



DEPARTMENT OF TRANSPORTATION

November 20, 2014

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Re: Comments on the Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743

Mr. Calfee:

Thank you for the opportunity to review and provide comments on the Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743.

We support per capita VMT as the basis for new CEQA transportation analysis criteria. We believe that VMT per Capita performance measures 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. As part of the General Plan update the Pasadena City Council adopted a new set of transportation performance measures and CEQA thresholds that better align with the City's goals and objectives for transportation and mobility.

With the City's General Plan Update placing 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. The new measures also align with the sustainability goals of the Pasadena 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 transportation measures with CEQA thresholds adopted by Pasadena are:

1. Vehicle Miles Traveled Per Capita
2. Vehicle Trips Per Capita
3. Proximity and Quality of the Transit Network
4. Proximity and Quality of the Bicycle Network
5. Pedestrian Accessibility

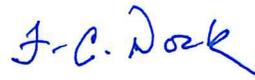
The attached Pasadena City Council Resolution adopted November 3, 2014 details the CEQA Thresholds for each of the new performance measures.

While we support the establishment of a significance threshold for the VMT measure of significance we request that agencies be allowed to set the significance threshold to a geographic area less than the "regional average." We believe that for the City of Pasadena an appropriate significance threshold would be a "citywide average."

We ask that as OPR moves forward in developing a recommendation on an alternative to LOS that you will not preclude cities from developing and adopting additional metrics to the one ultimately amended into the CEQA guidelines.

Thank you for your consideration of this request.

Sincerely,



Frederick C. Dock, PE AICP
Director of Transportation

Attachment: Pasadena City Council Resolution - 11-03-14

c: Michael J. Beck, City Manager, Pasadena
David Jones, Emanuels Jones & Associates

RESOLUTION NO. 9398

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA, ADOPTING
NEW TRAFFIC THRESHOLDS OF SIGNIFICANCE FOR PURPOSES OF THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT**

WHEREAS, the City Council of Pasadena last updated its Transportation Performance Measures in 2004 through the last General Plan Mobility Element update; and

WHEREAS, the existing Transportation Performance Measures are not in accordance with the revised goals and objectives of the existing or proposed update to the General Plan, are silent with regard to system performance of non-auto modes and tend to generate mitigation solutions that are increasingly contrary to community values; and

WHEREAS, therefore, as part of the General Plan (Land Use and Mobility Elements) update, over the last four years Department of Transportation staff has presented and discussed the concept of developing new Transportation Performance Measures at duly noticed public meetings with the Transportation Advisory Commission, Planning Commission, the community and the City Council; and

WHEREAS, during that process, Senate Bill (SB) 743 amended the California Environmental Quality Act (CEQA) in 2013, and the Governor's Office of Planning and Research is currently undertaking amendments to the State CEQA Guidelines, to change analysis of transportation impacts under CEQA; and

WHEREAS, the five proposed Transportation Performance Measures have been

developed to be consistent with the upcoming CEQA Guidelines amendments prescribed in SB 743; and

WHEREAS, the proposed new Transportation Performance Measures emphasize sustainability and a continued focus on livability by determining how to balance trade-offs among travel modes and among the mobility needs of different members of the community; and

WHEREAS, the new Transportation Performance Measures also align with the sustainability goals of the existing and proposed update to the General Plan by evaluating the “efficiency” of projects and analyzing the per capita length and number of trips associated with changes in land use; and

WHEREAS, the City Council held a duly noticed public meeting on the proposed Transportation Performance Measures on November 3, 2014.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Pasadena as follows:

1. The Transportation Performance Measures attached hereto and incorporated herein by this reference are consistent with the policies of the City’s existing and proposed update to the General Plan and the purpose of Title 17 (Zoning Code) of the Pasadena Municipal Code.
2. The Transportation Performance Measures have been promulgated pursuant to State CEQA Guidelines Section 15064.7, formally subjected to a lengthy public review process, are supported by substantial evidence, and are hereby adopted

as the City of Pasadena's thresholds of significance for traffic and transportation analysis pursuant to the California Environmental Quality Act.

3. Staff is directed to amend the administrative procedures for the Traffic Impact Analysis Guidelines within sixty days herefrom, such amendments to be approved by the Director of the Department of Transportation.

Adopted at the regular meeting of the City Council on this 3rd day of November, 2014 by the following votes:

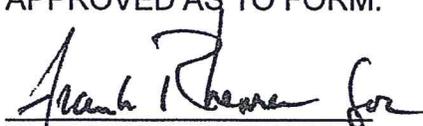
AYES: Councilmembers Madison, Masuda, McAustin, Tornek,
Vice Mayor Robinson, Mayor Bogaard
NOES: None
ABSENT: Councilmembers Gordo, Kennedy
ABSTAIN: None

ATTEST :



MARK JOMSKY, CMC
City Clerk

APPROVED AS TO FORM:



THERESA E. FUENTES
Assistant City Attorney

Pasadena Transportation Performance Measures and CEQA Thresholds

Performance Measure		Description	CEQA IMPACT THRESHOLD
1	VMT Per Capita *	Vehicle Miles Traveled (VMT) in the City of Pasadena per service population (population + jobs).	22.6 VMT/Capita**
2	VT Per Capita ***	Vehicle Trips (VT) in the City of Pasadena per service population (population + jobs).	2.8 VT/Capita**
3	Proximity and Quality of Bicycle Network	Percent of dwelling units and jobs within a quarter mile of each of three bicycle facility types	Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Bike Facility
4	Proximity and Quality of Transit Network	Percent of dwelling units and jobs located within a quarter mile of each of three transit facility types.	Any decrease in % of units or employment within a ¼ mile of Level 1 or 2 Transit Facility
5	Pedestrian Accessibility	The Pedestrian Accessibility Score uses the mix of destinations, and a network-based walk shed to evaluate walkability	Any decrease in the Citywide Pedestrian Accessibility Score

* The Vehicle Miles Traveled (VMT) per Capita measure sums the miles traveled for trips within the City of Pasadena 2013 Citywide Travel Demand Model. The Citywide VMT is calculated by adding: 1) 100% of VMT associated with trips traveling within the City of Pasadena boundaries that are generated or attracted by the City, and 2) 50% of VMT associated with trips with an end or origin outside of the City. The City's VMT is then divided by the City's total service population, defined as the population plus the number of jobs, per Capita.

** Existing 2013 Travel Demand Model Based

*** Vehicle Trips (VT) per Capita is a measure of motor vehicle trips associated with the City. The measure sums the trips with origins and destinations within the City of Pasadena, as generated by the 2013 Trip-Based Citywide Travel Demand Model. The regional VT is calculated by adding the VT associated with trips generated and attracted within the City of Pasadena boundaries, and 50 percent of the VT associated with trips that either begin or end in the City, but have one trip end outside of the City. The City's VT is then divided by the City's total service population, defined as the population plus the number of jobs, to calculate VT per Capita.