

McMillan, Acquanette (Netta)

From: Andrew Salimian
Sent: Friday, April 01, 2022 3:49 PM
To: PublicComment-AutoResponse
Cc: Sue Mossman; Susan Mossman
Subject: Item 6 - Local Mobility Analysis

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Dear Members of the City Council,

Pasadena Heritage supports the updates to the Local Mobility Analysis as proposed by the Department of Transportation. We thank the City Council for their direction in early 2020 to begin this update process. Pasadena Heritage's advocacy efforts engage us with the development process in Pasadena, and we understand that traffic impacts are one of the major negative externalities associated with new development. Increased traffic leads to unsafe conditions for pedestrians and bicyclists, increased air pollution and decreased productivity. When arterials are overburdened, traffic cuts through local, residential streets. Traffic should be concentrated on appropriate corridors and discouraged from smaller, residential streets.

The broadening of the Active Transportation Assessment is also deeply needed. Pasadena has completed numerous planning documents that will improve walkability and bikeability in the City, but has been slow to implement the improvements due to lack of funding. Many of these studies have been completed in areas that are primed for development. Having new development partially fund the improvements is a common sense solution. The infrastructure upgrades will be used by new residents and employees of these new developments, hopefully encouraging alternative modes of transportation and further reducing traffic impacts.

We thank DOT Staff and their consultant for hard work on this. We are pleased to see the City in alignment with current best practices on this issue.

Andrew Salimian
Preservation Director
O: (626) 441-6333 x19
asalimian@pasadenaheritage.org



PASADENA
HERITAGE
PRESERVATION | ADVOCACY | EDUCATION

04/04/2022
Item 6

McMillan, Acquanette (Netta)

From: Ken Perry
Sent: Sunday, April 03, 2022 4:22 PM
To: PublicComment-AutoResponse
Subject: Vote Against Item #6 On the Consent Agenda - Makes Traffic Worse Not Better

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Dear Mayor and City Council:

When we started looking at what development was doing to our traffic months ago, many residents were excited. We thought we were finally going to be able to look at Level of Service and the flow of traffic – which has deteriorated with each new condo and multi-use project. Our traffic is bad and getting worse, and our neighborhood streets are more dangerous as cut off traffic endangers walkers, runners, cyclists, people walking their dogs and children playing in their neighborhoods.

Supposedly we were going to ask developers of large developments to mitigate against the cars and traffic congestion they were causing by their large projects.

What you have before you tonight is a resolution that does not do what we set out as a city to do when we wanted to update our Outside of CEQA guidelines.

This resolution will not improve traffic, or helped with clogged intersections or prevent cut off traffic from threatening our neighborhood streets. It continues the same tired and unpopular complete streets projects that have made our situation so bad in the first place. With this resolution, we will have more disastrous traffic circles like the one at the intersection of Glenarm and Los Robles. More streets will be gridlocked like California and Foothill (and these corridors will become even worse).

Please vote against this resolution and send it back to the drawing board until it actually comes up with solutions residents want. We need to address our bad traffic situation in Pasadena. We need to keep traffic flowing on major corridors and off of neighborhood streets.

Also, we need for transportation issues to be debated and presented as regular agenda items. The Pasadena DOT cannot continue to operate under the radar and slip through their policies and major projects on the consent agenda like we are doing tonight. We need to shine a light on exactly what they are doing and allow more Pasadenans to participate in decisions about their streets and neighborhoods.

Ken Perry

East Pasadena Resident

Pasadena, CA 91104

McMillan, Acquanette (Netta)

From: Erika Foy
Sent: Sunday, April 03, 2022 5:19 PM
To: Jomsky, Mark; Gordo, Victor; Kurtz, Cynthia
Cc: Wilson, Andy; Masuda, Gene; Madison, Steve; Williams, Felicia; Kennedy, John J.; Hampton, Tyron; Rivas, Jessica; PublicComment-AutoResponse
Subject: Outside CEQA- Erika Foy Public Response
Attachments: City Council April 4, 2022 LLG.docx

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Hello Mayor and City Council- Please make my letter public correspondence for tomorrows meeting. I greatly appreciate the consideration with an issue I have spent many, many hours trying to fix. I honestly don't understand the complications I am seeing here because every public body approved ALL recommendations, but that is not what the LMA proposal includes. Many thanks, Erika Foy

ERIKA FOY

PROTECTING PASADENA

April 3, 2022

Honorable Mayor Victor Gordo
Members of the City Council
City of Pasadena
175 North Garfield Avenue
Pasadena, CA 91109

RE: Updating of CEQA Thresholds

The City of Pasadena hired LLG, a traffic engineering company, to delve into and attempt to solve very important issues we are seeing on our city streets; clogged arteries, unsafe intersections and gridlock traffic. We appreciate this effort because residents are continually seeing a staggering number of unmitigated projects planned and developed around their neighborhoods, and other areas within the city boundaries. Many of us have been concerned for years of what we see as a growing problem so we hired our own traffic engineer to understand what was happening ourselves. It is unfortunate that Pasadena residents had to go as far as hiring their own traffic engineering firm to substantiate the gridlock and failing intersections we live with every day, but nevertheless, we organized, raised the necessary funds, and hired PRISM Engineering to provide a very technical and investigative traffic study. The findings were considerable and gave impetus for what LLG observed needed fixing as well.

The time is now to take a hard look at the way Pasadena reviews and approves new developments especially when it comes to our Outside CEQA process. Since our city has been challenged by the state to zone Pasadena for 9,400 new housing units in the next eight years, we must not overlook the quality of life concerns such as unmovable traffic that will come with this substantial increase in density. Pasadena's leadership must consider how zoning for so many high-density developments will drastically affect our traffic flow at our intersections by reevaluating Outside CEQA mitigation metrics to accommodate growth without sacrificing quality of life or public health and safety.

Thankfully, LLG has provided incredible insight and the necessary changes needed to bring the City's local mobility analysis requirements into better alignment with current best practices and greater transparency with the general public. ***Unfortunately, the Pasadena DOT did not fully incorporate what LLG recommended and the new LMA metrics fall short of what is needed to improve a very critical document for***

our city. I hope this City Council will question why the document does not address the following concern's LLG laid out in their extensive and expensive report.

Missing Metrics of the LMA Report

Scoping Memorandum-

- 1) LLG recommended the city formulate a scoping review process like an MOU document worksheet outlining what the project transportation study would include. You will see below this scoping process is needed for almost every other element.

Intersection Operation Analysis-

- 1) The LMA report does not mention how the city will select the traffic area to be studied. What is the criteria for which driveways, intersections and streets will be evaluated? LLG says this is important because it sets expectations as to which locations will be assessed and to what extent. For instance, will some impacted intersections or neighborhoods be left out of the study? This should be part of the MOU process. If the city does not lay out what area is going to be studied in a logical and reasonable way, we may not come to the right engineering needs.
- 2) LLG specifically recommends that future conditional analysis includes future baseline traffic for projects located ½ mile from the site. They also recommend that related projects within the vicinity be mentioned in the scoping process and thoroughly researched at the time of the project's application. This is not presented in the LMA proposal.
- 3) Traffic counts need to be collected according to industry standards. The city should not be using counts older than two years and this must be addressed as part of the scoping process. If new counts for the area being studied are needed, this would be part of the MOU document.

Trip Generation Credits and Adjustments-

- 1) There is zero mention of trip credits in staff's current LMA metric proposal. This is one of the most important aspects of the LLG report. The adjustments given need to be laid out in the scoping process.
- 2) Trip credits must have supporting documentation to verify the status of an active or recently terminated project.
- 3) Transit credits should only be given to projects in proximity of public transit and only given 20% if directly across from a station. If projects are within a TOD area but not directly across from a station, they can receive 15% credit.

Intersection Analysis Methodology and Parameters-

- 1) The latest addition of HCM must be used and a provision must be included that the latest version of Synchro be utilized when analyzing intersections. This is not in the LMA report.
- 2) Parameters for HCM must be documented in the LMA report to provide consistency in the analysis. This element is key to getting correct data showcasing the traffic concerns in the area.

Exclusive Turn Lane Queuing Analysis-

- 1) LLG recommended analyzing exclusive turn lane queuing at studied intersections. This language is not in the LMA document.

Street Segment Operational Analysis/Neighborhood Traffic

- 1) Projects located in the vicinity of a roadway which is known to operate at an unacceptable LOS need to be identified in the MOU process and therefore trigger further review of those areas.

I sincerely hope this council will review closely what is missing in the DOT's LMA proposal as compared to what LLG has recommended. I find this especially stange since each body of commissions agreed to approve all recommendations. It doesn't make sense to have very blatant recommendations missing from the LMA metrics. Without these other metrics, the problem will never be solved. Traffic engineering is a very precise science and eliminating certain elements would be counterintuitive. I would also appreciate a discussion when considering many projects are on the edge of a TOD and might be adjacent to a single family neighborhood. An LOS E intersection may not be appropriate where families are trying to enter and exit single family neighborhoods.

Thank you for your time and consideration on a complicated issue,

Erika Foy

McMillan, Acquanette (Netta)

From: FI D
Sent: Monday, April 04, 2022 7:33 AM
To: Gordo, Victor; Masuda, Gene; Williams, Felicia; Kurtz, Cynthia; cityclerk; Hampton, Tyron; Kennedy, John J.; Rivas, Jessica; Madison, Steve; Wilson, Andy; PublicComment-AutoResponse
Cc: KeepPasadenaMoving
Subject: Item No. 6, Local Mobility Analysis Update

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April 4, 2022

Mayor Gordo and City Council

Subject: April 4, 2022, Item No. 6, Local Mobility Analysis Update

The residents of Pasadena are asking the City Council for a more stringent VMT/CEQA policy, not less. The residents understand that more development means more traffic and the goal is not to let Sacramento compel Pasadena (SB9) to allow increased development while obfuscating traffic impact based on convoluted transportation policy (outside CEQA). New development would place excessive traffic on neighborhood streets and impact the safety of residents, and the concept of affordable housing will impact all residents.

California's fixation on density and transit sparks opposition in small cities and local small businesses. Many cities are put off by the notions of "road diets" and "traffic calming" which are failures across the country. Pasadena Complete Streets Coalition continues to push this approach as a solution for "safety" while being the self-imposed spokespersons for all Pasadena residents. More 'urbanism' means over-development creating monumental traffic and safety issues. Meantime, mass transit, despite some \$20 billion in investment, lost market share and riders, even before the pandemic.

"Traffic is like water and will find the path of least resistance." The 'Outside CEQA' narrative is a convenient way to remove the stringent laws of the state of California, which was once a leader in environmental protection, now wants to conveniently change the rules to allow for increased development. Current outside-CEQA reports are deeply flawed, and Pasadena streets are not functioning in an acceptable way. Cut-through traffic and cumulative concerns rapidly grow as massive development projects continue. The city is compromising not only quality of life but safety. When accidents inevitably occur on our jammed streets, the city risks liability and all forms of multi-modal transportation is affected.

I urge city leaders to put residents' concerns forward, pause on any votes and/or recommendations on the Local Mobility Analysis Update and reexamine the LLG favorable recommendations and ask to reexamine DOT's proposal that are missing key elements from LLG's report. Without those recommendations, there is no complete solution for all users of the road.

Respectfully,
Frank Duerr

McMillan, Acquanette (Netta)

From: Kim santell
Sent: Monday, April 04, 2022 7:34 AM
To: PublicComment-AutoResponse
Subject: STOP THE OVER GROWTH

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April 4, 2022

Mayor Gordo and City Councilmember's

Subject: April 4, 2022, Item No. 6, Local Mobility Analysis Update

Add to the public record.

KPM supports the Local Mobility Analysis proposed by the Linscott, Law and Greenspan report (LLG) report as a good first step. KPM also wants to thank the city and DOT for pursuing the transportation analysis for the future of Pasadena. While an update to the traffic Outside CEQA analysis as recommended by LLG will bring Pasadena in line with best practices in traffic engineering of our city, these new guidelines will inherently trigger more use of "traffic calming" measures which will equate to increased traffic congestion. It's a simple point: more development means more "traffic calming", which means gridlock.

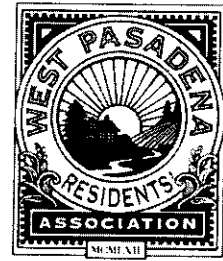
I hope this City Council will pause on any decision and request further analysis as a next step. Pasadena must grow in a way that doesn't create traffic gridlock and a harmful environment and implement safer streets for all who share the road.

Kim Santell
District 4

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2022 APR -4 AM 8:43

WEST PASADENA
CITY OF PASADENA



April 4, 2022

Honorable Mayor Victor Gordo
Members of the City Council
City of Pasadena
VIA EMAIL

**RE: Local Mobility Analysis Update to the City's Transportation Impact Analysis
Current Practice and Guidelines (Item 6, Council Agenda of April 4, 2022)**

Honorable Mayor and Council Members:

The West Pasadena Residents' Association commends the work and dedication of City staff, consultants and community representatives in developing the revised Local Mobility Analysis process. The greatly-improved Practice and Guidelines will provide much-improved analysis, understanding and mitigation of the impacts of development on our City and its neighborhoods.

The Department of Transportation's report of this date contains crucial language (Recommendation 2) that must be adopted, clearly understood and fully carried out:

2. Adopt a resolution to replace the current Outside California Environmental Quality Act (CEQA) Current Practice and Guidelines with an updated Local Mobility Analysis, *inclusive of the recommendations identified in the LLG [Linscott, Law & Greenspan] Recommendations report dated October 19, 2021.* (pertinent language italicized)

This language is critical because the Local Mobility Analysis Metrics (Attachment A to the resolution) are essentially an outline of the revised LMA process. The actual specific and detailed processes of conducting LMA analyses, essentially the "instructions", are contained in extensive and highly professional detail in the referenced LLG report. LLG's recommendations cover a wide variety of the specific components of LMA analyses, ranging from scoping memoranda and intersection analysis, to use of the appropriate software.

I am confident that interested parties, including community groups and neighborhood associations will obtain much-improved information through the transparent use of the Local Mobility Analysis update incorporating the adopted LLG recommendations.

WEST PASADENA RESIDENTS' ASSOCIATION
POST OFFICE BOX 50252 • PASADENA, CA 91115

04/04/2022
Item 6

With this understanding, WPRA supports the revised Local Mobility Analysis process and again thanks the many participants whose hard work accomplished this important result.

Respectfully,

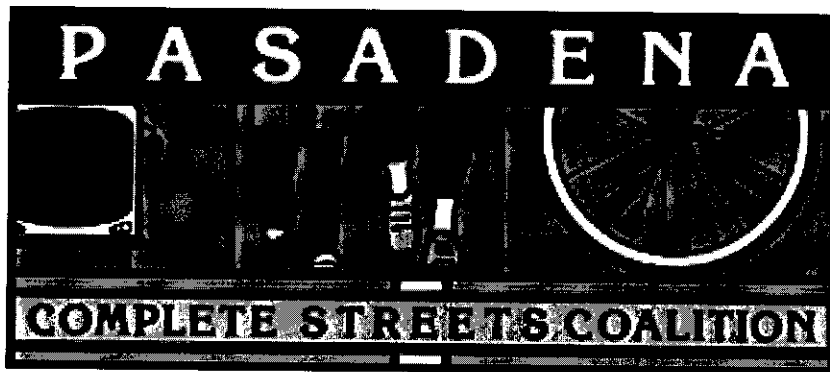


Dan Beal, WPRA President
For the Board of Directors

C: Cynthia Kurtz, Interim City Manager
Laura Rubio-Cornejo, Director of Transportation
David Reyes, Director of Planning and Community Development

The WPRA is an all-volunteer organization dedicated to maintaining and enhancing the quality of life in southwest Pasadena. We have over 1,000 paid members.

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22 APR -4 PM 1:28

STREET WORK
MAY 11 2022

April 4, 2022

Pasadena City Council
100 Garfield Avenue
Pasadena CA 91101

RE: Local Mobility Analysis Update, Agenda Item #6

Mayor Gordo and Council Members:

The Pasadena Complete Streets Coalition (Pasadena CSC) appreciates the opportunity to comment on the City's consideration of updates to the Transportation Impact Analysis Current Practice and Guidelines.

Pasadena CSC supports the Staff's recommendations in Attachment C to the April 4th, 2022 staff report from the Department of Transportation.

Background

As you are aware, until 2019 Pasadena along with all other cities in California, was required by the California Environmental Quality Act (CEQA) to evaluate the impact of new commercial and residential developments based on how fast cars could move (Level of Service). If a new development would generate new car trips which would slow down the ability for drivers to get from Point A to Point B, mitigation measures were required to ensure that traffic could flow at existing or greater speeds.

The reason that the State of California no longer uses "Level of Service" is that it led to street and city design that emphasized vehicle speed over safety. Speed is unsafe for drivers and people traveling by foot, bicycle, or other modes.

Now Pasadena evaluates potential developments based on Vehicle Miles Traveled (VMT). This new metric acknowledges that building housing, jobs, and services close to each other can reduce the number and length of auto trips generated.

In addition to VMT, the City looks at the impact of developments on local mobility (“Local Mobility Analysis”) using the Transportation Impact Analysis Current Practice and Guidelines, with the following mobility priorities:

- Reducing travel times
- Protecting residential neighborhoods from excessive through traffic and parking
- Providing safe, inviting spaces for all users
- Reducing wait times at intersections
- Encouraging bicycling and other active modes
- Encouraging use of transit

The Coalition supports all of these mobility priorities, with the following comments:

Where there is a conflict between the goals of “Reducing travel times” and “Providing safe, inviting spaces for all users” the conflict should be resolved in favor of safety. High vehicle speeds on roadways are dangerous for the drivers and passengers themselves, and for those traveling by foot, bicycle, or other modes. Lower speeds can be reinforced by improved street engineering, which can also help reduce cut-through traffic.

Traffic can flow freely at lower speeds, especially if there are fewer drivers on the road. Here are some ways to lower the number of cars on the road:

- A. Create housing closer to public transportation and jobs
- B. Unbundle parking from new housing units
- C. Eliminate on-site parking minimums and introduce maximums in TOD zones
- D. Encourage transit use and walking by coupling transit passes with new housing
- E. Give people a variety of safe transportation options

With regard to the changes proposed to the Local Mobility Analysis, the Coalition generally supports these changes, with the following comments:

In addition to discontinuing PEQI and BEQI and changing the focus to all street users, the City should explicitly support projects that improve transportation networks, such as:

- 1) Create more frequent headways on Pasadena Transit routes
- 2) Update and **implement** a comprehensive Bike Plan that connects residents to shops, services and transit
- 3) Improve Pasadena’s dismal pedestrian safety record so that people feel safer walking on the streets

The neighborhood intrusion and cut-through analysis should consider engineering solutions, such as traffic diverters, speed humps, and raised crosswalks. Also, much of Pasadena is single-family neighborhoods bounded by larger arterials, so if an expanded definition of “cut-through, diverted trips” would impact new housing along transportation corridors, that impact would need to be assessed in conjunction with the City’s ability to meet the state

mandated requirements for housing.

We need to embrace our future by providing Pasadena residents with REAL options for circulating without cars.

There will always be Pasadena residents who need to drive: people who are older or disabled, people with young children, people with longer commutes. But not all commutes or errands need to be done by car, especially with Pasadena's climate, geography and population. We know that about half the trips in Pasadena are 3 miles or less, which is a distance easily traveled by bicycle, bus, or walking. Surveys consistently show that concerns over safety are a major obstacle to using these modes.

The sooner we can create safe and convenient alternatives to driving, especially for people who live in new, denser buildings near transit, shops and services, the sooner we can reduce the number of vehicle trips generated.

Funds generated by new developments should be used to address Pasadena's transportation issues on a comprehensive basis, not project-by-project or block-by-block.

Per the Transportation Impact Analysis Current Practice and Guidelines: "The vision relies upon an integrated and multimodal transportation system that provides choices and accessibility for everyone living and working in the City. Key strategies to achieve this vision promote non-auto travel including public transit services, parking strategies, bicycle facilities, and pedestrian components that are well coordinated and connected with a larger regional transportation system."

We wholeheartedly support this vision, and we look forward to working with Pasadena DOT staff and other organizations to make it a reality.

Sincerely,

Blair L. Miller

Blair Miller
On Behalf of the Pasadena Complete Streets Coalition

McMillan, Acquanette (Netta)

From: Erika Foy
Sent: Monday, April 04, 2022 12:22 PM
To: Jomsky, Mark; Gordo, Victor; Kurtz, Cynthia
Cc: Wilson, Andy; Masuda, Gene; Madison, Steve; Williams, Felicia; Kennedy, John J.; Hampton, Tyron; Rivas, Jessica; PublicComment-AutoResponse; Siques, Joaquin; Reyes, David; De La Cuba, Vannia
Subject: Re: Outside CEQA- Erika Foy Public Response

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Good afternoon- It has come to my attention there has been a massive confusion between what the Attachment A in the Outside CEQA item presents and what the finished guidelines will be in the next 30 days. I have spoken with Joaquin Siques of DOT and he has clarified what the difference is between thresholds and metrics and why it is not a complete document at this time. I will be anxious to see the new guidelines once these metrics are hopefully approved tonight. LLG did an absolute killer job of helping our city improve our transportation analysis to a point I can retire on the issue;) I hope our city considers using LLG's services again for any transportation needs.

I will never forget the time Fred Dock took with me to walk me through the Outside CEQA process years ago and the shock on my face when I learned what little mitigation, if any, was happening. The next step will be to zero in on the necessary changes to our required mitigations when Outside CEQA thresholds are triggered. My hope is the council approves what DOT is presenting tonight with flying colors. This has been a long haul in working to address a very serious concern for a massively growing city in the next 8 years. Thank you, Erika Foy

> On Apr 3, 2022, at 5:18 PM, Erika Foy <fofamily@sbcglobal.net> wrote:

>

> Hello Mayor and City Council- Please make my letter public correspondence for tomorrows meeting. I greatly appreciate the consideration with an issue I have spent many, many hours trying to fix. I honestly don't understand the complications I am seeing here because every public body approved ALL recommendations, but that is not what the LMA proposal includes. Many thanks, Erika Foy

>

> <City Council April 4, 2022 LLG.docx>

McMillan, Acquanette (Netta)

From: Lee Allen
Sent: Monday, April 04, 2022 2:16 PM
To: PublicComment-AutoResponse
Subject: April 4, 2022 Agenda Item No. 6

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April 4, 2022

Honorable Mayor Gordo and City Councilmembers

Subject: April 4, 2022, Item No. 6, VOTE NO on Local Mobility Analysis Update

Tonight, a resolution is being brought forth by the Department of Transportation that changes the rules and departs from what the city set out to do to update our Outside of CEQA guidelines and reduce if not eliminate what protections we currently have. This resolution is flawed and will only add to our already congested streets as a result of overdevelopment. The promised mitigations to large developments have been disguised in sheep's clothing as "road diets" and "traffic calming" alternatives, such as bulb outs, traffic circles, and traffic diverters that have proven disastrous in other cities, expensive, and confusing and dangerous for motorists, pedestrians, and cyclists, not to the mention, the delays for EMS vehicles. Pasadena Complete Streets Coalition is pushing for these "traffic calming" approaches in the interest of "safety" as if they are speaking for the majority of Pasadena residents. Which they do not.

I don't believe this resolution will provide solutions the residents want. I believe we would have more residents involved if DoT agenda items were timelier and the process more transparent so Pasadenans are made aware, can participate in decisions, and be made fully aware of the costs to the city by these projects.

Related to the topic tonight, Mayor Gordo, in your 2022 State of City address, I applaud your recommendation for a revamped budget process that includes departmental oversight. You stated

"...For some time I have advocated for a revamped budget process... With the advice and consent of our City Manager, this year's process will be different; Council Committees with subject matter responsibility over a department will review respective budgets and be able to dig into their programs...It is my hope that this new process will allow for improved oversight by Pasadena's elected officials of precious City dollars and resources, and provide the public a better opportunity to review not only budgetary numbers, but also the effectiveness and efficiency of our programs and related expenditures."

Transportation and how it relates to our neighborhoods is too important for alternative mitigations to be fast-tracked through Council like tonight without being able to "...dig into their programs..." and determine the "...effectiveness and efficiency of our programs and related expenditures."

Please VOTE NO or press pause on the LMA update as proposed tonight.

Thank you,

Lee Allen