



September 8, 2020

City of Pasadena Planning Commission
Attn: Tess Molinar
Hale Building
175 N. Garfield Ave., 2nd Floor
Pasadena, CA 91101

Re: CEQA Thresholds

Dear Members of the Planning Commission:

Pasadena Heritage is encouraged to see our City's CEQA transportation thresholds come before the Planning Commission for reevaluation. We and others brought attention to this subject in recent years as an element of our opposition to several large housing projects. Pasadena thought itself to be on the cutting edge of transportation planning when we adopted the initial CEQA thresholds in 2014. Since then, we have had time to see how these metrics have performed, and have seen examples from other cities with different approaches.

One thing has been clear to us over the past few years — the current threshold is set too high, resulting in nearly every new project proposed in Pasadena showing no impact on traffic. Common sense tells us this simply isn't true, especially where there is a concentration of large, new development, mostly housing, within a small area (the Los Robles corridor, for example). In Pasadena and across the region, VMT has steadily increased year-over-year, and straphangers abandon transit, families purchase additional vehicles, and rideshare proliferates. This problem has been identified not only by transit and bike advocates, but also existing drivers, who have seen an overall increase in traffic, congestion on local streets and longer commute times.

CEQA thresholds have a direct impact on historic preservation and our urban environment and quality of life. Recently, there have been a multitude of large-scale housing developments in the Central District and near our TOD areas that make use of urban infill exemptions, Affordable Housing Concession Permits, and TOD development standards to create dense urban housing. This is in keeping with Smart Growth goals laid out by the City and the State. However, these projects are often seriously overparked, and previous environmental analyses have predicted high levels of VMT per capita are being induced. In order to accommodate additional parking, buildings often sit on top of bulky parking podiums, which reduce pedestrian experience and loom over adjacent historic resources. Meanwhile, in TOD areas where we should be building housing or work space for people who actually rely on transit, projects being built are more focused on attracting new cars

and drivers. We need to set more reasonable limits that truly encourage the use of other forms of transit..

We understand that the methodology for calculating VMT is proposed to be modified, as it should. Giving a 50% discount-of-sorts outside the City limits does not make much sense. We as Pasadenans still share the collective burden of air pollution and greenhouse gas emissions, and many of those cars will travel through Pasadena as the San Gabriel Valley hub with multiple freeway interfaces. The new methodology raises the allowable VMT from 22.6 to 30.3. Even with the changes in methodology, this extremely disheartening. It feels like a step backwards.

One obvious example of a nearby city’s VMT metrics is Los Angeles’. The following chart is taken from the Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines, dated July 2019:

Table 2.2-1: VMT Impact Criteria (15% Below APC Average)

| Area Planning Commission | Daily Household VMT per Capita | Daily Work VMT per Employee |
|--------------------------|--------------------------------|-----------------------------|
| Central | 6.0 | 7.6 |
| East LA | 7.2 | 12.7 |
| Harbor | 9.2 | 12.3 |
| North Valley | 9.2 | 15.0 |
| South LA | 6.0 | 11.6 |
| South Valley | 9.4 | 11.6 |
| West LA | 7.4 | 11.1 |

Los Angeles’ VMT targets are drastically lower than what is proposed for Pasadena. It may be too restrictive to set standards like those of LA’s Central or West LA APCs in Pasadena, but are we that materially different from the North Valley or South Valley? In many ways, Pasadena is more multi-modal and accessible than the San Fernando Valley. It would be helpful to see our threshold metrics more closely align. The City of San Jose has similarly low VMT thresholds, ranging from 10.12 to 14.37 depending on use. Despite our best intentions, if the thresholds are set too high, VMT will continue to increase.

We suggest considering two different thresholds for VMT/VT based on location: within the Central District/TOD area and outside it. If you live a block away from Del Mar Station, commuting by car every single day could be discouraged. In the Central District/TOD areas, the threshold for VMT/capita should be under 10 (or even lower) and VT under 1.5. Meanwhile in Hastings Ranch, for example, it is reasonable to assume there would be more vehicle travel. Limits could be less restrictive, yet a more reasonable threshold can be set: VMT in the rage of 15-20 and VT under 2.5. These metrics align closely to the San Fernando Valley APCs and San Jose, two locations with similar development patterns to Pasadena.

Setting real thresholds coupled with lower parking requirements is essential, still allows for increased density, and aligns with Complete Streets goals. Some mitigation strategies may include reducing parking, uncoupling parking from unit count (for example one parking space per unit with some additional parking spaces available at additional cost), adding bike

storage, introducing car share, providing transit credits or discounts or subsidies, or making improvements to the multimodal network. We must always keep in mind the potential that additional cars would be parked on neighboring street which would be unfair and counter-productive to the overall goal. It is important to remember that there are households that may share one vehicle or are car free, and there are renters and condo owners that rely on transit or biking as their primary means of transportation.

The bottom line is that we believe the thresholds need to be modified, cumulative traffic measurements need to be realistic and identifiable, and mitigation must be developed and implemented to make a positive difference. We thank the Planning Commission for your interest and hope you can further strengthen these proposed changes.

Sincerely,



Susan N. Mossman
Executive Director



Andrew Salimian
Preservation Director

cc: Laura Comejo, Director of Transportation
David Reyes, Director of Planning & Community Development