusion. A significant concern of residents regarding local neighborhood streets is the volume of traffic, the speed of traffic, noise impacts and on-street parking impacts, and impacts of truck traffic of large construction projects.”); *see also* Mobility Element Policy 3.1 (“Make the most efficient use of major corridors and discourage auto and truck traffic from using local streets to bypass congested inter-sections. Review new development along multimodal corridors to eliminate or minimize the intrusion of traffic from these projects.”); Mobility Element Policy 3.11 (“Recognize designated de-emphasized streets as routes where efforts will be made to limit increases in travel. Measures that would increase traffic in these streets will not be planned or implemented.”); General Plan Policy 3.12 (“Cooperatively develop and implement pro-grams developed for designated de-emphasized streets to control future increases in traffic volumes.”).

<sup>34</sup> General Plan Update Outreach Summary Report, Part II: Most Frequently Heard Themes (May 2010).

<sup>35</sup> *Id.* Admittedly, there were a range of comments on these issues and the views of some Central District residents may have been underrepresented during the outreach process. Nevertheless, it is beyond dispute that the largest number of comments stated that Pasadena was suffering from negative impacts such as traffic congestion.

I support balanced and thoughtful development, and do not believe that a moratorium on new development would be appropriate. However, documented community concerns about traffic and overdevelopment should be consequential factors in developing mobility performance metrics for future development. Residents' concerns about traffic are part of the community context for the General Plan update. "Planning for gridlock" would patently discount those who took the time during the outreach process to voice strong concerns about traffic and overdevelopment in the Central District.

The proposal to accept traffic "failure" violates the General Plan's objectives and policies of promoting a livable and economically strong community, protecting neighborhoods, and managing multimodal corridors.<sup>36</sup> We should re-commit ourselves to these principles by rejecting the idea that Pasadena should settle for "failure" within TOD areas.

**CONCLUSION:**

The City should adopt forward-looking non-auto mobility performance metrics in combination with more traditional auto metrics that evaluate potential traffic impacts for future development. Moreover, City Hall should reject the false premise that rigorous traffic studies are an impediment to economic growth and development. Robust economic growth and neighborhood quality of life go together to make Pasadena a great place to live, work and play. Toward these ends, we should adopt new mobility performance measures that reflect our smart growth needs and aspirations, and the current reality of auto traffic. I look forward to working with my Planning Commission colleagues and DOT to make this happen.

Respectfully Submitted,

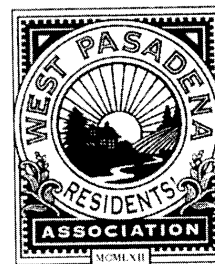
VINCE FARHAT

At-Large Commissioner  
City of Pasadena Planning Commission

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<sup>36</sup> See 2004 General Plan Mobility Element § 3.2 (Objectives & Policies).

July 20, 2014



To (via email): Pasadena Mayor and City Council  
Pasadena Department of Transportation  
Pasadena Planning Commission

Re: Revised Recommendations Related to the Pasadena  
Department of Transportation (PasDOT) Proposed New Traffic  
Metrics

Dear Mayor, Councilmembers, Commissioners and Staff:

On behalf of the West Pasadena Residents' Association (WPRA), I would like to commend PasDOT staff on efforts to update Pasadena transportation measures to reflect both anticipated state measures as well as Pasadena's efforts to become a green, multi-modal transportation city.

In response to the original proposed PasDOT transportation measures dated June 11, 2014 (Reference 1), the WPRA documented a list of recommendations and questions (Attachment 2). Since then, further changes have been proposed by PasDOT in a memo dated June 25, 2014 (Reference 2) and in a presentation to the Pasadena Planning Commission on June 25, 2014. This memo is to document our recommendations and concerns regarding these modified measures.

**1. We strongly recommend that the city delay the adoption of new metrics at this time.** Reasons include:

- a. At the June 25, 2014 Planning Commission Meeting, it was revealed that the Governor's Office of Planning and Research (OPR) will be proposing new state transportation measures in the near future. These new measures are controversial and will be subject to review and iteration. It is anticipated that final state measures will not be approved until sometime in 2015. PasDOT stated that it was proposing new transportation measures at this time to 'get out in front of these changes.' We believe that anticipating the final state measures are speculative and that new Pasadena measures, if adopted in the immediate future, will likely require modifications within a year.
- b. Once new state measures are approved and understood, we believe that Pasadena should evaluate what flexibility it has within state law to achieve our own unique transportation objectives. Only then can resident stakeholders have a meaningful discussion on what measures should be proposed and their potential impacts.

**2. In the interim, we strongly recommend that the city use PasDOT's currently approved transportation measures for the purpose of evaluating the General Plan.** Using a new set of measures that are likely to change within a year will lead to confusion and controversy.

**3. If the City Council is compelled to adopt new transportation measures immediately, then WPRA does not support PasDOT's currently proposed plan** for the following reasons:

a) *There are too many unanswered questions, both in the impacts of the PasDOT de-emphasized automobile approach, and in the parameterization, sensitivity and usefulness of several of the proposed metrics.*

These questions are both extensive and vital to the well-being of our neighborhoods and economy. We have provided a list of key questions in Attachment 1.

b) *PasDOT's approach, which largely ignores automobiles as an environmental impact, is premature given that the city's goal of providing an efficient public transportation network has not yet been fully realized.*

The purpose of the de-emphasized automobile measure approach is to reduce greenhouse gas emissions. However, this can only be achieved if alternate modes of transportation (e.g. walking, bicycles, or mass transit) are readily available to most city neighborhoods, employees, visitors and commercial centers; otherwise, adding automobile congestion to city streets will lead to gridlock and increased emissions. To our knowledge there has been no assessment on the impact to Pasadena's neighborhoods or economy if these new measures are enacted before significant progress has been made toward a comprehensive, green, public transportation system.

We urge you to also consider these additional specific comments on proposed transportation metrics:

- As stated previously (See Attachment 2), we support PasDOT's addition of transportation measures to reflect the city's goal of multi-modal transportation, e.g. adding measures for Proximity and Quality of the Bicycle Network, Proximity and Quality of the Transit Network and Pedestrian Accessibility.
- As stated previously (See Attachment 2), we continue to believe that Street Segment Analysis is an important tool in assessing traffic volume growth impacts and recommend that it be retained as a California Environmental Quality Act (CEQA) criteria. Furthermore, if Street Segment Analysis is for 'Neighborhood Protection' as stated, then Connector Streets must be included in this Analysis, since these streets are also in neighborhoods. We agree with PasDOT's approach to amending current Street Segment thresholds to sensibly resolve issues related to current Average Daily Traffic (ADT).
- We cannot support a plan that lowers the impact threshold for auto Level of Service (LOS) to F as a general policy. While we understand that traffic

impacts cannot always be mitigated, we believe that projects with significant traffic volume impacts should still be fully analyzed and approved on a one-by-one basis.

- We are receptive to adding new measures for Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) provided responses are provided to the questions cited in Appendix B, and these measures are demonstrated to have real value.

We also look forward to PasDOT's response as to why traffic models only consider one intersection on Orange Grove Boulevard, when this is clearly a major north/south artery for west Pasadena. We believe that traffic on Orange Grove Boulevard will be directly impacted by many large projects currently under consideration, such as the extension of the 710 Freeway and new events at the Rose Bowl (e.g. the National Football League and a large 3-day music festival).

In conclusion, while we support PasDOT's efforts to update the city's transportation measures, we believe the proposed measures are premature and do not allow for a realistic transition from today's transportation needs to our city's goal toward green transportation.

**We strongly urge you to find a way to balance our City's need to be environmentally proactive while ensuring reasonable traffic flows on our streets.**

Sincerely,



Geoffrey Baum  
President, West Pasadena Residents' Association

Attachments:

- 1 WPRAs Questions Regarding PasDOT's Proposed Transportation Measures
- 2 Recommendations Related to the Memorandum 'New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQA,' Geoffrey Baum on behalf of the WPRAs. June 11, 2014.

References:

- 1 New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for California Environmental Quality Act (CEQA), Fred Dock, June 11, 2014.
- 2 New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQA, Fred Dock, June 25, 2014.
- 3 Preliminary Evaluation of Alternative Methods of Transportation Analysis, Governor's Office of Planning and Research (OPR), December 30, 2013.

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**Attachment 1:**  
**WPRA Questions Regarding PasDOT's Proposed Transportation Measures**

- What are the similarities and differences between the proposed PasDOT transportation measures and thresholds, the current PasDOT transportation metrics and thresholds, the requirements of SB 743, and the regulations and proposed metrics from the Governor's Office of Planning and Research (OPR)?
- What is the current mode split in Pasadena? What is the anticipated mode split resulting from enactment of the proposed transportation performance measures, and how does it compare to the assumptions in the General Plan?
- Pasadena's business, social, recreational, service, residential, entertainment and other lifestyle elements depend on a certain level of people, goods and services moving into, out of, within and through Pasadena daily. Most of that movement takes place today via privately owned motor vehicles. The proposed new transportation performance measures de-emphasize motor vehicle movement and place more emphasis on alternative modes such as transit, cycling and walking. These are appropriate policy goals, but has there been any analysis of whether alternative modes can be expected to maintain the movement of people, goods and services? What are the affects on the City and its residents if they cannot? For example, what is the affect on Pasadena's businesses and economy? What is the affect on significant regional attractors such as Old Pasadena, Lake Avenue and the Huntington Hospital area? What is the impact to seniors and the disabled who are unable to walk long distances or bicycle?
- If a primary goal is to reduce driving, what would be the result of reduced regional travel to Pasadena (because transit does not serve Pasadena from many areas) and the impact of reduced parking revenues, especially in Old Pasadena where parking revenues provide critical financial support?
- It appears that any level of traffic congestion up to and including Level of Service (LOS) F in certain areas and LOS D citywide, would be deemed acceptable. Has there been any analysis of the effect of this congestion on bus transit, goods movement and emergency services?
- What would be the effect of traffic diversion to neighborhood streets resulting from LOS F traffic conditions on major streets and intersections? Are there any proposed mitigations?
- Why are residential projects exempt from Street Segment Analysis? Won't large residential projects generate traffic on neighborhood streets like other developments? Are mixed-use projects also exempt?
- The June 11, 2014 PasDOT memo (Reference 1, page 6) states that "...the City can reduce VMT on a per-capita basis with land use policies that help Pasadena residents meet their daily needs *within a short distance of home...* (emphasis added). If the effect of land use policies is within a small area, why is PasDOT proposing to measure VMT impact on a city-wide per-capita basis, where the percentage impact of virtually any project is minimal? (The same question applies to VT.) Why not measure local impacts locally, where they

actually happen?

- In Reference 3, OPR suggests that VMT/VT should be calculated 'per capita' for residential areas, 'per employee' for employment centers and 'per trip' for commercial centers. Why is all of Pasadena classified as residential? What is the effect of this classification given that it is also an employment center and has commercial activities?
- How might the VMT and VT measures be made more sensitive and meaningful? What is the affect if VMT and VT are calculated over a smaller area? What is the affect if VMT and VT are calculated over areas with higher or lower density populations?
- Other agencies have commented that changes in VMT are difficult to calculate accurately, as it typically requires a four-step travel demand model that accounts for trip generation, trip distribution, mode choice and traffic assignment, and also needs to be combined with the Air Resources Board's air quality model (OCTA, 2/14/14). Can PasDOT assure the ability to accurately calculate VMT if it is to be a prime impact criteria, and can it do so at the local level as well as City-wide?
- In the PasDOT June 11, 2014 memo (Reference 1, page 8), it is stated that "The City can improve the measures of Transit Proximity and Quality by reducing headways on existing transit routes, by expanding routes to cover new areas... How can the City assure this outcome, since it does not control most of the transit service in the City?
- Both the PasDOT June 11, 2014 and June 25, 2014 memos (Reference 1 and 2) refer to Proximity and Quality of Bicycle Network and Proximity and Quality of Transit Network as impact threshold criteria. What capacity do those levels of bicycle and transit service provide, and how much motor vehicle travel would they replace? Why is a quarter-mile radius proposed here as opposed to the half-mile radius recommended for High Pedestrian Impact Areas and Transit Oriented Districts?
- What kinds and service levels of transit - regional, rapid-bus, local, circulator, etc. - are assumed in the Proximity and Quality of Transit Network criteria? Will the actual impact of transit usage be estimated in project proposal evaluations? Or will the city merely "check the box" and determine that services are available?

## Attachment 2



June 23, 2014

To (via email): Fred Dock, Director, Pasadena Department of Transportation  
Mark Yamarone, Case Manager, Department of Transportation

Subject: Recommendations Related to the Memorandum 'New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQ', June 11, 2014

Dear Mr. Dock and Mr. Yamarone,

The West Pasadena Residents Association Board of Directors has reviewed the memorandum 'New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQ' and the recording of the June 11, 2014 Pasadena Planning Commission Meeting, where an overview of the proposed new transportation performance measures was presented. Our initial comments to the proposed plan are provided below:

- The Pasadena Department of Transportation is to be commended in its effort to modernize and improve the department's models, metrics and threshold criteria, especially to reflect the city's smart growth principles for Old Pasadena and its goal to be a green, livable and walkable city. We support the department's proposal to add sensible metrics for Proximity and Quality of the Bicycle Network, Proximity and Quality of the Transit Network and Pedestrian Accessibility.
- We continue to believe that Street Segment Analysis is an important tool in assessing traffic volume growth impacts and recommend that it be retained. However, we recognize that this analysis has shortcomings and unintended consequences as identified in the department's memo. Therefore, we support amending the city's Traffic Impact Guidelines to sensibly resolve these issues.
- We cannot support a plan that lowers the impact threshold for auto Level of Service (LOS) to F for all streets inside a designated High Pedestrian Area (HPA). The HPA areas identified represent a significant part of the City of Pasadena (stated by Mark Yamarone as ~30% of the city). While we understand the intent of this proposal is to give preference to pedestrians and non-auto transportation in Old Pasadena, we cannot ignore that the city's goal for green transportation has not yet been fully realized. Automobiles are still the primary means of transportation in our city and their impacts to our community cannot be ignored. Furthermore, while we understand that traffic impacts cannot always be successfully mitigated, we

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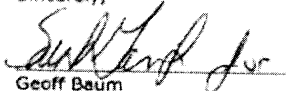
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believe that exceptions should still be fully analyzed and approved on a one-by-one basis.

- As proposed, the Vehicle Miles Traveled (VMT) Per Capita and Vehicle Trips (VT) Per Capita metrics appear to have limited usefulness; it is almost impossible to trigger the impact thresholds for these parameters. This was evident in the 3 case studies presented, and in a statement made at the June 11 Planning Commission Meeting that probably nothing in the General Plan would trigger these thresholds. Thus, we recommend that these metrics be modified, if possible, to make them more meaningful. For example, instead of measuring 'per capita over the entire city', one might measure 'per capita over a smaller immediately affected area'. Also the metrics might be changed so impacts do not appear insignificant because they are only identifiable at the 3<sup>rd</sup> or 4<sup>th</sup> decimal place. If improvements can't be made, we recommend deleting these metrics.
- It is unclear why city traffic models only consider one intersection on Orange Grove Boulevard, when this is clearly a major north/south street for west Pasadena. Furthermore, Orange Grove Boulevard will be directly impacted by many large projects currently proposed, such as the extension of the 710 Freeway and new events at the Rose Bowl (e.g. the National Football League and a large 3-day music festival).

In general, the WPRA believes that transportation metrics and thresholds must clearly reflect the impacts of development and growth on city traffic, both in our neighborhoods and at the city level. We understand that the department will be presenting a modified plan at the June 25 Planning Commission Meeting. We look forward to reviewing the next iteration and working with you in the near future.

Sincerely,

  
Geoff Baum  
WPRA President

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Memo to M. Jomsky for distribution to staff and Council  
before the Council meeting of July 21, 2014

Mark [mjomsky@cityofpasadena.net](mailto:mjomsky@cityofpasadena.net)

**To: City Council and Staff**  
**Re: Council Agenda Item #14**  
**July 21, 2014 Meeting**

**Subject:**  
**General Plan Update, Project Schedule, & Proposed Traffic Measure Changes**

The City staff is proposing to "update and replace current measures and thresholds that determine whether the impact created by a project is significant", apparently because the current measures "only examine the impact a project will have on car traffic; they do not explore a project's impact on pedestrians, bicyclists and transit users"

A worthy objective, certainly. But of the of "the three new performance measures proposed by staff that would be used to determine significant impacts under CEQA." two of the three - Vehicle Miles Traveled Per Capita and Vehicle Trips Per Capita make sense for General and Specific plans, where density increases are often proposed and the best way of dealing with them evaluated.

**These particular measures, however, do not make sense for evaluating "projects".**

The third measure, Auto Level of Service, will not be used for high pedestrian activity areas, such as Old Pasadena, where the congestion is. **This leaves us with no measure of a project's impact on traffic, transit, bicycles, or pedestrians. So, in evaluating projects, we go from measures that only examine the impact on car traffic to no measures at all.**

In summary, the measures are appropriate for comparing methods to deal with growth targets in the General and Specific Plans but positively perverse for evaluating affects of individual projects on neighborhoods and on the city.

**If required by the General Plan schedule, I ask that you use the existing measures for the General Plan rather than enacting this set of measures which essentially abandons assessment of traffic impacts for projects.**

**The stated dilemma needs be resolved before the measures are established.**

Respectfully submitted.

Kenneth J. Grobecker AICP  
Principal, Townscape.  
Chair, Land Use Committee, West Pasadena Residents Association  
626 583-8547 / [Townscape1@aol.com](mailto:Townscape1@aol.com)

**Buchanan, Rita**

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**Subject:** FW: No Motorcycles on South Orange Grove Boulevard

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**From:** Barbara Bishop [<mailto:barbarart@hotmail.com>]  
**Sent:** Monday, July 21, 2014 8:26 AM  
**To:** Jomsky, Mark  
**Subject:** No Motorcycles on South Orange Grove Boulevard

To the City Clerk, Mark Jomsky: please forward this suggestion to the members of the City Council, for consideration. Thank you, Barbara Bishop

Mr. Mayor and the City Council,

I understand traffic considerations are on the agenda at tonight's meeting.

Do you suppose there might be any chance the city council could declare South Orange Grove a No Motorcycles Zone? The bikes are so very offensive to us residents enjoying our patios on a hot summers evening.

I think it would be worthy of consideration. I'm sure my neighbors would agree.

Thank you,

Barbara Bishop, Homeowner  
315 S. Orange Grove Blvd. at Arbor  
Pasadena

**Buchanan, Rita**

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**Subject:** FW: Transportation Metrics

**From:** Bob Gutzman [<mailto:bob.gutzman@gmail.com>]  
**Sent:** Monday, July 21, 2014 9:28 AM  
**To:** Jomsky, Mark; Madison, Steve; [president@wpra.net](mailto:president@wpra.net)  
**Subject:** Transportation Metrics

Hi, Mr. Jomsky.

This letter is in support of delaying the implementation of Pasadena's proposed new transportation metrics until the State has weighed in on its changes.

Also, the relevant Pasadena officials/experts (i.e., PasDOT) should not be so hasty in making such sweeping changes until they have thoroughly explored the consequences of their proposed changes. Gridlock, pollution (including greenhouse gas emissions), and over development are all critically important issues to our city. Based on the information that I have researched and reviewed, it is clear that further investigation is needed prior to making any decisions.

Mark, if you could please forward my comments to the Mayor and the City Council, I would greatly appreciate it.

Thanks much.

Bob Gutzman



**Subject:**

FW: Council Agenda Item #14 on July 21, General Plan Update & Traffic Measures

Mayor Bogaard and Pasadena City Council,

The City staff is proposing to “replace current measures and thresholds that determine whether the impact created by a project is significant.” because the current measures “only examine the impact a project will have on car traffic; they do not explore a project’s impact on pedestrians, bicyclists and transit users.” (June 11 memo)

This is a terrific goal. Staff proposes “three new performance measures that would be used to determine significant impacts under CEQA.” (July 21 memo) Here is the problem.

Two of the three, Vehicle Miles Traveled Per Capita and Vehicle Trips Per Capita make sense for General and Specific plans, where you assume a density increase and are evaluating the best way to deal with it. They do not make sense for evaluating projects, more about that below. The third measure, Auto Level of Service, will not be used for High Pedestrian Activity Areas, such as Old Pasadena, where the congestion is. This leaves us with no measure of a project’s impact on traffic, transit, bicycles, or pedestrians.

So, in evaluating projects, we go from measures that only examine the impact on car traffic to no measures at all.

To put it bluntly, this proposal is a developer’s dream come true. Let’s look at two examples of the perverse affect of using Vehicle Miles Traveled Per Capita and Vehicle Trips Per Capita.

1. Say I want to build a condo for a family of four in Old Pasadena, with two parents, two kids, two cars, and four bikes. This project would make the measures worse, because of all the special trips to take kids to soccer and band and the science fair.
2. Instead, I’ll propose putting the Rose Bowl’s sold-out events in Old Pasadena. This would result in terrific measures, because I’d bring in 75,000 people all taking packed buses and trains and carpooling. In fact, with 75,000 people I could probably improve the entire city’s vehicle miles and trips per capita by having a sold-out event every day in Old Pasadena.

Ridiculous isn’t it. But isn’t that what the new measurements would show?

In summary, the measures are appropriate for comparing methods to deal with growth targets in the General and Specific Plans. But they are positively perverse for evaluating affects of individual projects on neighborhoods and on the city. This dilemma must be resolved before the measures are established.

If required by the General Plan schedule, please use the existing measures for the General Plan rather than enacting this set of measures which essentially abandons assessment of traffic impacts for projects.

Thank You  
Bill Urban  
Pasadena Resident



*Culture, Commerce and Community in the Heart of Pasadena*

October 22, 2014

Mayor Bogaard & City Council Members  
City of Pasadena  
100 N Garfield Avenue, Room 212  
Pasadena, CA 91109

**Subject:** Transportation Performance Measures

Honorable Mayor and Council Members:

The Playhouse District Association Board of Directors voted on Wednesday, October 22, 2014 to support the following items concerning the new transportation performance measures for transportation impact analysis and CEQA Thresholds for Pasadena.

1. The Playhouse District Association supports the goal of setting appropriate new metrics for determining traffic impacts due to new development within High Quality Transit Areas that better account for greenhouse gas emission reduction and Complete Streets mandates.
2. The Playhouse District Association supports the Colorado Boulevard Infill Opportunity Zone which includes Downtown areas within a half-mile of transit services.
3. The Playhouse District Association supports staff recommendations, as presented to the Municipal Services Committee on October 14, 2014, for Vehicle Miles Traveled (VMT) per Capita, Vehicle Trips (VT) per Capita, Proximity and Quality of Bicycle Network, and Pedestrian Accessibility. The PDA will closely monitor staff's revised proposals for Auto Level of Service and Modified Street Segment Analysis.

We appreciate that the City's proposed performance metrics will promote infill development and smart growth that maximizes public transit, bike travel, and walkability in balance with vehicle access – simultaneously reinforcing the Complete Streets mandates. We look forward to seeing these metrics reflected in the General Plan process to insure Pasadena becomes a multi-modal city. The metrics are consistent with the goals of SB 743 and will assist the City in complying once CEQA Guidelines are finalized in 2015.

Sincerely,

A handwritten signature in black ink that reads "Erlinda L. Romo". The signature is written in a cursive style.

Erlinda L. Romo  
Executive Director

cc: Michael Beck, City Manager  
Fred Dock, Director of Transportation  
Mark Yamarone, Transportation Administrator