August 16, 2011

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

RE: Review of Transportation/Traffic Portion of Draft Environmental Impact Report (EIR) at College Avenue Safeway Shopping Center Project (Case # ER09-0006).

Dear Mr. Vollman:

My name is Kevan Shafizadeh, and I have been hired to review the traffic and transportation portion of the July 2011 Draft EIR for the College Avenue Safeway Shopping Center Project on the behalf of the Rockridge Community Planning Council (RCPC), the community organization representing the residents of Rockridge. I am a transportation engineering consultant with a Ph.D. in civil engineering (transportation engineering), and I am a California-licensed professional civil engineer (PE) [#70099] and a certified professional transportation operations engineer (PTOE) [#2208].

This letter identifies, in no particular order, the areas of concern that I have about the potential impacts with the proposed shopping center after reviewing the Draft EIR:

1. Project Study Area and Report Scope – The study area of the Draft EIR transportation and traffic analysis is insufficient for a project of this size. The traffic analysis is limited to 15 "critical" intersections in the study area "where the proposed project would increase volumes by 30 or more peak-hour vehicles trips or by 10 or more peak-hour vehicles at intersections already operating at unacceptable conditions during peak hours" (p. 4.3-3). A more detailed analysis of intersections near the project site is likely to reveal that residential streets and local intersections beyond those studied would be adversely affected. Further, the cumulative impact analysis needs to have an expanded scope because even intersections where the project would cause less than 30 additional peak hour trips could contribute to a cumulatively significant traffic impact.

   The signalization of unsignalized intersections would lead to changes in driver route selection into the adjacent residential areas and would lead to increased cut-through traffic or increased congestion on residential side streets. This increased, higher-speed traffic created by diverted traffic is likely to affect pedestrian and bicycle safety, as well as noise and air quality, on local side streets. The traffic analysis presented in the draft

EIR needs to extend beyond the 15 critical intersections to check for significant impacts as required by CEQA. Based on the analysis in the Draft EIR, there is no way to determine if other intersections other than those 15 meet or exceed the significance thresholds in Oakland (or Berkeley) due to this project. It is highly probable that more intersections will be affected by this project than the intersection studied in the draft EIR. For example, the Draft EIR expects the corridor of College Avenue between Alcatraz Avenue (Intersection #5) and Ashby Avenue (Intersection #1) to experience an increase of 31 or more peak hour trips as shown in Figures 4.3-13A (Weekday PM Peak Hour Project Trip Assignment) and 4.3-13B (Saturday Peak Hour Project Trip Assignment); we would also expect the parallel residential streets of Benvenue Avenue and Hillegas Avenue, which are located just west of College Avenue, to experience a significant increase in congestion as motorists try to avoid congestion on College Avenue. Similarly, 63rd Street would receive increased traffic from motorists avoiding congestion on Alcatraz Avenue west of College Avenue. The traffic analysis needs to account for the increase in congestion from cut-through traffic on nearby residential streets. The Draft EIR's analysis should then be revised to consider whether this congestion results in potentially significant congestion, automobile, bicycle, and pedestrian safety, noise, and/or air quality impacts on these streets.

2. Level of Service (LOS) Analysis – Some of the turning movement counts in Appendix A do not match the volumes shown in LOS Analysis Worksheets shown in Appendix B. The report indicates that "traffic volumes not served by the intersection during the peak hour were added to the vehicle turning movement counts to determine the peak hour demand volume and better estimate delay and LOS at the study intersections" (p. 4.3-14), and while it is appropriate to include the unserved demand in the level of service determination, it is not made clear in the report how this unserved demand was measured and why it was not included in Appendix A with the other traffic data. Additionally, a reader of the Draft EIR cannot determine if bicycles were included with the vehicle counts in determining level of service. Without all the data available, it is impossible to replicate the LOS analysis results. For example, the westbound through movement at College Avenue & Ashby Avenue in Appendix A (p. 53 of 1027) contains 452 through vehicles and 59 bicycles in the entire westbound approach (p. 34 of 1027), but the "HCM Signalized Intersection Capacity Analysis" in Appendix B (p. 99 of 1027) indicates 528 through vehicles at that location. One can only assume that the additional 17 vehicles during the peak hour were unserved vehicles.

   Because the proposed project area is within the City of Oakland's Land Use Transportation Element (LUTE) Neighborhood Center Mixed-Use area, a more thorough multimodal level of service analysis (MMLOS) should be conducted of the transportation and traffic impact to see how all travel modes fare and interact along these important

community and regional corridors.[1] The MMLOS method was developed to evaluate "complete streets," context-sensitive design alternatives, and smart growth from the perspective of all users of the street; it enables project stakeholders to better understand the tradeoffs of various street designs in terms of their effects on the needs shared by automobile drivers, transit riders, bicycle riders, and pedestrians in their street designs by evaluating different allocations of scarce street right-of-way to the different modes using the street, which is consistent with the goals and policies set forth in the City of Oakland General Plan, and specifically the LUTE.[2]

3. Modal Split Characteristics - A fundamental error in the report was made in Table 4.3-11, which summarize "Project Trip Generation Estimates by Various Modes. It was assumed that the traffic mode share (or "mode split") surveyed on a Friday would be typical of a weekday mode share. Friday traffic patterns, however, can, in many ways, resemble those travel patterns exhibited on a weekend day. The Draft EIR itself states "existing traffic volumes on College and Claremont Avenues are similar on a Friday and Saturday" (p. 4.3-44), and it is common practice in the transportation field that "typical weekday" traffic studies are conducted Tuesday through Thursday to avoid this problem.[3]

   In this particular situation, we would expect a higher mode share of bicyclists, pedestrians, and transit users on a Friday than on typical weekday. (Again, travel behavior on Fridays can resemble that of the weekends, where individuals have more leisure time and are more likely to ride the bicycle, walk, or use public transportation.) As a result, the mode share used in this analysis underestimates the percentage of automobile trips and overestimates the number of bicycle, transit (p. 4.3-113), and walking trips – all of which forms the basis to the forecasted trip and parking demand at this location. The traffic analysis and forecasting needs to be revised to properly reflect weekday, as opposed to Friday, mode splits. A separate survey of mode share should be

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[1] See the National Highway Cooperative Research Program (NCHRP) *Report 616: Multimodal Level of Service Analysis for Urban Streets* (2008) available at http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_rpt_616.pdf, or the *2010 Highway Capacity Manual*.

[2] The 2008 California Complete Streets Act (AB 1358) requires cities and counties to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, as well as motorists, and the City of Oakland has repeatedly acknowledged the importance of complete streets in evaluating transportation impacts in its own policies. The City of Oakland is pursuing several "Complete Streets" projects that emphasize pedestrian, bicycle, and transit as well as automotive traffic, in order to revitalize urban neighborhoods and commercial corridors, which is also consistent with citywide transportation plans and policies such as its "Transit First" Policy (1996) and its BRT Principles & Policies Memorandum (2009), in addition to its General Plan.

[3] While not explicit to modal split, the California Department of Transportation (Caltrans) states that "common rules for counting vehicular traffic include but are not limited to: 1. Vehicle counts should be conducted on Tuesdays, Wednesdays, or Thursdays during weeks" (p. 4 *Guide For The Preparation of Traffic Impact Studies* December 2002, available at http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf).

conducted should be on a typical weekday (i.e., Tuesday through Thursday) when schools are back in session, and if necessary, additional traffic counts should be done to provide accurate baseline data for weekday, as opposed to Friday, mode splits.

With regard to employee mode split, a larger grocery store and shopping center is more likely to employ a greater percentage of its staff outside of the local community. As a result, it is more likely that the modal split presented in Table 4.3-12, "Day-Time Employee Mode Split," overestimates local walking and bicycle mode share and underestimates vehicle and possibly transit share.

4. Trip Generation – The proposed ITE Trip Generation predictions provided in Table 4.3-10 ("Project Automobile Trip Generation Estimates") underestimate the automobile traffic generated by the existing 24,260 square foot Safeway, according to the peak-hour vehicle counts collected on March 13 and 16, 2010 provided in Figure 4.3-8 and in Appendix A. The number of vehicles entering ("In") and exiting ("Out") the Safeway parking lot can be determined, based on actual data collection at this project site. This count methodology is consistent with the approach implemented at the approved Safeway expansion project on Henry Street in North Berkeley.[4] This observed travel demand is greater than the ITE Trip Generation estimates as shown in Table 1 and Figure 1 below. When compared to Table 4.3-10 of the Draft EIR, the vehicle counts shown in Table 1 demonstrate that ITE Trip Generation predictions underestimate the automobile traffic generated by the existing grocery store by 12% during the week and by 62% on Saturdays. Similar results were also found for Saturday traffic at the nearby Berkeley Bowl West store. These findings indicate that the ITE weekday trip rates can grossly underestimate Saturday travel demand at some sites, and that Saturday traffic impacts may be considerably worse than stated. The Draft EIR should provide justification for using the ITE trip generation methodology, when in similar circumstances with similar land uses, including other Safeway stores, the more accurate method of using local traffic data was used.

[4]. See *Draft Safeway on Shattuck Transportation Impact Analysis Report*, Fehr & Peers, April 2010, available at http://cityofberkeley.info/uploadedFiles/Planning_(new_site_map_walk-through)/Level_3_-_General/Traffic%20Study,%20Submitted%20April%202009.pdf.

Table 1. Comparison of Traffic Counts and ITE Trip Generation Methodologies

Methodology	Weekday PM Peak Hour			Saturday PM Peak Hour		
	In	Out	Total	In	Out	Total
ITE Trip Generation Method	185	178	363	134	129	263
Existing Traffic Counts (from Figure 4.3-8)	204	202	406	213	214	427
Difference (%)	19 (10%)	24 (13%)	43 (12%)	79 (59%)	85 (66%)	164 (62%)

It is common knowledge in the transportation and traffic engineering profession that the ITE Trip Generation rates are often based on limited empirical data, which is why the ITE Trip Generation Manual itself cites the need to "collect local trip generation data to either validate the use of Trip Generation data for local use" (p. 1, ITE, 2004).[5]

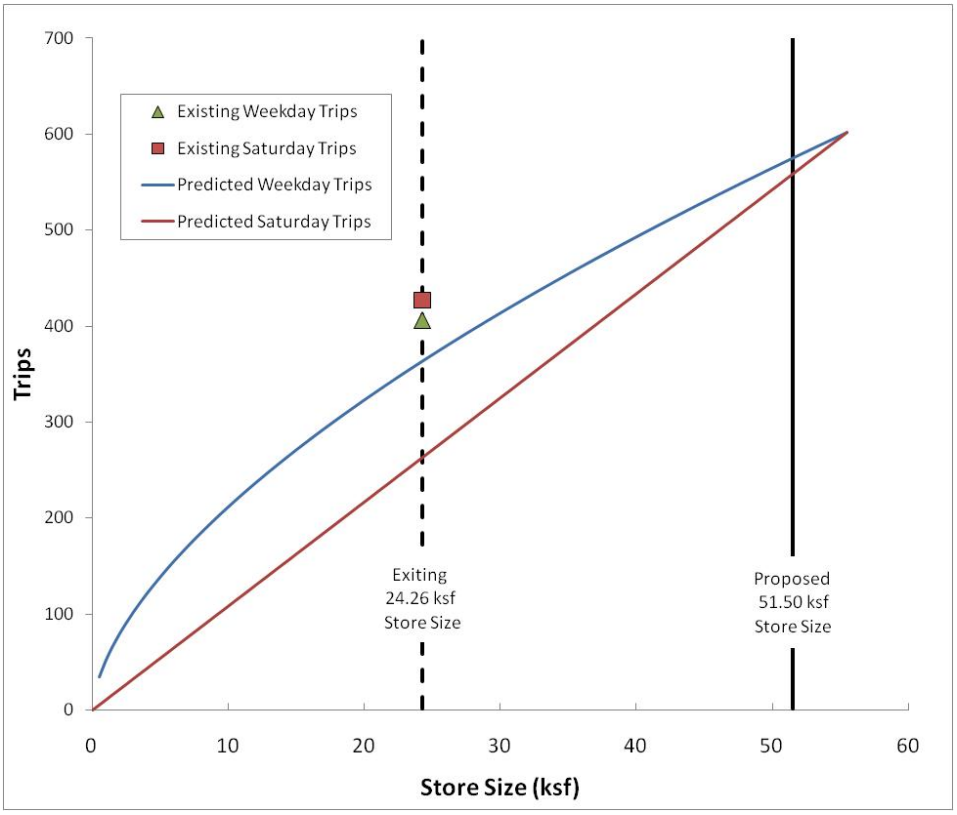

Figure 1. Comparison Between Existing and Predicted ITE Trips

[5] *Trip Generation Handbook, 2nd Edition*, ITE, 2004.

Based on the data collected, we would also expect the ITE Trip Generation rates to underestimate the automobile traffic generated by the proposed project. As a result, the traffic analysis in the Draft EIR needs to be revised to consider these additional vehicle trips in its analysis of both existing and proposed project conditions.

It should also be noted that the Saturday traffic counts were collected on Saturday March 13, 2010 between 4:00 p.m. and 7:00 p.m., but residents observe that the peak period on Saturday occurs closer to noon, particularly if there is a major event at the University of California like a football game (which there was not on March 13, 2010). The parking and roadway data collection in the Draft EIR should consider that the peak travel period on Saturday occurs outside of the typical weekday peak travel period. Traffic and parking should be recollected on Saturdays for a longer time period, like 10 a.m. to 7 p.m., to accurately determine when the true peak period occurs as well as to empirically determine accurate traffic volumes for a typical Saturday around this site.

5. Trip Distribution – In this study, the methodology used for trip distribution is different than traditional traffic impact studies for proposed development projects because existing data exists that may be more accurate than traditional methods. The existing Safeway store has valuable trip data available through its Club Card program (p. 4.5-48). The Club Card data could be used to approximate trip distribution of its customers, and Club Card data is probably more accurate than the traditional four-step travel demand modeling process that combines census track data with regional land uses assumption and employment estimates among other data, as noted in Appendix G ("Land Use Assumptions Memorandum") of the Draft EIR. It would be important to compare available Club Card data with output from the existing Alameda County Congestion Management Analysis (ACCMA) travel demand model (now known as the Alameda Countywide Travel Demand Model) to validate its accuracy, but Club Card data were not made available.[6] While Club Card data has limited use when forecasting future travel demand in 2035, exiting information could be used to modify or adjust forecasted distributions and the resulting traffic assignment if it was discovered that the trip distributions under existing "base year" conditions were inaccurate.

[6] The data used to prepare the Draft EIR, such as the "Avg HH Distance by Zip4.xls" file acquired via e-mail communication with Todd Paradis of Safeway on May 10, 2010 and cited by footnote 86 on page 4.5-49, should have been made available as part of the Draft EIR review process.

6. Travel Demand Model – It is recommended that the final EIR be prepared using the recent 2009 update to the Alameda Countywide Travel Demand Model, formerly the Alameda County Congestion Management Analysis (ACCMA) Travel Demand Model, available through the Alameda County Transportation Commission (ACTC). This version of the model contains updated land uses and has been made available since the completion of the Draft EIR, which contains projected 2007 land uses. The updated model should include important transportation projects in the broader study area.

7. Parking Generation – There are inconsistencies in Table 4.3-22, "Automobile Parking Demand Estimate." The 85th percentile rate is used for the supermarket land use, but the (lower and less conservative) average rates are used for the retail and restaurant land uses. For the retail shops (ITE Parking Generation Land Use Code 820), a rate of 2.65 vehicles per 1,000 sq. ft gross floor area (GFA) was used when a much higher rate of 3.35 vehicles per 1,000 sq. ft GFA should have been used. The result is that at least six more parking spaces are needed (27 instead of 21 parking spaces), as shown in the table below. This result further increases the parking deficits to 26 (weekday) and 36 spaces (Saturday) shown in Table 4.3-22 of the report.

Table 2. Draft EIR vs. Recommended Parking Demand

Land Use	ITE Code	Units (ksf)	DEIR Parking		Recommended Parking		Difference	
			Weekday	Sat.	Weekday	Sat.	Weekday	Sat.
Proposed Supermarket	850	51.510	146	149	146	149	-	-
Proposed Retail	820	7.913	21	24	27	28	6	4
Proposed Restaurant	931	2.744	42	47	52	66	10	19
Time of Day Reduction			-12	-13	-15	-18	-3	-5
Subtotal			42	47	37	48	7	14

The Draft EIR does not explain why it uses the 85th percentile for the supermarket part of the analysis and the average for the retail part of the analysis, other than to say that the rates "best fit the proposed uses" (p. 4.3-110). It is not clear what is intended by this statement when so much uncertainty exits about the exact uses of the retail spaces. The EIR should either provide a clearer explanation and justification for the difference, or should be revised to use the more conservative 85th percentile for all project uses.

It is also unclear under how the 28% time-of-day reduction was made for the high-quality restaurant use. This calculation was not provided and may not be valid during the weekday period. According to the ITE Parking Generation Manual, the peak periods for all three uses have a peak in the evening and a 28% time-of-day reduction may not be justified: supermarket (1 p.m. – 2 p.m. and 3 p.m. – 6 p.m.), retail (11 a.m. – 3 p.m. and 6

p.m. – 7 p.m.), and restaurant (7 p.m. – 8 p.m.).[7]

It should also be noted that the parking and trip generation on Fridays can be much higher than those during the week and on the weekend. The 85th percentile retail parking generation rate is 3.35 vehicles per 1,000 sq. ft. between Monday through Thursday and 3.56 vehicles per 1,000 sq. ft on Saturday, but 4.36 vehicles per 1,000 sq. ft on Friday.[8] These values suggest that there may be increased difficulty finding parking for the retail stores on Fridays. As with the traffic analysis, a separate parking analysis for Fridays, especially Friday PM hours, should be provided. As will be discussed further below, the interaction between congestion and parking deficiencies can result in exacerbating congestion and other traffic-related impacts. For this reason, consideration of possible interactions between parking and traffic impacts during the Friday PM hours is particularly important.

8. On-Street Parking – Parking shortages have been a problem with the current Safeway and are expected to get worse with the proposed project. A large portion of the weekday PM peak-hour on-street parking already operates at or above capacity. During the week, 19 street segments operate at or above capacity (> 90% occupancy), and of those streets 11 operate over 100% without the project. On Saturday, 10 street segments operate at or above capacity. Community members have already expressed concern of the *existing* lack of available on-street parking. Parking occupancy rates of 120% at Harwood Avenue between Auburn and College, shown in Figure 4.3-6, has six vehicles trying to park for every five available spaces. As the report states, "the effective capacity of on-street parking is around 90 percent, *above which drivers search, circulate and wait for vacant spaces… [which] is not only an inconvenience, but also can cause congestion and potential blockage of vehicles on the public street system while waiting for an available space*" (p. 4.3-14 [emphasis added]). In other words, the parking problem would lead to adverse environmental and air quality issues as "hot-spots" develop when vehicle queues develop as drivers circle or idle in search of parking. However, the Draft EIR dismisses the impacts of the expected parking deficiency as being a non-CEQA issue (p. 4.3-56) and fails to consider or discuss the cumulative impacts of the combined parking deficiency due to the project plus the existing parking deficit in the area. As a result, the Draft EIR fails to identify or address the likely significant congestion and other potential secondary impacts (increased congestion, air pollution, wasted fuel, and accidents) caused by the cumulative parking deficiency.[9]

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[7] *Parking Generation Manual, 3rd Edition*, ITE, 2004.
[8] Values are based on amount of gross leasable area (GLA) during non-December days (*Trip Generation Manual, 8th Edition, ITE, 2008*).
[9] Shoup, D. "Cruising for Parking," *Transport Policy*, Vol. 13, No. 6, Nov. 2006, pp. 479-486.

9. AC Transit BRT Impacts – The Draft EIR does not sufficiently consider the impacts of the planned AC Transit Bus Rapid Transit (BRT) service in its analysis. This state-of-the-art, regional transit system would connect Berkeley, Oakland, and San Leandro and extend well beyond the scope of this project study area. All portions of the proposed BRT route are considered "Priority Development Areas" within each city and are likely to lead to increased congestion as capacity is restricted. Telegraph Avenue is a north-south arterial that extends from the University of California-Berkeley campus to Broadway in Oakland. Telegraph Avenue provides two lanes of traffic in each direction, but one through lane in each direction would be converted into BRT right-of-way, as explained on p. 4.3-30.

   The Draft EIR is correct when it acknowledges 1) "The proposed BRT project would result in more automobile congestion along Telegraph Avenue due to the reduced lane capacity" and 2) "the reduced traffic capacity on Telegraph Avenue may also result in traffic diverting to other parallel corridors such as College Avenue or Claremont Avenue" (Appendix D, p. 161 of 1027). Where the Draft EIR may be mistaken is when it claims that the "BRT project may have off-setting benefits… if a substantial number of people switch to BRT, [because] the overall person delay in the corridor would be less than with the current configuration as it would increase the capacity of Telegraph Avenue on a per person basis" (p. 161 of 1027). By its very nature, BRT service is designed to be very different from local bus service and may better serve longer-distance commute travel instead of local travel. As a result, local trips may not be reduced enough by BRT to offset the accompanying loss in roadway capacity, and may instead be diverted to other nearby through streets, including College Avenue. BRT should be modeled, at least as an option, as part of the cumulative impact analysis for the project as well as in the alternatives analyses.

   In May of 2007, AC Transit published a Draft Environmental Impact Statement/ Environmental Impact Report (EIS/EIR) where significant or potentially significant impacts were identified at: Ashby Avenue/College Avenue (Intersection #1), Alcatraz Avenue/Telegraph Avenue (Intersection #6), and College Avenue/Claremont Avenue/62nd Street (Intersection #9). As the Draft EIR states, "If the BRT project is implemented, the Safeway on College Avenue project may result in an additional impact at the Telegraph Alcatraz/Avenue intersection, and impacts already identified by this EIR may have a higher magnitude" (p. 162 of 1027).

   Over the next year, AC Transit will update the Draft EIS/EIR for the BRT project. The analysis will be based on a new travel demand forecasting model, an expanded study area, and additional data collection. While that updated analysis may not yet be available

in time for inclusion in this EIR, its present availability should be investigated. In any case, a more detailed discussion of the potential cumulative impacts that would result from this important project needs to be added.

10. Caldecott Tunnel Improvement Project Impacts – The Draft EIR scenarios assume the completion of intersection improvements at Miles Avenue/College Avenue (Intersection #13) and at Shafter Avenue/Keith Avenue/College Avenue (Intersection #14) as "part of the Caldecott Tunnel Improvement Project Settlement Agreement" (p. 4.3-77). It should be noted that there were two settlement agreements that affect the proposed project area, the City of Oakland Settlement Agreement and the Fourth Bore Coalition (FBC) Settlement Agreement.[10] The Oakland Settlement includes Shafter Avenue/Keith Avenue/College Avenue (Intersection #14) and all additional Oakland intersections, but it is not clear from the Oakland Settlement that those improvements will be implemented as proposed because a lengthy public process still needs to be conducted. Currently, there are no finalized plans for improvements at these intersections, no assurance of full funding for the improvements, and no approvals from the City of Oakland or other public agencies. Because the Caldecott Tunnel mitigations are not fully designed, approved, or funded, the Draft EIR should reconsider whether these proposed roadway improvement should be included in its analysis.

    In general, the consideration of cumulative impacts from the Caldecott Tunnel Improvement Project was insufficient. The Draft EIR recognized that a "potential increase in delay" exists from the Caldecott Tunnel, but this delay "[could] not be reasonably quantified because the details of the improvement that may be implemented at this intersection are not known at this time" (p. 4.3-64). There are ways to estimate projected impacts of the Caldecott Tunnel Improvement Project the same way that any freeway capacity improvement project is evaluated through travel demand modeling process. In this case, the Alameda Countywide Travel Demand Model should be used to estimate travel impacts on the proposed project from capacity improvements on nearby Highway 24.

11. Truck Traffic – As part of mitigation measure TRANS-2, "Construction Traffic and Parking," the Draft EIR recommends that "a set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours" (p. 4.3-38). There is concern that the Draft EIR failed to sufficiently account for truck traffic on Claremont Avenue (i.e., the delivery entrance through the employee

[10] See the Fourth Bore Coalition website for details on both settlement agreements at http://www.fourthbore.org/.

parking lot/docking area). There is concern that truck traffic occurring during the peak commute hours (7:00 to 9:00 A.M. and 4:00 to 6:00 P.M.) will adversely impact localized traffic and will result in worse levels of service and higher delays on intersections leading up to and including Claremont Avenue. A mitigation measure should be added requiring conditions of approval that both construction and operational truck traffic be scheduled to occur outside of peak commute hours. As part of the CEQA process, a Mitigation Monitoring and Reporting Program (MMRP) should be established for this project to explain how compliance with these conditions will be monitored and effectively enforced.

12. Bicycle and Pedestrian Safety – There remain unaddressed pedestrian and bicycle safety concerns as a result of this proposed project. Not only is there concern about increased automobile speeds and volumes on adjacent residential streets (discussed above), there remains concern that that the pedestrian treatments by parking lot entrance to the project will be effective at ensuring the safety of pedestrians as vehicles exit a parking garage. In general, there is concern that all of the proposed improvements along College Avenue will jeopardize bicycle and pedestrian safety because: 1) there will be an increase in motorized/non-motorized traffic conflicts, particularly at intersections, and 2) all of the proposed improvements and mitigation measures may not be able to peacefully coexist in the available right-of-way.

    A separate concern is that the Draft EIR does not take into account various bicycle facility improvements that have already identified and prioritized in the City of Oakland Bicycle Master Plan, such as planned bicycle lanes on College Avenue and Broadway and Safe Routes to Schools (SR2S) program improvements that are slated for implementation between 2012 and 2013. The Draft EIR makes no mention of these planned bicycle safety improvements and how they would be impacted by the proposed project or its related vehicle traffic mitigation measures. In some instances, like the College Avenue lanes, the Draft EIR incorrectly states the status of these projects: “None of these proposed [bicycle facility] improvements are currently planned for implementation. In addition, these changes do not have finalized design plans or are not fully funded. Thus, this EIR assumes that these changes will not be provided in the study area.” (p .4.3-30).

    The City of Oakland website, however, updates the status of the various bicycle projects affected by this proposed Safeway project on its Pedestrian Facilities Program “Bikeway Striping Projects Tracking” sheet; it shows a proposed Class 3A bicycle facility (designated arterial bicycle route) on College Avenue between Broadway and Berkeley

which has been funded and approved and is scheduled for implementation in 2012.[11] There are also Class 2/3A bicycle facilities (designated bicycle route with bicycle lanes) prioritized on Alcatraz Avenue as part of a SR2S grant, which was awarded several years ago and should be completed in 2012, and other Class 2/3A bicycle facilities planned for Claremont Avenue starting on Alcatraz Avenue and extending beyond Highway 24 to Telegraph Avenue.[12] There is also a proposed Class 3B bicycle facility (bicycle boulevard) planned for Colby Avenue in the proposed project area that the Draft EIR assumes will not be implemented, even though signage is expected in 2011 and accompanying pavement marking is expected in 2012. Further, the Draft EIR does not correctly identify the *existing* Class 3 Colby Avenue bicycle route in Figure 4.3-4 and in the 2007 Oakland Bicycle Master Plan, shown in Figure 2, nor does it consider its potential impacts.

Figure 2. Existing Designated Bicycle Route on Colby Avenue at Alcatraz Avenue

[11] A list and map (updated April 22, 2011) showing the status of all bikeway projects currently under development are available at: http://www2.oaklandnet.com/Government/o/PWA/s/BicycleandPedestrianProgram/OAK026930.

[12] Also see the proposed bicycle projects on a map with completed bicycle projects on the City of Oakland Bikeway Network Map at: http://www2.oaklandnet.com/oakca/groups/pwa/documents/report/oak026931.pdf.

In general, the greater issue here is the appearance that there was not adequate circulation and consultation between the Planning Office and other city departments and programs including but not limited to: Bicycle & Pedestrian Program, Capital Projects, Traffic Safety & Parking, and Streets & Sidewalks. Some of these other city departments and programs have worked with community groups like the RCPC as well as advisory committees like the Bicycle & Pedestrian Advisory Committee (BPAC) for years to identify and prioritize local improvements, and this Draft EIR gives the impression to these community groups and advisory committees that their previous work and input into the public planning process has been, at best, overlooked or, at worst, ignored.

Thank you for accepting my comments related to the Draft EIR of the proposed Safeway on College Avenue. Please notify me of all future events in the City's consideration of this project. If you have any questions regarding this letter, please contact me or Stuart Flashman, RCPC Board Chair.

Sincerely,

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