MEMORANDUM - CITY OF PASADENA
DEPARTMENT of TRANSPORTATION

DATE: **July 23, 2020**

TO: **Transportation Advisory Commission**

FROM: **Conrad Viana, Engineer**

RE: **UPDATE TO CEQA TRANSPORTATION PERFORMANCE THRESHOLDS OF SIGNIFICANCE**

RECOMMENDATION:

It is recommended that the Transportation Advisory Commission review and provide comments to the City Council on the recommended update to CEQA transportation performance thresholds of significance. The current and recommended CEQA transportation performance thresholds of significance are as follows:

METRIC	DESCRIPTION	Current Guidelines IMPACT THRESHOLD	Staff Recommendation IMPACT THRESHOLD
VMT Per Capita	Vehicle Miles Traveled (VMT) in the City of Pasadena per service population (population + jobs).	An increase over existing Citywide VMT per service population. **Current CEQA Threshold: 22.6**	Net change in VMT per service population is 15% below Citywide average baseline **2017 Baseline: 35.6*** **15% Below Baseline Threshold: 30.3**
VT Per Capita	Vehicle Trips (VT) in the City of Pasadena per service population.	An increase over existing Citywide VT per service population. **Current CEQA Threshold: 2.8**	Net change in VT per service population is 15% below Citywide average baseline **2017 Baseline: 4.2*** **15% Below Baseline Threshold: 3.6**

Proximity and Quality of Bicycle Network	Percent of service population within a ¼ mile of bicycle facility types.	Any decrease in existing Citywide service population within a ¼ mile of Level 1 or 2 bike facilities. **Current CEQA Threshold: 31.7%**	Any decrease in baseline Citywide service population within a ¼ mile of Level 1 or 2 bike facilities. **2017 Baseline: 32.3%** **Recommended Threshold: 32.3%**
Proximity and Quality of Transit Network	Percent of service population located within a ¼ mile of transit facility types.	Any decrease in existing citywide service population within a ¼ mile of Level 1 or 2 transit facilities. **Current CEQA Threshold: 66.6%**	Any decrease in baseline citywide service population within a ¼ mile of Level 1 or 2 transit facilities. **2017 Baseline: 66.8%*** **Recommended Threshold: 66.8%**
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 **Current CEQA Threshold: 3.9**	Any decrease in the Citywide Pedestrian Accessibility Score **2017 Baseline: 3.9*** **Recommended Threshold: 3.9**

* The Baseline should be updated approximately every 5 years in order to reflect changes to the street network and parcel level land uses.

The most current Governor's Office of Planning and Research (OPR) technical advisory, issued on December 2018, recommends that a VMT per capita or per employee 15% below that of existing development may be a reasonable threshold. OPR indicates that goal is achievable by applying transportation strategies at the project level outlined by the California Air Pollution Control Officers Association (CAPCOA).

To be consistent with SB 743's direction to select a threshold that will help the State achieve its climate goals, the City is recommending the net change in VMT and VT per service population to be 15% below Citywide baseline average. Given the City Council's direction to move from Level of Service (a delay based approach) to VMT (an accessibility based approach) to evaluate vehicular traffic impact, a VMT per service population and VT per service population impact threshold 15% below Citywide baseline average will align with the State's emission reduction goals. The

recommended updated thresholds are consistent with the direction provided by Council in 2014 when the CEQA thresholds were first established.

The recommended thresholds are also aligned with SB 32, which requires California to reduce greenhouse gas (GHG) emissions to 40% below 1990 levels by 2030. California Air Resources Board (CARB) finds that per capita vehicle travel would need to be kept lower than existing levels to achieve state climate goals. CARB must assess each region's progress on achieving regional greenhouse gas emissions reduction targets at least every 4 years to evaluate what progress has occurred. It is important that the travel demand model be updated to account for changes to the transportation network and land uses. Reevaluating and/or updating the City's travel demand model every 5 years is a reasonable timeline to keep the model relevant.

BACKGROUND:

In response to the growing concern over the environment and a sense of urgency to reduce greenhouse gas (GHG) emissions, the State of California made a fundamental decision to move away from the traditional transportation evaluation metric of Level of Service (LOS). Signed into law in September 2013, SB 743 (Steinberg) required the Governor's Office of Planning and Research (OPR) to amend the California Environmental Quality Act (CEQA) Guidelines to provide an alternative to LOS when evaluating a project's transportation impacts.

The intent of the law is to establish guidelines that would promote the reduction of GHG emissions, multi-modal transportation systems and diverse land uses. SB 32 (Pavley, 2016) further requires California to reduce gas emissions by 40% below 1990 levels by 2030. Effective July 1, 2020 all California lead agencies are required to shift the focus of CEQA transportation analyses from vehicle delay to vehicle miles travelled (VMT).

City of Pasadena's Approach to SB-743

In anticipation of the direction of the State legislature and after an extensive planning and community engagement process, City Council decided to adopt a more environmentally sound and holistic approach to evaluating project impacts. At the November 3, 2014 City Council Meeting, the City Council adopted a resolution to establish five new Transportation Performance Measures and set CEQA thresholds of significance. The five transportation measures with CEQA thresholds are:

- Vehicles Miles Travelled (VMT) per Capita
- Vehicle Trips (VT) per Capita
- Proximity and Quality of the Transit Network
- Proximity and Quality of the Bicycle Network
- Pedestrian Accessibility

With the expanded emphasis on sustainability and a continued focus on livability, the adopted performance measures provide a balance in trade-offs among travel modes

and among the mobility needs of different members of the community. The guidelines apply to all projects that require environmental review in accordance with CEQA. The CEQA performance measures and thresholds City Council adopted in 2014 assumed a 2013 baseline. In order to ensure analyses remain relevant, the baseline must be updated on a regular basis to reflect changes to the street network and parcel level land uses.

OPR Technical Advisory on Evaluating Transportation Impacts in CEQA

The Governor's Office of Planning and Research (OPR) gives the lead agency discretion in preparing environmental documents subject to CEQA. Although OPR does not specify the methodology to analyze VMT impacts, OPR discusses general principles for agencies to consider when determining VMT levels of significance:

- Lead agencies should select a significance threshold that aligns with the state's goals to reduce greenhouse gas emissions, develop multimodal transportation networks, and a diversity of land uses.
- Continued growth depends on increased efficiency and conservation in land use and transportation from all Californians.
- OPR states that a 15% reduction is consistent with SB 743's direction to select a threshold that will help the State achieve its climate goals.

OPR understands that lead agencies, using more location-specific information, may develop their own specific thresholds and screening criteria.

California Agencies' Approach to VMT

By July 1, 2020, agencies are required to have shifted the focus from LOS to VMT to evaluate a project's potential impact. Where congestion and traffic impacts to drivers were once the determining factor for a project's environmental impact, accessibility and the act of driving itself now determines whether a project impacts traffic as measured by the amount of vehicle travel.

Agencies in California who have moved to adopt VMT have stated, in their guidelines, that a project will have a potential impact if, for example:

- the household VMT per capita exceeds 15% below the existing average household VMT per capita for residential projects,
- the work VMT per employee exceeds 15% below the existing average work VMT per employee for office projects,
- the project would result in a net increase in VMT for regional serving retail projects,
- For other land use types, VMT impacts are measured for the work trip element exceeding 15% below the existing average work VMT per employee, or evaluate each land use independently per the thresholds described above

Some agencies also support streamlining of projects in travel efficient locations and that improve access to destinations, livability, and community such as:

- projects within a transit priority area
- a project pre-screened to have low residential or office VMT
- residential housing projects composed of 100% affordable housing located in any infill location

As of this writing, a draft has not been circulated regarding the Los Angeles County methodology for evaluating CEQA transportation impacts under the new State requirements. Caltrans recommends use of OPR's recommended thresholds for evaluating a project's possible transportation impacts to the State highway system.

DISCUSSION:

The General Plan identifies a mix of land uses where walking, bicycling, and the use of transit are encouraged. At General Plan build-out, a balanced mix of land uses are expected to reduce the trip length associated with adjacent land uses by encouraging walking and other non-motorized modes of travel, thereby reducing dependency on the automobile. The City's adopted VMT metric is reflective of the City's comprehensive approach of planned land uses and supportive transportation options that, when combined, are intended to produce a more sustainable urban environment.

Changes to the Travel Demand Model

The City employs a locally calibrated Travel Demand Forecasting (TDF) model developed from the SCAG regional model. A regional TDF model reflects information gathered from various sources to develop commuting patterns for the region (US Census, California Household Travel Survey, National Cooperative Highway Research Program, SCAG Planning Model, National Household Travel Survey, etc.). The level of detail for applying the regional model, however, may not be adequate to evaluate results at a local scale. Accordingly, the City of Pasadena uses a locally calibrated and validated model to analyze projects subject to CEQA.

The City's model is in line with the discretion granted by OPR to develop localized thresholds specific to the jurisdiction. The City's travel demand model more accurately captures and reflects local conditions using GPS and cell phone data, traffic counts, parcel level land use, vehicular availability, and street network and travel time information. The model development process resulted in a calibrated and validated model that matched travel data specific to the City for use in evaluating potential project transportation impacts. By using this model, transportation analyses more accurately reflect and capture potential impacts at the local level.

The current thresholds are based on the City's traffic conditions in year 2013 and must be updated to reflect conditions that are more current. Update of the TDF model entails citywide traffic data collection, an update of new parcel level development, and model

calibration to ensure the model is representing the existing traffic conditions. The recommended thresholds are based on the 2017 baseline year traffic conditions, and noticeable changes are due to the following:

- New land use development
- Changes to the transportation network
- Updated vehicular trip generation rates
- Changes to account for 100% rather than 50% of trips that have only one trip-end in Pasadena (originate in Pasadena with a destination outside the City, or destined to Pasadena with an origin outside the City).

The most substantial change in establishing the updated CEQA thresholds is due to OPR's December 2018 guidelines recommending that agencies not truncate VMT evaluation at jurisdictional boundaries. The previous 2013 model accounted for only half of the trip miles outside the City boundary. The higher values for the recommended VMT and VT thresholds reflect changes made to account for those trips.

Recommendation to Update CEQA Thresholds for Consideration:

OPR recommends that a per capita or per employee VMT that is 15% below that of existing development may be a reasonable threshold to achieve the state's goals. The California Air Resources Board (CARB) finds per capita vehicle travel would need to be kept below what today's policies and plans achieve.

Staff recommends thresholds 15% below citywide baseline average to evaluate VMT and VT per capital CEQA impacts. Doing so better positions the City to reduce GHG emissions, encourage the development of multimodal transportation networks, and promote a diversity of land uses.

The thresholds recommended by staff are in line with the direction adopted by the City Council in 2014. A potential result of lower thresholds may be that some projects that would otherwise be in compliance with the adopted Land Use of the General Plan may be subject to additional environmental review processes.

The 2017 baseline and subsequent updates to the baseline will be included in DOT's Transportation Impact Analysis Current Practice and Guidelines. The Guidelines are posted on the Development Review Section of the Transportation Department website: cityofpasadena.net/transportation. The revised thresholds will be applied to new project applications deemed complete six months after the update to CEQA thresholds of significance is approved by City Council.

NEXT STEPS:

This update for Transportation Performance CEQA Thresholds of Significance will be presented to the Planning Commission and the Municipal Services prior to presenting to City Council for consideration. Should the CEQA Thresholds be approved by City

Council, a resolution will be prepared for Council approval prior to the CEQA Thresholds of Significance taking effect. At the direction of the City Council, staff will work with the Transportation Advisory Commission to update the administrative procedures for the Traffic Impact Analysis Guidelines that will include the updated CEQA thresholds and Outside CEQA caps within sixty days.

Respectfully submitted,

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