



# California Renters Legal Advocacy and Education Fund

360 Grand Ave, #323  
Oakland, CA 94612  
hi@carlaef.org

February 7, 2020

City of Pasadena  
City Council  
100 North Garfield Ave.  
Pasadena, CA 91101

RECEIVED  
2020 FEB - 7 PM 5:00  
CITY CLERK  
CITY OF PASADENA

Re: Application for Density Bonus Development at 253 S. Los Robles Avenue

Dear City Council, and City Attorney,

The California Renters Legal Advocacy and Education Fund (CaRLA) submits this letter to inform the Council that they have an obligation to abide by all relevant state housing laws when evaluating the above-referenced proposal to develop 90 units of housing, including eight units for very low-income families. The Housing Accountability Act, Gov. Code Section 65589.5, requires approval of zoning and general plan compliant projects unless the City Council can make findings that the project would result in specific, objective, written health and safety hazards. Importantly, the Housing Accountability Act considers projects, such as the proposal here, receiving concessions under the state mandated density bonus program to be compliant with zoning and general plan requirements.

As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit. It will bring increased tax revenue, new customers to local businesses, decarbonization in the face of climate crisis, but most importantly it will reduce displacement of existing residents into homelessness or carbon-heavy car commutes. The proposed Project will provide badly needed housing and even more desperately needed housing for very low-income families. Pasadena has fallen far short of its planning goals for very low-income units, and this project would help alleviate that shortfall. More importantly, these units would provide homes for eight families who may otherwise be displaced from Pasadena. We ask that the Council approve this project and help move Pasadena's housing policy in the right direction.

CaRLA is a 501(c)3 non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. While no one project will solve the regional housing crisis, the proposed 253 S. Los Robles Avenue development is the kind of housing Pasadena needs to mitigate displacement, provide shelter for its growing population, and arrest

unsustainable housing price appreciation. You may learn more about CaRLA at [www.carlaef.org](http://www.carlaef.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Dylan Casey', with a horizontal line extending to the right from the end of the signature.

Dylan Casey  
Executive Director  
California Renters Legal Advocacy and Education Fund

## Martinez, Ruben

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**Subject:** FW: 253 S. Los Robles Avenue - Affordable Housing Concession Permit #11869  
**Attachments:** 253 S. Los Robles Avenue - Affordable Housing Concession Permit #11869.pdf

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**From:** Ben Libbey  
**Sent:** Friday, February 7, 2020 5:23:34 PM (UTC-08:00) Pacific Time (US & Canada)  
**Cc:** cityclerk; Mellem, Araceli  
**Subject:** 253 S. Los Robles Avenue - Affordable Housing Concession Permit #11869

**CAUTION:** This email was delivered from the Internet. Do not click links or open attachments unless you know the content is safe.

2/7/2020

Pasadena Planning Commission  
100 North Garfield Ave.  
Pasadena, CA 91101

[cityclerk@cityofpasadena.net](mailto:cityclerk@cityofpasadena.net); [amellem@cityofpasadena.net](mailto:amellem@cityofpasadena.net);  
Via Email

Re: 253 S. Los Robles Avenue  
Affordable Housing Concession Permit #11869

Dear Pasadena Planning Commission,

Yes In My Back Yard submits this letter to inform you that the Pasadena Planning Commission has an obligation to abide by all relevant state housing laws when evaluating the above captioned proposal, including the Housing Accountability Act (HAA).

California Government Code § 65589.5, the Housing Accountability Act, prohibits localities from denying housing development projects that are compliant with the locality's zoning ordinance or general plan at the time the application was deemed complete, unless the locality can make findings that the proposed housing development would be a threat to public health and safety. The most relevant section is copied below:

(j) When a proposed housing development project complies with applicable, objective general plan and zoning standards and criteria, including design review standards, in effect at the time that the housing development project's application is determined to be complete, but the local agency proposes to disapprove the project or to approve it upon the condition that the project be developed at a lower density, the local agency shall base its decision regarding the proposed housing development project upon written findings supported by substantial evidence on the record that both of the following conditions exist:

(1) The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density. As used in this paragraph, a "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.

(2) There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (1), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.

...

(4) For purposes of this section, a proposed housing development project is not inconsistent with the applicable zoning standards and criteria, and shall not require a rezoning, if the housing development project is consistent with the objective general plan standards and criteria but the zoning for the project site is inconsistent with the general plan. If the local agency has complied with paragraph (2), the local agency may require the proposed housing development project to comply with the objective standards and criteria of the zoning which is consistent with the general plan,

however, the standards and criteria shall be applied to facilitate and accommodate development at the density allowed on the site by the general plan and proposed by the proposed housing development project.

The applicant proposes to construct a new 91,217 square-foot, five to six-story, 90-unit, multi-family residential building with associated parking.

The above captioned proposal is zoning compliant and general plan compliant, therefore, your local agency must approve the application, or else make findings to the effect that the proposed project would have an adverse impact on public health and safety, as described above.

Yes In My Back Yard is a 501(c)3 non-profit corporation, whose mission is to increase the accessibility and affordability of housing in California.

I am signing this letter both in my capacity as the Executive Director of Yes In My Back Yard, and as a resident of California who is affected by the shortage of housing in our state.

Sincerely,

A handwritten signature in black ink that reads "Sonja Trauss". The signature is written in a cursive, flowing style with a large initial 'S'.

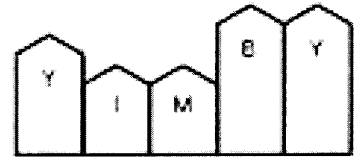
Sonja Trauss  
Executive Director  
Yes In My Back Yard

# Yes In My Back Yard

1260 Mission St  
San Francisco, CA 94103  
[hello@yimbylaw.org](mailto:hello@yimbylaw.org)

RECEIVED

2020 FEB 10 AM 10:19



CITY CLERK  
CITY OF PASADENA

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2/7/2020

Pasadena Planning Commission  
100 North Garfield Ave.  
Pasadena, CA 91101

[cityclerk@cityofpasadena.net](mailto:cityclerk@cityofpasadena.net); [amellem@cityofpasadena.net](mailto:amellem@cityofpasadena.net);  
Via Email

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A handwritten signature in black ink that reads "Sonja Trauss". The signature is written in a cursive, flowing style with a large, decorative flourish at the end of the name.

Sonja Trauss  
Executive Director  
Yes In My Back Yard

# ERIKA FOY

## PROTECTING PASADENA

RECEIVED

2020 FEB -7 PM 6:37

CITY CLERK  
CITY OF PASADENA

February 7, 2020

**Mayor Tornek, City Council, Planning Department**

c/o Mark Jomsky

City Clerk

100 North Garfield Ave.

Pasadena, CA 91101

**Re: AFFORDABLE HOUSING CONCESSION PERMIT NO. 11869 LOCATED AT 253 S. Los Robles AVENUE**

Dear Mayor, City Council, and Planning Department,

I am writing today to point out six serious flaws with the traffic modeling and thresholds in place for the development at 253 S. Los Robles as evidenced by the two DOT transportation documents provided for the project:

1. Five large-scale projects have been approved within a one-block radius in the Central District, and yet traffic impact reports and projections have only been considered per project, with no consideration given to the cumulative effect of these five developments;
2. VMT for 253 South Los Robles is estimated at the unrealistically low number of 12.6;
3. DOT is using older versions of the Synchro software and HCM 2000 LOS metrics to analyze traffic projections, which is leading to an underestimation of traffic impacts.
4. DOT is averaging intersection approach LOS as a whole, which hides unacceptable LOS for some movements, and avoiding mitigating for the worst case scenario at peak hours.
5. We will never reach any neighborhood calming measures on high capacity streets like South Los Robles with current ADT thresholds.
6. The support of Goal 5 in our General Plan is not happening because our thresholds are too high.

The questionable aspects of the CEQA Traffic Analysis and the Outside CEQA Traffic Analysis must be brought to light as we move forward growing all of Pasadena's housing production. Our city has decided to pursue high-density, multi-family apartments and condos in existing urban neighborhoods at a feverish pace, but we need to take a step back and review how and, more importantly, why we are allowing an enormous increase in unmitigated vehicle trips to clog our streets and neighborhoods. My hope is that the council will take time to closely review the two transportation analysis produced by DOT each time a large project is up for approval. We have serious issues with the way we evaluate projects, which makes for frustrated residents seeing their city being altered in ways they never imagined.

02/10/2020

Item 12

The biggest question I have is why CEQA didn't get triggered for 253 S. Los Robles considering it was the fifth large-scale project in one-block radius. Our city evaluated each project alone and our VMT thresholds are too high. The VMT for 253 S. Los Robles was 12.6 and showed no significant impact.

Table 4. Transportation Performance Metrics Summary

Transportation Performance Metrics	Significant Impact Cap (existing)	Incremental change (existing + project)	Significant Impact?
VMT Per Capita	>22.6	12.6	No
VT Per Capita	>2.8	2.1	No
Proximity and Quality of Bicycle Network	<31.7%	31.7	No
Proximity and Quality of Transit Network	<66.6%	66.7	No
Pedestrian Accessibility	<3.88	3.88	No

INCREMENTAL SCENARIO RESULTS					
Pop	Emp	VMT	VT	VMT/Cap	VT/Cap
188	0	2,361	396	12.6	2.1
				PASS	PASS

The bottom line is the 12.6 VMT calculation means that the city estimates that the 188 residents who will live at 253 S. Los Robles will only be driving a total of 12 miles a day. This includes work, grocery store, shopping, exercise, etc. I really question this 12-mile-a-day budget considering the distances you have to go just to get to LA or Glendale. In order to make this work, the city is counting on the future residents of 253 S. Los Robles to make significant use of public transportation.

Does traffic engineering guarantee this will actually happen? The answer is no—such a low VMT estimate is an assumption based on a best-case scenario. Does reducing VMT really occur when you base your housing plan on untested ideals? Will Pasadena go back and test these assumptions to see if they were correct? Jennider Hernandez, a partner at the West Coast land use and environment practice group of Holland & Knight LLP, recently wrote, “only the smallest fraction of California even has a chance of being successful ‘transit-oriented’ component of TOD development, as fixed route bus service continues to dramatically decline in



ridership and availability and new rail service requires about 20 years to complete.”  
<https://www.chapman.edu/communication/files/ca-getting-in-its-own-way.pdf>

Grant P. Johnson, Traffic Engineer and author of a recent traffic engineering review funded by MHNA said, “When approvals are made for projects even when traffic conditions are unacceptable, the new project will add even more vehicles to the road, and the result is even worse traffic conditions. Typical ramifications of ignoring traffic impacts include longer lines of traffic waiting at intersections, drivers waiting through more signal cycles, and more intense turning movement conflicts at intersections involving vehicles, pedestrians and bikes. Light rail too can exacerbate conflicts of these turning movement conflicts at intersections.”  
<http://www.prism.engineering/pasadena253v2.html>. This holds true for many of our failing intersections in the Central District.

On Wednesday, I participated in a citizen-funded traffic study for Pasadena around the Madison Heights vicinity. The traffic study was conducted on three major intersections, Lake/California, Marengo/California, and Del Mar/Marengo. I stood on the corner of Del Mar and Marengo for four hours, from 7-9am and again from 4-6pm taking videos of the car congestion and movement <https://www.youtube.com/watch?v=2xFiF2MPUwo>. The backup was consistent on Marengo from California to Del Mar the entire 5-6pm hour. I can tell you with confidence that this intersection has failed. We have too many cars on the road utilizing unmitigated streets. Just like running water, streets can only flow as fast as the area allows. We have reached maximum capacity because cars are not clearing impacted intersections and people are not using public transportation as anticipated.

The other questionable analysis I would like to point out is the Outside CEQA Analysis created for 253 S. Los Robles. The city measured Del Mar and Marengo as an LOS of D in 2016. After MHNA hired their own traffic engineer, he found we are using older versions of the Synchro software to configure this data. The city uses a version of software from 2008 that hasn't been updated in 12 years, and which does not have HCM 2010 features. This ancient version used by Pasadena DOT today utilizes a Synchro method based on older calculation methods used in the HCM 2000 methodology, and does not incorporate the latest HCM 2010 methods which allow for more detail and accuracy of PEAK traffic. In reality, if the newer software was used, we would be seeing a different, and much more realistic, peak hour result. We would have seen an LOS F at Marengo and Del Mar just as I recorded myself on video while helping conduct the traffic study on Wednesday.

Table 3. LOS Capacity Criteria

HIGHWAY CAPACITY LEVEL OF SERVICE CRITERIA		
LOS	DESCRIPTION	DELAY (s)
A	Progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.	< 10.0
B	Progression is good, cycle lengths are short, or both. More vehicles stop than with LOS A, causing higher levels of average delay.	> 10.0 to 20.0
C	Higher congestion may result from fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear at this level, though many still pass through the intersection without stopping.	> 20.0 to 35.0
D	The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.	> 35.0 to 55.0
E	This level is considered by many agencies to be the limit of acceptable delay. These high delay values generally indicate poor (vehicle) progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences.	> 55.0 to 80.0
F	This level is considered oversaturation, which is when arrival flow rates exceed the capacity of the intersection. This level may also occur at high V/C ratios below 1.0 with many individual cycle failures. Poor progression and long cycle lengths may also be contributing factors to such delay levels.	> 80.0

Source: 2010 *Highway Capacity Manual*.

Table 4: Intersection Level of Service Caps.

Study Intersections	Existing + Project LOS Cap
Citywide	D
Transit Oriented District (TOD)	E

Table 6. Signalized Intersection LOS Summary

Intersection	Peak Hour	Existing		Existing w/Project		Exceeds LOS Cap?
		Delay	LOS	Delay	LOS	Yes/No
Cordova Street at Los Robles Avenue	AM	11.5	B	11.5	B	No
	PM	15.5	B	15.5	B	No
Cordova Street at Marengo Avenue	AM	20.8	C	20.8	A	No
	PM	33.9	C	33.9	C	No
Del Mar Boulevard at Los Robles Avenue	AM	18.3	B	18.6	B	No
	PM	17.2	B	17.6	B	No
Del Mar Boulevard at Marengo Avenue	AM	23.5	C	23.6	C	No
	PM	39.6	D	40.4	D	No
Green Street at Los Robles Avenue	AM	13.7	B	13.6	B	No
	PM	13.9	B	13.8	B	No
Green Street at Marengo Avenue	AM	16.0	B	16.1	B	No
	PM	26.7	C	27.1	C	No
Union Street at Los Robles Avenue	AM	12.3	B	12.4	B	No
	PM	10.7	B	10.7	B	No

**The intersection of Del Mar and Los Robles not only has an E, but the # equals queue length**

Queues

729: Del Mar & Los Robles

2/6/2018



Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	NBR	SEL	SBT	SEB
Lane Group Flow (vph)	67	593	66	1062	60	490	63	91	306	56
Act Effct Green (s)	46.8	46.8	39.9	39.9	25.2	25.2	25.2	25.2	25.2	29.7
Actuated g/C Ratio	0.58	0.58	0.50	0.50	0.32	0.32	0.32	0.32	0.32	0.37
v/c Ratio	0.30	0.29	0.17	0.62	0.24	0.84	0.13	0.85	0.52	0.09
Control Delay	6.4	6.4	8.6	11.6	22.9	37.7	13.2	78.1	25.7	7.2
Queue Delay	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Delay	6.4	6.4	8.6	11.6	22.9	37.7	13.2	78.1	25.7	7.2
LOS	A	A	A	B	C	D	B	E	C	A
Approach Delay		6.4		11.5		33.8			33.9	
Approach LOS		A		B		C			C	
Queue Length 50th (ft)	7	61	14	223	23	231	13	43	127	6
Queue Length 95th (ft)	15	44	m12	71	52	#377	32	#83	182	23
Internal Link Dist (ft)		371		1290		1585			199	
Turn Bay Length (ft)	65		65		100		55	100		100
Base Capacity (vph)	405	2046	398	1715	253	605	505	111	605	782
Starvation Cap Reductn	0	0	0	0	0	0	0	0	0	0
Spillback Cap Reductn	0	0	0	0	0	0	0	0	0	0
Storage Cap Reductn	0	0	0	0	0	0	0	0	0	0
Reduced v/c Ratio	0.17	0.29	0.17	0.62	0.24	0.81	0.12	0.82	0.51	0.07

**Intersection Summary**

Cycle Length: 80  
 Actuated Cycle Length: 80  
 Offset: 50 (63%), Referenced to phase 4:WBTL and 8:EBTL, Start of Yellow  
 Control Type: Actuated-Coordinated  
 Maximum v/c Ratio: 0.85  
 Intersection Signal Delay: 18.6  
 Intersection Capacity Utilization 71.3%  
 Analysis Period (min) 15  
 # 95th percentile volume exceeds capacity, queue may be longer.  
 Queue shown is maximum after two cycles.  
 m Volume for 95th percentile queue is metered by upstream signal.

Two years ago, on 2/6/18, the traffic study for 253 S. Los Robles was completed. As you will see in the data above, the intersection of Marengo and Del Mar had one E as you made the southbound left turn. The delay was recorded at 78.1 seconds. You will also see in the Highway Capacity Level chart, 80 second delay is an F, just two seconds from failing in 2018. The city does not show any LOS E's or F's in Table 6 because the intersection data is AVERAGED.

In an even more dramatic example, Marengo and Del Mar was recently studied for a new pending project at 650 South Raymond. The city shows the northbound PM left as an F and the southbound thru as an E. This is more in line with what I witnessed on Wednesday.

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations	↵	↕		↵	↕		↵	↕		↵	↕	↵
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0	3.0
Lane Util. Factor	1.00	0.95		1.00	0.95		1.00	0.95		1.00	1.00	1.00
Flt Protected	1.00	0.98		1.00	0.99		1.00	0.97		1.00	1.00	0.85
Flt Permitted	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00	1.00
Satd. Flow (prot)	1770	3482		1770	3496		1770	3424		1770	1863	1583
Flt Permitted	0.25	1.00		0.29	1.00		0.15	1.00		0.31	1.00	1.00
Satd. Flow (perm)	474	3482		548	3496		287	3424		583	1863	1583
Volume (vph)	65	784	94	127	694	61	68	388	108	74	487	53
Peak-hour factor, PHF	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Adj. Flow (vph)	71	852	102	138	754	66	74	422	117	80	529	58
RTOR Reduction (vph)	0	10	0	0	6	0	0	28	0	0	0	37
Lane Group Flow (vph)	71	944	0	138	814	0	74	511	0	80	529	21
Heavy Vehicles (%)	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%	2%
Turn Type	pm+pt			Perm			custom			custom		pm+ov
Protected Phases	1	6			2			4			4	1
Permitted Phases	6			2			8			8		4
Actuated Green, G (s)	54.7	54.7		46.5	46.5		25.1	25.1		25.1	25.1	30.1
Effective Green, g (s)	56.0	56.0		47.8	47.8		26.0	26.0		26.0	26.0	32.2
Actuated g/C Ratio	0.62	0.62		0.53	0.53		0.29	0.29		0.29	0.29	0.36
Clearance Time (s)	3.2	5.3		5.3	5.3		4.9	4.9		4.9	4.9	3.2
Vehicle Extension (s)	2.5	4.8		4.8	4.8		2.5	4.8		2.5	4.8	2.5
Lane Grp Cap (vph)	355	2167		291	1857		83	989		168	538	619
v/s Ratio Prot	0.01	c0.27			0.23			0.15			c0.28	0.00
v/s Ratio Perm	0.11			c0.25			0.26			0.14		0.01
v/c Ratio	0.20	0.44		0.47	0.44		0.89	0.52		0.48	0.98	0.03
Uniform Delay, d1	7.8	8.8		13.2	12.9		30.6	26.8		26.4	31.8	18.8
Progression Factor	0.95	1.01		1.85	1.86		1.00	1.00		0.84	0.89	1.86
Incremental Delay, d2	0.2	0.6		5.2	0.7		63.6	0.9		1.4	32.5	0.0
Delay (s)	7.6	9.5		29.7	24.6		94.3	27.6		23.6	60.8	35.0
Level of Service	A	A		C	C		F	C		C	E	C
Approach Delay (s)		9.4			25.4			35.7			34.1	
Approach LOS		A			C			D			D	
HCM Average Control Delay			28.2			HCM Level of Service			C			
HCM Volume to Capacity ratio			0.65									
Actuated Cycle Length (s)			90.0			Sum of lost time (s)		12.0				
Intersection Capacity Utilization			77.3%			ICU Level of Service			D			
Analysis Period (min)			15									

To make an even more compelling case, the intersection of Arroyo Parkway and Glenarm has three failing turns with the addition of 650 South Raymond but yet again, it shows a pass. The wait time to make a left turn onto the freeway in the PM is 9 minutes yet the City does not mitigate for this because they average the whole intersection and act like nothing is wrong.

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBR
Lane Configurations	↔	↕		↔	↕		↔	↕		↔	↕
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0
Lane Util. Factor	1.00	0.95		1.00	0.95		1.00	0.91		1.00	0.91
Frpb, ped/bikes	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00
Flpb, ped/bikes	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00
Frt	1.00	0.94		1.00	0.98		1.00	0.95		1.00	0.99
Flt Protected	0.95	1.00		0.95	1.00		0.95	1.00		0.95	1.00
Satd. Flow (prot)	1805	3377		1805	3539		1805	4952		1805	5119
Flt Permitted	0.53	1.00		0.24	1.00		0.11	1.00		0.11	1.00
Satd. Flow (perm)	1016	3377		454	3539		217	4952		217	5119
Volume (vph)	97	457	346	424	208	41	51	1132	507	83	1262
Peak-hour factor, PHF	0.79	0.94	0.94	0.92	0.70	0.92	0.61	0.93	0.96	0.80	0.91
Adj. Flow (vph)	123	486	368	461	297	45	84	1217	528	104	1387
RTOR Reduction (vph)	0	8	0	0	13	0	0	98	0	0	12
Lane Group Flow (vph)	123	846	0	461	329	0	84	1647	0	104	1488
Confl. Peds. (#/hr)											8
Turn Type	Perm			Perm			Perm			Perm	
Protected Phases		4			8			2			6
Permitted Phases	4			8			2			6	
Actuated Green, G (s)	37.0	37.0		37.0	37.0		35.0	35.0		35.0	35.0
Effective Green, g (s)	37.0	37.0		37.0	37.0		35.0	35.0		35.0	35.0
Actuated g/C Ratio	0.46	0.46		0.46	0.46		0.44	0.44		0.44	0.44
Clearance Time (s)	4.0	4.0		4.0	4.0		4.0	4.0		4.0	4.0
Lane Grp Cap (vph)	470	1562		210	1637		95	2167		95	2240
v/s Ratio Prot		0.25			0.09			0.33			0.29
v/s Ratio Perm	0.12			c1.02			0.39			c0.48	
v/c Ratio	0.26	0.54		2.20	0.20		0.88	0.76		1.09	0.66
Uniform Delay, d1	13.1	15.4		21.5	12.7		20.6	19.0		22.5	17.8
Progression Factor	1.00	1.00		1.00	1.00		1.00	1.00		1.00	1.00
Incremental Delay, d2	1.4	1.4		553.2	0.3		64.6	2.6		120.3	1.6
Delay (s)	14.5	16.8		574.7	13.0		85.2	1.5		142.8	9.4
Level of Service	B	B		F	B		F	C		F	B
Approach Delay (s)		16.5			335.5			24.5			27.4
Approach LOS		B			F			C			C
HCM Average Control Delay			71.8			HCM Level of Service			E		
HCM Volume to Capacity ratio			1.66								
Actuated Cycle Length (s)			80.0			Sum of lost time (s)		8.0			
Intersection Capacity Utilization			98.4%			ICU Level of Service			F		
Analysis Period (min)			15								
c Critical Lane Group											

Averaging the Failing Intersection of Glenarm and Arroyo Parkway- Where are the F's?

Table 7. Signalized Intersection LOS Summary

Intersection	Peak Hour	Existing		Existing w/Project		Exceeds LOS Cap?
		Delay	LOS	Delay	LOS	Yes/No
Raymond Ave at Del Mar Blvd	AM	18.1	B	18.3	B	No
	PM	21.1	C	21.2	C	No
Marengo Ave at Del Mar Blvd	AM	18.3	B	18.5	B	No
	PM	27.8	C	28.2	C	No
Raymond Ave at California Blvd	AM	16.9	B	17.1	B	No
	PM	22.6	C	22.9	C	No
Marengo Ave at California Blvd	AM	16.3	B	16.3	B	No
	PM	15.6	B	15.6	B	No
Raymond Ave at Glenarm St	AM	5.2	A	5.2	A	No
	PM	7.4	A	7.4	A	No
Arroyo Pkwy at Glenarm St	AM	21.3	C	22.3	C	No
	PM	68.4	E	71.8	E	No

650 South Raymond Avenue  
Transportation Impact Analysis

4/25/2019

What I find most frustrating is by averaging intersections and not mitigating the E's and F's, we are preventing developments from providing the needed Complete Streets measures which help us achieve Goal 5 in our General Plan. Please see the list of ways developers can contribute to this ideal below-

- Project specific measures:
  - Establish an Average Vehicle Occupancy (AVO) Cap or more aggressive AVO target that exceeds the City's AVO average by enhancing the required TDM plan under the City's Trip Reduction Ordinance (TRO)
  - Parking strategies to share parking or reduce on-site parking
  - Transit passes and/or transit cash-out
  - Bikeshare program with 10 or more bikes
  - Carshare program with two or more vehicles
  - Shuttle service to major transit stops
  - On-site transit kiosk
- Complete Streets measures
  - Pedestrian lighting to and from major transit stops
  - Pedestrian and Bike Traffic signal upgrades/enhancements
  - Installation of non-vehicular improvements at studied intersections

Finally, I need to point out additional issues of ADT in the Outside CEQA Analysis for 253 S. Los Robles. First off, the number listed of 12,869 for Los Robles at Del Mar is outdated. On October 30, 2019 the City did a new count and reported an ADT of 14,684 for South Los Robles below Del Mar (see attached documentation). We should be using these updated numbers now that it is 2020 and 253 S. Los Robles is still in question. In fact, South Los Robles above Del

Mar has an ADT total of 15,189, but that street segment was not used in the analysis. I would like to know why this was omitted. In the graph below, you can see the outdated numbers as well as the missing segment of South Los Robles.

Table 5. Street Segment Changes Summary

Street Segment	Daily Volume	Project Volume	Vehicular Increase in ADT	Exceeds Cap?
Cordova St b/t Marengo and Euclid Ave	10,368	40	0.4%	No
Cordova St b/t Euclid Ave and Los Robles Ave	10,333	40	0.4%	No
Cordova St b/t Los Robles Ave and Oakland Ave	11,987	80	0.7%	No
Marengo Ave s/o Del Mar Blvd	15,719	53	0.3%	No
Los Robles Ave s/o Del Mar Blvd	12,869	80	0.6%	No

253 South Los Robles Avenue  
Transportation Analysis

2/6/2018

Additionally, our city traffic modeling says there will be 535 total trips from 253 S. Los Robles (see below). The concern here is the threshold created to counterbalance the increased vehicle trips will never be reached to provide neighborhood calming measures. If you refer to Pasadena's own Transportation Impact Analysis Current Practice and Guidelines (<https://ww5.cityofpasadena.net/transportation/wp-content/uploads/sites/6/2015/12/Current-Practice-and-Guidelines.pdf>ADT ) you will see we will never reach any neighborhood calming measures on high capacity streets like South Los Robles but this is exactly the kind of mitigation needed to keep our city growing in a way that helps all modes of transportation.

253 S. Los Robles and the entire growing corridor could use the exact mitigations you list to protect neighborhoods and provide for a Complete Streets ideal but, we will sadly never see the mitigations with these kinds of thresholds. 253 S. Los Robles never come close to achieving these mitigations with only reaching 3% of final ADT. S. Los Robles carries 15,000 cars a day and you divide that by the 535 vehicle trips determined by the city which equals 3%. In order to reach the 8%, 253 S. Los Robles would have to have had 1200 trips a day. I would like to offer that the five new projects on the S. Los Robles corridor would have reached that threshold in combination, but the city was determined to not conduct a cumulative report and instead rely solely on the General Plan EIR.



Project Trip Generation

The industry standard procedure to determine the number of daily and peak hour trips a project would generate is based on published trip generation estimates from the ITE Trip Generation manual which is summarized in the following table:

Trip Generation Rates (proposed)											
Proposed Use	Land Use Code	Amount	Units	Measure	Daily	AM Peak Hour			PM Peak Hour		
						In	Out	Total	In	Out	Total
Residential Condominium/Townhouse	230	92	DU	1	5.81	0.07	0.37	0.44	0.35	0.17	0.52
Volumes											
Proposed Use	Daily	AM Peak Hour			PM Peak Hour						
		In	Out	Total	In	Out	Total				
Residential Condominium/Townhouse	535	7	34	40	32	16	48				
<b>Net total (proposed minus existing trips)</b>					<b>535</b>	<b>7</b>	<b>34</b>	<b>40</b>	<b>32</b>	<b>16</b>	<b>48</b>

**Table 4- ADT Caps for Requiring Neighborhood Traffic Calming Measures**

Existing ADT	Project-Related Vehicular Increase In ADT
0 to 1500	150 or more
1,501 to 3,499	10 percent or more of final ADT
3,500 or more	8 percent or more of final ADT

If project-related net trips exceed the caps in the table above conditions of approval would require the project applicant to develop and implement a targeted Complete Streets Plan with input from the affected residents, council districts and DOT to encourage use of non-vehicular modes by the project's patrons, and implement measures to discourage use of residential streets to-and-from the project site. Below is a list of typical measures that would be included in a Complete Streets Plan.  
Project specific measures:

Our City misses the opportunity yet again to support Goal 5 when we use such high thresholds for ADT. What is particularly strange is the higher the street volume, the less chance we have to get any mitigation. The Complete Street measures listed on the next page for ADT Caps will never be seen in our City at this level. Ideals like curb extension, pedestrian and bike traffic signal upgrades, signal meeting, project turn restrictions, etc. It is no wonder MHNA is feeling overwhelmed by the increasing traffic in and around the area because you are not allowing mitigation to happen.

### **Pasadena Trip Reduction Program**

- Establish a more aggressive Average Vehicle Occupancy (AVO) target that exceeds city's AVO average by enhancing the required TDM plan under City's Trip Reduction Ordinance (TRO)
- Project turn-restrictions
- Revised project access and circulation

#### Complete Streets measures

- Curb Extensions
- Pedestrian and Bike Traffic signal upgrades/enhancements
- Turn-restrictions
- Neighborhood Gateways (raised medians)
- Traffic circles
- Speed humps
- Signal metering

Is the City really interested in reducing traffic from all these projects coming into neighborhoods? If so, VMT, ADT caps and LOS measurements must be reconsidered. You are losing the faith of your residents by having such high thresholds. Didn't you promise to protect single family neighborhoods? Is this still a priority? Something has to give because you will find residents appealing projects every single time. This is not going away. In fact, the longer you wait to address these issues, the more you will increase long commute durations even on our local streets.

I believe you are actually hurting housing production by encouraging appeals on projects due to the lack of proper mitigations. There is an intense frustration in the community for our increasing traffic congestion and our current status quo. Imagine what adding incredible density with unmitigated projects will do?

The traffic discussion needs perfect transparency, public engagement, and engineering discipline to grow our city without creating a mess of hopeless congestion. I hope this council will consider taking a closer look at the many issues I have presented. I will be presenting the citizen driven traffic study within the next month so please stay tuned.

Much appreciation,

Erika Foy

Wednesday, October 30, 2019

CITY: Pasadena

PROJECT:

ADT7 Los Robles Ave between Cordova St and Del Mar Blvd.

Prepared by AimTD tel. 714 253 7888

AM Period	NB	SB	EB	WB	PM Period	NB	SB	EB	WB	
0:00	13	15			12:00	121	101			
0:15	10	11			12:15	120	107			
0:30	14	10			12:30	139	102			
0:45	11	48	5	41	12:45	129	509	94	404	
1:00	9	12			13:00	116	128			
1:15	2	5			13:15	127	103			
1:30	4	8			13:30	122	115			
1:45	2	17	5	30	13:45	123	488	105	451	
2:00	0	5			14:00	121	95			
2:15	3	7			14:15	139	108			
2:30	2	5			14:30	126	105			
2:45	2	7	5	22	14:45	143	529	118	426	
3:00	2	4			15:00	123	121			
3:15	3	3			15:15	172	95			
3:30	6	0			15:30	145	142			
3:45	2	13	2	9	15:45	147	587	136	494	
4:00	5	5			16:00	139	142			
4:15	5	9			16:15	129	133			
4:30	5	11			16:30	154	133			
4:45	15	30	16	41	16:45	150	572	161	569	
5:00	11	12			17:00	147	151			
5:15	15	14			17:15	134	135			
5:30	33	23			17:30	147	120			
5:45	36	95	30	79	17:45	122	550	161	567	
6:00	40	33			18:00	149	107			
6:15	61	46			18:15	122	130			
6:30	69	57			18:30	119	136			
6:45	78	248	56	192	18:45	128	518	122	495	
7:00	124	89			19:00	126	126			
7:15	140	94			19:15	112	86			
7:30	138	106			19:30	118	98			
7:45	158	560	114	403	19:45	99	455	101	411	
8:00	199	103			20:00	85	96			
8:15	168	97			20:15	89	70			
8:30	158	102			20:30	53	57			
8:45	153	678	130	432	20:45	57	284	76	299	
9:00	156	81			21:00	73	76			
9:15	145	88			21:15	52	75			
9:30	138	85			21:30	53	80			
9:45	144	583	89	343	21:45	45	223	75	306	
10:00	109	86			22:00	52	57			
10:15	119	92			22:15	28	54			
10:30	113	72			22:30	44	46			
10:45	113	454	98	348	22:45	24	148	30	187	
11:00	100	106			23:00	24	38			
11:15	117	84			23:15	17	26			
11:30	115	98			23:30	22	20			
11:45	131	463	115	403	23:45	14	77	17	101	
<b>Total Vol.</b>	3196	2343		<b>5539</b>		4940	4710		<b>9650</b>	
								<b>Daily Totals</b>		
						NB	SB	EB	WB	Combined
						8136	7053			<b>15189</b>
								<b>PM</b>		
<b>Split %</b>	57.7%	42.3%		<b>36.5%</b>		51.2%	48.8%			<b>63.5%</b>
<b>Peak Hour</b>	7:45	8:00		<b>8:00</b>		15:15	16:30			<b>16:30</b>
<b>Volume</b>	683	432		<b>1110</b>		603	580			<b>1165</b>
<b>P.H.F.</b>	0.86	0.83		<b>0.92</b>		0.89	0.90			<b>0.94</b>

Wednesday, October 30, 2019 CITY: Pasadena PROJECT: ADT8 Los Robles Ave between Del Mar Blvd and California Blvd. Prepared by AlmTD tel. 714 253 7888

AM Period	NB	SB	EB	WB	PM Period	NB	SB	EB	WB
0:00	11	16			12:00	105	123		
0:15	12	11			12:15	92	125		
0:30	11	11			12:30	126	118		
0:45	16	50	8	46	12:45	91	414	125	491
1:00	8	12			13:00	112	141		
1:15	4	7			13:15	118	116		
1:30	4	8			13:30	104	109		
1:45	4	20	5	32	13:45	128	462	113	479
2:00	0	6			14:00	117	121		
2:15	3	7			14:15	121	115		
2:30	2	5			14:30	112	114		
2:45	3	8	4	22	14:45	137	487	131	481
3:00	4	3			15:00	130	127		
3:15	4	6			15:15	122	114		
3:30	7	2			15:30	116	129		
3:45	5	20	0	11	15:45	140	508	124	494
4:00	5	4			16:00	124	125		
4:15	3	11			16:15	119	109		
4:30	4	13			16:30	140	132		
4:45	13	25	13	41	16:45	130	513	127	493
5:00	14	11			17:00	142	136		
5:15	18	13			17:15	137	114		
5:30	24	24			17:30	130	108		
5:45	30	86	32	80	17:45	117	526	120	478
6:00	38	37			18:00	140	122		
6:15	59	48			18:15	129	148		
6:30	68	66			18:30	92	151		
6:45	80	245	56	207	18:45	127	488	113	534
7:00	108	90			19:00	118	129		
7:15	125	97			19:15	116	94		
7:30	122	114			19:30	118	97		
7:45	128	483	115	416	19:45	95	447	114	434
8:00	117	111			20:00	88	94		
8:15	113	93			20:15	79	79		
8:30	135	109			20:30	57	73		
8:45	118	483	107	420	20:45	70	294	81	327
9:00	126	86			21:00	58	84		
9:15	104	87			21:15	61	87		
9:30	119	96			21:30	48	79		
9:45	128	477	96	365	21:45	43	210	80	330
10:00	90	108			22:00	53	77		
10:15	128	105			22:15	30	54		
10:30	106	95			22:30	39	51		
10:45	108	432	107	415	22:45	24	146	29	211
11:00	94	119			23:00	16	34		
11:15	101	95			23:15	20	25		
11:30	120	105			23:30	19	21		
11:45	124	439	125	444	23:45	16	71	19	99
<b>Total Vol.</b>	<b>2768</b>	<b>2499</b>		<b>5267</b>		<b>4566</b>	<b>4851</b>		<b>9417</b>

	Daily Totals				Combined	
	NB	SB	EB	WB		
	7334	7350			14684	
<b>Split %</b>	<b>AM</b>		<b>PM</b>			
	52.6%	47.4%	48.5%	51.5%	64.1%	
<b>Peak Hour</b>	7:45	11:45	11:45	16:30	17:45	16:30
<b>Volume</b>	493	491	938	549	541	1058
<b>P.H.F.</b>	0.91	0.98	0.94	0.98	0.90	0.95