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November 21, 2014

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

Dear Mr. Calfee:

On November 3, 2014, with the enthusiastic support of this organization, Pasadena's City Council voted unanimously to **remove Level of Service (LOS)** as a transportation performance metric for CEQA purposes, and implemented five (5) new performance metrics that align with the city (and state)'s goals for land use, mobility and sustainability.

This action made Pasadena an early-adopter of the changes mandated by SB743, and therefore our experience may be instructive.

Motivation: our General Plan. Pasadena citizens are passionate about their city. We are proud of and care deeply about our many distinct and historic neighborhoods, our traditions, and our cultural, scientific, civic, commercial, and educational institutions. Pasadena unanimously adopted the new metrics because it is nearing the end of a 4-year effort to update its General Plan, a document that we take extremely seriously because it guides growth and development for the next two decades.

Historically, Pasadena's peak rate of growth occurred in the 1920s, when it was well served by streetcar lines. The city was developed around these street car lines – residential neighborhoods proximate to commercial corridors, parks, and entertainment, which were easily accessible via foot or street car. As such, the city was well established before the automobile dominated city planning. As a result, Pasadena's Downtown and many of the outlying neighborhoods have retained much of their walkable character. The prospect of change—as a result of growth and new development—may present a threat, if that new development is auto-orientated and therefore erodes the walkable character that still exists. On the other hand, if new infill development is pedestrian-orientated and well-done, new infill development may be desirable to repair the mistakes of the past and to foster economic prosperity, reasonably-priced housing, and civic vitality.

Our General Plan addresses change by anticipating demand for a city that is walkable and environmentally friendly--recognizing opportunities to repair the mistakes of 1960s and 1970s urban renewal efforts with improved planning models that target pedestrian-orientated growth in our Downtown. Our General Plan explicitly calls for a city in which we can move about without the need for cars, and our mobility element calls for policies that balance transportation modes.

Implementing the General Plan: CEQA review using transportation metrics. A General Plan requires analysis under CEQA to determine its impact on the environment. Since the 1970s, practice has been to analyze transportation impacts using "Level of Service" (LOS) as the standard, prioritizing cars over all other modes of transportation. LOS counts driver delay--the number of seconds that a driver must wait at an intersection before proceeding onward. LOS is basically an “anti-urban” measure because it values getting in and out of town very highly.

> Thus, our General Plan would be analyzed by asking the question, "If the city envisioned by the General Plan is realized, how much longer will drivers have to wait at red lights before clearing an intersection?"

For the reasons thoroughly enumerated by OPR (and not repeated here), we recognized that question does not determine any *environmental* impact and, in fact, yields results that are *harmful* to the environment and are diametrically opposed to our General Plan's goals to target *pedestrian-orientated* growth and achieve multi-modal (“Complete Streets”) mobility solutions. <u>Therefore, we were motivated to conduct our General Plan analysis using metrics that are aligned with, not counter productive towards, our principles and goals.</u>

How we implemented new metrics. With the help of independent consultants Fehr & Peers, Pasadena's Department of Transportation (“DOT”) proposed a suite of *seven* (7) metrics for use in CEQA analysis for both the General Plan and for individual projects as follows:

	METRIC	DESCRIPTION	CONSISTENT WITH STATE STATUTES?	Staff Recommendation October 27, 2014	
				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 SB 743 changes	CEQA Threshold: An increase over existing Citywide VMT per Capita.	Yes – Consistent with 8/6/14 OPR guidance on SB 743 changes
2.	VT Per Capita	Vehicle Trips (VT) in the City of Pasadena per service population (population + jobs).	Yes SB 743 changes are silent about this metric	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 *Highway Capacity Manual (HCM) 2010*. Uses intersection control delay to evaluate auto congestion	No - LOS precluded inside TPAs by SB 743 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 in January 2016 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 SB 743 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
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 SB 743 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
6.	Pedestrian Accessibility	The Pedestrian Accessibility Score uses the mix of destinations, and a network-based walk shed to evaluate walkability	Yes SB 743 changes are silent about this metric	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 in January 2016	Not a CEQA measure of significance. Neighborhood traffic intrusion will be assessed for conditions of approval.	Yes – consistent with police powers granted to cities

Metrics #4-6, measuring proximity to bike and transit facilities and pedestrian accessibility, were universally accepted. These metrics are critical because they establish a nexus between development and multi-modal mobility infrastructure, a nexus that is required to allow the City's Traffic Reduction and Transportation Improvement Fees to be spent on improvement projects such as bike lanes, crosswalks, traffic calming, and other bike/pedestrian projects. However, metrics #4-6 have limited value when applied to individual projects and are insufficient on their own.

Objections. The other four metrics that were proposed, however, generated some controversy. ***Perceived*** automobile congestion (driver delay) remains an irritant among Pasadena citizens. Many community members had an intuitive sense that any additional development causes additional traffic congestion. LOS (and also metric #7, Street Segment Analysis) is well understood, and its use represents a long-standing method to measure added congestion. DOT initially proposed retaining LOS as a metric but "accepting a Level F" in the Downtown area. "Level F" translated to "planning for failure" to some community members, who envisioned gridlock as the result. The discussion then turned to Metrics #1 and #2, VMT and VT, with the expectation that VMT and VT should act as *equivalent replacements* for LOS and should thus yield results related to *traffic congestion* in the same way that LOS does. A series of case studies proved inconclusive and did not satisfy that expectation.

In addition to concerns about potential traffic congestion, some community members had concerns about the loss of *control* over development decisions. Using LOS is frequently the determining factor that "trips the wire" and forces a project to conduct an Environmental Impact Report ("EIR"). The EIR, in turn, enables more public scrutiny and often reveals aspects of a project that are unrelated to transportation. Because of this perceived loss of public scrutiny, the move to metrics which have thresholds that are less likely to "trip the wire" was feared to be giving developers a "free pass."

Realizations. Ultimately, we were able to move beyond these objections when we realized the following points:

A. When used in CEQA, LOS asks a loaded question: "How does this project affect driver delay at these particular intersections?" When asked within the context of CEQA, that question has several incorrect assumptions *baked into it* that unavoidably and insidiously shape the debate:

1. Only Driving Matters, and
2. Faster Is Better.

LOS reinforces the intuitive notion that additional development *induces* additional traffic congestion. However, City of Pasadena decision-makers, using planning processes based on 21st century urbanism, no longer recognizes those assumptions as necessarily valid. We recognize that the 1960s urban renewal approach to "spread out and speed up" has failed; asking the LOS question immediately throws the conversation backwards and frames the entire debate through the lens of an auto-dominated era. The *correct* question to ask is, ***"How does this project affect people's trip behavior and overall mobility?"***

B. Driver delay and traffic congestion, however, *does* matter to people, so we *still* will measure LOS, but not within CEQA. CEQA asks, "Does this project cause harm to the environment?"; LOS will not be determined for CEQA impact purposes, but as part of an overall project review. Within project review, LOS can provide some useful information, ***but it should not serve as the foundation for debate.*** The same for Street Segment Analysis.

C. Zoning decisions should be evaluated on their own merit. Transportation analysis, in many cases, was used as a "back-door" to achieve less density. Our planning process is more transparent and honest, however, when the results we *say* we would like to achieve are *actually achievable.*

D. Although the EIR process is essential for public scrutiny of projects that truly have negative environmental impacts, requiring that same scrutiny--at considerable cost—based on an LOS trigger alone is placing an undue burden on worthwhile projects that could have a positive impact. We heard testimony from architects who spoke of repeatedly seeing worthwhile small to mid-sized projects whither on the vine, never to be publicly pursued, because they could not justify the cost of an unnecessary EIR. To date, this argument is speculative and anecdotal in regards to development projects—we cannot see or measure or evaluate projects that are never consummated—but is well known for mobility projects such as the San Francisco bike lanes that experienced substantial delay and additional cost to evaluate LOS under CEQA.

After full discussion and a debate that included these considerations, we saw that we could retain and improve new development by moving LOS and Street Segment Analysis out of CEQA and into project review, where large projects (over 50,000 sq ft) could be subject to standard conditions of approval, and could reform our transportation metrics to match our stated goals in a manner that was politically feasible. In the end, council adopted the following metrics:

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 located within a quarter mile of each of three bicycle facility types	Any decrease in % of units or employment within an X 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 an X 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.

Sincerely,

Jonathan Edewards, Secretary and Past-President
DOWNTOWN PASADENA NEIGHBORHOOD ASSOCIATION