



Office of the City Manager

October 17, 2011

Ms. Deanna Santana  
City Administrator  
City of Oakland  
1 Frank Ogawa Plaza, 3rd Floor  
Oakland, CA 94612

Subject: Comments on Safeway Shopping Center – College and Claremont Avenue:  
ER 09-0006

Dear Ms. Santana:

Thank you for the opportunity to comment on the above DEIR document. We are looking forward to working with City of Oakland staff and Safeway representatives to ensure a mutually acceptable project that benefits both cities and their common neighborhood.

We received the DEIR document in the middle of July when the Berkeley City Council was on summer recess. The comment letter, submitted and dated August 15, 2011 reflected comments from the City's Transportation Commission and staff. At the September 20, 2011 City Council meeting, Oakland city staff stated that the City would still receive and accept, for the record, comments provided by the Berkeley City Council. We appreciate and thank you for that offer and this letter provides those comments. For clarity, you may develop your responses based solely on this new letter as it incorporates the previous comments sent to you dated August 15, 2011.

The City of Berkeley's comments follow. Page references, when listed, relate to the DEIR document itself.

#### General Comments

1. Do not approve the project nor certify the EIR until the Safeway store itself is altered to minimize traffic congestion, reduce parking demand, and contribute positively to the already successful Rockridge shopping environment and community. All of the alternatives to the proposed expansion listed in the DEIR have been rejected by Safeway as not sufficiently meeting their objectives. A project of this significance in such a unique area must give more weight to the desires and concerns of the community, as well as the ability of the project to serve

its own parking needs. Several of these alternatives must be analyzed in detail to afford the opportunity to make an informed decision as to the impacts on the neighborhood. In particular there should be an alternative for which the store is scaled back sufficiently that the resultant parking demand does not exceed the proposed parking supply.

2. Truck deliveries are a major concern. Evidence was presented at the Berkeley City Council's September 20, 2011 meeting that trucks currently queue on-site, in the parking lot, and on-street. Inadequate evaluation was undertaken of the actual truck parking and delivery needs – not only for Safeway but for the new retail frontage on College Avenue. Truck counts must be undertaken and observations made of truck operations on several weekday and several Saturdays to ensure an adequate sample – otherwise, the EIR documents can make no legitimate findings as to impact. It is our understanding that trucks would not be able to access the garage lower level due to the low vertical clearance. Therefore, inadequate truck docking facilities would cause an overload of truck parking on the upper level garage. Also, truck delivery needs of the new retail on College would either cause more congestion, due to double parking, or, with the installation of a curb-side truck zone, loss of auto parking. The EIR document must evaluate the impact of this issue and propose a resolution. It is possible that a scaled-back store would increase the space available for truck parking on site to the point where a third truck dock could be provided.
3. We are concerned about whether the Safeway customer garage would be available to non-Safeway customers to park. There appears to be only two references to the Project allowing the "general" public to park there (page 4.3-41 and 4.3-111) but it is never stated in any of the project description chapters anywhere in the document. This project proposal must be stated unequivocally and clearly elsewhere such as in the Summary and Project Description chapters.

Also, clarification is needed about who and what type of vehicles could utilize the lower level garage. Page 4.3-108 states the 144 parking spaces in the garage would be "...primarily for customers..." Who else would be using it? Small trucks for deliveries? Again, the "operational" characteristics of the garage must be clarified.

4. The DEIR document identifies numerous significant auto-related traffic impacts and mitigations and also proposes numerous pedestrian oriented improvements. However, it fails to identify any bicycle related impacts or improvements. With bike trips projected to increase by 14 trips during the peak hours, coupled with the increased project auto trip, it is imperative that bicycle improvements be funded. Only in this way would the bicycle network improve and lead to an increase in bicycle trip making, including those to Claremont Avenue, as referenced in the Berkeley Bicycle Plan.

5. Implementation of Mitigation Measures Trans-2, Trans-6, and Trans 11 all relate to improvements at the same intersection – College Avenue and Alcatraz Avenue. Among other measures, angled parking is proposed to be converted into parallel parking resulting in the loss of approximately 6 metered spaces. These parking spaces and meters are within the City of Berkeley and such changes cannot be implemented without the City's approval. Moreover, the meters generate revenue to the City, the loss of which would have to be mitigated.

### Specific Comments

#### 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. This would mean 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, 2<sup>nd</sup> 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.

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 and restaurant 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 customer-only 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.

Page 4.3-45 discusses the employee survey that was conducted for Safeway employees. Since large grocery stores such as this have their peaking characteristics during and after the PM peak period, employee shifts covering this time period often extend until 9 or 10 PM. What is the data to support the day-time mode split being the same as the evening mode split? Is there any documentation as to which shifts the surveys covered?

Also, the BART percentage mode split seems extremely high. When compared to mode split from the year 2000 census, for the block groups immediately north of the Project, only six percent of workers who work in that block group use BART. When compared to downtown Berkeley, the BART use for workers there is only 11 percent. Compare the Safeway survey results to the US Census data for credibility.

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 placed 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, 3<sup>rd</sup> 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.

If your staff needs any clarification of these comments, please contact Farid Javandel, Transportation Manager for the City of Berkeley at 510-981-7010.

Sincerely,



Phil Kamlarz  
City Manager

cc: Honorable Mayor Quan and Oakland City Councilmembers  
Honorable Mayor Bates and Berkeley City Councilmembers  
Christine Daniel, Deputy City Manager  
Deanna Despain, City Clerk  
Ann-Marie Hogan, City Auditor  
Andrew Clough, Director, Public Works  
Wendy Cosin, Interim Director, Planning and Development  
Zach Cowan, City Attorney  
Farid Javandel, Transportation Division Manager, Public Works  
Mary Kay Clunies-Ross, Public Information Officer  
Peterson Vollman, Planner III, City of Oakland Community & Economic  
Development Agency, Planning Division