

Agenda Report

November 3, 2014

TO: Honorable Mayor and City Council

THROUGH: Municipal Services Committee (October 14, 2014)

FROM: Department of Transportation

SUBJECT: NEW TRANSPORTATION PERFORMANCE MEASURES FOR TRANSPORTATION IMPACT ANALYSIS AND THRESHOLDS OF SIGNIFICANCE FOR CEQA

RECOMMENDATION:

It is recommended that the City Council:

1. Find that:
 - a. the adoption of New Transportation Performance Measures and Thresholds of Significance for CEQA is not a "project" pursuant to the California Environmental Quality Act (CEQA), State CEQA Guidelines Sections 15060 (c)(3) and 15378;
 - b. the thresholds are promulgated pursuant to State CEQA Guidelines Section 15064.7;
 - c. the thresholds have been formally subjected to a public review process; and
 - d. the thresholds are supported by substantial evidence as summarized herein; and
2. Adopt a resolution replacing two existing Transportation Performance Measures with five new Transportation Performance Measures and Set Thresholds of Significance for CEQA for the new measures.

MUNICIPAL SERVICES COMMITTEE RECOMMENDATION:

After reviewing and discussing the proposed transportation performance measures and CEQA thresholds over the course of meetings on June 10, 2014, and October 14, 2014, the Municipal Services Committee passed the following motions;

- Support for the Vehicle Miles Traveled and Vehicle Trips per Capita Measures and CEQA Thresholds

- Support for the Bicycle, Transit and Pedestrian Proximity Measures and CEQA Thresholds
- Accept that Auto Level of Service (LOS) and Street Segment Analysis will no longer have CEQA Thresholds and direct staff to develop a process by which LOS and Street Segment analysis would be applied to large development projects for purposes of applying standard conditions of approval to address identified effects.

PLANNING COMMISSION RECOMMENDATION:

After reviewing and discussing the proposed transportation performance measures and CEQA thresholds over the course of meetings on April 9, 2014, May 28, 2014, June 11, 2014, June 25, 2014, July 23, 2014, and September 10, 2014, the Planning Commission passed the following motions;

- Support for the Auto Intersection LOS D CEQA Threshold citywide with a CEQA Threshold of LOS E within designated TOD areas
- Support for the Bicycle, Transit and Pedestrian Proximity Measures and CEQA Thresholds
- Support for the Modified Street Segment Analysis applied to all commercial and residential project and to all street types as a CEQA Threshold
- Oppose the VMT and VT per Capita CEQA Thresholds

TRANSPORTATION ADVISORY COMMISSION (TAC) RECOMMENDATION:

After reviewing and discussing the proposed transportation performance measures and CEQA thresholds over the course of meetings on February 27, 2014, March 27, 2014, May 27, 2014, June 12, 2014 and September 11, 2014, TAC unanimously passed two motions:

- TAC strongly supports all six of the proposed transportation measures and CEQA thresholds
- Recommended addition of the Colorado Blvd High Quality Transit Corridor as an Infill Opportunity Zone.

EXECUTIVE SUMMARY:

As part of the General Plan update Transportation staff is proposing that the City Council adopt a new set of transportation performance measures and thresholds that help meet its objectives for transportation and mobility. With the expanded emphasis on sustainability and a continued focus on livability, the newly adopted performance measures will have the ability to assist in determining how to balance trade-offs among travel modes and among the mobility needs of different members of the community.

Consequently, a more robust set of transportation performance measures has been developed that adds depth and balance to the existing measures of vehicle capacity and delay while adding measures to evaluate impact on the non-motorized modes as

well as transit. The new measures also align with the sustainability goals of the General Plan by evaluating the “efficiency” of projects by analyzing the per capita length and number of trips associated with changes in land use. The five proposed transportation measures with CEQA thresholds are:

- Vehicle Miles Traveled Per Capita
- Proximity and Quality of the Transit Network
- Pedestrian Accessibility
- Vehicle Trips Per Capita
- Proximity and Quality of the Bicycle Network

BACKGROUND:

Over the past four years Department of Transportation staff has presented and discussed the concept of developing new mobility performance measures with the Transportation Advisory Commission (TAC), Planning Commission (PC), the community and the City Council. Public workshops were held on March 26, 2014 and June 17, 2014.

The five proposed transportation performance measures collectively assess the quality of walking, biking, transit, and vehicular travel in the City of Pasadena. The proposed update of the City’s performance metrics and CEQA thresholds better align transportation system performance with community values as expressed in the General Plan.

Overview of CEQA Approach to the Transportation Analysis

The following discussion provides a summary of CEQA-recommended practices related to transportation impact analysis as well as specific details related to performing this type of analysis for development projects such as specific plans. To start this discussion, the lead agency needs to have a clear philosophy about what constitutes an adequate level of analysis. Agency interpretations of CEQA requirements differ, so we reflect on the statutes, guidelines, and case law to provide a recommended approach that achieves the following primary objectives:

- Accurately describe transportation conditions for the baseline, project, and cumulative conditions.
- Comply with regulatory guidelines and state-of-the-practice techniques when preparing technical analysis.
- Disclose limitations of the data, analysis methodology, and models used in the impact and mitigation analysis.
- Address competing objectives between travel modes (and other community objectives) when recommending mitigation.
- Include sufficient information to allow for general plan consistency to be evaluated.

While the CEQA guidelines in particular are clear about the general expectations for environmental analysis as noted below, they are silent about what data, analysis methods, models, and mitigation approaches are adequate for transportation impacts.

Policy Considerations

Pasadena currently employs a combination of vehicular performance measures and emerging multimodal measures for evaluating system performance and in reviewing the impacts of new development. However, CEQA significance thresholds are only identified for the vehicular measures. Intersection vehicular volume-to-capacity (V/C) ratios and auto Level of Service (LOS) are the primary measures used in project level mitigation recommendations. The city also uses a vehicular volume-based analysis of change in traffic on street segments to assess impacts. Both methods result in recommended mitigations that have potential to conflict with other General Plan objectives and the intersection analysis method (ICU) is no longer considered state of the practice for LOS analysis.

The current significance thresholds are silent with regard to system performance of non-auto modes and tend to generate mitigation solutions that encourage widening of intersections and streets, which may compromise the performance of non-auto modes and are increasingly contrary to community values.

Transportation staff, understanding that the revised goals and objectives of the General Plan are not in accordance with the performance measures being used to evaluate development projects, has invested time to explore new methodologies and tools to better measure and manage multi-modal networks. In addition, the department has built sophisticated models, such as a Travel Demand Forecasting model and a Dynamic Traffic Analysis (DTA) model, to better estimate vehicle miles of travel (VMT), vehicle trips (VT) and tools with the ability to forecast traffic at the intersection level. Each of these approaches is more consistent with General Plan goals and objectives than the current ICU and V/C methods. Moreover, the 2010 *Highway Capacity Manual* is widely accepted as standard practice for analyzing auto LOS, and consistency with these methods is recommended.

As part of the General Plan update staff is proposing that the City Council adopt a new set of transportation performance measures and CEQA thresholds that are more closely aligned with the Mobility Element objectives and policies. With the expanded emphasis on sustainability and a continued focus on livability, the proposed performance measures will assist in determining how to balance trade-offs among travel modes as well as the mobility needs of different members of the community.

Transportation impact studies must serve the dual purpose of General Plan consistency and compliance with CEQA; therefore, consistent performance measures and thresholds of significance must be established. Thus, any inconsistencies in performance measures and thresholds of significance between the General Plan and the development review analysis would be resolved. Both the General Plan and the transportation study guidelines should identify the desired resolution between conflicting

modal impact analysis findings. A context sensitive approach to resolution of conflicts is recommended, along with explicit guidance for modal priority, and a policy-based exemption framework. The City's street typologies and/or land use planning areas could inform a context sensitive approach. Having consistent performance measure promotes a defensible and harmonious framework for the transportation analysis the City will undertake in the future; first in the General Plan EIR, and then in the development review process.

The proposed revisions to the transportation performance measures seek to effectively and efficiently align the adopted and proposed land use and mobility policies with the transportation performance measures and CEQA thresholds of significance used to serve everyone using Pasadena's transportation system.

New Transportation Performance Measures

A key challenge facing the City is the current set of Performance Measure and Metrics, which as used in the 2004 General Plan and the Transportation Impact Review Current Practice and Guidelines, place a considerable emphasis on automobile operations. If these measures continue to be used in their current form, it would present a conflict with the proposed Mobility Element objectives.

Pasadena is currently using a conventional set of performance measures for evaluating system performance and in reviewing the impacts of new development. Intersection volume to capacity ratios and Level of Service (LOS) are the primary measures. The city also uses a volume-based analysis of change in traffic on street segments to assess impact. The 1994 General Plan update went as far as to include a measure of the environmental capacity of residential streets, essentially an estimate of the level of traffic volume that would be perceived as *acceptable* on residential streets as opposed to the operational capacity. This measure was replaced in the 2004 update by the Street Segment Analysis.

When looked at in the above context, the current measures are silent with regard to system performance of non-auto modes and tend to generate mitigation solutions that encourage widening of intersections and streets, which may compromise the performance and safety of non-auto modes and are increasingly contrary to community values. Consequently, a more robust set of transportation performance measures has been developed to evaluate impact on the non-motorized modes as well as transit and to align with the sustainability goals of the General Plan by evaluating the "efficiency" of projects by analyzing the per capita length and number of trips associated with changes in land use.

The existing measures of vehicle capacity and delay embodied in the LOS and Street Segment analyses are recommended for removal from CEQA analysis. This recommendation is consistent with the new CEQA Guidelines mandated by SB743 as described below. As the SB743 changes provide for cities to use LOS in local plans and conditions of approval for projects, staff is proposing that Pasadena retain modified forms of Auto Level of Service (LOS) and Street Segment Analysis for "Projects of

Communitywide Significance” which are defined as 50,000 square feet of new commercial use, 50 residential units or more, or any combination of the two. The modified LOS and Street Segment analyses are described later in this report.

The five proposed transportation measures (Attachment 1) with CEQA thresholds are:

- Vehicle Miles Traveled Per Capita
- Vehicle Trips Per Capita
- Proximity and Quality of the Transit Network
- Proximity and Quality of the Bicycle Network
- Pedestrian Accessibility

The proposed metrics and thresholds would guide system-wide bike and local transit improvements in the General Plan and guide pedestrian improvements in Specific Plan Updates. The bike and transit improvements identified would be included in a nexus study for the update of the Traffic Reduction and Transportation Improvement Fee (TRTIF) following the adoption of the Land Use and Mobility Element updates. The following table summarizes the Proposed Performance Measures and CEQA Thresholds and the Transportation Advisory Commission and Planning Commission actions taken.

| METRIC | DESCRIPTION | CONSISTENT WITH STATE STATUTES? | As approved by the Transportation Advisory Commission on Sept 11, 2014 | | As approved by the Planning Commission on July 23 and Sept 10, 2014 | | Staff Recommendation November 3, 2014 | |
|--------|---|--|---|--|--|--|--|--|
| | | | IMPACT THRESHOLD | CONSISTENT WITH STATE STATUTES? | IMPACT THRESHOLD | CONSISTENT WITH STATE STATUTES? | IMPACT THRESHOLD | CONSISTENT WITH STATE STATUTES? |
| 1. | VMT Per Capita Vehicle Miles Traveled (VMT) in the City of Pasadena per service population (population + jobs). | Yes – Consistent with 8/6/14 OPR guidance on SB743 changes | CEQA Threshold: An increase over existing Citywide VMT per Capita. | Yes – Consistent with 8/6/14 OPR guidance on SB743 changes | Not to be used as a CEQA measure | Allowable until updated Guidelines are adopted by the State. | CEQA Threshold: An increase over existing Citywide VMT per Capita. | Yes – Consistent with 8/6/14 OPR guidance on SB743 changes |
| 2. | VT Per Capita Vehicle Trips (VT) in the City of Pasadena per service population (population + jobs). | Yes SB743 changes are silent about this metric | CEQA Threshold: An increase over existing Citywide VT per Capita. | Yes | Not to be used as a CEQA measure | Yes – VT not specifically identified as a metric in statute | CEQA Threshold: An increase over existing Citywide VT per Capita. | Yes |
| 3. | Auto Level of Service Level of Service (LOS) as defined by the Transportation Research Board's <i>Highway Capacity Manual (HCM) 2010</i> . Uses intersection control delay to evaluate auto congestion | No - LOS precluded inside TPAs by SB743 as of September 2013 LOS outside TPAs allowable until updated Guidelines adopted – current timing is January 2016 | CEQA Threshold: A decrease beyond the LOS D Threshold outside Transit Priority Areas (TPAs) LOS will not be CEQA Threshold inside designated TPAs and half-mile buffer of Colorado Blvd. TP Corr. | Allowable outside TPAs until updated Guidelines are adopted by the State (Est. State adoption of CEQA Guidelines is January 2016) Yes | CEQA Threshold: A decrease beyond the LOS D Threshold outside designated TOD Areas Up to and including LOS E will be accepted inside designated TODs | Allowable outside TPAs until updated Guidelines are adopted by the State (Est. State adoption of CEQA Guidelines is January 2016) No. | Not a CEQA Threshold: A decrease beyond LOS D Citywide or LOS E within Transit Oriented Districts (TODs) would trigger conditions of approval to reduce project vehicular trips | Yes |
| 4. | Proximity and Quality of Bicycle Network Percent of dwelling units and jobs within a quarter mile of each of three bicycle facility types | Yes SB743 changes are silent about this metric | CEQA Threshold Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Bike Facility | Yes | CEQA Threshold Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Bike Facility | Yes | CEQA Threshold Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Bike Facility | Yes |
| 5. | Proximity and Quality of Transit Network Percent of dwelling units and jobs located within a quarter mile of each of three transit facility types. | Yes SB743 changes are silent about this metric | CEQA Threshold Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Transit Facility | Yes | CEQA Threshold Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Transit Facility | Yes | CEQA Threshold Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Transit Facility | Yes |
| 6. | Pedestrian Accessibility The Pedestrian Accessibility Score uses the mix of destinations, and a network-based walk shed to evaluate walkability | Yes SB743 changes are silent about this metric | CEQA Threshold Any decrease in the Citywide Pedestrian Accessibility Score | Yes | CEQA Threshold Any decrease in the Citywide Pedestrian Accessibility Score | Yes | CEQA Threshold Any decrease in the Citywide Pedestrian Accessibility Score | Yes |
| 7. | Modified Street Segment Analysis The modified street segment analysis assesses traffic intrusion on local streets in residential neighborhoods | No Allowable outside TPAs until updated Guidelines are adopted by the State | Not Included | Yes | Modified Street Segment Analysis as CEQA Threshold Applied to Commercial and Residential Projects and all Street Types | No Allowable outside TPAs until updated Guidelines are adopted by the State | Not Included Increases of 10-15% above existing on streets with more than 1500 ADT would trigger conditions of approval to reduce project vehicular trips | Yes |

SB743 – AUTO LEVEL OF SERVICE UNDER CEQA:

On September 27, 2013, Governor Brown signed Senate Bill 743. Among other things, SB743 creates a process to change analysis of transportation impacts under the California Environmental Quality Act (CEQA). Currently, environmental review of transportation impacts focuses on the delay that vehicles experience at intersections and on roadway segments. That delay is measured using a metric known as “level of service,” or LOS. Mitigation for increased delay often involves increasing capacity (i.e. the width of a roadway or size of an intersection), which may increase auto use and emissions and discourage alternative forms of transportation. Under SB743, the focus of transportation analysis (under CEQA) will shift from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses.

Specifically, SB743 requires the Governor’s Office of Planning and Research (OPR) to amend the CEQA Guidelines (Title 14 of the California Code of Regulations sections and following) to provide an alternative to LOS for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” Measurements of transportation impacts may include “vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated.” *“Preliminary Evaluation of Alternative Methods of Transportation Analysis”* (Attachment 2) which was circulated late last year by the Governor’s Office of Planning and Research contains a comprehensive discussion of the alternatives to LOS being considered under SB743. The current schedule has the new CEQA guidelines related to Auto LOS taking effect in mid-2015.

Summary of the OPR Draft CEQA Guidelines

The OPR report recommends amendments to the CEQA Guidelines to replace the Level of Service (LOS), auto delay based standard with a Vehicle Miles Traveled (VMT) in order to align CEQA analysis more closely with other state goals, most notably the greenhouse gas emission reduction goals contained in the state’s climate change law, AB32. The OPR report proposes the following amendments to the CEQA Guidelines:

- Eliminate Level of Service (LOS)/Delay as a CEQA Impact
- Proposes use of Vehicle Miles Traveled (VMT) Metric for CEQA Transportation Analysis
- Continued Analysis of Impacts Resulting from Transportation, such as Noise, Air Quality and Safety
- Required assessment of growth inducing impacts of roadway expansion
- Applies to CEQA Only and Does Not Preclude Addressing Traffic Congestion in Local General Plan Policies, Zoning Codes, Conditions of Approval, Thresholds, or Fee Programs
- Addresses Phase-in of New Guidelines

SB743 did not authorize OPR to set thresholds, but did direct OPR to develop Guidelines for determining the significance of transportation impacts of projects. OPR recommends that a project that results in vehicle miles traveled that is greater than the regional average might be considered to have a significant impact. Average in this case could be measured using an efficiency metric such as per capita, per employee, etc.

OPR has proposed the following phase-in of the New CEQA Guidelines:

- The standards will not be retroactive: Approved projects will be subject to mitigations exacted under the old standard.
- The new standards will only apply to Transit Priority Areas (defined below.)
- Local governments may apply the standard to other areas on an “opt-in” basis at first.
- The new standards will apply statewide as of January 1, 2016.

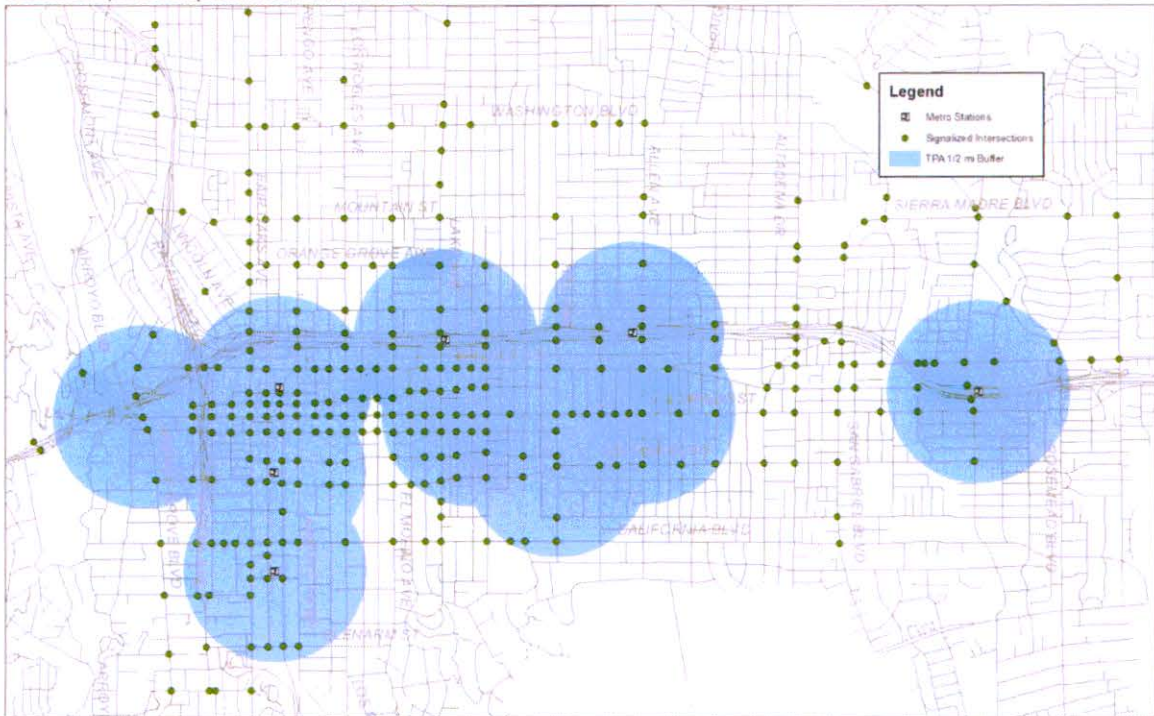
Transit Priority Areas

Transit Priority Area (TPA) means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in an adopted Transportation Improvement Program. “Major transit stop” includes rail transit stations, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with frequencies of service intervals of 15 minutes or less during the morning and afternoon peak commute periods. According to OPR, planned major transit stops contained in a Regional Transportation Plan (RTP) comply with the definition above for transit priority areas. The map on the top of the following page identifies the Transit Priority Areas within Pasadena included in SCAG’s adopted RTP.

SB743 allows cities to designate “infill opportunity zones”. Infill opportunity zones are areas within one-half mile of a high quality transit corridor or a major transit stop. Under SB743 the area within the designated Infill Opportunity Zone are also exempt from Level of Service (LOS) requirements. To avoid having isolated intersections along Oakland Ave and Madison Ave between Union St. and Del Mar Ave. staff is recommending that the City Council designate the half-mile buffer along the Colorado Blvd. High Quality Transit Corridor between Orange Grove Ave. and Allen Ave. (two existing TPAs) as an Infill Opportunity Zone. If LOS is not used as a CEQA threshold citywide as now proposed by staff there is no longer a need to designate an Infill Opportunity Zone along Colorado Blvd.

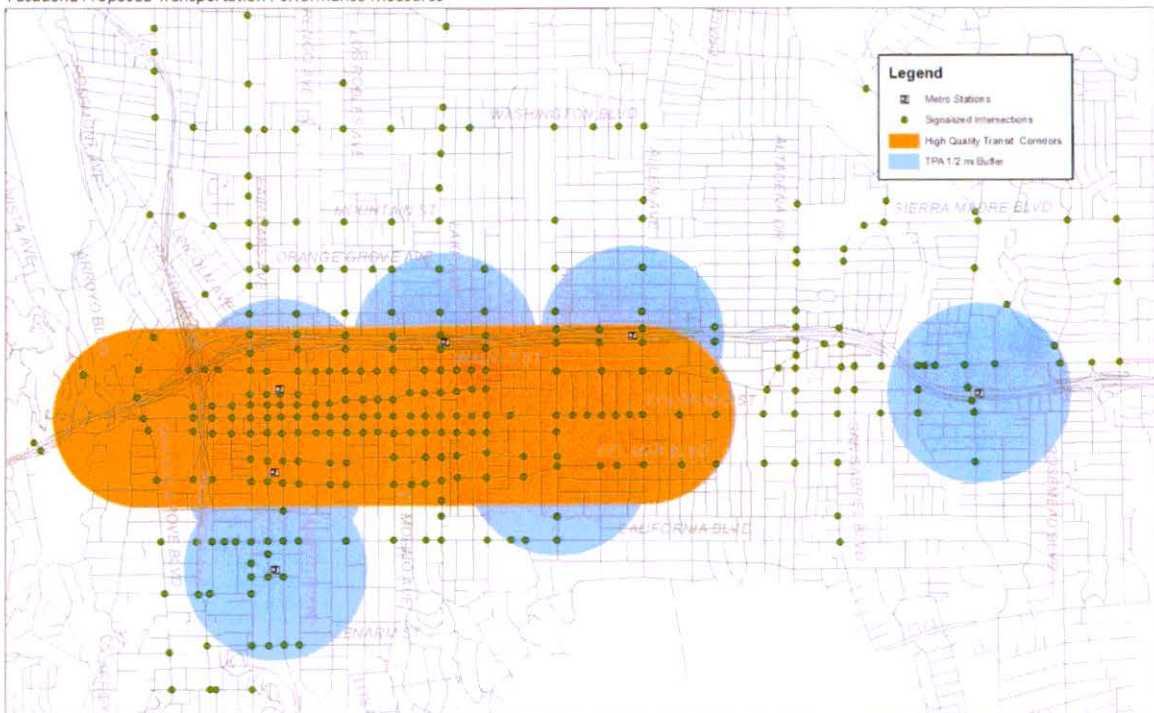
The map on the bottom of the following page identifies the proposed Infill Opportunity Zone along Colorado Boulevard, which is included in SCAG’s adopted RTP as a High Quality Transit Corridor.

Pasadena Proposed Transportation Performance Measures



Transit Priority Areas in Pasadena

Pasadena Proposed Transportation Performance Measures



Previously Proposed Colorado Boulevard Infill Opportunity Zone

MODIFIED LOS AND STREET SEGMENT ANALYSES:

Consistent with the provision of SB743 that the restriction on the use of vehicle capacity or delay measures in CEQA “does not preclude addressing traffic congestion in local General Plan Policies, Zoning Codes, Conditions of Approval, Thresholds, or Fee Programs,” staff is proposing that the following modified Auto Level of Service (LOS) and Street Segment Analyses be used for “Projects of Communitywide Significance” which are defined as 50,000 square feet of new commercial use, 50 residential units or more, or any combination of the two.

Modified Level of Service (LOS) Analysis

A 2010 *Highway Capacity Manual* (HCM) intersection Level of Service (LOS) analysis will be applied to proposed new development projects that meet or exceed the size thresholds to be Projects of Communitywide Significance and the results will be measured for compliance with the following intersection LOS caps (Attachment 3):

| Study Intersections | LOS Cap |
|---------------------------------|----------------|
| Citywide | D |
| Transit Oriented District (TOD) | E |

Intersection LOS analysis is conducted for peak hour conditions (either morning or evening or both, depending upon size and location of the proposed project). The number of intersections to be analyzed will vary also depending upon size and location of the proposed project. Where the evaluated intersections exceed the LOS caps, conditions of approval will be recommended consistent with the City’s Guiding Principles to encourage walking, biking and transit to-and-from the project site to reduce project-related vehicular trips. Below is a list of typical measures that would be included in trip reduction programs:

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

Modified Street Segment Analysis for Neighborhood Protection

Both the Planning Commission and Transportation Advisory Commission acknowledged the deficiencies of the City's existing Street Segment Analysis methodology and suggested that staff consider amendments which would allow the analysis to be retained as a tool to protect neighborhood streets from increased traffic associated with development.

Pasadena currently employs a Street Segment Analysis metric to identify the amount of new auto trips a development project will add to adjacent streets. The traffic growth on a street segment is calculated as follows: Percentage of Traffic Growth on Street Segment = Net New Project Vehicular Trips / Existing Auto Daily Traffic

While the current Street Segment Analysis methodology identifies changes to vehicle volumes on all streets, including residential streets, the increase in traffic volumes on a street in itself is not an environmental impact. Absent physical barriers the City cannot reduce traffic volumes on streets. The methodology establishes significance on the basis of percent increase, which means that the same projected increase in traffic volume is significant on one street, but not on another street, based entirely on the existing traffic volumes on the two streets.

In response to both the Planning Commission and Transportation Advisory Commission's desire to retain a modified version of the Street Segment Analysis to address impacts to neighborhoods from traffic intrusion staff explored a potential Modified Street Segment Analysis for Neighborhood Protection (Attachment 4). By setting a decreasing scale for the percent of project traffic on a street with a minimum Average Daily Traffic the potential methodology addresses some of the issues with the current Street Segment Analysis. Under the modified methodology, the number of streets that would be affected would be reduced substantially and the level of added traffic would be increased. The modified analysis would retain the reliance on a relative change in traffic volume to determine effect.

It is important to note that there are currently in place policies and a systematic approach for Neighborhood Traffic Management that addresses traffic intrusion in neighborhoods and implements neighborhood protection measures to manage the effects of that traffic. Any modifications developed by the program are carefully designed to respect City Council adopted Neighborhood Traffic Management Program (NTMP) policies that are sensitive to not diverting traffic from one neighborhood street to another. Where the results of a Street Segment Analysis for a Project of Communitywide Significance exceed the ADT caps on residential streets, conditions of approval will be applied that require the development of a complete streets plan with input from the affected residents, council districts and DOT to encourage use of non-vehicular modes by the project's patrons, and implement measures to discourage use of residential streets to-and-from the project site that are consistent with the established NTMP guidelines.

PROJECT CASE STUDIES:

Staff has prepared a summary of the three Development Case Studies (Attachment 5) which include the transportation impacts identified by both the current and proposed transportation performance measures.

COUNCIL POLICY CONSIDERATION:

The proposed New Transportation Performance Measures and Thresholds for CEQA support the City Council strategic planning goals to improve mobility and accessibility throughout the City.

ENVIRONMENTAL ANALYSIS:

The proposed adoption of New Transportation Performance Measures and Thresholds for CEQA are 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). Instead, they are proposed thresholds of significance promulgated pursuant to State CEQA Guidelines Section 15064.7. That Section provides:

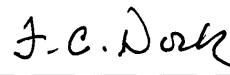
- (a) Each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects. A threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect will normally be determined to be less than significant.
- (b) Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence.
- (c) When adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

Section 15064.7(b) of the CEQA Guidelines provides that thresholds of significance must be formally adopted through a public review process and supported by substantial evidence if, as in this case, they are to be placed in general use. There is no requirement in CEQA that any other environmental review is prerequisite prior to adopting a threshold. The reason for this is that the preparation of an EIR or other CEQA document would largely duplicate the extensive public review process set forth above, and the “substantial evidence” standard set forth in Section 15064.7.

FISCAL IMPACT:

There is no Fiscal Impact from this action.

Respectfully submitted,



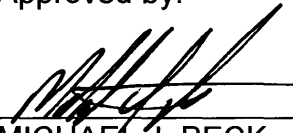
FREDERICK C. DOCK
Director
Department of Transportation

Prepared by:



Mark Yamarone
Transportation Administrator

Approved by:



MICHAEL J. BECK
City Manager

Attachments: (5)

- 1) Description of Proposed Performance Measures
- 2) OPR – Preliminary Discussion Draft of Updates to CEQA Guidelines Implementing SB743, August 6, 2014
- 3) Modified Auto Level of Service
- 4) Modified Street Segment Analysis for Neighborhood Protection
- 5) Case Study Summaries of Existing and Proposed Transportation Measures