

Office of the City Manager

August 12, 2011

Peterson Vollmann, Planner III
City of Oakland Community and Economic Development Agency
Planning Division
250 Frank Ogawa Plaza, Suite 2114
Oakland, CA 94612

RE: Comments on Safeway Shopping Center – College and Claremont Avenue

Dear Mr. Vollmann:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR). We look forward to your responses and working with Oakland staff to ensure a mutually acceptable project that benefits both Cities and its common neighborhood.

We received the DEIR document in the middle of July when our City Council is on summer recess. There was no time to prepare a staff report to them and receive their comments. Therefore, the comments provided below do not necessarily reflect their particular concerns. Also, because this project could cause significant impacts on City of Berkeley commercial and residential neighborhoods, it is critical that our elected officials be provided an opportunity to comment. Staff was able to schedule a discussion item on our Transportation Commission meeting (July 21) and the Commission directed staff to forward a request for an extension of time. The next Berkeley City Council meeting is scheduled for September 20, 2011 and we are requesting an extension of the comment period until Friday, September 23, 2011. This would provide sufficient time for City staff to prepare a letter to Oakland summarizing the Council's comments.

In the meantime, the following staff comments are listed below:

On-Site Parking Supply and Demand Section (starting on page 4.3-10)

The parking surveys were taken on only one weekday and one Saturday. In a location such as the Rockridge neighborhood, where parking is such a critical component of the success of the local merchants, it is imperative that multiple count days be utilized. An absolute minimum of three days each for Saturdays and weekdays is necessary to obtain a reasonable understanding of the parking conditions. Also, to ascertain whether secondary parking impacts, caused by an increase in parking demand as a result of the Project, occurs, cruising must also be surveyed. With parking on-street at and above capacity, no conclusions should be drawn unless sufficient data is collected and utilized as the basis for further analysis.

Trip Generation Section (starting on page 4.3-42)

Table 4.3-10 (page 4.3-42) presents a summary of the trip generation methodology and assumes that 36 percent of the vehicle trips generated for the supermarket would be pass-by trips. The cited reference, ITE TRIP GENERATION HANDBOOK, 2nd Edition, presents data on 12 stores surveyed. Much of this data is over 24 years old or the street characteristics on which the stores are located are not consistent with either College Avenue or Claremont Avenue (e.g., most of the stores are located on streets with a much higher traffic volume). Therefore, the DEIR's utilization of 36 percent is inappropriate. Though the concept of use of a pass-by percentage is valid, it is critical that a more valid approach be used – such as an on-site customer survey of their travel patterns. This simple-to-conduct survey would provide a more credible percentage. The use of the 36 percent results in a supermarket trip reduction of 108 vehicles on a typical Saturday – if a customer survey found the pass by percentage should be only 10 percent, for example, the reduction would be only 30 vehicles. Meaning that the DEIR underestimated the auto trips generated by the project during the Saturday peak hour by 78 vehicles. Therefore, a survey is critical to ensure the proper estimates of project auto trips generated. Also, the DEIR bases its auto trip generation on utilization of rates taken from the ITE TRIP GENERATION MANUAL, 8th Edition. While the ITE manual is generally used as a standard industry-wide guideline for trip generation estimates, if locally generated trip generation data is available, the ITE TRIP GENERATION HANDBOOK, 2nd Edition, states the strong preference to use this local data. The DEIR presents, on Figures 4.3-8a and 4.3-8b, Safeway driveway turn count data – data that can directly be utilized as a measure of Safeway's trip generation rates. This data should be utilized as the sole source from which trip generation characteristics for the project are developed or, at the very least, used to temper use of the ITE data. When the driveway-only data is utilized as the basis for auto trip generation for Safeway, the Net New Safeway Trip data shown on Table 4.3-10 would be increased by 11 percent for weekday peak hours and by a significant 63 percent for Saturday peak hours. Therefore, the DEIR document significantly underestimated the project impact on intersections and traffic operations on a Saturday and somewhat underestimated the project impact on a weekday evening.

Parking Demand Analysis Section (starting on page 4.3-110)

Table 4.3-22 (page 4.3-110) has Note 2 that does not properly describe the method used for development of urban parking demand rates – the numbers and ratios do not match the numbers shown in the table. Revise the Note to reflect the proper method actually used so we may provide comments on it. Similar to the comments provided on the trip generation methodology, the methodology utilized for the parking generation is inappropriate. The ITE PARKING GENERATION MANUAL is clear in alerting its users that their data should be considered appropriate only when the project to be evaluated falls within the data range for the ITE land use. In this case, the proposed Safeway Store is estimated at 51,510 gsf while the ITE data range is for store sizes below approximately 45,000 gsf. The DEIR ignored this caveat by applying the ITE data to the proposed project – which is outside the ITE data range.

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If the consultant-collected on-site parking data is applied to the parking analysis methodology (i.e., by using the on-site data and not the ITE data), the parking demand estimate would increase by up to 10 percent meaning an additional 14 space parking deficit for weekday (for a total of 40 space deficit) and an additional 4 space parking deficit for Saturday (for a total of 42 space deficit).

Parking spaces for employees are limited to the upper deck garage- but only Safeway employees would be permitted to park there. Based on the employee mode split data collected for the DEIR and the DEIR estimate of 67 peak-shift employees, that would mean 44 employee spaces are needed – which translates into a 17 space Safeway employee deficit. However, what about the other retail employees? If there are 20 non-Safeway employees working in the over 10,000 gsf retail spaces, looking for parking, that means there is a total employee (and therefore long-term) parking space deficit of 37 spaces. Since the proposed Safeway non-employee garage would be limited to short-term parking, where, would these non-Safeway employees park? Also, with about two-thirds of the on-street parking survey area being Residential Permit Parking or metered, there are few spaces remaining where the longer term parking needed for employees can be met.

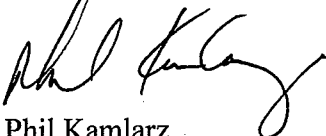
Parking for Bicycles and Automobiles (page 4.3-41 and starting on page 4.3-107):

Bicycle parking is being provided (page 3-19 and p 4.3-107) through the installation of 68 short-term and 15 long-term spaces. However, the specific racks and bike parking area must be located to encourage their use – consideration must be given to personal security, weather protection, and proximity to the main store entrances. Otherwise, they would not be properly used and any parking reductions taken by Oakland code (an 8 space reduction per Table 4.3-21) would be inappropriate – creating an even worse neighborhood parking impact and increasing cruising and traffic congestion. Page 4.3-107 makes a general statement that short-term bike parking should be place within 50 feet of building entrances but does not appear to mandate adherence to this distance. Also, bike parking must be sufficient to accommodate bikes with trailers and longer bicycles.

TDM Program (page 4.3-103, 3rd Paragraph):

It is imperative that a robust Transportation Demand Management Program be implemented that includes specific milestones and criteria so that the employee mode split can periodically be measured and, as appropriate, revised. A program that encompasses other retail businesses in the entire Rockridge area would increase the likelihood of success – especially since Safeway is a major employer in the area and could anchor such a program.

Sincerely,



Phil Kamlarz
City Manager