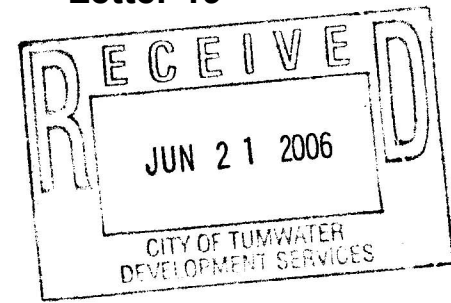


Comments on Draft Wal-Mart SEIS
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June 20, 2006



Because of the voluminous nature of the draft SEIS, and time limitations, I focused my review on sections dealing with traffic concerns. I have the following observations regarding the analysis of traffic by the draft SEIS.

1. The existing and projected traffic data in Tables 3.9-1 and 3.9-4 make it clear that several intersections will be at the highest defined Level of Service (LOS) category in 2007 without the project. The highest LOS is Category F, defined in Table A-1 of the 2000 Highway Capacity Manual as "Forced Flow (jammed)." An additional 2 of the 13 studied points will be at LOS E, defined as "Unstable flow (intolerable delay)." Going ahead with the project, without first mitigating the existing traffic congestion, seems extremely ill-advised. 1
2. The study does not consider propagating effects of increasing levels of traffic congestion. It is focused exclusively on 13 discrete locations, all of which are intersections or freeway exit ramps. Now that Crosby Blvd. has been opened to connect to Sapp Rd., many drivers will be able to travel southbound on Crosby, thus bypassing congestion at the I-5 exit ramps. Crosby connects to Sapp Rd., the southbound portion of which becomes Rural Rd. Rural Rd. ends at Trosper Rd., west of the Trosper Rd./Littlerock Rd. intersection. Rural Rd. is very narrow and this narrowness and the rolling nature of the terrain make it hazardous for even moderate volumes of traffic. Visibility at the Rural Rd. /Trosper Rd. intersection is very restricted in both directions; increasing traffic volumes on both Trosper Rd. and Rural Rd., will make this a very dangerous unsignaled intersection. 2
3. The study does not consider the impact of the project upon use of Littlerock Rd. and Trosper Rd. as bicycling routes. Both roads currently see significant bicycle traffic. Trosper Rd., as it lacks a shoulder for most of its length, is especially hazardous under current conditions; additional traffic created by the project, including the propagating effect at the Trosper Rd./Rural Rd. intersection discussed above, will make bicycling on Trosper Rd. a foolhardy endeavor. Unfortunately, there are no east-west alternative corridors in the area. 3
4. In estimating the number of trips taken in the area, the study does not appear to have taken into account the housing developments being constructed and planned in the area of Tumwater Hill. Much of the traffic from these developments will flow south on Rural Rd. to get to existing shopping in the Trosper Rd. area, as discussed above, and will make Rural Rd. and the intersection at Trosper Rd. very hazardous even in the absence of the project. Residents living in the developments on the south side of Tumwater Hill will have Rural Rd. as their most feasible route for shopping at the new Wal-Mart project, and this will add substantially to the burden on that corridor. It is thus imperative that the SEIS give consideration to traffic along Rural Rd. 4

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Based on my review of the traffic issues alone, I cannot help but conclude that construction of the Wal-Mart project is premature at this point. Already substandard traffic flow in the area needs to be improved before construction begins. This is an acceptable alternative mitigation strategy, as described on p. 3.9-23 of the draft SEIS.

“Elimination of impacts may occur by delaying the project until additional transportation capacity is provided by other development applicants, the City, another governmental agency, or by not building the proposed project.”

I urge the City to adopt this alternative, and alleviate traffic flow problems, including those not addressed in the draft SEIS, before giving final approval to this project.

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