TRAFFIC ANALYSIS OF WALGREENS @ LAMAR & BLUEBONNET AND ASSESSMENT OF TRAFFIC PENETRATION INTO NEIGHBORHOOD

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Introduction

The South Lamar Neighborhood Association (SLNA) has long feared that the intense traffic generated by commercial establishments on our borders may spill into the heart of our neighborhoods along neighborhood collector streets, unless this is prevented by appropriate zoning and planning enforcement. We believe that the Walgreens store proposed near the Lamar & Bluebonnet intersection poses such a threat. Traffic analyses for this project have been prepared by the City of Austin, as well as by Mr. John Hickman, a consultant for the Applicant (Walgreens). We have concluded that these analyses understate the magnitude of the potential traffic penetration by a very significant amount. The underestimates have occurred with respect to:

- (1) the unadjusted traffic likely to be generated by the proposed Walgreens store; and
- (2) the amount of traffic likely to travel on Bluebonnet, East of the Walgreens access driveway.

In this report, our conclusions will be substantiated through the description and analysis of independently collected data, and our own, higher traffic estimates will be provided.

Background

Zoning hearings have occurred regarding this Walgreens project in both 2003 and 2004. One of the original City traffic analyses was prepared by Amy Link, Watershed Protection and Development Review Dept., and was published in a Memorandum on May 14, 2003. A more recent City traffic analysis for the 2004 revised Walgreens proposal was prepared by Emily Barron, Transportation Planner, and was presented in a Memorandum dated July 26, 2004. The Applicant's consultant, John Hickman, prepared an analysis presented in a Memorandum dated March 15, 2004–revised June 2, 2004. These are the analyses questioned in this report.

The reason for the neighborhood's traffic concern is that we all have a large amount of first hand experience in observing that the traffic through our neighborhoods already appears to contain a significant component of individuals "cutting through" the neighborhood without stopping, and often without slowing down very much either. By traveling from Lamar along Bluebonnet, to Del Curto, to Clawson Road, and/or Southridge Drive, it is possible to connect East to S. 5th or S. 1st, or to connect to Ben White at the Bannister Lane crossing, or to connect to Ben White at Manchaca. Perhaps because of road construction, it seems that more and more people have been detouring through our neighborhoods. The stop sign at Lightsey and Clawson Road is very

regularly flattened–presumably by people somewhat unfamiliar with the area who were just "passing through".

In the 2003 traffic analysis by Amy Link, the existing traffic on Bluebonnet was cited as 1,432 vehicles per day (vpd), while the 2004 analysis by Emily Barron cites a level of 1,921 vpd. This 34% increase cannot be explained by population growth within our neighborhoods–indeed, the rental housing occupancy has been flat to down over the past several years, and new construction has been small in these mature neighborhoods. We believe that this increase in non-neighborhood traffic is evidence of the "cut through" traffic that we would like to minimize.

Trip Generation by Walgreens

Each of the above-cited authors has based the Walgreens projected trip generation upon coefficients extracted from the Institute of Transportation Engineer's (ITE) handbook, <u>Trip Generation</u>, 6th Edition. For the average retail pharmacy with a drive through, the ITE coefficient is 88.16 trips per day per 1000 square feet of store area. Using the Walgreens store size of 14,550 sf, one therefore obtains a projection of 1,283 unadjusted daily trips (or vpd). (When someone drives to Walgreens, makes a purchase, and drives away, that is counted as two trips.)

We believe that this ITE coefficient for the traffic generated by an **average** pharmacy, significantly underestimates the traffic likely to be generated by this particular Walgreens pharmacy proposed for Lamar & Bluebonnet. We discovered during the 2003 zoning hearings that from modern electronic cash registers, Walgreens has an accurate count of their daily customer transactions. And to a good approximation, the number of trips to a Walgreens is about twice the number of customer transactions (i.e., two "trips" per visit to the store).

To apply this methodology to the case in point, in 2003 we inquired of the manager of the existing Walgreens at Lamar & Manchaca as to the daily number of customer transactions, and we were told that the transaction count generally averaged between 900 and 1,000 transactions per day. Choosing the midpoint, the number of trips would then be about 1,900 unadjusted trips per day for this Walgreens pharmacy. This particular Walgreens contains about 12,000 sf, and does not possess a drive through. In this case, the ITE handbook coefficient is 90.06 trips per day, per 1,000 sf, so that the ITE projection would be 1,081 unadjusted trips per day. The ratio of the cash register trip projection to the ITE trip projection is then 1,900/1,081 = 1.758! Since the Walgreens store at Lamar & Manchaca is fairly close to the proposed location at Lamar & Bluebonnet, and since the store at Manchaca is to be closed once the store at Bluebonnet is completed, the Manchaca Walgreens seems a very fair proxy to use in assessing the likely traffic at the Bluebonnet Walgreens. Naturally, in projecting the traffic at the Bluebonnet Walgreens, one must adjust for the larger size (by about 21%) and for the drive through. The result is that one obtains a projection of about 2,256 unadjusted trips for the Walgreens at Bluebonnet, based

upon the measured 2003 customer traffic at the nearby Walgreens at Manchaca–versus the ITE projection of 1,283 unadjusted trips.

Just to eliminate the possibility that the Manchaca Walgreens manager had given us incorrect data, we also inquired in 2003 of the managers of the Walgreens at 45th St. & Guadalupe, as to their count of daily customer transactions. They reported an average of about 1,000 transactions per day from this store of 13,000 sf. In this case, the cash register projection of about 2,000 trips/day exceeds the ITE projection of 1,243 trips/day by an enhancement factor of 1.609. This qualitatively corroborates the result found at the Manchaca Walgreens: in both cases, the ITE projection is a severe underestimate.

It is puzzling that the ITE handbook projections should be treated with such reverence. Inspection reveals that the ITE data were obtained from a small number (e.g., only three, in the case of a pharmacy with drive-through) of studies conducted in the 1990s in Florida, New York, and California. Because of the small number of data points, there is a significant standard deviation (i.e., spread) abut the mean trip generation rates obtained. In other words, some pharmacies generate significantly more traffic than others. Is that so surprising? Moreover, during the past decade since the ITE data were taken, significant demographic trends suggest that more drugs are now being dispensed to more customers. Why should one even expect a single, out of date, ITE coefficient to apply well for all cities, for all neighborhoods, regardless of population density, regardless of the amount of nearby competition, etc.? It does not surprise us at all that the use of a "one size fits all" handbook coefficient gives such poor results. Nevertheless, use of these coefficients is popular, perhaps because it is easy. After all, it takes some work to actually go out of one's office and take data.

Steve Drenner (agent of the Applicant) has given us his opinion that "basing estimated traffic trips on cash register receipts [is] a hopelessly flawed methodology". Out of respect for Mr. Drenner, we should address his concerns, which are probably rooted in the appreciation that there is some ambiguity in translating from the number of cash register transactions to the number of cars driven to Walgreens by the customers. However, this ambiguity is not large. By far the most common occurrence is that a single customer will drive to Walgreens, make a purchase, and drive away. However, there are small variations. There might be multiple customers in one car, or the customer might not purchase anything and leave the store emptyhanded, or the customer might not be traveling in a car at all. Consider the following analysis.

- T = number of trips
- V = number of vehicles driven to store by Walgreens customers
- C = number of "customer units" traveling together to Walgreens (e.g., a single person, a couple traveling together, a parent with children, etc.)
- R = number of cash register transactions

The simple equations which relate these variables are

	R =	C(1 + g - h)
	V =	C (1 - f)
and	T =	2 V = 2 R (1 - f)/(1 + g - h)
where g =		fraction of customer units for which two transactions were completed
	h =	fraction of customer units for which no transaction was completed
	f =	fraction of customer units not traveling in a vehicle to Walgreens

Therefore, the factor of two which we originally used to translate from R to T should, more accurately, be replaced by the factor 2 (1 - f)/(1 + g - h), providing the fractions f, g, and h can be determined. However, even though these factors may be difficult to determine, the important fact is that they are all small, and they act in different directions. For example, our rough estimate is that g = 1%, h = 5%, and f = 18%.

(For an isolated store, f would tend to be much smaller, but since the Manchaca Walgreens is located in a shopping center, some customers may visit multiple stores, and so f is effectively increased to eliminate a portion of the traffic more appropriately allocated to the nearby stores.) For this choice of the small factors, one finds that T = 1.708 R, which is about 15% below the 2R result that we assumed in 2003, and it implies an enhancement over the ITE trip figure of "only" about 1.50 rather than 1.758, based upon the 2003 transaction count.

However, out of further respect for Mr. Drenner's concerns, we revisited the Manchaca Walgreens in early August 2004, to confirm the present transaction count.

This year, the managers inform us that business has increased "more than 10%", and that the daily transactions tend to "range between 1,100 and 1,300, depending on the day and what is going on". Therefore, using the 2004 transaction midpoint of 1,200 transactions and the factor of 1.708 trips per transaction (discussed above), one arrives at the 2004 cash register projection of 2,050 unadjusted trips generated per day by the Manchaca Walgreens, which is higher than the ITE handbook projection of 1,081 trips/day by an **enhancement factor of 1.896!** This is even higher than the 2003 enhancement factor of 1.758, despite the more conservative translation from cash register transactions to trips. It implies that the Walgreens at Bluebonnet may generate about **2,433 unadjusted trips per day**, after correction for the larger size and drive-through of this store.

Because this enhancement over the ITE handbook is so significant, we decided to explore whether this result could be corroborated by collecting even more data, which indeed proved to be possible. In principal, the ITE handbook traffic prediction might be checked by directly counting the traffic visiting Walgreens during a 24 hour period. However, that would be tedious, and our neighborhood must rely upon unpaid, volunteer labor. Fortunately, the ITE handbook also contains coefficients which may be used to project the traffic which is expected to occur during certain peak hours of the day. A direct count to crosscheck these peak hour ITE projections is much more feasible, less tedious, and equally valid.

For example, the ITE handbook projects that for a pharmacy without drive-through, such as the Manchaca Walgreens, the average rate of trip generation for one hour between 7 and 9 a.m. on a weekday is 3.20 trips per 1000 sf. In early August 2004, we directly measured the trip rate at the Manchaca Walgreens during this time window, by observing the Walgreens "customer units" as they exited the store and walked to their cars, or elsewhere. By observing the customers outside of the store, the ambiguities regarding the number of transactions per customer inside the store are bypassed. However, a new ambiguity is that since the Manchaca Walgreens is located in a shopping center, it is sometimes difficult to keep an exiting customer in sight until they reach their car, as they wander off across a good sized parking lot. During our count, we observed that 45 "customer units" per hour exited Walgreens, of which about 64% went to their cars, 3% were observed to walk or bicycle off the edge of the property, and the remaining 33% were observed to either enter another store (about one-third of the 33%) or else disappeared from sight before reaching the edge of the parking lot. Of this 33%, we assume that a fraction F eventually found their way to their car, and that their trips should properly be allocated to the Walgreens visit. (A portion of the 33% group, including some of those observed to enter other stores, should properly have their trips allocated to some of these other stores.) Our observations are that the unadjusted trip rate during this AM time period, which can be allocated to Walgreens, is 4.79 + 2.5 F trips/hour per 1,000 sf, versus the ITE projection of an average trip rate of 3.20 trips/hour per 1,000 sf. The observed enhancement factor over the ITE projection is therefore 1.50 + 0.78F, which ranges from 1.50 (a) F = 0, to 1.89 (a) F = 50%, to 2.28 (a) F = 100%. We believe that F = 50% is reasonable, which corresponds to assuming that half of the disappearing customers are drivers, properly allocated to Walgreens. (This choice, combined with the 3% of observed nondrivers, leads to a fraction f = 19% of Walgreens customers who are either non-drivers, or are drivers allocated to a different store.) We also note with some satisfaction that this observed enhancement factor of 1.89 is practically the same as the factor previously deduced from the 2004 cash register transaction counts.

One may also note that the ITE handbook data for this AM trip generation rate, found a standard deviation of 2.00 trips/hour per 1,000 sf, about the average rate of 3.20 trips/hour per 1,000 sf. This standard deviation is about 63% of the average, which is rather large, and so the enhancement factor of 1.89 means that this Manchaca Walgreens is generating trips at only about 1.4 standard deviations above the mean–certainly within reason for an above-average pharmacy.

For good measure, we repeated this Walgreens counting exercise also during a peak PM hour of trip generation, defined by the ITE to be between 4 and 6 p.m. on a weekday. The ITE handbook projection for this PM period is an average trip generation rate of 7.63 trips/hour per 1,000 sf, for a pharmacy without drive-through. Our PM observations found that 106.7 "customer units" per hour exited Walgreens, of which 69% were observed to enter their cars, 3% were observed to walk or bicycle off the boundaries of the center, and the remaining 28% either entered other stores, or were lost from view. Therefore, the observed rate of trip generation turns out to be 12.22 + 5 F unadjusted trips/hour per 1,000 sf, and the enhancement factor over the ITE average

rate of 7.63 trips/hour per 1,000 sf is found to be 1.60 + 0.66 F. This enhancement factor ranges from 1.60 @ F = 0, to 1.93 @ F = 50%, to 2.26 @ F = 100%. As above, we believe the choice F = 50% is reasonable, corresponding to a fraction f = 17% of Walgreens customers being either non-drivers, or else drivers allocated to another store. Once again, the **enhancement factor of 1.93** is rather close to the enhancement factor previously deduced from the 2004 Walgreens cash register transaction counts.

Therefore, our neighborhood has deduced from direct Walgreens counts of their own transactions at two different stores, including one store in two different years, and corroborated by our own direct counts of AM as well as PM traffic from their Manchaca & Lamar store, that their rate of trip generation is very substantially enhanced from that projected in the ITE handbook, by a factor of about 1.9. Because of the ambiguities which remain, the enhancement could possibly (but not likely) be as low as 1.5 or as high as 2.3. In any case, it is a very large enhancement. It is not scientifically defensible to claim that because of these small remaining uncertainties, it is preferable to adhere to a ten-year old handbook projection, which appears to be about 50% in error for this particular Walgreens.

Bluebonnet Traffic East of the Walgreens Driveway

In addition to projecting the total amount of unadjusted trips generated, it is very important to also project how these trips are distributed on the roadways surrounding the site. The neighborhood is particularly sensitive to the amount of traffic projected to fall on our neighborhood collector street, Bluebonnet Lane, to the East of the Walgreens access driveway, in the direction of our core neighborhoods.

For this crucial allocation, the ITE handbook is of no particular help. Allocations are generally made by first observing the percentage distribution of traffic on the streets before the store is built, and then **making some assumptions about how the store itself may affect the distribution**. We believe that in making these allocation forecasts for Bluebonnet–East of the Walgreens driveway (henceforth, "BB-East")–even more grievous underestimates were made by the Applicant. Although it is much more difficult to justify conclusions on this point, we have again attempted to gather objective data to shed light upon this issue.

The total unadjusted traffic generated by a site is commonly divided into a primary non-pass-by portion, and the remaining diverted pass-by portion. The diverted pass-by trips are those by individuals who would have been traveling in the area anyway, but spontaneously decide to stop and visit the Walgreens. The ITE handbook projects a pass-by fraction of 49%, which we accept. It is common in traffic analysis, to simply deduct this pass-by traffic from the total unadjusted trips, to obtain the primary non-pass-by traffic generated specifically by the site. However, if one is interested in the traffic upon a particular street–such as BB-East–then the pass-by traffic may become very important if it is redistributed from the streets upon which it would have flowed in the absence of the new site. In other words, traffic which might naturally have flowed along Lamar, might divert to the Walgreens, and then might be redistributed such

that a portion of it subsequently flows along BB-East rather than returning immediately to Lamar. Even though this diverted pass-by traffic is not "new" traffic, **it is new to BB-East**! This point has not been given nearly enough attention in the previous traffic analyses cited.

The total traffic, of which a portion might flow along BB-East, may be divided into three pieces:

- (1) the primary, non-pass-by, adjusted traffic generated by Walgreens and by the 350 sf of added space in the Taco Xpress restaurant;
- (2) the diverted pass-by traffic generated by each of these; and
- (3) traffic from the existing 3650 sf of the Taco Xpress restaurant, plus the 20 unit mobile home park, each of which will gain new access to BB-East which is not now present.

The sum of all of this traffic, consisting of the total unadjusted traffic for the existing plus proposed land uses, is displayed in Exhibit VIII of the Hickman traffic analysis. This figure shows a total of 2,372 trips, of which 1,283 are for Walgreens (which we now claim should be about 2,433 Walgreens trips), and the remaining 1,089 are for the 4,000 sf Taco Xpress restaurant plus the 20 unit mobile home park. Hickman has distributed these trips as follows:

- 43.0% Lamar, North of Bluebonnet intersection
- 49.9% Lamar, South of Bluebonnet intersection
- 5.0% Bluebonnet, West of Lamar intersection
- 2.1% Bluebonnet, East of the access driveway

These percentages are essentially the same as those shown on Hickman's Exhibit II (existing traffic), Exhibit V (assumed site trip origins & destinations), and Exhibit VII (adjusted 24-hour trip volumes). Hickman states that his estimate of site trip origins and destinations is **based upon the existing traffic flow patterns** (i.e., set equal to the existing flow percentages). Finally, Hickman's Exhibit XII (estimated 24-hour Bluebonnet traffic volumes), shows that in addition to the existing 1921 vpd of traffic on Bluebonnet, there are a projected 692 vpd of new projected volume, of which Hickman allocates 662 vpd West of the Bluebonnet driveway to Lamar, and **only** 30 vpd (!) East of the Bluebonnet driveway toward the neighborhoods. In conclusion, Hickman projects that **only about 2%** of the total site traffic will be allocated to BB-East, and **only about 4%** of the traffic on Bluebonnet East of Lamar will also travel East of the access driveway.

This amazing result, that 96% of the Bluebonnet traffic will fall onto the short stretch of Bluebonnet between the access driveway and Lamar, is convenient for the Applicant, since he proposes to improve only this short stretch of the roadway, which will mitigate this traffic. However, we believe that the allocation of such small fractions of the traffic to Bluebonnet East of the driveway is very unreasonable. We believe that this completely disregards the likelihood that the traffic congestion on Lamar and Bluebonnet near the intersection, **which will surely be exacerbated by the new store**, will significantly influence the decision of drivers as to which route to take to and from the store. We believe that this low allocation also disregards the observation of an appreciable element of "cut through" traffic, presently using BB-East, evidenced by the 34% increase in the traffic count during the past few years.

By comparison with Hickman's allocation of about 4% of the Bluebonnet traffic to the roadway East of the driveway, Emily Barron allocates about 10% of the corresponding traffic East of the driveway–although her traffic volumes are lower, and her analysis differs in several other respects as well. We believe that both of these allocation estimates are too low, but Hickman's is the most egregious.

To illustrate the sort of situation that we have in mind, consider a pass-by driver that normally commutes home from work in the central Austin area, along S. Lamar, heading toward a destination along S. 1st Street, South of Ben White. Along the way, he deviates to make a pass-by stop at Wallgreens at Bluebonnet. Upon returning to his car in the parking lot, he notices that Lamar is clogged with rush hour traffic, and the traffic light at Bluebonnet is congested. He realizes that if he heads East on Bluebonnet, he avoids several traffic lights further South on Lamar, and he can emerge at the Banister Lane crossing over Ben White, on his way to S. 1st. This is a pass-by trip that generates new traffic on Bluebonnet, East of the driveway. It is not reflected in the present traffic distribution percentages, since without the presence of Walgreens to prompt a pass-by stop, the Eastward diversion along Bluebonnet would not occur. We believe that Walgreens may serve as a catalyst for many such diverted trips Eastward through our neighborhoods, as well as attracting a fair number of diverted trips toward Walgreens from the East and South of our neighborhoods. It seems clear that such traffic onto Bluebonnet East of the access driveway **is completely ignored** in the Hickman traffic analysis, and is largely ignored in the Barron analysis.

The "Hickman Hypothesis" is that traffic percentages on a roadway flowing away from a site are completely unaffected by the site, and are the same as they were before the site was constructed. If this hypothesis is true, then it follows that the percentage distribution of traffic leaving a site (out the driveways) must be the same as the overall percentage distribution of traffic on the roadways. It has occurred to us that this is a hypothesis which can be empirically tested, and we have done so.

We examined the Office Depot site at Lamar & Oltorf, which shares several of the characteristics of the Lamar & Bluebonnet site. Chief among the similarities are the congestion at the traffic light at the intersection, and the similar topology, with access streets to the West and North, and the fact that the Lamar traffic is very dominant. During 2003 we had examined this same site, and we determined from Amy Link that Oltorf carried about 32% of the combined Lamar + Oltorf traffic. During that study, we determined from onsite traffic counts that the Oltorf driveways provided about 35% of the ingress traffic to the site, but 60% of the egress from the site. The analogy between Oltorf and Bluebonnet, although not perfect, is what prompted us to impute a larger fraction of the Walgreens traffic onto Bluebonnet, than Amy Link was projecting.

For this 2004 study, conducted in late-July and early-August, we again surveyed the Office Depot site on different days, during both AM and PM rush hour traffic. For the AM survey, we observed that Oltorf appeared to carry about 29% of the combined Lamar-Oltorf traffic, and that this was broken down such that 16% was West-bound and 13% was East-bound. (The Lamar traffic was 48% North-bound and 23% South-bound, to complete the 100% surveyed.) Of the traffic exiting the site parking lot, Oltorf driveways captured 59% of the total exits, and of these Oltorf exits, 60% of the cars turned East. Therefore, of the overall traffic exiting the site, about 35% ended up traveling East on Oltorf. This 35% portion **is much higher** than the 13% portion of the overall, non-site specific traffic, which disproves the Hickman Hypothesis in this AM instance. Moreover, it reveals an **incremental propensity of exiting Office Depot customers to depart Eastbound**, **in comparison with the background traffic**.

For the PM site survey, we obtained similar results. Oltorf carried about 34% of the combined Lamar + Oltorf traffic, with the Oltorf traffic being about 17% Eastbound and 17% Westbound (and the Lamar traffic being 24% Northbound and 42% Southbound). Of the traffic exiting the site, the Oltorf driveways captured about 48% of the total, and of these Oltorf exits, about 80% headed East. Therefore, of the total site exits, about 39% ended up headed East on Oltorf. Once again, this 39% portion **is much higher** than the 17% portion of the overall, non-site specific traffic, which again disproves the Hickman Hypothesis in this PM instance. **The incremental propensity of departing Office Depot customers to depart Eastbound, in comparison with the background traffic, is again manifested.**

This increased inclination of drivers to depart East from a parking lot adjacent to Lamar rush hour traffic is not difficult to understand. During the traffic count, there were several occasions in which a driver attempted to exit the Lamar driveway, and-being foiled by the intense Lamar traffic-turned in frustration and exited the Oltorf driveway, turning East. It moreover seems unlikely that this observed "incremental propensity to depart Eastbound" is a characteristic somehow unique to Office Depot customers. More likely, this is a characteristic of parking lots sharing a similar topology to the Office Depot parking lot, such as the proposed Walgreens lot at Lamar & Bluebonnet.

Because Oltorf is so much larger than Bluebonnet, it appears clear that the proper traffic allocation fraction for Bluebonnet East will not be nearly so large as the 35% seen at Oltorf. On the other hand, we believe that it is clear that there is no basis for assuming that the Bluebonnet East traffic share will remain at the present low level of 2%, but instead is likely to become much larger, if Walgreens is allowed access to Bluebonnet. We note that both Amy Link and Emily Barron allocated 30% of the adjusted site traffic to Bluebonnet–far in excess of the present traffic load. (However, they disregarded pass-by diversion onto Bluebonnet, and Barron assumed that 90% of the Bluebonnet traffic would occur West of the access driveway.) We believe that the proper allocation fraction to Bluebonnet East of the driveway is likely to be **10% - 15% or more**, after the store is constructed, and that this fraction should be applied to the **total**

unadjusted traffic, and not just the adjusted traffic, in order to capture the redistribution of the diverted pass-by trips onto Bluebonnet-East from Lamar. For example, if one combines the 2,433 vpd of Walgreens unadjusted traffic which we project, to the 1,089 vpd of traffic from the 4,000 sf of the Taco Xpress restaurant plus the 20 unit trailer park, and then applies an allocation factor of 10%-15% to Bluebonnet East, one obtains a projection of about 352 vpd - 528 vpd onto Bluebonnet East. This traffic is in addition to the 1,921 vpd of existing traffic. By comparison, Hickman projects only 30 vpd in addition to the existing 1,921 vpd.

Conclusions

The South Lamar Neighborhood Association Traffic Study Committee believes that the traffic estimates made by the Applicant for the Walgreens at Lamar and Bluebonnet are grossly underestimated. We project (from hard data collected) that the unadjusted trips generated are enhanced above the ITE handbook estimate of 1,283 trips by a factor of about 1.9, to about 2,433 trips per day. This enhancement occurs because Walgreens is much more efficient in generating store traffic than is the average pharmacy, as determined by direct store counts of transaction receipts at the Manchaca & Lamar Walgreens, and as further corroborated by direct traffic counts at the same store, during peak traffic hours. In addition, we believe that the allocation factor for traffic onto Bluebonnet East of the access driveway, should be increased from the unreasonably low figure of 2% proposed by the Applicant, to a figure in the range of 10%-15%, in order to account for the traffic likely to divert East through our neighborhoods to escape the traffic congestion near the traffic light at Lamar & Bluebonnet. We believe that the new Bluebonnet East traffic is likely to fall in the range of 352 vpd - 528 vpd, in addition to the existing traffic of 1,921 vpd. Since the safe level of traffic is only 1,200 vpd, this new traffic will raise the traffic level from about 160% of the safe level now, to between 189%-204% of the safe level. Moreover, it no longer appears sufficient to cope with all of this traffic by merely improving Bluebonnet near its intersection with Lamar, because of this level of additional traffic which we project to flow much further East along Bluebonnet, to Del Curto and into our neighborhoods.

However, we are opposed to the notion that we should have to widen our neighborhood collector streets, and convert them into arterials, just to accommodate Walgreens. The SLNA Traffic Study Committee believes that commercial traffic should be restricted to major arterials, and that neighborhood collector streets should be reserved for residential traffic. That is why, given these traffic projections that we believe to be realistic, we are opposed to allowing this Walgreens to access our neighborhood collector street, and this is a key reason that we have opposed this zoning.

August 7, 2004

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Mr. Steve Drenner Drenner-Stuart-Wolff-Metcalfe-Von Kreisler, LLP 301 Congress Ave., Suite 1200 Austin, Texas 78701

RE: Traffic Analysis for Walgreens @ Lamar & Bluebonnet

Dear Mr. Drenner:

I am a member of the South Lamar Neighborhood Association, and have been one of several members who have volunteered to examine traffic issues surrounding the Walgreens zoning cases during the past couple of years. Kevin Lewis of SLNA has recently forwarded to me a copy of an e-mail from you, dated 8-3-04, which requests certain information–including names and locations of Walgreen's managers consulted, copies and dates of cash register receipts, and "any other written traffic analysis which SLNA has produced …". Naturally, we wish to cooperate so far as possible with your requests.

So that you do not reach the false conclusion that we have been hiding anything. I wish to assure you that until very recently, there were no written reports to share, but only handwritten notes from our investigations which were used in preparing testimony to Council during the summer 2003 zoning hearings. I understand that Kevin Lewis has already provided you with a transcript of my remarks on that occasion. In regard to our inquiries of the Walgreen's managers, our approach was very straightforward. It seemed to us that they probably had a very good idea of their own customer traffic, and we knew that there was a very close connection between the customer traffic and the vehicular traffic, since most customers drive to the store. It appears from the dates on my notes that our initial inquiries were made on 7-16-03 at the Walgreens stores @ Lamar & Manchaca and @ 45th Street & Guadalupe. I asked the managers whether they had an accurate count of their daily transactions by customers, and if so, what the "average transaction count" was on an "average day". At the Manchaca Walgreens, I spoke with a female manager, but apparently failed to write down her name. She told me that Walgreens had records of all transactions which were available from the electronic computerized cash registers, and that at that particular store, the tally ranged typically between 900 - 1,000 customer transactions per day. Since I did not view this inquiry as though it was a deposition, I did not obtain a signed statement and I did not ask for a copy of her receipts. I don't even know whether there is any single "receipt" which contains the tally. Each store typically has several cash registers in operation, although they are probably linked electronically. I simply asked a straightforward question, received a straightforward answer, wrote it down, and left. At the 45th Street

Walgreens, I spoke with Mr. Russell Syma, and I picked up the card of Mr. Ekpeyong Eke, the store manager. I don't remember whether Mr. Eke was present, or in the back, or whether Mr. Syma just gave me his card. In any case, the average transaction count reported for that store was "about 1,000 transactions per day".

More recently, on 8-4-04, because of your inquiry and my failure to have written down the name of the Manchaca & Lamar Walgreen's manager, I returned to that store. I discovered that the female manager had evidently been replaced, and the present manager is a Mr. Diaz, with assistant manager Ms. Fontenot. Ms. Fontenot and Mr. Diaz collaborated to give me an updated transaction count, which was consistent with, but a bit higher than the count obtained last year-as one might expect.

By the way, I offer all of these names in the spirit of cooperation, and so that you can do any verification that you desire; however, I do so upon the presumption that you will insure that no punishment or reprimand befalls these managers for having given us straightforward answers to our questions.

Because of requests received from you and others representing the City, I am trying to write up some of our own traffic investigations. When this report is completed and ready for circulation, I will send you a copy.

I am not surprised that our numbers are "far in excess of any that [you] have seen", because the other traffic projections are far too low. The others are based upon ITE handbook coefficients for an "average" pharmacy, and Walgreens is evidently well above average. Does that surprise you? It does not surprise us, because our neighborhoods support Walgreens with a lot of business. One thing which should not surprise you is that our neighborhood is very sensitive to traffic issues, and that we wish to keep commercial traffic off of our residential neighborhood collector streets. I have been present many times when that message was delivered loud and clear.

Thank you for your interest and cooperation.

Very sincerely,

James R. (Bob) Thompson Member of SLNA

TRAFFIC ANALYSIS OF WALGREENS @ LAMAR & BLUEBONNET AND ASSESSMENT OF TRAFFIC PENETRATION INTO NEIGHBORHOOD

By: Bob Thompson (512) 444-0019 (H)

(512) 693-2545 (W)

Draft Copy for Internal Review Only By SLNA Members

See you all @ 1:00 PM, Saturday, Aug. 7, 2004 at 3308 Clawson Road (Parking in rear; enter back door)