



DEPARTMENT OF TRANSPORTATION

California Transportation Commission

October 8, 2014 Meeting

RE: Item 18: Draft Updates to the CEQA Guidelines Implementing SB 743

Good Afternoon.

My name is Fred Dock and I am the Director of the Transportation Department for the City of Pasadena. The Transportation Department is responsible for all aspects of planning and operating the City's transportation system.

My intent in speaking today is to offer Pasadena's perspective on transportation metrics, particularly what we have found as we have sought to develop a set of performance measures that reflect the complex conditions of transportation systems in an urbanized city.

As we started an update to our General Plan Land Use and Mobility Elements in 2009, we began evaluating performance measures from a perspective of better alignment with our mobility policies and objectives. In that evaluation, we determined that our current CEQA metrics of auto Level of Service (LOS) at intersections and increases in average daily traffic (ADT) on streets were not directly addressing transit, bicycles and pedestrians or safety and that a more robust set of metrics was needed.

We began what is now a five-year process to researching appropriate performance measures and piloted use of a variety of metrics in both planning settings and project review. From that work, which was conducted largely in advance of the passage of SB 743, we arrived at the following conclusions:

- The current metrics of auto LOS and ADT were resulting in outcomes that negatively affected pedestrian and bicycle travel that were not being addressed. The auto measures needed to be balanced by metrics that evaluated pedestrian and bicycle travel conditions.
- The transportation metrics were ignoring the City's goals for addressing climate change and sustainability. Additional metrics were needed to address the efficiency of travel in Pasadena in relation to urban form and land use patterns.
- One of the City's eight Guiding Principles – the ability to move about Pasadena without a car – was not being addressed at all by the current metrics. Performance measures for transit, non-auto modes and accessibility were needed.

Pasadena's research identified the following:

- Vehicle Miles of Travel per Capita is an effective metric for measuring the efficiency of travel in Pasadena and with adequate modeling represents the effects of infill development on trip length. In the alternatives development phase of the General Plan Update, we used VMT per capita to illustrate how travel patterns differ in various parts of Pasadena and to show how those patterns link to urban form, intensity of development and accessibility.
- Auto LOS could continue as a measure, but only if paired with multi-modal metrics that considered the related effects of other users of the street system. This led us to explore through pilot applications the Pedestrian and Bicycle Environmental Quality Indices developed by San Francisco and Multi-Modal Level of Service as developed by the National Cooperative Highway Research Program and the Transportation Research Board.
- The calculation methodology for auto LOS needed to be sensitive to the characteristics of urban traffic operations and to the system management strategies embodied in Intelligent Transportation Systems (ITS). This precluded the use of planning methods for calculating LOS (Intersection Capacity Utilization and Volume/Capacity) and pointed to the use of simulation models for the analysis.

We used the above findings to define a strategy for modifying the City's CEQA metrics and Thresholds and started a public discussion at roughly the same time that SB 743 was signed into law. We are currently near the conclusion of that process with updated CEQA Thresholds scheduled for City Council action later this month that will recommend VMT per capita as one of the metrics for CEQA in Pasadena with a threshold of significance set at the current citywide VMT per capita.

Our recommendation of a Citywide VMT threshold differs from the Office of Planning and Research's suggested regional VMT threshold, but is consistent with the guidance in SB 743 for a local jurisdiction to have the latitude to apply a more stringent threshold. Pasadena is consistent with the Sustainable Communities Strategy for our subregion and mirrors regional policies for location and scale of development in relation to transit, which indicates that citywide VMT per capita will be a more stringent measure.

From the technical standpoint as noted, Pasadena is in support of the guidance proposed by OPR for the use of VMT per capita, but we have asked and continue to ask that as OPR moves forward in developing a recommendation that OPR not preclude cities from developing and adopting additional metrics to the one ultimately amended into the CEQA guidelines.

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