



November 12, 2020

Honorable Mayor Terry Tomek
Members of the City Council
City of Pasadena
175 North Garfield Avenue
Pasadena, CA. 91109

I recently watched the Municipal Service Commission meeting where the proposed update to the CEQA VMT and VT thresholds were presented and discussed. There was no presentation of the traditional LOS method of analysis and thresholds, which are at least equally important for updates. The CEQA VMT metric and updates are based solely on recommendations from the CA Office of Planning and Research (OPR), and have nothing to do with traffic flows, safety, or the operation of a traffic signal. The method of CEQA transportation impacts is all related to green house gas reduction goals, and air quality impacts, not traffic impacts.

It is my view that traffic safety needs to be prioritized in the existing comprehensive transportation system within the City, primarily consisting of vehicle traffic. As important as the climate change argument is, safety in road transportation in Pasadena is of higher immediate concern, since accidents there are on the rise and safety has been compromised, as documented in part in a comprehensive traffic study PRISM Engineering prepared in March of 2020¹ (*see link to study, below*).

The CEQA threshold update discussion was lacking in the “how and why” details pertaining to external trips in the model being 50% but now are seemingly arbitrarily raised to 100% and attributed completely to a proposed project, all while the VMT and VT thresholds are increased from previous levels. Some in the meeting suggested that this would be a wash, but none of that could be independently verified. This needs much more explanation and even some sample calculations that can be reviewed and studied, to verify the methodology and soundness of the decisions/changes, especially as it relates to how specific project triggers are ultimately affected in the CEQA VMT and VT thresholds.

It was not clear to me, a Traffic Engineer, what exactly was going on or being proposed in making these changes, or how to compare to the past. The explanations from City Staff were insufficient for me to fully understand the details and procedures behind the proposed updates to the CEQA thresholds. It seems the City should not move forward without a full understanding of the process and proposed updates, or while missing the needed

¹ Traffic study PRISM Engineering prepared in March of 2020 in the City of Pasadena found here:

<http://www.prism.engineering/pasadenatrafficvids.html>

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simultaneous update to the “outside CEQA” LOS analysis process for traffic impact thresholds, which are critical to safety.

It is imperative that both processes, CEQA and “outside CEQA” be advanced together because the city’s update process for evaluating CEQA transportation VMT impacts is guided completely by the recommendations from the Office of Planning and Research (OPR), and the OPR’s stated goals have absolutely nothing to do with traffic flows, in the state or the City of Pasadena. In fact, OPR’s recommendations are entirely about achieving global warming reduction goals through a concerted effort to influence shift from people using cars to people instead riding bikes and buses/transit.

It is not known whether changing the CEQA VMT threshold might adversely affect the goals of the “outside CEQA” thresholds and impacts to traffic, and thus needs further study to document how real world traffic conditions may be affected by changing CEQA VMT and VT thresholds, and then updating the model with different assumptions. Both methods need to be studied together to make sure the big picture is understood, and that one method is not adversely affected by the other. This concern as much to do with how out of date the city’s LOS analysis methodology actually is, and because it yields incorrect LOS results on a consistent basis (it reflects better than real-world conditions).

Traffic Study

Back in March of this year, I finalized a comprehensive traffic study about traffic conditions in Pasadena. I was hired as a Traffic Engineer by residents of the city to prepare a traffic study to analyze traffic, review the city’s analysis process, etc. In this traffic study, we counted traffic and filmed signal operations. Our team watched traffic operations carefully, filmed them, and noted all irregularities and back-ups. We also observed bus operations and rider occupancy to measure effectiveness of transit.

I personally conducted a field review of the current traffic situation in the City of Pasadena, and drove many streets with cameras mounted on the vehicle to document the experiences. Afterwards, I used industry standard software and the most recent methods employed in most cities and counties throughout the state (HCM 2010 and the Synchro software), to calculate the LOS at several intersections and street segments for both the am and pm time periods. I also built a microsimulation model to accurately observe the data in computer form, with animated vehicle movement to verify data integrity. I then compared my LOS calculation results with how traffic was being analyzed within the City’s project review process in recent studies, and I noticed some glaring differences. Here is a specific example of what I found and published in the traffic study report:

Table ES.1. Existing Year 2020 Intersection Level of Service (LOS) Summary, Comparing with City of Pasadena DOT Recent Results		PRISM Engineering Existing Year 2020						City of Pasadena DOT Existing Year 2019		
		Analyzed w/ SFR & PHF values as measured at signal, and as CBD*			Analyzed w/ SFR & PHF values as measured at signal, <i>not</i> as CBD*			Analyzed w/ Synchro software defaults: SFR=1900, PHF=0.92		
INTERSECTION	DESCRIPTION of SIGNAL CONTROL, PHASINGS, TIMINGS	PEAK HOUR	AVG. DELAY	LOS	PEAK HOUR	AVG. DELAY	LOS	PEAK HOUR	AVG. DELAY	LOS

2	California Boulevard at Marengo Avenue	<i>SIGNALIZED. 4 Phase, Semi-Actuated. Lead/Lag Optimize allowed. Protected then Permissive Phase Left Turn for WBL, Permissive Phase for all other Left Turns. Cycle Lengths observed in field: 90-105 secs.</i>	AM	122.1	F	AM	88.9	F	AM (2019 **)	16.3	B
			PM	92.4	F	PM	61.3	E	PM (2019 **)	15.6	B

The City’s method results in a “LOS B” condition for the intersection of California at Marengo, but I found that LOS F conditions actually existed at this same intersection, and could prove it with video documentation as well, where long lines of traffic could not get through the intersection in one signal cycle. Sometimes intersections took up to four signal cycles for a vehicle to get through. If even one signal cycle is not sufficient to let all vehicles pass, this is an LOS F condition for the delayed vehicles.

These differences in results were not some random outlier, but a consistent and systemic difference in how LOS is calculated at the city. The city is using outdated software methods (over a decade out of date) and incorrect factors. They are using the wrong “Saturation Flow Rate” (SFR) which measures driver aggressiveness (the City used default values, and not calibrated values). This is a field measured value, which we did measure. The same happened with how peak hour traffic count data was being used and calculated by the city. They simplified and used default values for Peak Hour Factor (PHF) which softened the peaking result, and was not reflective of the data from the field counts.

These decisions created favorable outcomes for developments under review, specifically for 650 South Raymond. The thresholds were NOT met in the “outside CEQA” analysis because the City’s calculated “LOS B” is not considered a problem, but this is only because the software defaults used by the city were/are forgiving of the real situation in the field. However, if LOS had been calculated correctly, the intersection would have been graded LOS F, the thresholds in the traffic studies would have been triggered, and appropriate mitigations would have been proposed.

During this study we also observed average bus ridership on California Blvd. During the peak hour, ridership ranged from one to two riders, depending on the intersection. This raises the question, How effective are these transit measures in shifting people out of their cars? It does not seem very effective considering the very low occupancy of the buses observed during the peak two hour time period (see p. 24-25 of report).

Conclusions

It seems that the City should not move forward until these other important issues are considered, updated, and corrected, and where the CEQA threshold updates are more fully explained. The city’s process for reviewing projects is not activated when using the “outside CEQA” process because the city’s analyses do not match field conditions. The analysis models used by the city are not calibrated to current conditions and are incorrect in many cases. This conclusion is based on our verifiable field reviews which can be proven with peak hour video, and by anyone else who has driven these roads in the peak hour time periods. There are consistent long lines of traffic backing up at key large intersections, even since the pandemic shutdowns have subsided.

Other significant findings to note:

- **VMT is not a traffic performance metric** in any sense of the word “*performance.*” It is not a calibrated with real world data for trip distances. It does not represent traffic flow in *any* way, and has no relationship or bearing to traffic operations, delay, or how well a signal works. It is merely an output from a theoretical traffic model, not a real world condition, and no verifiable relation to reality as to how far people drive. That information requires a personal survey of all people in Pasadena, and this was not done.
- **LOS in Pasadena is not being calculated correctly**, resulting in LOS at intersections being published in DOT traffic studies that are not consistent with or agree with actual traffic conditions. State DOT standards in calculation are not being followed².
- **A proper Cumulative Traffic Analysis** is needed for traffic studies to measure any significant traffic impact from future developments. Stand-alone analyses are rounding impacts down to zero. The actual increase of traffic is 44% over existing, based on 20 projects shown in Figure ES.1.
- **The City’s Bus System** has only a handful of riders on Route 20 along California Blvd. (average number of riders observed = 1 to 2 people), is significantly underutilized, and does not achieve ridership goals, or help to reduce congestion.
- **Transportation Safety** has been compromised as Vehicle Level of Service (LOS) is de-emphasized by the City, but fatal traffic accidents continue to rise in Pasadena in the past 7 years.
- **Vision Zero not achieving goals** as intended. Neighboring Los Angeles is experiencing a 32% increase in fatal car crashes since the Year 2015, even after Vision Zero projects were implemented.

It is my view that traffic safety needs to be prioritized, as important as the climate change argument is, safety in road transportation is of higher immediate concern, since accidents are on the rise and safety has been compromised, as documented in the traffic study. The “outside CEQA” LOS analysis methods are currently allowing projects to advance without mitigation as compared to a situation where the LOS were calculated correctly. The thresholds may be acceptable, but the method of calculating the LOS is incorrect and forgiving to traffic impacts.

Sincerely,

Grant Johnson, TE



Grant P. Johnson, TE,

² See the nacto.org published document [Caltrans Guide for the Preparation of Traffic Studies](#), p. 5, footnote 8

Principal. Lic #1453

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CITY CLERK
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November 15, 2020

City Council
c/o Mark Jomsky
City Clerk
100 North Garfield Ave. Pasadena, CA 91101

Re: Proposed changes to VMT Threshold

Dear Mayor Tornek and City Council members:

We are writing with our concerns regarding the proposal in front of you to increase the CEQA threshold numbers used when determining the impact future projects would have on our city streets. The new proposed VMT threshold is much higher than 2013 numbers, and yet even these thresholds didn't accurately reflect or mitigate the true impact projects are having on our streets and infrastructure. Raising the VMT yet again will not help us better judge the impact a project will have on our city, and in fact it could virtually guarantee that any project in Transit Oriented Districts (TOD)- regardless of size - will not trigger a higher level of scrutiny.

Simply trusting that the necessary calculations have been made, but with no explanation of how this new threshold was arrived at, is concerning. We believe that the city first should verify how the increased VMT is being captured with new projects against the 2017 threshold model Pasadena DOT is encouraging City Council to approve this evening. Unfortunately, the DOT has not yet demonstrated how they arrived at their calculations, which should look like the attached exhibit (the VMT analysis from the infill exemption report for the project from 253 South Los Robles). There are many factors at play here, and the DOT has not revealed how they in fact analyzed the higher threshold. For example, how does the TOD distinction affect the new VMT threshold? The DOT has not shared with City Council how the TOD element works with the new threshold. Many of the proposed projects are near our transit centers, and so they would get VMT credits for being located in these areas. This should be accounted for and questioned for trigger aspects with the updated numbers. Will the new thresholds ever trigger a TOD project, or will we create another westside high density, traffic clogged streets scenario in our Central District?

There already has been much discussion about VMT but the information needed to make substantial decisions is not there. Raising the VMT without understanding the mathematics behind the increase could potentially remove the ability of City Council and the Planning Department to accurately assess the impact future projects could have on our city and our infrastructure. We urge the City Council to take the time to read through the citizen driven traffic analysis prepared by Prism Engineering. It is an understatement to say that our streets were already overburdened prior to the COVID crisis. We must review how these new thresholds will add to our already failing intersections and unmitigated streets. To ignore how these thresholds could change our city streets would be a travesty.

Thank you,

Megan Foker
On behalf of Livable Pasadena

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Daily Trips	Internal	External
Internal	351,074	335,942
External	335,942	491,156

Pop	136,126
Emp	111,348
Ext. Factor	50%

FINAL REDUCED DAILY VMT BY SPEED BIN					EMFAC INPUT
Speed	Internal	External	Regional	Total	
5	109	0	1,740	1,849	0%
10	672	135	14,351	15,158	0%
15	4,138	1,272	45,856	51,266	1%
20	16,828	4,554	75,159	96,541	2%
25	96,297	12,622	150,148	259,067	5%
30	489,214	61,377	275,019	825,610	15%
35	824,735	139,370	320,125	1,284,230	23%
40	200,956	55,887	225,405	482,248	9%
45	136,006	104,900	169,342	410,248	7%
50	113,994	2,075	211,672	327,741	6%
55	94,166	7,974	229,235	331,376	6%
60	120,005	15,080	238,048	373,132	7%
65	323,520	20,894	181,003	525,416	9%
70	3,633	0	528,892	532,524	11%
75	0	0	77,281	77,281	
80	0	0	0	0	
85	0	0	0	0	
SUM	2,424,274	426,139	2,743,277	5,593,690	100%

TOTAL RAW DAILY SUMMARY					
Metric	Internal	External	Regional	Total	Capita
VMT	2,424,274	852,278	5,486,553	8,763,105	35.4
VT	351,074	671,884	-	1,022,957	4.1
Length	6.9	1.3	-	8.6	-

REDUCED DAILY SUMMARY					
Metric	Internal	External	Regional	Total	Capita
VMT	2,424,274	426,139	2,743,277	5,593,690	22.6
VT	351,074	335,942	-	687,015	2.8
Length	6.9	1.3	-	8.1	-

FINAL DAILY SCENARIO SUMMARY					
Pop	Emp	VMT	VT	VMT/Cap	VT/Cap
136,126	111,348	5,593,690	687,015	22.6	2.8

2013 EXISTING SUMMARY					
Pop	Emp	VMT	VT	VMT/Cap	VT/Cap
135,938	111,348	5,591,328	686,619	22.6	2.8

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

2020 NOV 16 AM 9: 05

November 16, 2020

CITY CLERK
CITY OF PASADENA

Honorable Mayor Terry Tornek and members of the City Council
City of Pasadena
175 North Garfield Avenue
Pasadena, CA. 91109

Subject: In response to the City's Nov. 16 agenda item 11: UPDATE TO CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) TRANSPORTATION PERFORMANCE THRESHOLDS OF SIGNIFICANCE.

Add to the public record.

VMT – Vehicle Miles Traveled – is a complex formula for allowing more cars and more traffic caused by development to impact our already overcrowded city streets without any mitigation.

It bills itself as way to allow developers to create more density while at the same time reducing green house gases. Does that idea sound a little far-fetched? We think so.

Let's review what has happened in Pasadena. While many cyclists young and old have been getting outside to ride their bikes and enjoy our beautiful city, how many of those instances involve a trip replacement? Unless it is hidden away in a secret file drawer, the Pasadena DOT does not publish information about how many bicycle trips are replacing car trips. Even though the city continues to invest millions of dollars in "bicycle infrastructure" no one seriously believes automobile trips are being reduced.

How many people on their daily runs or walks in their neighborhoods have reduced their car trips or given up their cars? Many even drive to the Rose Bowl to run their three-mile loop or swim laps at the Rose Bowl Aquatics Center. Even before the pandemic ridership levels on our regional busses and trains kept dropping from reduced levels. Now it is easy to see empty busses or trains passing by. So call us skeptical that VMT has improved air quality or the environment in Pasadena. It certainly hasn't reduced traffic which keeps getting worse and worse.

While it may be hard to show actual greenhouse gasses reductions through VMT, it has been a very effective tool to encourage runaway development. The Pasadena DOT itself has admitted that no project was subject to CEQA thresholds until now, and the new proposed "reduction" may yield a whopping 1 project that might be subject to CEQA in the future. Some are skeptical that the new proposal would stop any proposed development in the future from having to undergo this review.

Pasadena

Every development increases the number of cars on our already clogged streets. And we have signed up to put thousands more on the street before the end of 2030 through RHNA. While we have been very effective at letting developers put in a lot of luxury condos in Pasadena, very little affordable housing has gone up in our city.

Overdevelopment, lack of oversight and transparency and lack of local control over our future were all key issues in the recent municipal elections. The results show people want to reject the status quo and change the way we move forward.

The VMT proposal does not reflect what residents voted overwhelmingly for in the recent election. It should be sent back and reworked so that a more meaningful number of future developments be subject to CEQA review.

Through their votes, the people have spoken loudly and strongly. We urge you to listen to them.

Thank you,
Keep Pasadena Moving

###

Martinez, Ruben

From: [REDACTED]
Sent: Monday, November 16, 2020 9:35 AM
To: PublicComment-AutoResponse
Subject: CEQA Thresholds, Item 11, Council Agenda of November 16, 2020

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Mayor and Council Members:

I'm President of the West Pasadena Residents' Association and a member of the Transportation Advisory Commission, but speaking today only as an individual.

I am concerned that there are unclear provisions and poorly understood outcomes of the proposed updating of CEQA thresholds as currently presented, which argues strongly for a continuance in the Council's consideration to allow for additional and modified analysis and outreach.

While presented as adjustments, these are major policy changes capable of affecting the form and livability of our City for years to come.

Analysis and commentary provided you by Livable Pasadena, traffic engineer Grant P. Johnson of Prism Engineering, and Erika Foy make a compelling case for continuation and full understanding of the circumstances, calculations, analyses and outcomes of the proposal.

Thank you for your consideration.

Dan Beal

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Martinez, Ruben

From: cityclerk
Sent: Monday, November 16, 2020 9:45 AM
To: Flores, Valerie; Iraheta, Alba; Jomsky, Mark; Martinez, Ruben; Novelo, Lilia; Reese, Latasha; Robles, Sandra
Subject: FW: ADD TO THE PUBLIC RECORD.

From: Kim santell
Sent: Monday, November 16, 2020 9:44:29 AM (UTC-08:00) Pacific Time (US & Canada)
To: Tornek, Terry; Mermell, Steve; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; cityclerk; Jomsky, Mark
Subject: ADD TO THE PUBLIC RECORD.

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November 16, 2020 Honorable Mayor Terry Tornek and members of the City Council City of Pasadena 175 North Garfield Avenue Pasadena, CA. 91109 Subject: In response to the City's Nov. 16 agenda item 11: UPDATE TO CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) TRANSPORTATION PERFORMANCE THRESHOLDS OF SIGNIFICANCE. Add to the public record. VMT – Vehicle Miles Traveled – is a complex formula for allowing more cars and more traffic caused by development to impact our already overcrowded city streets without any mitigation. It bills itself as way to allow developers to create more density while at the same time reducing green house gases. Does that idea sound a little far-fetched? We think so. Let's review what has happened in Pasadena. While many cyclists young and old have been getting outside to ride their bikes and enjoy our beautiful city, how many of those instances involve a trip replacement? Unless it is hidden away in a secret file drawer, the Pasadena DOT does not publish information about how many bicycle trips are replacing car trips. Even though the city continues to invest millions of dollars in "bicycle infrastructure" no one seriously believes automobile trips are being reduced. How many people on their daily runs or walks in their neighborhoods have reduced their car trips or given up their cars? Many even drive to the Rose Bowl to run their three-mile loop or swim laps at the Rose Bowl Aquatics Center. Even before the pandemic ridership levels on our regional busses and trains kept dropping from reduced levels. Now it is easy to see empty busses or trains passing by. So call us skeptical that VMT has improved air quality or the environment in Pasadena. It certainly hasn't reduced traffic which keeps getting worse and worse. While it may be hard to show actual greenhouse gasses reductions through VMT, it has been a very effective tool to encourage runaway development. The Pasadena DOT itself has admitted that no project was subject to CEQA thresholds until now, and the new proposed "reduction" may yield a whopping 1 project that might be subject to CEQA in the future. Some are skeptical that the new proposal would stop any proposed development in the future from having to undergo this review. Every development increases the number of cars on our already clogged streets. And we have signed up to put thousands more on the street before the end of 2030 through RHNA. While we have been very effective at letting developers put in a lot of luxury condos in Pasadena, very little affordable housing has gone up in our city. Overdevelopment, lack of oversight and transparency and lack of local control over our future were all key issues in the recent municipal elections. The results show people want to reject the status quo and change the way we move forward. The VMT proposal does not reflect what residents voted overwhelmingly for in the recent election. It should be sent back and reworked so that a more meaningful number of future developments be subject to CEQA review. Through their votes, the people have spoken loudly and strongly. We urge you to listen to them.

Thank you,

Kim Santell

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November 16, 2020

Pasadena City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, California 91101

RE: CEQA Transportation Thresholds - Support with Amendments

Dear Honorable Mayor and Members of the City Council:

Pasadena Heritage commends City Staff for the extensive public process on this difficult, yet important item. We consider this effort as one of our key current advocacy issues. It was upon Pasadena Heritage's request in early 2020, after seeing project after project fail to meet the thresholds for traffic impact under CEQA, that we asked for an update to the CEQA thresholds. We are thankful to the City Council for launching this effort at this time, and to the Department of Transportation for diligently seeing it through. We believe that there can be a metric that prevents excessive traffic while allowing for development. Over the past several years, each new development in Pasadena has shown "no significant impact" on traffic, although commonsense and lived experience prove otherwise.

Pasadena Heritage urges the City to adopt the strongest reduction allowed. The Planning Commission seriously considered a threshold reduction of 20% below current levels, but we understand that may run into legal challenges. However, the report hints that a 16.8% reduction may be viable, and enough evidence to support it. 16.8% is the actual reduction identified by CARB as needed to meet state environmental goals, and this reduction under baseline was adopted by Los Angeles County. We hope to hear from the City Attorney if a 16.8% baseline reduction is possible, which would align us with our adjacent unincorporated areas of Altadena and East Pasadena. Instead on undershooting our target, we should adopt one that aligns to the actual reduction needed.

As an historic preservation nonprofit, Pasadena Heritage is focused on this highly technical planning policy primarily to rein in out-of-scale development often exacerbated by high parking ratios. Not only do many recent projects appear too large and too massive, they also generate traffic that impacts adjacent local streets and older neighborhoods. Constant daily traffic and especially peak-hour commuter traffic is detrimental physically, aesthetically and from an air quality perspective. Reduced traffic is a goal we all share and would have many benefits!

For projects that include space for a large number of cars, developers and architects have two main tools in Pasadena, an at-grade parking podium or a subterranean garage. The podium option comes at a lower cost, but when these new developments are built

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adjacent to historic resources, they are largely out of scale by default. Underground parking is a better solution aesthetically, but is costly and has its own drawbacks. Subterranean garages have undermined historic trees, curtailed new landscape development, and prevented groundwater infiltration.

We are also strongly opposed to the more direct impact of traffic. Increased traffic degrades the quality of life in Pasadena, for drivers, pedestrians, and businesses alike. One of the main goals of infill development in urban cores is to reduce the dependence on cars. Despite this goal, in recent years streets such as Fair Oaks Ave., Los Robles Ave., and California Blvd. have become seriously bogged down by traffic. We believe that new developments in the Central District should be encouraging more urban living, not more long-distance commuting and the traffic it causes. Although this revision may be more stringent, it is still unlikely to trigger CEQA in any Central District development. We hope the new Central District Specific Plan will change the current model of urban infill with suburban parking standards to something more appropriate.

Setting a more strenuous threshold is an effective way of right-sizing new large-scale developments. The number of units or density of the project does not necessarily correlate to the VMT generated. The most direct factors on VMT are the parking ratio and the project location. For new residential structures that may cross over this threshold, there are multiple options for reducing parking, including Pasadena's TOD parking standards. Furthermore, the newly created Affordable Housing Concession Menu allows an up to 50% reduction on parking standards, which can be stacked on top of the TOD standards. Some projects may trip the threshold if they are located far from transit or jobs, but that is not necessarily a bad thing. The developer may choose to retool the project so that it has a greater mix of uses, or may need to mitigate the traffic impacts by making pedestrian improvements.

We appreciate the work and effort on this difficult issue. Pasadena Heritage urges you to adopt the most highest reduction legally possible. A strict threshold will protect historic resources, discourage new traffic, focus growth, and create fewer GHG emissions.



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director

cc: Laura Comejo, Director of Transportation
David Reyes, Director of Planning

Jomsky, Mark

From: richard luczynski <
Sent: Monday, November 16, 2020 12:13 PM
To: McAustin, Margaret; Tornek, Terry; Wilson, Andy; Felicia Williams; Kennedy, John; Masuda, Gene; Madison, Steve; Jomsky, Mark; Hampton, Tyrone; Gordo, Victor; Mermell, Steve
Subject: Item 11, Transportation Over site Issues

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Another Monday with changes proposed by sleeping residents who again are not aware of those chances because who can keep up with the City administration efforts for change?
I believe Pasadena residents went to the polls recently and voted a message to the administration that we want to slow down the high growth development going on in the city. We wanted a Mayor who will take action to do so. Our current Mayor has spent his service time with the city in all the departments that have led us to the current situation of overgrowth. We have tried to build out the city and capture all the revenue of the San Gabriel Valley into our city. This includes all the traffic coming from every direction into the limited street structure for those coming to work and recreate in Pasadena. Our Transportation Department forgot about those living in the city trying to find the best way to navigate through all the traffic situations just to shop in our own city. This is where the current changes are coming at us. We want the Department to show us where the VMT program has worked for such a city with similar offerings as Pasadena has. I'll bet there won't be many to show us? The residents of the city want to slow the growth, reduce the traffic, bring back the public school system and give regular families an affordable housing method to live in one of the best cities in America. So before you act quickly again it might be time to let the new members of the city council and Mayor to come on board first and let them have a greater say in the outcome.
Richard

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GLENN CAMHI

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November 16, 2020

The Honorable Mayor Terry Tornek and Members of City Council
City Hall
100 N. Garfield Ave.
Pasadena, CA 91109

RE: CEQA Thresholds Update

To be clear, I write this not in my capacity as a TAC Commissioner, nor as Secretary of the Madison Heights Neighborhood Association, but as an individual, longtime Pasadena resident.

Support of proposed threshold, and a clarification

I appreciate and support this lowering of the CEQA transportation thresholds of significance, with the expectation it will both help reduce greenhouse gas (GHG) emissions, and trigger more environmental reviews of development projects, leading to more positive mitigations.

I noticed in another submitted letter a claim that this is an *increase* in the threshold. However, that doesn't account for the full change in how VMT and VT ("VMT" for short) will be calculated, per State guidelines. Going forward, 100% (rather than just 50%) of all trip miles into or out of the city will be counted. As DOT has explained, that's primarily what made the new 2017 baseline VMT go up — yet it will *also* make every new project's VMT calculation go up, for the exact same reason. Hence, it's more or less a wash.

The relevant factor here is that this new CEQA threshold will be 15% *below* the baseline. This follows the State (OPR) recommendation, and it's what other cities have been adopting as well.

Further lowering of the CEQA threshold in the future

Once the coronavirus pandemic has settled to the point that transportation patterns have returned to normal (or a new normal emerges), I would hope DOT and City Council will work with SCAG to assess whether we're meeting the SB 375 benchmarks for its 2035 GHG reduction goals, bearing in mind that California Air Resources Board recommends reducing CEQA transportation thresholds to 25% below baseline if such Metropolitan Planning Organizations fail to meet those targets.

Apparent issues with a submitted report

The rest of my comments regard a letter submitted for this agenda item by PRISM Engineering. In case City Council hasn't had time to review it carefully, I'll point out some apparent issues think are worth being aware of. If you recall, this letter and the [report it links to](#) (dated 3/14/20) were authored by the same engineer who was hired to write a report that was submitted to City Council back in January. DOT issued an 8-page response correcting and/or explaining misconceptions in it. (That DOT report can be seen [here](#).)

Similarly, this letter and new report contain some claims I believe are misleading. I'll just point out a few, because they suggest to me that regardless of whether the central goal has merit, the entire piece should probably be carefully fact-checked before forming an assessment.

1. Pasadena has not yet adopted Vision Zero, despite implication

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The report by Mr. Johnson seems to argue against the Vision Zero road safety initiative, in part by claiming Vision Zero's "worthy goal is not being met in Pasadena."

This argument doesn't seem to make sense, because Pasadena has never actually adopted the Vision Zero initiative. It's unclear to me what the author is trying to say, but it may be misleading to anyone who doesn't know Vision Zero hasn't been adopted here.

2. Claims about Vision Zero in L.A.

The report further argues that "Vision Zero [is] not achieving goals as intended," and "The experience in Los Angeles is instructive, that there may be unintended consequences for drastically changing the transportation systems and how people use them."

The implication here seems to be that Vision Zero is failing or even making roads more dangerous. Yet if anything, the thrust of the L.A. Times article (dated 4/25/19) he quoted from was that L.A. is implementing its Vision Zero projects *too slowly*, not that the whole initiative should be canceled. A follow-up article by the same L.A. Times staff writer (dated 2/5/20), notes that traffic deaths in L.A. have continued to drop since 2016 (the benchmark year for Vision Zero in L.A.), albeit very slowly. This article suggests the leading reason for the slow decline is texting while driving, and echoes advocate's arguments that Vision Zero still isn't being implemented fast or fully enough.

3. Accidents apparently not on the rise in Pasadena

The report claims: "As important as the climate change argument is, safety in road transportation in Pasadena is of higher immediate concern, since accidents there are on the rise and safety has been compromised...." It also claims: "trends for fatalities are up...."

But according to DOT, in their response to his January report: "Citywide, total collision numbers are on a five-year downward trend. In addition, the total number of injury and fatal collisions are also on a five-year downward trend." Note this was even pre-Covid.

4. Apparently inaccurate bus ridership claim, and dubious attempted method of counting

Mr. Johnson claims Pasadena Transit ridership on Route 20 is about 10 passengers per service hour (PPH) (as of February 2020), far below General Plan goals.

Not only does that appear to be inaccurate (actual figures noted below), but his method for arriving at that claim seems rather strange. He did not get onto the buses to conduct accurate counts along routes, nor simply check the reliable ridership data the City collects (which is then audited by the Federal Transit Administration). Instead, as he puts it: "Bus Ridership was observed using video, and detecting passengers through the glass."

Most bus windows are too tinted and/or reflective (as he admits), and the impossibility of getting anything close to an accurate ridership count this way is even evidenced by the one video of this counting method he posted on the report's companion website: <http://www.prism.engineering/pasadenatrafficvids.html>. One would presume he posted his best bus video.

Even though the video is labeled "An empty bus," it's not actually empty. It's impossible to see inside most of the bus in the video clip, but there is clearly at least one person standing in the rear half of the bus. It vaguely looks like at least two others can be seen seated in other parts of the bus, but again, it's nearly impossible to tell. (It's not the most common scenario that a lone bus passenger stands, so it's plausible there are even more seated. But we have no way of knowing.) In his report, he doesn't list this bus number as being empty, so it's unclear where the mismatch lies.

I don't suspect this is how serious transit ridership studies are conducted. Particularly when done at one corner, for just two hours, if that's indeed how it worked.

Fact is, as of FY2019 (which ended Sept. 2019), ridership on Route 20 was actually 36 PPH, which is about what it's been for the past several years. That's well above the General Plan's goal. What's more, from December 2019 through February 2020, overall Pasadena Transit ridership was *up* by 13%. Not down by nearly two-thirds, as Mr. Johnson's report indicates.

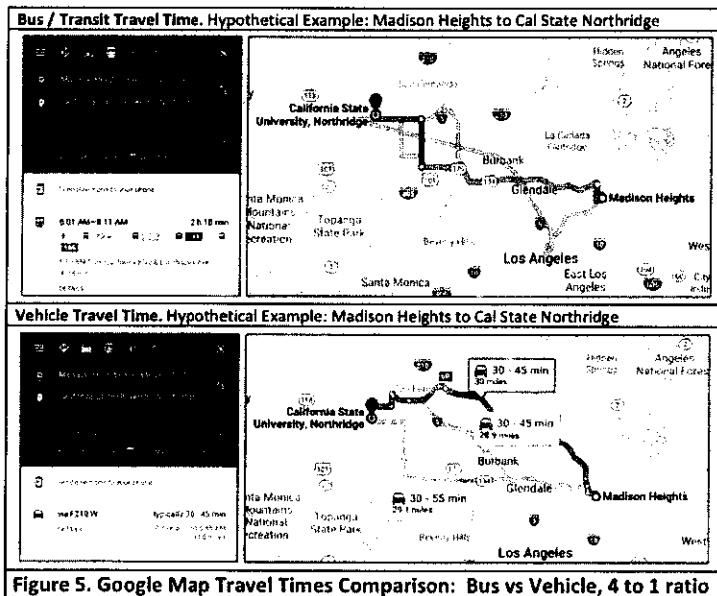
As Pasadena Transit explains: Based on this trend, FY20 ridership would have been a record year if it wasn't for COVID. But even now, ridership is again rising compared to earlier in the pandemic, and buses are being added to Route 20 and others.

Even if Mr. Johnson could get accurate figures from that limited survey, not every segment has the same ridership, and peak for transit isn't always the same as peak for other traffic.

The report reads as if it's using this ridership claim in order to suggest Pasadena should not put capital expenditures to improving public transit. It reads on p.25: "This information can also be useful in determining the viability of capital expenditures on future buses...." A good, viable public transit system is essential for the city, can help reduce GHG emissions and traffic, and is called for in our General Plan.

5. Misleading claims about transit travel times

On p.27 of his report, he shows this graphic:



But it appears he didn't check whether that was really the fastest transit route for comparison. It is not.

As any transit rider or transportation professional would know, Metro's trip planner can find the most efficient routes.

It's actually **96 minutes** via transit (*including* walking and waiting), not 130 minutes (*not including* walking and waiting), as his report claims.

He shows departure at 6:01 and arrival at 8:11 on a Wednesday morning. But one could actually depart at 6:22 and arrive at 7:58. *(The most efficient route: starting in Madison Heights [Los Robles at Fillmore], walk to Fillmore station; L/Gold Line to Union Station; Metrolink Ventura County Line 6 to Northridge Station; DASH Northridge to the Reseda/Nordhoff stop; walk 2 blocks to the school.)*

Johnson doesn't even provide evidence justifying his claim of 130 minutes "not counting walk times to bus stop and wait times for bus arrival." Google Maps indeed includes those in its calculations, and even his own Google Map above shows that the route begins with a walk time. (However, his driving comparison does not include time for parking or walking to/from the lot.)

His report's next claim also appears inaccurate: "The ratio of time for a bus ride compared to time for a car ride is 4 to 1."

Even if we used his own inefficient figure of 130 minutes for transit to compare to Google's estimate of 30-45 minutes for a car, the ratio would be 3.46 to 1, not 4 to 1. (If he was rounding to the nearest whole number, that would be 3 to 1.) But the actual ratio, using the logical transit route's travel time of 96 minutes, is 2.56 to 1.

The report then makes an ever stranger misleading claim: "In simpler terms, a commuter from Pasadena to a destination 30 miles away could spend 60 to 90 minutes a day in the car, or 5 hours on a bus, which is not a practical option for many commuters."

Apparently he arrived at this "5 hours" claim by using the inaccurate 4:1 ratio, and simply multiplied the Google car estimate by a factor of 4. That's a faulty and false extrapolation, as explained above.

6. "Road rage" graphic added to a video without apparent road rage

One of the videos the report [links](#) to shows normal rush hour delays at various intersections. Whenever it takes longer than 80 seconds to pass an intersection, the video displays a graphic reading "Road Rage." Sometimes it pulsates, sometimes it blinks, other times it grows and spins. While entertaining, it appears to be directly contradicted by the video footage itself, which shows no apparent instances of road rage. Drivers appear to be driving calmly and fairly safely overall, and pedestrians and bicycles appear able to cross even heavily-trafficked intersections safely and without incident.

Conclusion

Regardless of whether or not the PRISM letter and report have a valid goal, given these sorts of questionable claims, among others, my personal opinion is that one should carefully fact-check every claim in them before forming an assessment. For what it's worth, I do support updates to "outside CEQA" review where appropriate, which could lead to more mitigations for enhancing multimodal transport, in keeping with General Plan guidelines.

Sincerely,
Glenn Camhi

Martinez, Ruben

From: cityclerk
Sent: Monday, November 16, 2020 1:48 PM
To: Flores, Valerie; Iraheta, Alba; Jomsky, Mark; Martinez, Ruben; Novelo, Lilia; Reese, Latasha; Robles, Sandra
Subject: FW: City Traffic Dept

From: Greg Beach
Sent: Monday, November 16, 2020 1:48:21 PM (UTC-08:00) Pacific Time (US & Canada)
To: Gordo, Victor
Cc: Tornek, Terry; Mermell, Steve; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; cityclerk; Jomsky, Mark
Subject: City Traffic Dept

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Please add to the public record

Mr. Victor Gordo,

As a resident in Pasadena for over 53 years, I ask that the city limits to the fullest extent any additional buildings or structures that would add to the traffic in our beautiful city. Thank you,

Greg Beach
Resident of Hastings Ranch since 1967

11/16/2020
Item 11

Martinez, Ruben

Subject: FW: VMT/CEQA

From: KEVIN CASTAING

Sent: Monday, November 16, 2020 2:18:07 PM (UTC-08:00) Pacific Time (US & Canada)

To: Tornek, Terry; Mermell, Steve; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; cityclerk; Jomsky, Mark

Subject: VMT/CEQA

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Dear Mayor and Councilmembers:

The consideration of new VMT levels is on the agenda for tonight's meeting. I urge you to send the item back to city staff for reconsideration.

Development was a major issue in the recent municipal election and the residents of Pasadena clearly supported a change in direction. I urge you to allow the incoming council to study this issue and not rush through this current proposal. I am not an expert on the subject, but I do know that the net result of this proposal will allow continued runaway development and its resulting issues. Traffic congestion is a concern for the residents of Pasadena. The net result of VMT is an increase in traffic congestion. That method is supported by developers because it does little to reign in development.

Again, I urge the council to allow the incoming council to further study the real effects of this proposal and not rush to pass another tool to favor developers.

Thank you for your consideration.

Kevin C. Castaing

11/16/2020
Item 11

November 16, 2020
Honorable Mayor Terry Tornek and members of the City Council
City of Pasadena
175 North Garfield
Pasadena, CA 91107

RECEIVED

2020 NOV 16 PM 2:43

CITY CLERK
CITY OF PASADENA

**Re: City Council Agenda November 16, 2020 Update to CEQA Traffic Thresholds
Add to public record**

I am writing on behalf of the Lower Hastings Ranch Homeowners Association in opposition to the Department of Transportation's proposal to change the manner in which traffic is measured pertaining to new developments. I will not argue the technical aspects of this proposal since you have already received letters from others who have so ably and clearly discussed the deleterious effects of this proposal. Rather I think it more beneficial to look at this from a neighborhood viewpoint. We just held a city election that I believe was a referendum on development and the resulting impacts on neighborhoods and citizens. The Covid crisis has also increased citizens' concerns for the environment, especially the issue of density.

In East Pasadena we have been inundated with development both commercial and residential- all supposedly excused because of the location of a Gold Line station. In truth the Gold Line Station has brought more traffic and density into the area. Foothill Boulevard is a failed street. The recent changes made to Foothill because of the Home Depot development will negatively impact traffic flow. (Couldn't we have had some green in the center divider? Remember, concreting the earth raises its temperature not allowing for cool off at night).

Our residents are concerned with density and traffic. They value the environment and take pleasure in the green space around them, the ability to walk a neighborhood and say "have a nice day" to a passerby, walk to a coffee bar, donut shop, or ice cream shop. This really is the essence of East Pasadena and the reason for the stability of our neighborhoods.

I ask you to keep the well being of your residents at the top of your priorities when making these very important decisions that will have impact the lives of your constituents. Please reject the proposal of DOT relative to changing the method used to measure traffic. We are in the middle of a pandemic, and I don't believe this is an appropriate time to make such a decision. The public has been unable to easily and effectively access public information, elicit details from staff, attend presentations, ask questions, and speak before you. In general government has been doing its own thing. At least, that is the perception of many of your active citizens. Thank you for your consideration. Again, please reject this proposal.

Respectfully submitted,
Diane Kirby, Co-President, Lower Hastings Ranch Association

Martinez, Ruben

Subject: FW: November 16 Council Meeting Agenda Item 11 - Add To Public Record

From: Lawrence Harsha
Sent: Monday, November 16, 2020 4:31:12 PM (UTC-08:00) Pacific Time (US & Canada)
To: Tornek, Terry; Mermell, Steve; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; cityclerk; Jomsky, Mark
Subject: November 16 Council Meeting Agenda Item 11 - Add To Public Record

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City Council and City Staff,

I support the position of Keep Pasadena Moving. This past election the residents of Pasadena indicated they do not want any more large scale development, which will increase traffic congestion and put additional demands on the infrastructure, especially water, power and sewer. I believe you all received a letter from PRISM Engineering, a traffic engineering firm, regarding the CEQA requirements and VMT. I also agree with the traffic engineer's findings and recommendations. The letter from PRISM recommended that additional study and work needs to be done and I am in complete agreement with their findings and recommendations.

Also, information on items like this, which impact all the residents of Pasadena, should be made available to everybody far enough in advance, to allow for comment. The information could be distributed in the In Focus publication or the city council members could send the information to the residents in their districts. They could also include the link to the City Council agenda, so the residents can access the staff reports.

Thank you.

Lawrence Harsha

Pasadena 91107

11/16/2020
Item 11

Martinez, Ruben

Subject: FW: Nov. 16 - Pasadena City Council Meeting - Agenda item 11

From: Lawrence Harsha

Sent: Monday, November 16, 2020 5:37:32 PM (UTC-08:00) Pacific Time (US & Canada)

To: Tornek, Terry; Mermell, Steve; Hampton, Tyron; McAustin, Margaret; Kennedy, John; Masuda, Gene; Gordo, Victor; Madison, Steve; Wilson, Andy; cityclerk; Jomsky, Mark

Subject: Nov. 16 - Pasadena City Council Meeting - Agenda item 11

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(Add to the Public Record)

Pasdenans spoke in the recent election:

WE DO NOT WANT:

1. The current overdevelopment
2. Increased density
3. Increased vehicular traffic and congestion
4. Multistory buildings blocking air, light and views of adjacent property occupants
5. Increase in overnight parking

WE DO WANT:

1. Thorough research of ALL aspects and ramifications, both present and future
2. Public input opportunities announced in a timely manner
3. Thorough study, understanding and discussion prior to decision making by the Mayor and City Council members

IN ADDITION:

Please, carefully study:

1. March 2020 study by PRISM Engineering
2. November 12, 2020, letter from Grant Johnson, Traffic Engineer with PRISM Engineering
3. November 16, 2020, letter from Keep Pasadena Moving
4. Statement from Madison Heights resident, Erika Foy

THANK YOU.

Carol Harsha
Pasadena Resident

11/16/2020
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