

Agenda Report

April 4, 2022

TO: Honorable Mayor and City Council

THROUGH: Municipal Services Committee (February 8, 2022)

FROM: Department of Transportation

**SUBJECT: LOCAL MOBILITY ANALYSIS UPDATE TO THE CITY'S
TRANSPORTATION IMPACT ANALYSIS CURRENT PRACTICE AND
GUIDELINES**

RECOMMENDATION:

It is recommended that the City Council:

1. Find that the adoption of the Local Mobility Analysis is not a "project" pursuant to the California Environmental Quality Act ("CEQA") Guidelines Sections 15060 (c)(3) and 15378; and
2. Adopt a resolution to replace the current Outside California Environmental Quality Act (CEQA) analysis in the Transportation Impact Analysis Current Practice and Guidelines with an updated Local Mobility Analysis, inclusive of the recommendations identified in the LLG Recommendations report dated October 19, 2021.

TRANSPORTATION ADVISORY COMMISSION RECOMMENDATION:

On October 28, 2021 the Transportation Advisory Commission (TAC) reviewed and provided comments on the recommended updates to the Local Mobility Analysis (LMA) section (formerly referred to as "Outside CEQA") of the Transportation Impact Analysis Current Practice and Guidelines. The motion to recommend the LMA section update for approval passed with one abstention.

PLANNING COMMISSION RECOMMENDATION:

On December 8, 2021, DOT presented the recommended updates to the City's LMA section of the Transportation Impact Analysis Current Practice and Guidelines to the

Planning Commission. The Commission voted unanimously to approve the recommended updates to the LMA section of the Guidelines with the following comments:

1. Update the best practices research to include other cities outside of California that excel in transportation and traffic management;
2. Include an analysis to evaluate a project's post-construction traffic;
3. Study the effectiveness of conditions of approval post-construction through code compliance and monitoring;
4. Include a bond as part of the conditions of approval to hold the developer responsible for any adverse effects of the project on the street network; and
5. Follow up with tracking the conditions throughout the project.

Responses to the Commission's motion are contained within the body of this report.

EXECUTIVE SUMMARY:

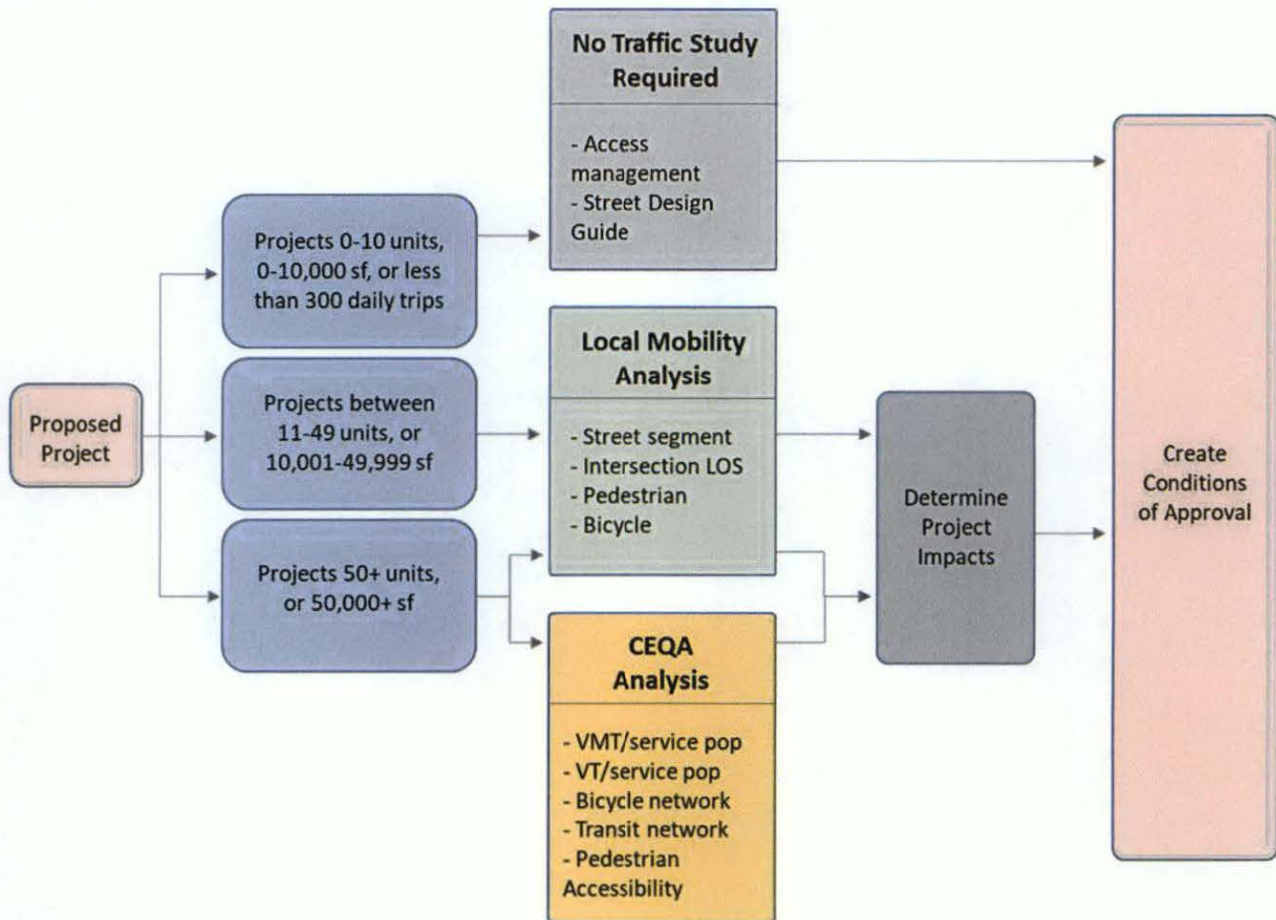
The Department of Transportation (DOT)'s Transportation Impact Analysis Current Practice and Guidelines outline how development projects are to be evaluated. The CEQA thresholds in the Guidelines were updated in November 2020. As the LMA section of the Guidelines has not been updated since 2015, the LMA is due for an update to be consistent with current best practices and methodologies. To assist the City in updating the Local Mobility Analysis section of the City's Guidelines, Linscott, Law and Greenspan, Engineers (LLG) was contracted to research best practices and new analysis methodologies that 18 municipal California agencies use in reviewing transportation impacts; to facilitate the public engagement and feedback sessions; and to review public comments received during the entitlement processes for previously analyzed proposed developments. The LMA metrics (Attachment A) would best serve the City's needs in evaluating project traffic. The consultant's recommendations memorandum may be found in Attachment B.

BACKGROUND:

DOT is responsible for determining how the City's street network is potentially affected by proposed developments and identifying strategies that align with the State's long-term climate goals of reduced greenhouse gas emissions and the City's goals as identified in the General Plan. Traffic analyses can help identify deficiencies and impose measures to future development to either minimize or manage potential project-related impacts to the City's transportation network.

The current Guidelines require an LMA analysis for all projects greater than 10 residential units, add more than 10,000 non-residential square feet (sf), or are expected to generate 300 or more daily trips. Any project less than the stated criteria is generally exempt from requiring a traffic analysis, but is still reviewed against the City's Street Design Guide and for overall traffic safety. The following figure summarizes the path and study criteria for a project to receive DOT approval.

Figure 1: Current Project Path for Transportation Review and Approval



To ensure that transportation analysis is reflective of current best practices and accurately capture a proposed project's potential local mobility impacts, DOT is recommending a revised Local Mobility Analysis section to the City's Transportation Impact Analysis Current Practice and Guidelines.

COMMUNITY ENGAGEMENT:

In December 2020, City staff met with representatives from Pasadena Complete Streets Coalition and representatives from Keep Pasadena Moving to better understand their concerns regarding the City's CEQA thresholds and Local Mobility Analysis process. On February 1, 2021, a study session was held with City Council to provide greater clarity on the distinctions and overlaps between CEQA and Local Mobility Analysis processes.

An informational item was presented at the July 22, 2021 Transportation Advisory Commission (TAC) meeting to gather initial feedback and welcome public input in the update to the LMA section of the Transportation Impact Analysis Current Practice and Guidelines. Two public outreach meetings were held in fall 2021 to receive public

feedback for consideration in the update to the LMA section of the Guidelines. Notification of the Public Outreach meetings was posted through social media, direct outreach to neighborhood advocacy groups, through notification to the Council District Liaisons, posted on the City events calendar on the City's website, and through local media.

LOCAL MOBILITY ANALYSIS:

An LMA is currently required for all projects that are greater than 10 units, when a non-residential project is 10,000 sf or more, or the project is anticipated to generate 300 daily trips or more. The City's current Guidelines evaluate a project's effects under the following metrics:

Table 1: Current Local Mobility Analysis Metrics

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 would trigger conditions of approval to reduce project vehicular trips
Auto Level of Service	Level of Service (LOS) as defined by the Transportation Research Board's <i>Highway Capacity Manual (HCM)</i> .	A decrease beyond LOS D Citywide or LOS E within Transit Oriented Districts (TODs) would trigger conditions of approval to reduce project vehicular trips
PEQI	Pedestrian Environmental Quality Index	Below average Conditions
BEQI	Bicycle Environmental Quality Index	Below average conditions

Based on public input, a review of agency best practices, and the City's goals as outlined in the General Plan, the proposed LMA metrics below will expand the evaluation criteria used in the current Guidelines:

Table 2: Proposed Local Mobility Analysis Metrics

Metric	Description
Screening Criteria	<p>Development project requires a Local Mobility Analysis (LMA) if:</p> <ul style="list-style-type: none"> • Project proposes more than 10 net new residential dwelling units • Project proposes more than 10,000 net new non-residential square feet • Project results in a net increase of 110 or more net new daily vehicle trips
Active Transportation Assessment	<ul style="list-style-type: none"> - Conduct inventory of existing and planned pedestrian, bicycle and transit infrastructure within .25 mile radius of the project boundary - Document destinations within .25 mile radius of the project boundary which could potentially attract pedestrian, bicycle, and transit trips to/from the project site
Intersection Operational Analysis	<ul style="list-style-type: none"> - Conduct intersection Level of Service analysis for AM and PM peak hour - Analysis shall include the following scenarios: <ul style="list-style-type: none"> • Existing Conditions • Existing with Project Conditions • Future (Project Build-Out) Baseline Conditions • Future (Project Build-Out) With Project Conditions - Analysis may also include the following scenario: <ul style="list-style-type: none"> • Future Cumulative (General Plan Build-Out) With Project Conditions - Future traffic forecasting shall include annual ambient growth rate and added volumes generated by other known and reasonably foreseeable development projects - Increase in LOS which exceed the following criteria may require corrective measures: <ul style="list-style-type: none"> • Minimum acceptable LOS is LOS D outside of Transit Oriented Districts (TODs) • Minimum acceptable LOS is LOS E inside of TOD

Residential Neighborhood Cut-Through / Intrusion Analysis	<ul style="list-style-type: none"> - Analysis shall be prepared for existing and future (project build-out) conditions - Evaluate neighborhood residential street segments classified as "Access" or "Neighborhood Connector" in the City's Streets Plan (which serve residential uses along at least one side of the roadway) that do not provide sole access to the project site if: <ol style="list-style-type: none"> 1. The project is expected to add trips to a neighborhood residential street(s), or 2. a) The project is located in the vicinity of an intersection known to operate at an unacceptable LOS during peak traffic conditions, and b) The street segment provides a viable alternative route which is parallel to and/or in proximity to a congested corridor - Increase in Average Daily Traffic (ADT) which exceed the following criteria may require corrective measures: <table border="1" data-bbox="488 877 1455 1094"> <thead> <tr> <th data-bbox="488 877 764 936">Baseline ADT</th><th data-bbox="764 877 1455 936">Project-Related Vehicular Increase In ADT</th></tr> </thead> <tbody> <tr> <td data-bbox="488 936 764 995">0 to 1,500</td><td data-bbox="764 936 1455 995">150 or more of final ADT</td></tr> <tr> <td data-bbox="488 995 764 1054">1,501 to 3,499</td><td data-bbox="764 995 1455 1054">10 percent or more of final ADT</td></tr> <tr> <td data-bbox="488 1054 764 1094">3,500 or more</td><td data-bbox="764 1054 1455 1094">8 percent or more of final ADT</td></tr> </tbody> </table>	Baseline ADT	Project-Related Vehicular Increase In ADT	0 to 1,500	150 or more of final ADT	1,501 to 3,499	10 percent or more of final ADT	3,500 or more	8 percent or more of final ADT
Baseline ADT	Project-Related Vehicular Increase In ADT								
0 to 1,500	150 or more of final ADT								
1,501 to 3,499	10 percent or more of final ADT								
3,500 or more	8 percent or more of final ADT								

To ensure that transportation analyses are reflective of current best practices, can more accurately capture potential impacts of proposed projects, and address public concerns, DOT is recommending that City Council adopt a resolution to replace the current Outside California Environmental Quality Act (CEQA) analysis section in the Transportation Impact Analysis Current Practice and Guidelines with a new Local Mobility Analysis section.

The updated Local Mobility Analysis will be included in the revised Guidelines posted on the Development Review Section of the Transportation Department website: www.cityofpasadena.net/transportation. The Local Mobility Analysis section requirements will be applied to new project applications deemed complete 90 days after approval by City Council.

RESPONSE TO PLANNING COMMISSION COMMENTS:

The Planning Commission approval of the recommended updates to the Local Mobility Analysis section of the Guidelines included comments regarding traffic monitoring and comments questioning why none of the agencies surveyed are outside California. Planning Commissioners had concerns regarding how project traffic would be monitored

after construction, and whether the developer of the project shall be responsible for project traffic effects to the street network after construction. The following discussion addresses Planning Commission comments including outlining the processes that DOT currently has in place to monitor traffic and to address congestion or neighborhood traffic intrusion.

DOT monitors travel times along key corridors throughout the City to track the overall efficiency of the street network. This information is reported quarterly through the Transportation Performance Metrics Dashboard, and summarized quarterly as a Department Key Performance Indicator. In addition, DOT monitors traffic conditions daily and may adjust traffic signal operations to reduce delay at signalized intersections, as deemed necessary.

If deficiencies in the transportation network are identified, the City implements projects through the Capital Improvement Program to address these concerns. Many of these projects are funded in part by the City's Traffic Reduction and Transportation Improvement Fee (TR/TIF) collected from developments in addition to the other conditions placed on them through the Guidelines. The City's TR/TIF Ordinance was created in 2006 to fund transportation-related infrastructure. The needs list of future facilities, all of which fully or partially support future development traffic, identifies improvements to the street network, public transit capital needs, bikeways, and pedestrian walkway facilities.

For isolated enhancements to mobility safety that do not meet the minimum criteria for inclusion into the City's Capital Improvement Program, DOT conducts Traffic Investigations in response to resident concerns regarding vehicle speed, traffic congestion, safety and access. These investigations allow for safety and mobility enhancements that can be implemented quicker.

In addition, DOT uses the Transportation Demand Management program to monitor specific trip reduction strategies for developments. The objective of the City's Trip Reduction Ordinance is to reduce the demand for vehicle commute trips post-construction. Non-residential developments greater than 75,000 sf; residential developments with 100 or more units; and mixed-use projects with a floor area greater than 50,000 sf and 50 units or more are required to prepare an Transportation Demand Management plan and annual report demonstrating the effectiveness of the project's trip reduction measures.

In response to the Planning Commission's request to understand what other agencies outside of California include in their traffic impact development review, DOT researched what is included in the traffic study requirements in Chicago, Illinois; Greensboro, North Carolina; and Portland, Oregon and found that California requirements are far more robust and detailed than those of agencies outside of California. Since the state of California requires the Vehicle Miles Traveled (VMT) metric to be used in environmental

impact for CEQA analysis beginning July 2020, most local California agencies were required to update their transportation impact analysis guidelines to not consider traffic congestion and delay as an environmental impact. Agencies outside of California do not require greenhouse gas emissions to be analyzed in their traffic analyses. With additional scrutiny required of California agencies, traffic analyses in California seem to be far more complex and thorough than that of other states.

ENVIRONMENTAL ANALYSIS:

The proposed adoption of the Local Mobility Analysis of the Transportation Impact Analysis Current Practice and Guidelines is not a “project” pursuant to the California Environmental Quality Act (CEQA) as defined in State CEQA Guidelines Section 15378 and is, therefore, not subject to CEQA pursuant to CEQA Guidelines Section 15060 (c)(3).

COUNCIL POLICY CONSIDERATION:

The proposed action is consistent with the goals and objectives of the General Plan Mobility Element including to:

- Enhance Livability
- Encourage walking, biking, and other alternatives to motor vehicles.

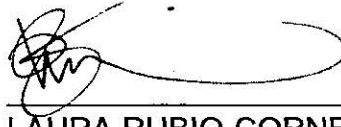
Specifically, this project addresses these policies of the Mobility Element:

- Policy 1.9 Support local and regional air quality, sustainability, and GHG emission reduction goals through management of the City’s transportation network.
- Policy 1.16 Support mobility performance measures which support the City’s sustainability goals.
- Policy 1.31 Emphasize transportation projects and programs that will contribute to a reduction in vehicles miles traveled per capita, while maintaining economic vitality and sustainability.

FISCAL IMPACT:

The updated Local Mobility Analysis may require more projects to be subject to additional transportation impact review processes than currently required since the updated Guidelines provide a more comprehensive review of various transportation metrics. Project applicants would be responsible for any costs associated with the preparation of traffic impact studies by the consultant and staff time for review of the analyses. While the staff related costs for this review are paid for by the applicant, the additional staff time required to review the analyses will need to be monitored to determine if additional staffing resources are required in the future.

Respectfully submitted,



LAURA RUBIO-CORNEJO

Director

Department of Transportation

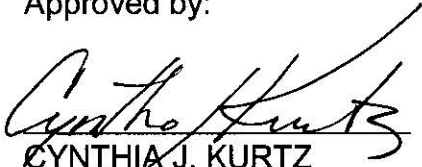
Prepared by:



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Approved by:



CYNTHIA J. KURTZ

Interim City Manager

Attachment: (3)

Attachment A – Local Mobility Analysis Metrics

Attachment B – City of Pasadena Transportation Impact Analysis Guidelines Update – LMA
Recommendations (October 19, 2021)

Attachment C – Municipal Services Committee Recommendations to Staff Memo