

PRELIMINARY EVALUATION OF ALTERNATIVE METHODS OF TRANSPORTATION ANALYSIS
SUPPORT FOR AUTOMOBILE TRIPS GENERATED METRIC



**DOWNTOWN
PASADENA
NEIGHBORHOOD
ASSOCIATION**

Thursday, February 13, 2014

Christopher Calfee, Senior Counsel
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Dear Mr. Calfee:

The Downtown Pasadena Neighborhood Association (DPNA) appreciates the effort that your office has put forward in researching and developing new methods of measuring environmental impacts related to transportation. Your office's December 30, 2013 memo encapsulates both the letter and the spirit of the law as required by Senate Bill (SB) 743 and helps take a very important step to lead our State's land use and transportation decisions towards a more sustainable future.

DPNA is a collection of residents, commercial property owners, business owners, and other stakeholders within the Pasadena Central District who share the common goal of promoting a walkable urban lifestyle in a city that is vibrant with thriving businesses, excellent arts, visionary government, and active public spaces. We advocate for urban parks, wider sidewalks, pedestrian-friendly street design, quality bicycle infrastructure, street trees & shrubbery, mixed-use & pedestrian-oriented development with reliable and frequent transit, enduring architecture, and other amenities that improve life for residents of an urban city center.

Problems with LOS. Your memo very eloquently described problems with the existing method of analyzing environmental impacts related to transportation which is the vehicle delay based Level-of-Service (LOS) metric. Of particular interest to DPNA, is the mischaracterization of pedestrian, transit, and bicycle improvements as detrimental to transportation. These types of projects greatly enhance the livability of urban areas. They improve the social and environmental quality of our cities which in turn benefit the communities by increasing property values, increasing business activity and improving public health and safety.

Another known problem of LOS lies in the mitigation of perceived impacts which usually involves increasing vehicle capacity. Increasing vehicle capacity typically involves widening streets that has the negative effect of degrading the pedestrian environment by increasing crossing distances, increasing vehicle speeds and in many cases, narrowing sidewalks and/or removing the landscaped buffer. Also, as vehicle capacity is increased, more vehicle trips are introduced into the network and contribute to reduced air quality.

Favored Metric: AUTO TRIPS GENERATED (ATG). While all the alternative methods listed have merit and could be an improvement to the current LOS metric, DPNA supports the Auto Trips Generated (ATG) metric for use in urban areas especially ones that have, or will have, access to quality transit or Transit Priority Areas as defined in SB 743.

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The ATG method correctly recognizes that every vehicle trip added to the transportation network has an impact and coupled with a trip based impact fee, encourages projects within urban areas **to pursue strategies that reduce vehicle trip making**. Some of these strategies include physical improvements to other modes of transportation such as walking, transit, and biking. Others may include transportation demand strategies (TDM) such as ridesharing, shuttle services, alternative work schedules etc. The ATG method also characterizes transit, pedestrian and bicycle improvements as beneficial as they typically facilitate reduced vehicle trip making and car dependence. ATG based impact fees also provide cities with much needed revenue to fund improvements to all modes of transportation compared to the LOS metric which only focuses on improvements for automobiles.

Concerns regarding VEHICLE MILES TRAVELED (VMT): Your memo enumerated one benefit of VMT that ATG lacks, the accounting of the impacts of regional location. VMT would "reward" centralized locations, because people drive fewer miles when destinations are centralized & concentrated, rather than spread out. Accounting for the impacts of regional location, however, may be problematic in Southern California, where our region is fragmented into numerous jurisdictions. Each of those jurisdictions have their own center, and therefore calculating the average mileage for each trip becomes difficult and might easily be manipulated or miscalculated.

Additionally, a threshold of significance will have to be set for transportation impacts that require mitigation. It is possible that VMTs for Pasadena projects would be so low—in its regional context—as to be below significant impact thresholds. If that were the case, developers would escape sharing the cost of the infrastructure to service their projects.

The ATG metric, on the other hand, has a one-trip threshold, which encourages all projects to reduce their vehicle trip generation, and aids efforts to collect funds which could be used to improve active modes of transportation.

Concerns regarding MULTI-MODAL LEVEL OF SERVICE (MMLOS): we are concerned that pedestrians are inherently ill-served by LOS because the factors that affect the pedestrian experience are far more qualitative rather than quantitative, in comparison with motorized modes. The qualitative nature of pedestrian level of service makes it likely to be shortchanged in the analysis.

Pedestrian Experience Factors. What makes a person choose to walk, rather than drive? What factors improve the walking experience? They are:

- Perceptions of safety from crime.
- Perceptions of safety from vehicle traffic.
- Perceptions of difficulty in reaching the destination.
- En-route activities. Things to look at/do (shopping destinations, etc) on the way.
- Satisfaction of multiple goals. ("Killing 2-5 birds with one stone") Trip chaining.
- Perceptions of "Normal Behavior."

All of those factors are extremely difficult and expensive to measure, and are therefore unlikely to be captured by MMLOS, and yet they are fundamental to actually measuring improvements or threats to the pedestrian experience.

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Conclusion. A robust commitment to reducing vehicle trip making allows cities to dedicate less infrastructure to automobiles which in turn allows more intense and efficient land use based on “smart growth” principles. Using these smart growth principles to intensify land use creates neighborhoods having a mix of uses with all citizens having access to more amenities within close proximity of their homes and jobs. Over time, moving towards more efficient land use makes walking, cycling and use of transit economically viable and attractive modes of transportation, consequently removing a large number of vehicles from our city streets and greatly enhancing our urban landscape.

Downtown Pasadena is already a thriving urban center that has benefited greatly from enhancements to the public realm and intensification of land uses that incorporate the pedestrian-oriented and human-scaled elements of Pasadena’s historic buildings and street grid. DPNA encourages policies that consider all modes of transportation with a strong recognition that **humans are the design parameters for our public spaces**. As OPR continues its efforts in defining the new metric for transportation impacts, it is our sincere hope that above all, the focus is in creating cities that we can all care about.

We look forward to participating in discussions that involve defining the new metrics. Thank you for the opportunity to provide this input.

Sincerely,

Downtown Pasadena Neighborhood Association



Jonathan Edwards, President



Andrew Ngumba, P.E., T.E.



Christine Fedukowski, Chair
DPNA Land Use and Economic Development Committee