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Department of Transportation

CEQA:
Transportation Performance Measures

City Council Meeting

January 13, 2020

Item 11

DOT Analysis Process

- DOT evaluates proposed projects for potential transportation impacts
  - > CEQA: Identify mitigations
  - > Outside CEQA: Recommend conditions of approval
  - > Goal is to eliminate or minimize the potential impacts

- Focus of analysis has shifted in recent years
  - > Level of Service (LOS) to Vehicle Miles Travelled (VMT)

Level of Service

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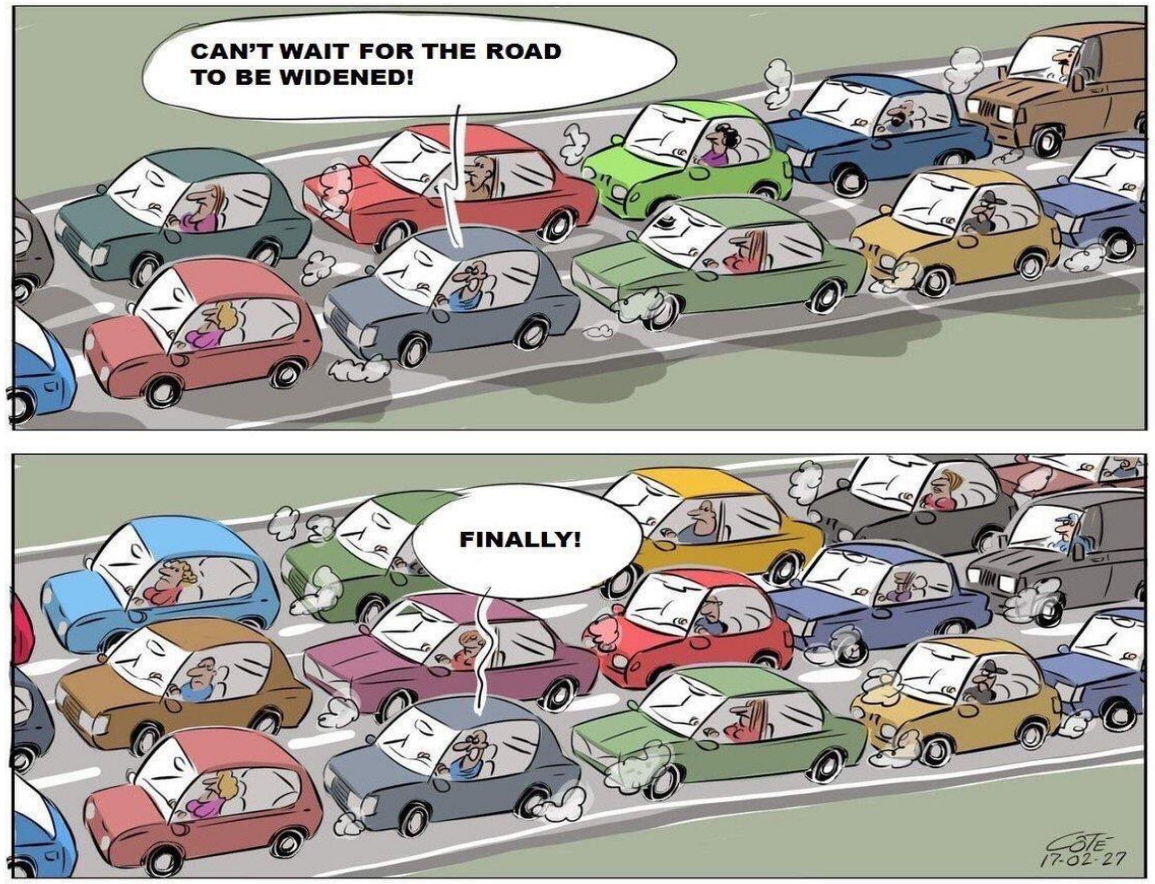
- Measured road performance by considering vehicle delay
- Did not consider other modes of travel
- Led to unintended design decisions that further prioritized vehicular travel



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CEQA Changes to Transportation Analysis

- SB 743 (Steinberg, 2013)
  - Eliminates the use of auto delay as defined by Level of Service (LOS) for evaluating transportation impacts
  - Directed Office of Planning and Research (OPR) to amend CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts
    - The method must "promote the **reduction** of greenhouse gas emissions, the development of **multimodal** transportation networks, and a **diversity** of land uses"
- SB 32 (Pavley, 2016)
  - Requires California to reduce gas emissions by 40% below 1990 levels by 2030

CEQA Changes to Transportation Analysis

- OPR proposed the following
  - Eliminate Level of Service (LOS)/Delay as a CEQA Impact
  - Use of Vehicle Miles Travelled (VMT) Metric for CEQA Transportation Analysis
  - Applies to CEQA Only
    - Does Not Preclude Addressing Traffic Congestion in Local General Plan Policies, Zoning Codes, Conditions of Approval, Thresholds, or Fee

- By July 1, 2020, all California lead agencies are required to use a Vehicle Miles Travelled (VMT) methodology in transportation analyses under CEQA

General Plan Guiding Principle 5:

Pasadena will be a city where people can circulate without cars

Objective 1: Enhance livability

Objective 2: Encourage walking, biking, transit and other alternative to motor vehicles

Objective 3: Create a supportive climate for economic viability

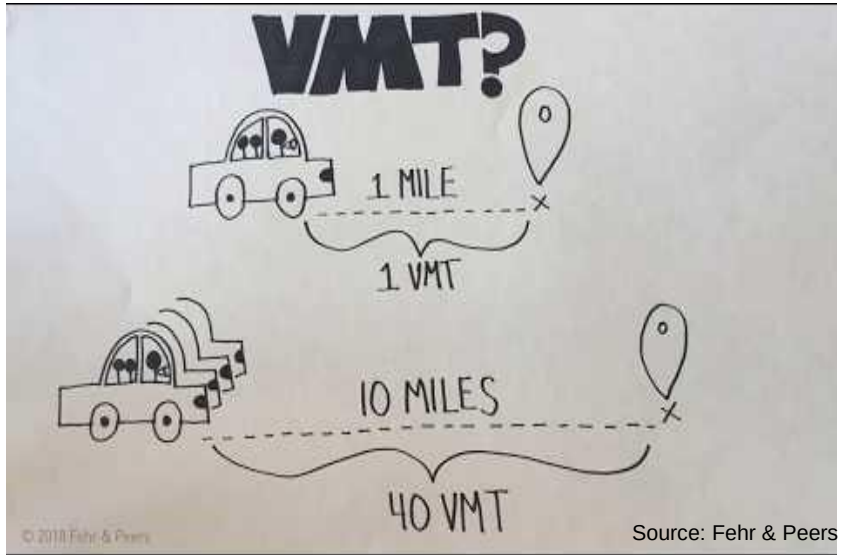
Pasadena Adopts VMT

- November 3, 2014 City Council adopts transportation performance measures and thresholds
  - Align with General Plan Guiding Principles
  - Reflect a holistic approach to addressing the City's transportation needs
  - Prioritize the movement of people
  - Encourage sustainable transportation solutions
  - Support a mix of land uses that promote livable communities
- The 5 transportation performance measures are:
  - Vehicle Miles Traveled per Capita
  - Vehicle Trips per Capita
  - Proximity and Quality of the Bicycle Network
  - Proximity and Quality of the Transit Network
  - Pedestrian Accessibility

Why did Pasadena adopt VMT?

VMT metric is reflective of the City's **holistic approach** of **planned land uses** and **supportive transportation options** that are intended to produce a more **sustainable urban environment**

- Assess project impact on the quality of, and impact on, both motorized and non-motorized modes of travel, including transit
- Discourage unintended consequences
- Align with adopted policies
- Reflect and address City's long term goals



Source: Fehr & Peers

Comparison of VMT and LOS

Vehicle Miles Traveled (VMT)	Level Of Service (LOS)
Measures travel distance times the number of vehicles over an efficiency metric	Evaluates intersection performance based on vehicle delay
Considers and analyzes for multi-modal mobility and access, including pedestrian, bicycle, transit and vehicular travel	Considers and analyzes vehicular travel only
Emphasis is on network management and travel efficiency for both vehicular and non-vehicular modes of transportation	Silent on evaluating system performance on non-vehicular travel modes

Comparison of VMT and LOS

Vehicle Miles Traveled (VMT)	Level Of Service (LOS)
Mitigation measures are related to the reduction of GHG, multimodal transportation networks, and a diversity of land uses	Mitigation measures place value on efficient movement of vehicles only
Mitigation measures decrease the emphasis on increasing roadway capacity and reducing intersection delay	Mitigation measures encourage street widening, which may compromise pedestrian and bicycle infrastructure
Mitigation measures are centered around reducing vehicular travel	Street widening may increase automobile use, reduce sidewalk widths, and other secondary impacts

Transportation Review Thresholds

Thresholds for Determining Transportation Review of Projects (Adopted by City Council on November 3, 2014)			
TYPE OF PROJECT	**EXEMPTION**	**Category 1: (Outside CEQA) BELOW COMMUNITYWIDE SIGNIFICANCE**	**Category 2: (CEQA) COMMUNITYWIDE SIGNIFICANCE**
Residential (Net # of units)	**10 units or less**	**11 – 49 units**	**50+ units**
Non-Residential Use (Net)	**10,000 Sq Ft or less than 300 daily trips**	**10,001 to 49,999 Sq Ft**	**50,000+ Sq Ft**

Category 2 CEQA Transportation Performance Measures

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CEQA THRESHOLDS OF SIGNIFICANCE (Adopted by City Council on November 3, 2014)		
METRIC	**DESCRIPTION**	**IMPACT THRESHOLD**
VMT Per Capita	Vehicle Miles Traveled (VMT) in the City of Pasadena per service population (population + jobs).	CEQA Threshold: An increase over existing Citywide VMT per Capita of 22.6.
VT Per Capita	Vehicle Trips (VT) in the City of Pasadena per service population (population + jobs).	CEQA Threshold: An increase over existing Citywide VT per Capita of 2.8.
Proximity and Quality of Bicycle Network	Percent of service population (population + jobs) within a quarter mile of bicycle facility types	CEQA Threshold: Any decrease in existing citywide 31.7% of service population (population + jobs) within a quarter mile of Level 1 & 2 bike facilities.
Proximity and Quality of Transit Network	Percent of service population (population + jobs) located within a quarter mile of transit facility types.	CEQA Threshold: Any decrease in existing citywide 66.6% of service population (population + jobs) within a quarter mile of Level 1 & 2 transit facilities.
Pedestrian Accessibility	The Pedestrian Accessibility Score uses the mix of destinations, and a network-based walk shed to evaluate walkability	CEQA Threshold: Any decrease in the Citywide Pedestrian Accessibility Score

Pasadena VMT Model

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- 2013 Baseline model builds upon regional model by reflecting local conditions
  - Regional model is used as foundation
  - Calibrated to include local conditions: land use/parcel data, street network, traffic counts, travel time information
  - More accurately captures potential impacts at the local level
- Land Use inputs updated approximately every 5 years
  - Changes to the regional model and calculation methodology
  - Street network changes
  - New developments and land use changes
  - New trip generation rates
  - Education land use employment factor
  - Expand model area

Cumulative Impacts

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- General Plan EIR considered cumulative transportation impacts

- Thresholds will not be exceeded at General Plan 2035 build-out
  - > Reduction of greenhouse gas emissions
  - > Development of multimodal transportation networks
  - > Diversity of land uses

Category 1 Outside CEQA Transportation Analysis

- SB 743 applies to CEQA Only
  - Does not preclude addressing traffic congestion in local General Plan Policies, Zoning Codes, Conditions of Approval, Thresholds, or Fee Programs
- Analysis outside of CEQA evaluation
  - Level of Service
  - Neighborhood Protection
  - Adhere to General Plan Guiding Principles
- All Category 2 CEQA projects are also analyzed under Category 1 Outside CEQA

Category 1 Outside CEQA Transportation Analysis

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METRIC	DESCRIPTION	CAP
Street Segment Analysis	The street segment analysis assesses traffic intrusion on local streets in residential neighborhoods	Increases of 10-15% above existing on streets with more than 1,500 ADT
Auto Level of Service	Level of Service (LOS) as defined by the TRB's Highway Capacity Manual (HCM) 2010.	A decrease beyond LOS D Citywide or LOS E within TOD
PEQI	Pedestrian Environmental Quality Index	Below average conditions
BEQI	Bicycle Environmental Quality Index	Below average conditions

Pasadena Municipal Code Requirements

- § 4.19 Traffic Reduction and Transportation Improvement Fee
  - Ensures that developments pay their “fair share” of the cost of future transportation facilities
  - Applies to net new residential, retail, industrial, and office developments
  - A Council approved “Needs List” identifies City-wide transportation projects eligible to be funded

- § 10.64 Transportation Demand Management Program
  - Requires projects to implement measures that promote alternative modes of transportation

Next Steps

- Return to City Council for consideration of an updated baseline year and associated CEQA thresholds to reflect new baseline conditions
  - City Council adopted CEQA performance measures and thresholds assumed a 2013 baseline
  - Industry standards suggest baseline and associated thresholds to be updated approximately every 5 years

Case Study #1: Overview

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- 3202 East Foothill Blvd
  - Construction of 550 apartments and 9,800 square feet of commercial space.
  - All existing structures will be demolished to accommodate the proposed development.

Case Study #1: Analysis

- 3202 East Foothill Blvd

Transportation Performance Metrics	Significant Impact Threshold (existing)	Incremental change (existing + project)	Significant Impact?
VMT Per Capita	>22.6	20.4	No
VT Per Capita	>2.8	3.5	Yes
Proximity and Quality of Bicycle Network	<31.7%	31.9%	No
Proximity and Quality of Transit Network	<66.6%	66.8%	No
Pedestrian Accessibility	<3.88	3.88	No

Case Study #1: Mitigations

- Mitigation measures
  - Unbundled parking for residential use
  - Purchase 275 Metro EZ passes for residents
  - Fund various improvements at the bus stops serving the property
    - Sidewalk improvements
    - Improved transit amenities
    - Technology to provide real-time predicted arrival of buses.

Case Study #2: Overview

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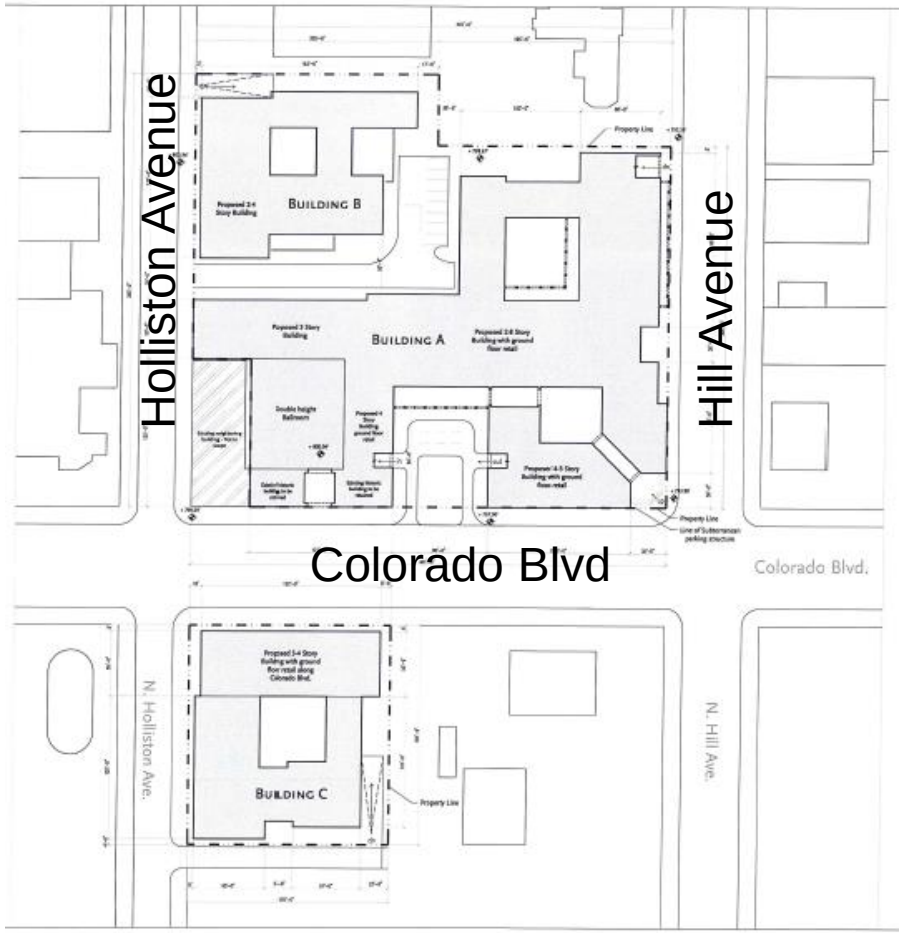
- 1336 and 1347 E Colorado Blvd
  - Hotel development comprising of up to 525 guest rooms and 26,400 sf of commercial space



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Case Study #2: Analysis

- 1336 and 1347 East Colorado Blvd

Transportation Performance Metrics	Significant Impact Threshold (existing)	Incremental change (existing + project)	Significant Impact?
VMT Per Capita	>22.6	22.4	No
VT Per Capita	>2.8	0.3	No
Proximity and Quality of Bicycle Network	<31.7%	31.4%	Yes
Proximity and Quality of Transit Network	<66.6%	70%	No
Pedestrian Accessibility	<3.88	3.89	No

Case Study #2: Mitigation

- Mitigation measure
  - Contribute fair share of funds toward the Union Street Cycle Track Complete Streets Project

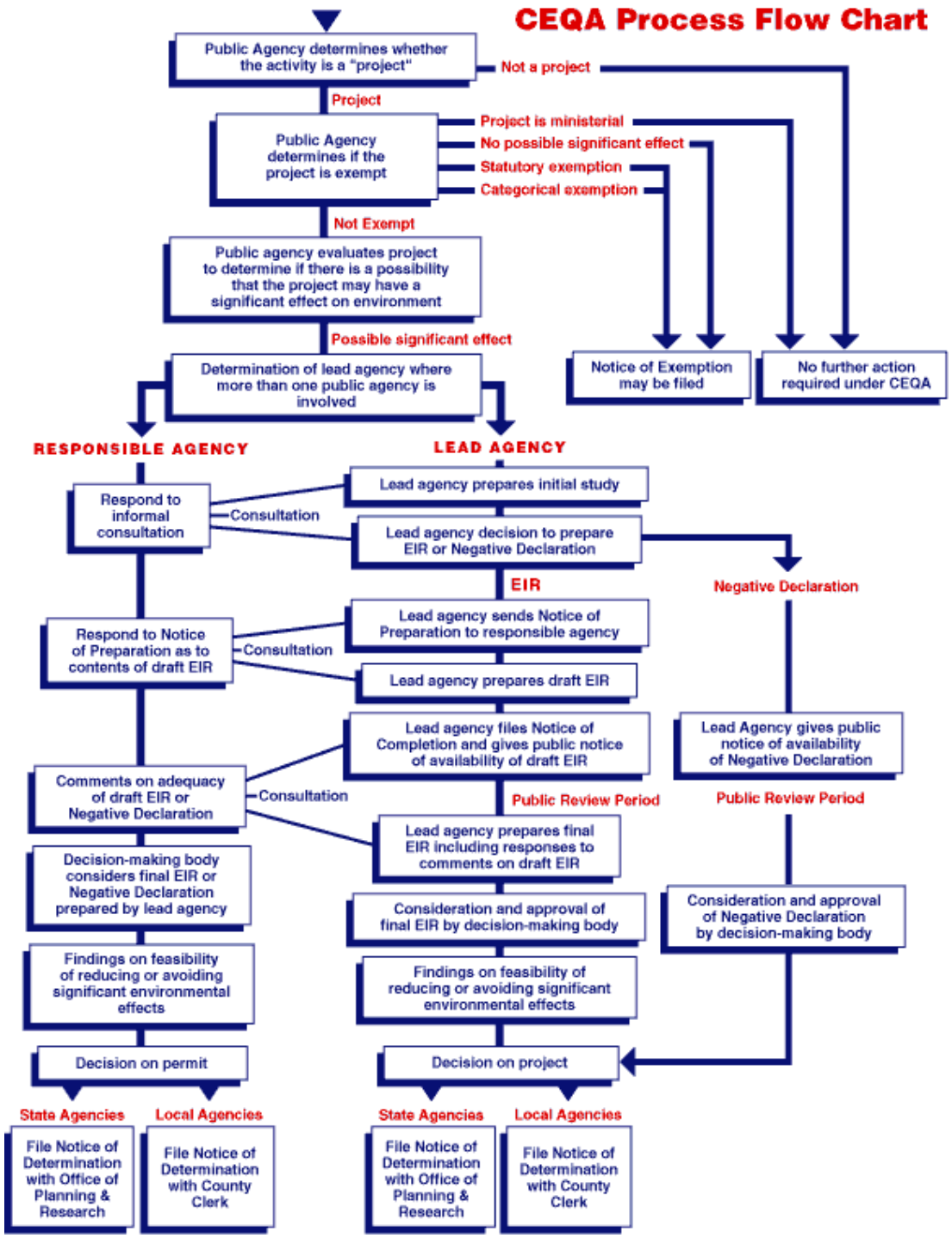
CEQA Overview

Purpose of CEQA

- Inform decision makers and the public about the potential, significant environmental effects of proposed activities
- Identify the ways that environmental damage can be avoided or significantly reduced
- Prevent significant, avoidable damage to the environment through the use of alternatives or mitigation measures when feasible
- Disclose to the public the reasons why an agency approved a project despite its significant environmental effects

When does CEQA Apply?

- CEQA applies to discretionary governmental actions, including:
  - > Activities directly undertaken by a governmental agency
  - > Activities financed in whole or in part by a governmental agency
  - > Private activities which require approval from a governmental agency
- CEQA does not apply to ministerial approvals



CEQA Process

Steps in the CEQA Process

1. Determine if the activity is subject to CEQA

   If subject to CEQA:

2. Determine whether the project is exempt from CEQA

   If not exempt:

3. Begin preparing IS/ND/MND, EIR, or other CEQA document

** These are the "Preliminary Review" steps per CEQA Guidelines Section 15060 et seq.*

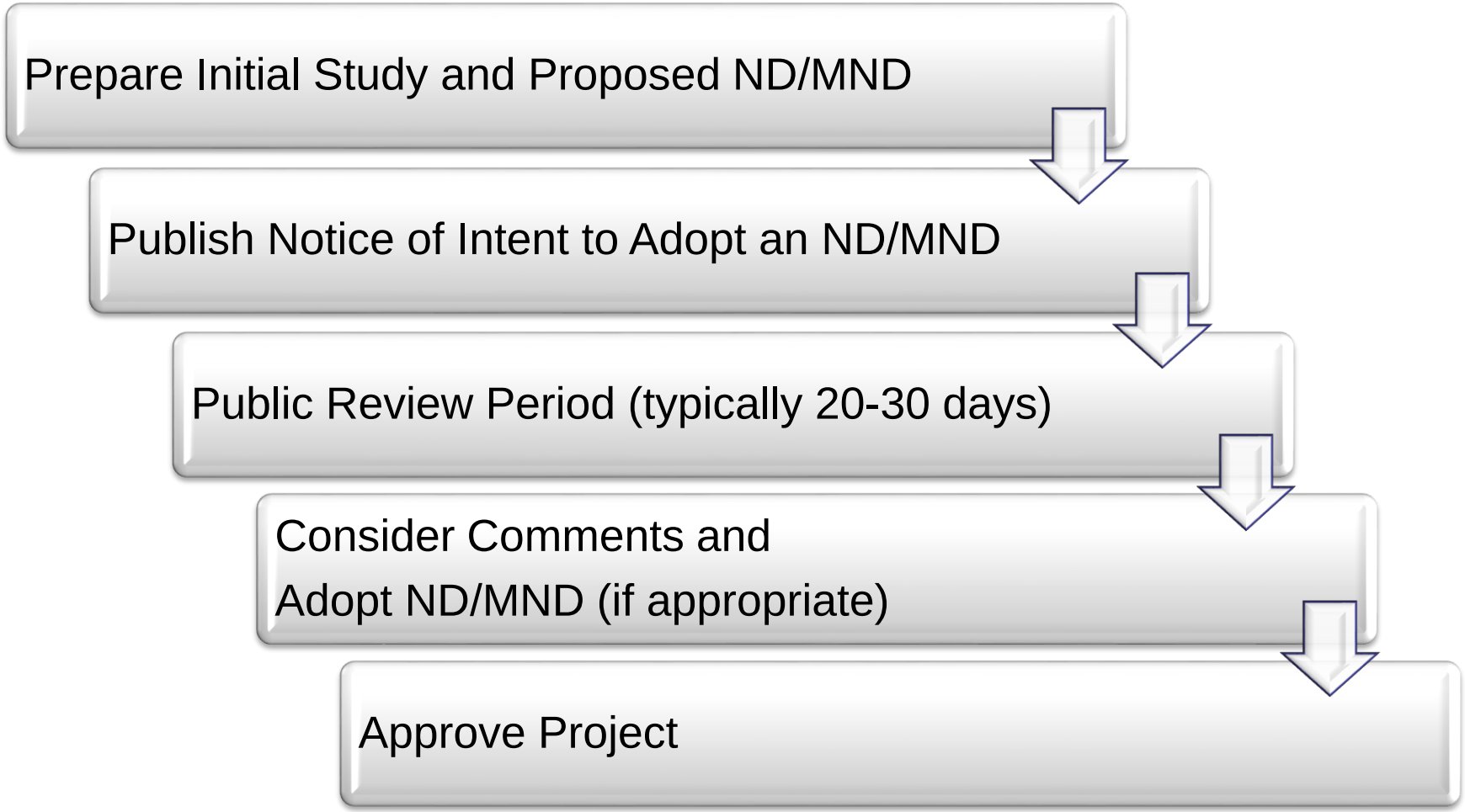
Typical Levels of CEQA Review

- Exemption
  - > Statutory Exemptions (numerous)
  - > Categorical Exemptions (Classes 1-33)
  - > Common Sense Exemption
  - > Other Exemptions (e.g., those enacted by the State Legislature)
- Negative Declaration
- Mitigated Negative Declaration
- Environmental Impact Report

Common Exempt Activities

- Alteration of existing facilities with negligible or no expansion of use (Class 1)
- Replacement or reconstruction of existing structures and facilities (Class 2)
- New construction of small structures (Class 3), in urbanized areas includes:
  - > Up to six dwelling units
  - > Up to 10,000 sf of commercial space
- In-Fill Development Projects meeting certain requirements (Class 32)

ND/MND Process



EIR Process

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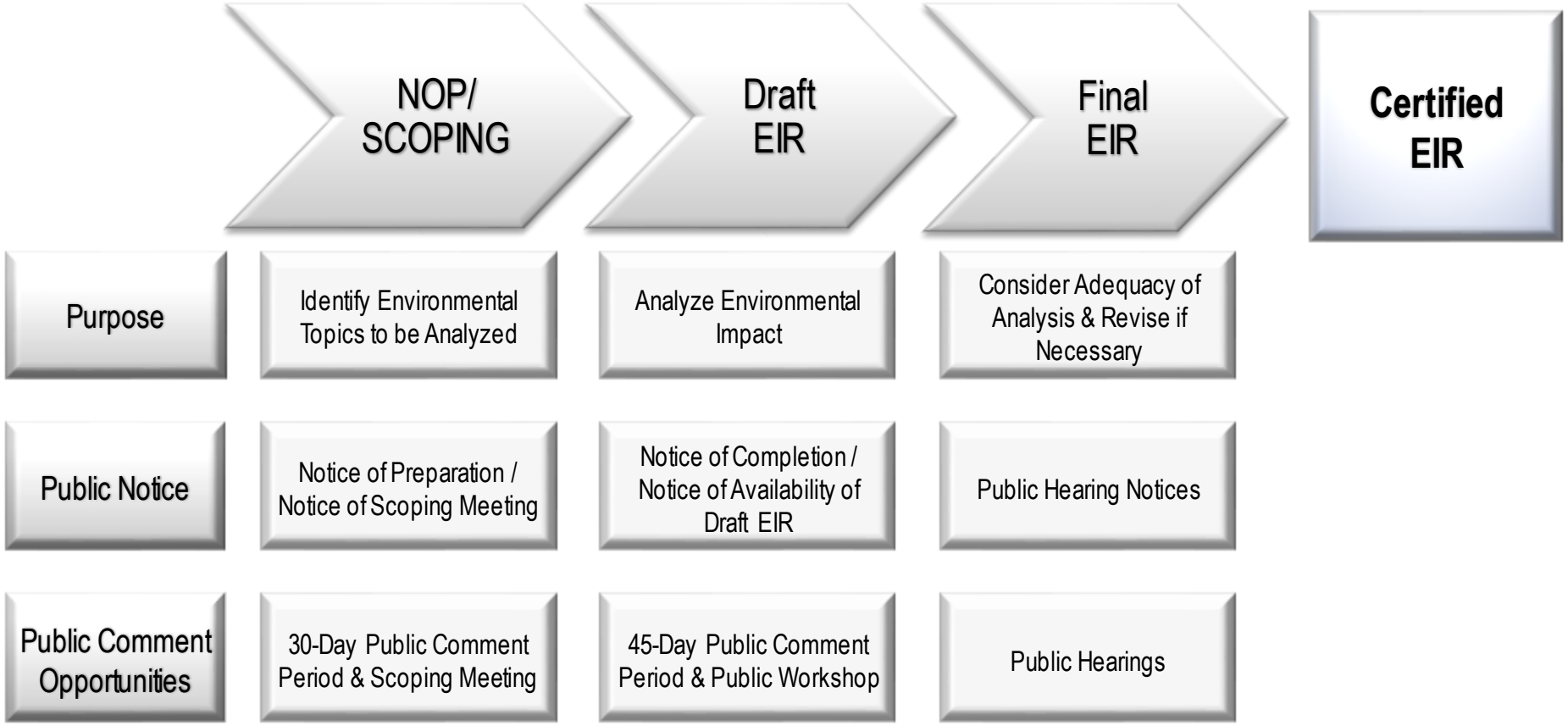

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Class 32 In-Fill Development Projects Categorical Exemption

5 Criteria to Qualify for a Class 32 CE

CEQA Guidelines Section 15332 provides the following requirements for projects to be exempt as an In-Fill Development:

a. ***The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.***

b. *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

c. *The project site has no value as habitat for endangered, rare or threatened species.*

d. ***Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.***

e. *The site can be adequately served by all required utilities and public services.*

Evaluating Consistency with General Plan and Zoning

- Conformity with every goal or policy not required
- Courts have consistently held that a finding of plan consistency requires only that a project be “compatible with,” and “not frustrate,” the goals and policies
- Density bonuses, concessions, and incentives requested pursuant to density bonus law are not inconsistencies with zoning regulations; the law renders the standards inapplicable

Traffic, Noise, Air Quality, and Water Quality Impacts

- The same analysis of impacts related to traffic, noise, air quality, and water quality is prepared for a Class 32 exemption as for an IS/MND or EIR
- Usually, technical studies are prepared to evaluate such potential impacts
- Result is a robust evaluation of potential environmental impacts of the project

Exceptions to Categorical Exemptions

The CEQA Guidelines identify exceptions to the use of Categorical Exemptions related to:

a. Location
b. Cumulative Impact
c. Significant Effect
d. Scenic Highways
e. Hazardous Waste Sites
f. Historical Resources

a. Location

- ***Location.*** *Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an* ***environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies****. (bold added)*
  - Example could be “critical habitat” area for an endangered designated by the USFWS

b. Cumulative Impact

- *Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*
  - Multiple projects do not necessarily result in significant cumulative impacts
  - Generally, the same thresholds that apply to project impacts apply to cumulative impacts
  - Cumulative impacts are studied, including detailed analysis in the technical studies

c. Significant Effect

- ***Significant Effect.*** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
  - CA Supreme Court has identified a two-step process for determining if this exception applies:

    Step 1: Determine if there are unusual circumstances

    Step 2: If there are unusual circumstances, determine if such circumstances result in a reasonable possibility of a significant effect on the environment

d. Scenic Highways

- ***Scenic Highways.*** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*
  - Two roadways in Pasadena that are identified in the State Scenic Highway Program:
    - Angeles Crest Highway
    - Historic Arroyo Parkway

e. Hazardous Waste Sites

- ***Hazardous Waste Sites.*** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
  - Commonly referred to as the Cortese list

f. Historical Resources

- ***Historical Resources.*** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*
  - CEQA defines a substantial adverse change as: physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historic resource would be materially impaired.
  - The significance of a historical resource is materially impaired when a project: demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that:
    - *…justify its inclusion in, or eligibility for inclusion in, the California Register or Historical Resources; or*
    - *…account for its inclusion in a local register of historical resources.*