



October 11, 2020

Felicia Williams, Chair and  
Members of the Planning Commission  
City of Pasadena  
175 North Garfield Avenue  
Pasadena, 91101

RE: Updating of CEQA Thresholds

Our city has decided to pursue high-density, multi-family apartments and condos in existing urban neighborhoods at a feverish pace, but we must review how—and more importantly, *why*—we are also allowing an enormous increase in unmitigated vehicle trips to clog our streets and neighborhoods. The questionable aspects of CEQA thresholds and their effects on our community must be examined and addressed as Pasadena's housing production continues to increase. [Michael Graf, a CEQA attorney, explains it succinctly](#): "It seems that in the name of fighting climate change, officials appear pretty ready to sentence those left in the urban areas to a miserable existence."

On October 7, 2019, *Pasadena Star News* published an informative [article](#) clearly explaining why this issue has come to the forefront for Pasadena residents. Simply put, CEQA has placed limits on the ways in which new developments can impact local traffic, noise levels, air quality, water quality, and access to city utilities and public services. When a new project's CEQA threshold is crossed in any one of these five outlined areas, the infill exemption no longer applies and the project's environmental impacts on the community must be further studied. These limits were put in place to protect our city and our quality of life.

Now, DOT is asking the planning commission to consider increasing VMT thresholds that are meant to protect residents from worsening, unmitigated traffic. If these thresholds are increased, more cars and longer drive times will be deemed acceptable, which means developers will have a much easier time obtaining their desired infill exemptions, allowing them to avoid providing expensive mitigation for the public's benefit. When CEQA thresholds are low enough to flag a project for a full environmental impact report, project timelines are frequently delayed, costs may go up, and the developer runs the risk of their plans being rejected. It's no wonder developers want to avoid these reports, but let me be clear: this is the **ONLY** protection residents have against unchecked development in our neighborhoods.

DOT maintains in the newest staff report that CEQA will still be activated in some cases, however the reality is that these newly proposed thresholds by DOT are so high that projects likely won't ever be legally required to conduct full environmental impact analysis. For example,

in 2018, “seven out of eight projects approved by (Pasadena) received infill exemptions. **One year earlier, every project had the once-rare status.**” Increasing VMT thresholds even further will make it nearly impossible to conduct appropriate CEQA analysis, and yet DOT is asking you to once again increase these thresholds to create even more gridlock on our streets. I would like to know why.

Disturbingly, this request is being billed as an effort to “better align the city’s thresholds to meet the state’s long term climate goals,” which requires asking residents to ignore our own concerns about traffic within our Pasadena boundaries. When we exempt CEQA, we lose the opportunity to fully understand how projects affect our local environment and air quality. DOT claims on one hand we are working on state climate change by increasing the VMT baseline to 2017 levels, but somehow we are also becoming “more restrictive to projects incremental change by lowering the VMT below this threshold.” Are you confused? So is the public.

This issue needs to be simplified, and thankfully the *Pasadena Star News* has already started the work. I have included with this letter the research journalist Bradley Bermont did on infill exemptions for our city. DOT should use this data to clearly show residents which approved infill-exempt projects would now require a full CEQA analysis with the newly proposed, below baseline thresholds. It is that easy. My guess is CEQA review will never be required again with the new proposed thresholds, and the stated goal of helping the state reduce emissions will actually create a city that is jammed with more cars, and that suffers from both noise and air pollution. (We haven’t even touched the topic of safety when adding all these additional cars and alternate modes of transportation to our already failing intersections.)

As traffic expert Robert Harrison [states](#), “the truth is that the mathematics of VMT *rewards* more and more traffic congestion, while *masking* the real world impacts. As an area’s roads become more and more congested, the VMT traffic impacts that any particular new project contributes *decreases as a percentage* of the overall impacts.” With these proposed thresholds, we risk our streets becoming so inefficient that we will lose what makes Pasadena special and healthy.

The traffic discussion needs perfect transparency, public engagement, and engineering discipline so that we may grow our city without creating a hopeless mess of congestion. I am sorely disappointed by the change in CEQA thresholds being proposed. Important issues such as this need full community discussion and the public's ability to really understand what DOT is laying out here. Sadly, the staff report does exactly the opposite, it adds to the confusion and is clearly not written for the public to understand such an important quality-of-life issue.

Thank you,

Erika Foy

## In-Fill Projects in Pasadena

Year	Project	In-Fill	Stage						
03/04/13	750 N. Fair Oaks Ave.	No	Final						
04/22/13	105 S. Los Robles Ave.	No	Final						
05/13/13	1203-1217 E. Colorado Blvd	No	Final						
05/28/13	196-200 S. Oakland Ave	No	Final						
06/24/13	940 E. Colorado Blvd.	No	Final						
07/08/13	100 S. Orange Grove Blvd.	No	Final						
07/08/13	270-280 S. Oakland Ave.	No	Final						
07/22/13	842 E. Villa St.	No	Final						
07/22/13	496 S. Arroyo Parkway	No	Final						
08/12/13	175 East Del Mar Ave	No	Final						
09/23/13	2424 East Del Mar Blvd	No	Final						
10/22/2013	686 East Union Street	No	Final						
10/22/2013	770 East Walnut Street	No	Final						
10/22/2013	229-243 South Marengo Ave	Yes	Final						
12/10/2013	3330 East Foothill Blvd	No	Final						
01/14/14	135-145 S. Wilson Ave	Yes	Final	? - Categorical Exemption on September 9, 2013 by Design Commission, but unclear if it was class 32					
02/11/14	167 East Walnut Street	No	Final						
5/13/14	132 N. Euclid Ave	No	Final						
5/13/14	377-395 South Marengo Ave.	No	Final						
06/10/14	130-135 North Mar Vista Avenue	No	Final						
06/24/14	233 North Fair Oaks Avenue	No	Final						
06/24/14	290 North Wilson Avenue	Yes	Final						
10/28/2014	1727 East Walnut Street	No	Final						
11/25/2014	60, 70, 80 Vinedo Avenue	Yes	Final	? - Categorical Exemption on May 21, 2014 by Zoning Hearing Officer					
02/03/15	33-45 West Green Street	Yes	Final	? - Categorical Exemption on May 21, 2014 by Zoning Hearing Officer					
04/14/15	550-556 East Colorado Blvd	No	Final						
03/10/15	300 West Green Street	No	Final						
05/26/15	123 Hurlbut Ave	Yes	Final						
08/25/15	25 West Walnut Street	Yes	Final						
09/08/15	2900 East Del Mar Blvd	No	Final						
10/13/15	2233 East Foothill Blvd.	No	Final						
10/27/15	2460-2480 Oswego Street	Yes	Final						
05/10/16	254 East Union Street	No	Final						
06/14/16	1081 North Fair Oaks Ave.	No	Final						
06/28/16	1105 East Villa Street	Yes	Final						
06/28/16	104 East Orange Grove Blvd	Yes	Final						
08/02/16	100 West Walnut Street	No	Final	Parsons					

09/13/16	277 North El Molino Ave.	No	Final						
10/25/16	913 Boston Court	Yes	Final	Jan 12 2016 concept decision, but where is this agenda????					
12/13/16	2490 Mohawk Street	Yes	Final						
12/13/16	388 S. Los Robles Ave.	Yes	Final						
06/27/17	380 East Union Street	Yes	Final						
08/08/17	711 East Walnut Street	Yes	Final						
08/22/17	94 South Los Robles	Yes	Final						
09/26/17	245 South Los Robles	Yes	Final						
12/12/17	140 Chestnut Street	Yes	Final						
12/12/17	2490 Mohawk Street	Yes	Final						
02/13/18	1200 East California Blvd/320 So	Yes	Final						
03/13/18	2900 East Del Mar Blvd	No	Final						
06/26/18	635 East Union Street	Yes	Final						
08/14/18	535 East Union Street	Yes	Final						
08/14/18	54 North Oakland Ave	Yes	Final						
08/14/18	130-140 North Fair Oaks Ave	Yes	Final						
10/09/18	170-180 South Euclid Ave	Yes	Final						
11/13/18	711 East Walnut Street/226 North	Yes	Final						
03/26/19	3202 East Foothill Blvd	No	Final						
05/08/19	85 West Green Street	Yes	Final						
05/08/19	1005 Armada Drive	No	Final						
06/11/2019	1539 E. Howard Street	No	Final						
09/10/19	690-700 N. Orange Grove Blvd	Yes	Final						
Compiled by Bradley Bermont/SCNG									