

July 20, 2014

To (via email): Pasadena Mayor and City Council  
Pasadena Department of Transportation  
Pasadena Planning Commission

Re: Revised Recommendations Related to the Pasadena  
Department of Transportation (PasDOT) Proposed New Traffic  
Metrics

Dear Mayor, Councilmembers, Commissioners and Staff:

On behalf of the West Pasadena Residents' Association (WPRA), I would like to commend PasDOT staff on efforts to update Pasadena transportation measures to reflect both anticipated state measures as well as Pasadena's efforts to become a green, multi-modal transportation city.

In response to the original proposed PasDOT transportation measures dated June 11, 2014 (Reference 1), the WPRA documented a list of recommendations and questions (Attachment 2). Since then, further changes have been proposed by PasDOT in a memo dated June 25, 2014 (Reference 2) and in a presentation to the Pasadena Planning Commission on June 25, 2014. This memo is to document our recommendations and concerns regarding these modified measures.

**1. We strongly recommend that the city delay the adoption of new metrics at this time.** Reasons include:

- a. At the June 25, 2014 Planning Commission Meeting, it was revealed that the Governor's Office of Planning and Research (OPR) will be proposing new state transportation measures in the near future. These new measures are controversial and will be subject to review and iteration. It is anticipated that final state measures will not be approved until sometime in 2015. PasDOT stated that it was proposing new transportation measures at this time to 'get out in front of these changes.' We believe that anticipating the final state measures are speculative and that new Pasadena measures, if adopted in the immediate future, will likely require modifications within a year.
- b. Once new state measures are approved and understood, we believe that Pasadena should evaluate what flexibility it has within state law to achieve our own unique transportation objectives. Only then can resident stakeholders have a meaningful discussion on what measures should be proposed and their potential impacts.

**2. In the interim, we strongly recommend that the city use PasDOT's currently approved transportation measures for the purpose of evaluating the General Plan.** Using a new set of measures that are likely to change within a year will lead to confusion and controversy.

**3. If the City Council is compelled to adopt new transportation measures immediately, then WPRA does not support PasDOT's currently proposed plan** for the following reasons:

a) *There are too many unanswered questions, both in the impacts of the PasDOT de-emphasized automobile approach, and in the parameterization, sensitivity and usefulness of several of the proposed metrics.*

These questions are both extensive and vital to the well-being of our neighborhoods and economy. We have provided a list of key questions in Attachment 1.

b) *PasDOT's approach, which largely ignores automobiles as an environmental impact, is premature given that the city's goal of providing an efficient public transportation network has not yet been fully realized.*

The purpose of the de-emphasized automobile measure approach is to reduce greenhouse gas emissions. However, this can only be achieved if alternate modes of transportation (e.g. walking, bicycles, or mass transit) are readily available to most city neighborhoods, employees, visitors and commercial centers; otherwise, adding automobile congestion to city streets will lead to gridlock and increased emissions. To our knowledge there has been no assessment on the impact to Pasadena's neighborhoods or economy if these new measures are enacted before significant progress has been made toward a comprehensive, green, public transportation system.

We urge you to also consider these additional specific comments on proposed transportation metrics:

- As stated previously (See Attachment 2), we support PasDOT's addition of transportation measures to reflect the city's goal of multi-modal transportation, e.g. adding measures for Proximity and Quality of the Bicycle Network, Proximity and Quality of the Transit Network and Pedestrian Accessibility.
- As stated previously (See Attachment 2), we continue to believe that Street Segment Analysis is an important tool in assessing traffic volume growth impacts and recommend that it be retained as a California Environmental Quality Act (CEQA) criteria. Furthermore, if Street Segment Analysis is for 'Neighborhood Protection' as stated, then Connector Streets must be included in this Analysis, since these streets are also in neighborhoods. We agree with PasDOT's approach to amending current Street Segment thresholds to sensibly resolve issues related to current Average Daily Traffic (ADT).
- We cannot support a plan that lowers the impact threshold for auto Level of Service (LOS) to F as a general policy. While we understand that traffic

impacts cannot always be mitigated, we believe that projects with significant traffic volume impacts should still be fully analyzed and approved on a one-by-one basis.

- We are receptive to adding new measures for Vehicle Miles Traveled (VMT) and Vehicle Trips (VT) provided responses are provided to the questions cited in Appendix B, and these measures are demonstrated to have real value.

We also look forward to PasDOT's response as to why traffic models only consider one intersection on Orange Grove Boulevard, when this is clearly a major north/south artery for west Pasadena. We believe that traffic on Orange Grove Boulevard will be directly impacted by many large projects currently under consideration, such as the extension of the 710 Freeway and new events at the Rose Bowl (e.g. the National Football League and a large 3-day music festival).

In conclusion, while we support PasDOT's efforts to update the city's transportation measures, we believe the proposed measures are premature and do not allow for a realistic transition from today's transportation needs to our city's goal toward green transportation.

**We strongly urge you to find a way to balance our City's need to be environmentally proactive while ensuring reasonable traffic flows on our streets.**

Sincerely,



Geoffrey Baum  
President, West Pasadena Residents' Association

Attachments:

- 1 WPRAs Questions Regarding PasDOT's Proposed Transportation Measures
- 2 Recommendations Related to the Memorandum 'New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQ,' Geoffrey Baum on behalf of the WPRAs. June 11, 2014.

References:

- 1 New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for California Environmental Quality Act (CEQA), Fred Dock, June 11, 2014.
- 2 New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQA, Fred Dock, June 25, 2014.
- 3 Preliminary Evaluation of Alternative Methods of Transportation Analysis, Governor's Office of Planning and Research (OPR), December 30, 2013.

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**Attachment 1:**  
**WPRA Questions Regarding PasDOT's Proposed Transportation Measures**

- What are the similarities and differences between the proposed PasDOT transportation measures and thresholds, the current PasDOT transportation metrics and thresholds, the requirements of SB 743, and the regulations and proposed metrics from the Governor's Office of Planning and Research (OPR)?
- What is the current mode split in Pasadena? What is the anticipated mode split resulting from enactment of the proposed transportation performance measures, and how does it compare to the assumptions in the General Plan?
- Pasadena's business, social, recreational, service, residential, entertainment and other lifestyle elements depend on a certain level of people, goods and services moving into, out of, within and through Pasadena daily. Most of that movement takes place today via privately owned motor vehicles. The proposed new transportation performance measures de-emphasize motor vehicle movement and place more emphasis on alternative modes such as transit, cycling and walking. These are appropriate policy goals, but has there been any analysis of whether alternative modes can be expected to maintain the movement of people, goods and services? What are the affects on the City and its residents if they cannot? For example, what is the affect on Pasadena's businesses and economy? What is the affect on significant regional attractors such as Old Pasadena, Lake Avenue and the Huntington Hospital area? What is the impact to seniors and the disabled who are unable to walk long distances or bicycle?
- If a primary goal is to reduce driving, what would be the result of reduced regional travel to Pasadena (because transit does not serve Pasadena from many areas) and the impact of reduced parking revenues, especially in Old Pasadena where parking revenues provide critical financial support?
- It appears that any level of traffic congestion up to and including Level of Service (LOS) F in certain areas and LOS D citywide, would be deemed acceptable. Has there been any analysis of the effect of this congestion on bus transit, goods movement and emergency services?
- What would be the effect of traffic diversion to neighborhood streets resulting from LOS F traffic conditions on major streets and intersections? Are there any proposed mitigations?
- Why are residential projects exempt from Street Segment Analysis? Won't large residential projects generate traffic on neighborhood streets like other developments? Are mixed-use projects also exempt?
- The June 11, 2014 PasDOT memo (Reference 1, page 6) states that "...the City can reduce VMT on a per-capita basis with land use policies that help Pasadena residents meet their daily needs *within a short distance of home...* (emphasis added). If the effect of land use policies is within a small area, why is PasDOT proposing to measure VMT impact on a city-wide per-capita basis, where the percentage impact of virtually any project is minimal? (The same question applies to VT.) Why not measure local impacts locally, where they

actually happen?

- In Reference 3, OPR suggests that VMT/VT should be calculated 'per capita' for residential areas, 'per employee' for employment centers and 'per trip' for commercial centers. Why is all of Pasadena classified as residential? What is the effect of this classification given that it is also an employment center and has commercial activities?
- How might the VMT and VT measures be made more sensitive and meaningful? What is the affect if VMT and VT are calculated over a smaller are? What is the affect if VMT and VT are calculated over areas with higher or lower density populations?
- Other agencies have commented that changes in VMT are difficult to calculate accurately, as it typically requires a four-step travel demand model that accounts for trip generation, trip distribution, mode choice and traffic assignment, and also needs to be combined with the Air Resources Board's air quality model (OCTA, 2/14/14). Can PasDOT assure the ability to accurately calculate VMT if it is to be a prime impact criteria, and can it do so at the local level as well as City-wide?
- In the PasDOT June 11, 2014 memo (Reference 1, page 8), it is stated that "The City can improve the measures of Transit Proximity and Quality by reducing headways on existing transit routes, by expanding routes to cover new areas... How can the City assure this outcome, since it does not control most of the transit service in the City?
- Both the PasDOT June 11, 2014 and June 25, 2014 memos (Reference 1 and 2) refer to Proximity and Quality of Bicycle Network and Proximity and Quality of Transit Network as impact threshold criteria. What capacity do those levels of bicycle and transit service provide, and how much motor vehicle travel would they replace? Why is a quarter-mile radius proposed here as opposed to the half-mile radius recommended for High Pedestrian Impact Areas and Transit Oriented Districts?
- What kinds and service levels of transit - regional, rapid-bus, local, circulator, etc. - are assumed in the Proximity and Quality of Transit Network criteria? Will the actual impact of transit usage be estimated in project proposal evaluations? Or will the city merely "check the box" and determine that services are available?

## Attachment 2



June 23, 2014

To (via email): Fred Dock, Director, Pasadena Department of Transportation  
Mark Yamarone, Case Manager, Department of Transportation

Subject: Recommendations Related to the Memorandum 'New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQ', June 11, 2014

Dear Mr. Dock and Mr. Yamarone,

The West Pasadena Residents Association Board of Directors has reviewed the memorandum 'New Transportation Performance Measures For Transportation Impact Analysis and Thresholds for CEQ' and the recording of the June 11, 2014 Pasadena Planning Commission Meeting, where an overview of the proposed new transportation performance measures was presented. Our initial comments to the proposed plan are provided below:

- The Pasadena Department of Transportation is to be commended in its effort to modernize and improve the department's models, metrics and threshold criteria, especially to reflect the city's smart growth principles for Old Pasadena and its goal to be a green, livable and walkable city. We support the department's proposal to add sensible metrics for Proximity and Quality of the Bicycle Network, Proximity and Quality of the Transit Network and Pedestrian Accessibility.
- We continue to believe that Street Segment Analysis is an important tool in assessing traffic volume growth impacts and recommend that it be retained. However, we recognize that this analysis has shortcomings and unintended consequences as identified in the department's memo. Therefore, we support amending the city's Traffic Impact Guidelines to sensibly resolve these issues.
- We cannot support a plan that lowers the impact threshold for auto Level of Service (LOS) to F for all streets inside a designated High Pedestrian Area (HPA). The HPA areas identified represent a significant part of the City of Pasadena (stated by Mark Yamarone as ~30% of the city). While we understand the intent of this proposal is to give preference to pedestrians and non-auto transportation in Old Pasadena, we cannot ignore that the city's goal for green transportation has not yet been fully realized. Automobiles are still the primary means of transportation in our city and their impacts to our community cannot be ignored. Furthermore, while we understand that traffic impacts cannot always be successfully mitigated, we


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believe that exceptions should still be fully analyzed and approved on a one-by-one basis.

- As proposed, the Vehicle Miles Traveled (VMT) Per Capita and Vehicle Trips (VT) Per Capita metrics appear to have limited usefulness; it is almost impossible to trigger the impact thresholds for these parameters. This was evident in the 3 case studies presented, and in a statement made at the June 11 Planning Commission Meeting that probably nothing in the General Plan would trigger these thresholds. Thus, we recommend that these metrics be modified, if possible, to make them more meaningful. For example, instead of measuring 'per capita over the entire city', one might measure 'per capita over a smaller immediately affected area'. Also the metrics might be changed so impacts do not *appear* insignificant because they are only identifiable at the 3<sup>rd</sup> or 4<sup>th</sup> decimal place. If improvements can't be made, we recommend deleting these metrics.
- It is unclear why city traffic models only consider one intersection on Orange Grove Boulevard, when this is clearly a major north/south street for west Pasadena. Furthermore, Orange Grove Boulevard will be directly impacted by many large projects currently proposed, such as the extension of the 710 Freeway and new events at the Rose Bowl (e.g. the National Football League and a large 3-day music festival).

In general, the WPRA believes that transportation metrics and thresholds must clearly reflect the impacts of development and growth on city traffic, both in our neighborhoods and at the city level. We understand that the department will be presenting a modified plan at the June 25 Planning Commission Meeting. We look forward to reviewing the next iteration and working with you in the near future.

Sincerely,  
  
Geoff Baum  
WPRA President

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