

# Memorandum

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From: Debbie Yueh, Senior Transportation Planner

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Re: Alameda Towne Centre Expansion Traffic Study – Peer Review

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This memorandum presents the findings of the peer review on *the Transportation and Circulation Impacts for the Proposed Alameda Towne Centre Expansion Final Draft Report* prepared by Omni-Means, Ltd (April 21, 2006). The purpose of the review is to ensure consistency between the approach and methodologies used in the Report and accepted standards and guidelines for traffic analyses in Alameda as described in the *Guidelines for Preparation of Traffic Studies and Reports* (City of Alameda Public Works Department August 2001 revised November 28, 2005). In addition, the approach used to derive the baseline and cumulative volumes were evaluated. A comparison of the traffic forecasts under the cumulative scenario of this report and the forecasts from the recent General Plan Transportation Element EIR was also performed.

## ***Approach and Methodologies***

The Guidelines dictates that project impacts be identified and analyzed in accordance with the current Highway Capacity Manual (HCM) and the level of service (LOS) be based on methodology and procedures outlined in the most recent edition of HCM. The intersection LOS in the Report was calculated using the 2000 HCM, which is the current edition. HCM contains concepts, guidelines and computational procedures for determining the capacity and quality of service on the roadways and was prepared by the Transportation Research Board in cooperation with the Federal Highway Administration and the American Association of State Highway and Transportation Officials.

The Guidelines also states that new trips generated by a proposed development should be computed in accordance to the latest edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual. The latest 7<sup>th</sup> edition of the *Trip Generation* (2003) was used to compute the number of trips generated by the proposed expansion. The number of new vehicular trips generated by the expansion was estimated by subtracting the total number of trips generated by the project before the expansion from the number of trips generated after the expansion. An adjustment for pass-by trips was then made to arrive at the number of net new trips. A pass-by rate of 10 percent was used. This rate is well within acceptable perimeters outlined in ITE's *Trip Generation Handbook* and may even skew towards the more conservative side considering the average pass-by rate for shopping center is 34 percent. The procedures used in calculating the project generated trips are consistent with the guidelines from the *Trip Generation*.

### ***Baseline Conditions Assumptions***

Because of continuous development on the project site, the “existing” gross leasable floor area (GLA) is dynamic. As a result, the Report elected the most conservative approaches to derive the “existing” and baseline volumes on which the impact analyses were based. First, the higher of the 2002 or 2005 turning movement counts were used to represent “existing” condition. The baseline volumes were calculated by adding the “existing” volumes, trips generated by approved projects, and the total number of previously approved GLA (112,000 sqft) for the Alameda Towne Centre. Since a portion of approved project has already been constructed thereby the associated trips would already be included in the 2005 “existing” volumes, double counting of these trips may potentially result.

In determining the distribution of the baseline project trips, the Report took into account the proposed Catellus and Alameda Pointe developments citing that these developments would “contribute one-third to one-half to the overall project trip distribution via Otis Drive and Shoreline Drive”. However, only the Catellus development was included as an approved project under Baseline Conditions. The Alameda Pointe development is only considered under Cumulative Conditions. Consequently, the baseline trip distribution percentages along Otis Drive and Shoreline Drive to the west may be overstated and the percentages along other routes may be underestimated. However, considering the number of project generated trips and the LOS presented in the report, it is not likely that the re-distribution of a portion of the westward bound trips would result in additional significant impact at the study locations.

Consistent with City traffic study guidelines, the previously evaluated 112,000-square foot expansion of the Alameda Towne Centre was included as one of the approved projects in the Baseline Conditions rather than a part of the proposed project. Some may assert that this constitutes “project segmentation” under the California Environmental Quality Act (CEQA). Consequently, a risk for potential challenge for CEQA compliance exists. This should be addressed in the Environmental Impact Report for this project.

### ***Cumulative Conditions Assumptions***

The cumulative base case volumes were calculated according to methodology outlined in the Guidelines. The cumulative base case volumes were calculated based on a background growth of one-half percent per year between the baseline year (2005) and the horizon year (2025). Further, trips generated by the approved projects not already accounted for under the Baseline Conditions were then added to arrive at the cumulative base case volumes. Again, this approach tends to be conservative as the vehicular trips generated by the approved projects may already be included in the assumed growth.

This may explain why the cumulative volumes used in this Report are substantially higher than those in the Transportation Element EIR even though the horizon year for the Transportation Element EIR is 2030. For instance, the roadway volume on Otis Drive east of Park Avenue is about 40 percent higher in the Report in the AM peak hour and about 15 percent higher in the PM peak hour. The difference is particularly acute on the westbound direction in the AM peak hour where the link volume is about 57 percent higher. This finding of higher projected volumes was consistent throughout the analysis segment along Otis Drive between Grand Street and Broadway where data are available from both studies though the extent varies.

## ***Conclusion***

The approach and methodologies used in the Report are consistent with those in the Guidelines. The volume assumptions are generally conservative and the cumulative forecasts in the Report are significantly higher than those in the recent Transportation Element EIR. This combination most likely resulted in an assessment of higher impacts than would have been identified using new (2008) traffic counts and travel forecasts consistent with the Transportation Element EIR.

Dowling Associates does not possess the necessary CEQA expertise to fully assess the potential risk for CEQA challenge. The issue of project segmentation under CEQA should be further reviewed by appropriate counsel.