

Mr. Gellenbeck,

20 June 2006

Thanks for the opportunity to respond to the draft SEIS. Please understand that I am not anti-retail for the site in question – I understand the need for more tax revenue for the city and for a balance between residential and commercial uses. I am, however, horrified at the prospect of another big box store, at least a typical big box store with the associated traffic nightmares and environmental degradation in the area. I don't see how the infrastructure can support the traffic and I don't see how Tumwater can survive as the Tumwater I love, if we accept Wal-Mart business as usual. I can see that you are working to make the community and the developer happy (or at least happier), and I appreciate this.

1

This is a great opportunity for the city and for Wal-Mart to make big news and big progress when looking toward the future of commercial development in the U.S. A small town north of Jackson, Mississippi did it (Madison, I believe) – they had a vision for their city and made Wal-Mart fit into that vision – without abandoning or compromising the vision.

2

I, too, lived in Texas where the only place to shop within 40 miles was the Wal-Mart (in Mineola) or the dollar store. I will probably not shop at the store – there are a lot of things about Wal-Mart as a corporation that I don't like, one of which is the homogenization of American life (everyone's shower curtains look the same because they all come from Wal-Mart). I recognize that many people want to shop there because it is cheap – I talked for a long time at the meeting with a retired lady who lives off Trosper. If we must have Wal-Mart, I want it to be the best Wal-Mart we can reasonably get. So, my questions and comments - long, but I hope you will read it all:

3

QUESTIONS:

1. If LRR Subarea Plan/Tumwater Town Center Plan, etc, are guidance only, how do they relate to permitting process if at all? An example: Tumwater Town Center, Chapter 3, 3.25, about retail in the area: view from west (e.g. LRR) would be backs of buildings visually buffered by landscaping.

4

2. Where is the stormwater retention area on Alternative #1?

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3. Why are they building noise reduction walls on the east side of the site? Protecting the freeway from noise?

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4. Asking for an exception to policy (“administrative modification of Tumwater Municipal Code”) for additional 316 parking places over those allowed by code. Is approval for this a must?

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5. What about Tumwater's Zero Effect Development Ordinance?

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6. Percival Creek Watershed protection area, Thurston County 1992. Area north of Bishop road falls here – with this, plus wellhead protection area (5-10 year travel area for contaminants from surface to water table) on site, high seasonal groundwater, multiple drinking water wells in the area and wetland (Thurston County Geodata) on site, extra mitigation measures and/or remedies in case of contamination are warranted (e.g. store staff leaving bags of weed killer out in the rain, flood larger than 100 year level, etc). Paying a fine, as Wal-Mart has done in the millions to the EPA on several occasions over the last few years for violations of the Clean Water Act won't fix our wells or pay to hook us into city services.

9

7. How many sensitive water issues on this site would convince the developer to build parking structures instead of paving over the entire area? Ikea does this. What about a multi-story store (there is one in California) instead of a huge footprint? This is a great opportunity for Wal-Mart to show they mean what they say with new environmental awareness. This would also answer open space issues, and potentially noise issues, as well as making many community residents much more comfortable with the development.

10

8. Truck traffic designation not clear to me, as the diagrams stop on side roads (Kingswood, for example) – access from LRR? U-turns on Kingswood? Can they really make delivery trucks do this? Can we ask for LRR to be designated a no truck road prior to completion of this project? What about the additional truck traffic projected for Littlerock Road from the Asphalt Plant on 88th?

11

9. The SEIS suggests moving entrance to Tumwater Middle School. As it is now, morning and after school traffic plus Wal-Mart main entrance traffic (9,716 trips per day or more) plus roundabout plus two lane road? Does anyone really think this will work?

12

9. From Tumwater Comprehensive Plan amended 2006:

a. General Commercial ‘minimizing the undesirable impacts of such uses on the residential neighborhoods which they serve.’

b. Ensure that new development is in conformance with standards of the City’s Protection of Trees and Vegetation Ordinance

c. Collector road (Tyee) would open up vacant landwhile reducing impacts along Littlerock Road.

d. All uses within the LR neighborhood should follow the guidelines for groundwater protection set forth in the Northern Thurston County Groundwater Management Plan.

e. As commercial uses locate in this neighborhood (LRRSA) they should be designed so as to create as little impact as possible to residential uses on the west side of Littlerock Road

13

COMMENTS ON THE SEIS:

GENERAL OBSERVATION: The alternate plan, with Kingswood Drive moved south, seems much more attractive – no exception for the number of parking places (how do they figure that? They would have less need for parking if the road is moved?), no pedestrians crossing the road to get to the store, more green spaces, a stormwater retention pond, the future gas station located away from the power lines. This seems manipulative to me – the store’s footprint is the same, the number of parking places should be the same, the green open space should be the same, and a gas station shouldn’t be under power lines in any case. Why isn’t there a third alternative? Why does the alternate plan have the gas station on the wetland?

14

SITE PLANS

1. Facing Littlerock Road? Economic impact plan relies on sales from passerby cars on I5. The store will be practically invisible from I5 due to Albany International and Home Depot, making the site impractical for these purposes. 18.44.150 of Tumwater municipal code limits sign height to 30’. Can the 30’ sign be on the I5 side and a smaller sign on the LRR side? Why can’t the store face the freeway/Tyee Drive?

15

16

2. Open space requirement – according to Thurston County and Tumwater code, commercial development must preserve 5% of site, and this can’t be all the little landscaped areas added up – it must be separate from required yards, setbacks and landscaped areas. Can include wetlands and buffers, and can include stormwater facilities if they are designed for active or passive recreational use. There is a list of amenities (play equipment, ballfield, trails, benches, etc) in the code, two of which must be included. The space should be placed in consolidation with open space areas of adjacent properties. Trees and vegetation must be retained. Where is this? The alternative plan has some park looking area, and the artist’s rendering of the front of the building (LRR side) implies trails, but the site plans don’t have room for these. The SEIS claims 1.3 acres.

17

3. Wetland: (approx 1800 sf) and 200’ buffer area located on site (per Thurston County Geodata) – not addressed in the mitigation plan, other than to say there is no wetland on site. Tumwater conservation plan (is this just a recommendation?) requires at a minimum that a qualified wetland biologist should determine wetland type and boundary for development sites containing wetland. SEIS refers to federal wetland inventory (no wetland listed) and on-site inspections (by a qualified wetland biologist?), but no reference to Thurston County listing. Exceptions are allowed if it can be shown that requirements deny reasonable use of the property – not in this case, as the vast majority of the property is still usable. Just a problem with paving over the whole thing. Future lease lot (gas station) is located on or near this area in the alternate plan.

18

4. Earthquake hazard: According to Kleinfelder Geotechnical Engineering Report, Dec 04, soil on the site is potentially subject to liquefaction in an earthquake due to high groundwater and high sand content of soil. What does that mean for contamination of the water in a wellhead protection area?

18

WATER QUALITY:

1. 1992 Letter from Kleinfelder, **groundwater flow is toward Trospen Lake** – same thing in AMEC study from 2002. SEIS says groundwater flow is towards Barnes Lake. Barnes Lake, according to the comprehensive Plan Area Text Amendments (City of Tumwater) is ‘the planning area’s most important asset, the shoreline and waters of Barnes Lake should be protected and improved.’”

19

2. **Studied current water conditions** – didn’t predict future impacts after development, other than to say they would follow procedures. If there is contamination of the water supply and the flow is, in fact, towards Trospen Lake, the wellhead protection area/nature of soil in this area would almost guarantee contamination of Glenwood Park wells (some within ½ mile, some just over) within a few years. What happens then?

20

3. SEIS study attachment lists some domestic wells in the area, but none in Glenwood Park (every house in the subdivision has its own well), although a well in 6200 block of Littlerock Road would be in danger of contamination. SEIS says groundwater depth and flow characteristics (in dispute with prior findings) indicate no adverse impact to area wells.

21

4. Required minimum separation between bottom of infiltration facility and seasonal high groundwater elevation. SEIS claims high groundwater level from 13 – 20+ feet. Study by AMEC in 2002 says 7 – 14 feet. Has the water level changed, or was one or the other study in error?

22

5. Cites 20 wells in the area – this can’t be correct as each house in Glenwood Park has its own well. Did they count or estimate? Can we require them to write a plan on how they will deal with contamination of domestic wells in the area?

23

TRAFFIC:

1. From Institute of Transportation Engineers (ITE) in Trip Generation, 7th Edition. This publication is the definitive source for estimating trips generated from different land use types:

<http://www.againstthewal.com/studies/MarkWolfeBigBoxCCMeasureCalcs021004.htm>

24

This edition was recently updated in late 2003 to include recent traffic studies conducted over the last six years. The information provided in this letter includes total daily trips by the day of the week and total weekly trips. Daily weekday trips: 10,800 average. Saturday trips: 12,800. Our estimates are low – why? Why would they build a Super Wal-Mart here if they expect below average visits to the store?

2. Thurston County Code (most stringent of Tumwater/Thurston Co. must be met) unusual traffic conditions require analysis of both a.m. and p.m. conditions. Tumwater Middle School traffic in the morning is located directly at the development site, it is very congested in the morning and constitutes, in my opinion, an unusual circumstance and should be analyzed for impact of additional traffic and potential impact of moving Kingswood Drive. 25
3. 9716 new trips daily divided by 793 peak hour trips means the daily trips were divided by 12.25 hours. That would mean 793 hourly trips in morning hours as well, despite their contention that they didn't need to study morning traffic because the development wouldn't impact morning traffic counts. Peak hour trips should be significantly more than the average over 12 hours. If I have figured this wrong, how do they decide how many trips during peak hour? 26
4. No discussion of increased traffic on 2 lane portion of LRR (Bishop to Israel). With LOS F at Trooper interchanges, customers will go to the Tumwater Blvd interchange and travel south on Littlerock Road – this isn't taken into account in the traffic study. 27
5. Appendix 1.3, Figure 6, Trip distribution, shows ¼ of the trips coming from North of the proposed store, an already failing intersection. 28
6. Can we request/study other Super Wal-Marts with a traffic circle as a main entrance? I don't see how this will work, given the projected volume of traffic. 29

TREES

1. Mr. Beach said, speaking for the developer in a public meeting in Feb 05 that they were working with the city to save the correct number of trees. Now they want an administrative change to the tree conservation plan to cut them down. This will increase noise, decrease soil and water quality and muck up the aesthetics, pretty artist rendering notwithstanding. I understand they will plant more trees in other areas, or pay into the tree fund, but that won't improve the aesthetics of this site, already pretty ugly with the existing stores. 30
2. SEIS uses as an excuse to clear trees that the majority of the site has already been cleared. In fact, according to old aerial photographs presented at the LRR Subarea Plan meeting at the Middle School, there are more trees on the site now than previously. 31
3. SEIS claims that several large evergreen trees will be planted along LRR – not evident in front of Costco or in the artist rendering. 32

NOISE:

- 1. SEIS says the major source of traffic noise is Littlerock Road? Noise sensors were placed directly next to Littlerock Road. Residential neighborhoods to the west get the majority of their noise from I5. Changes due to clear cutting and large paved area will amplify noise. Did they measure there? 33
- 2. Projected noise levels will be within 2-4 decibels of tolerance levels in residential areas, according to the SEIS. If, as claimed, changes of 1-3 decibels are indistinguishable, that means projected noise levels will be ‘indistinguishable’ from too noisy. It is already bordering on too loud. 34
- 3. Loading facility screening will protect the freeway and the residential neighborhood directly south of the site, but will direct the noise toward Littlerock Road and adjacent residential areas. 35
- 4. Issue of overnight camping isn’t addressed – this is a typical practice at Wal-Mart superstores. Overnight campers typically run generators, which add to noise, especially at night. 36

CITY SERVICES/FIRE/POLICE/CRIME:

- 1. According to the June 12th meeting, predictions of impact were made through conversation with local police. Since Tumwater police have no experience with Wal-Mart superstores, a better source may have been police from similar communities who have a Walmart. – Yelm? Shelton? Centralia? Especially since Wal-Mart is aiming to be a regional, not local, shopping center - this will bring, by design, a lot of out-of-town people to the area. 37

ECONOMIC IMPACT:

- 1. SEIS states Tumwater retail won’t be negatively affected because there is no established downtown area – “the city presently does not have a downtown area whose retailers may compete with the Wal-Mart store.” What about current Tumwater Town Center development? Isn’t that supposed to be the downtown? What do the developers there, aiming for retail, think about this proposal? 38
- 2. SEIS states Tumwater retail won’t be negatively affected because of faster than average residential growth in the area – there will be enough population growth to support Wal-Mart *and* other retail. How much residential space in the Urban Growth boundaries is left? Will faster than average growth continue for 5 years? 10 years? Can our schools and other public services absorb enough growth to support the Wal-Mart? 39
- 3. 12% predicted cut in grocery prices – can Mega Foods, Albertsons and Fred Meyer absorb this and still pay union wages to their employees? 40

4. Sales tax income – Wal-Mart sales taxes paid to the city don't take into account loss of taxes from other Tumwater retailers whose sales will go down. What is the projected net gain? 41
5. From the SEIS Economic Impact: Average wages given for Wal-Mart include all employees. Those compared to are extrapolated from Thurston County data (p. 14/15), which does not include non-hourly (management) wages. The SEIS also claims Tumwater pays higher wages than average Thurston County wages (p 9). This makes the comparison inaccurate. 42
6. The Economic Impact (Appendix H.GJ) references a study from Iowa on economic impact. I read the study, which is about how small town retail can compete with Wal-Mart: http://www.econ.iastate.edu/faculty/stone/1995_IA_WM_Study.pdf
- a. Stores that win: home furnishings (furniture, flooring), restaurants (no effective sales tax increase) and upscale clothing (things Wal-Mart doesn't carry). We don't have a lot of either of these. 43
- b. Stores that lose: Family clothing (down 17.9%), Specialty (e.g. drugstores) down 13.9%, building supplies (down 14.2%) – food and specialty lose a lot (1.3 – 1.8 million dollars in towns with average population of 15,000). This includes most Tumwater retail categories. 44
- c. Food stores in the study were not impacted because most small towns have already lost local food sales to Walmart in other locations – not true in Tumwater, since most residents shop at one of the three existing groceries. 45
- d. Study shows an overall retail sales increase for the area, but the increase goes to Wal-Mart, *more* than overall increase, which means loss of sales for other retailers. 46
- e. Overall retail sales decrease as geographic area is saturated with Wal-Marts – so this store will have negative impact on Lacey, Shelton, Yelm and Chehalis stores – where is the saturation level? A good question, because we don't need an empty big-box store or a poorly performing store in a few years. 47
7. Despite this cited study, the SEIS says impact on existing retailers cannot be viewed as significant (sales already growing despite losing business to out of town) – the 'sales leakage' theory (Tumwater shoppers already shop out of Tumwater). Is this based on theory or research of local residents shopping habits? If shoppers do come back, it will be only to Wal-Mart, unless we have stores that carry things they don't – which we don't. 48
8. Claim Tumwater residents already shop at Wal-Mart in Lacey and so this store doesn't pose competition – where are they planning to get their customers from, then – from the Wal-Mart in Lacey? This makes no sense, given the theory in number 7. 49

9. Claim Lacey taxable retail sales and number of retail establishments has grown since Wal-Mart opened. The figures given are prior to grocery sales in Lacey, and the increase, if the cited Iowa study is correct, is attributable only to Wal-Mart, with net loss of sales to other stores.

50

10. '328 Full time equivalents' doesn't mean 328 full time jobs – most Wal-Mart employees are part time.

51

CONCORDANCE WITH EXISTING REGULATIONS

1. Thurston County Zoning Requirements from Code, 20.02.010: aim is “to lessen congestion on streets, encourage high standards of development, prevent overcrowding of land, provide adequate light and air, and facilitate adequate provisions for transportation.....schools, parks, recreation needs...open space. . . “This development will add to congestion on streets, by their own traffic studies, and cause overcrowding of land (paving 21 acres), even with mitigations.

52

2. According to Thurston County Code, “Adjacent” means nearby and not necessarily contiguous. Contiguous means sharing a border. This is important when thinking about impact on adjacent neighborhoods – they need to consider impact on other residential areas than the one abutting the site to the south.

53

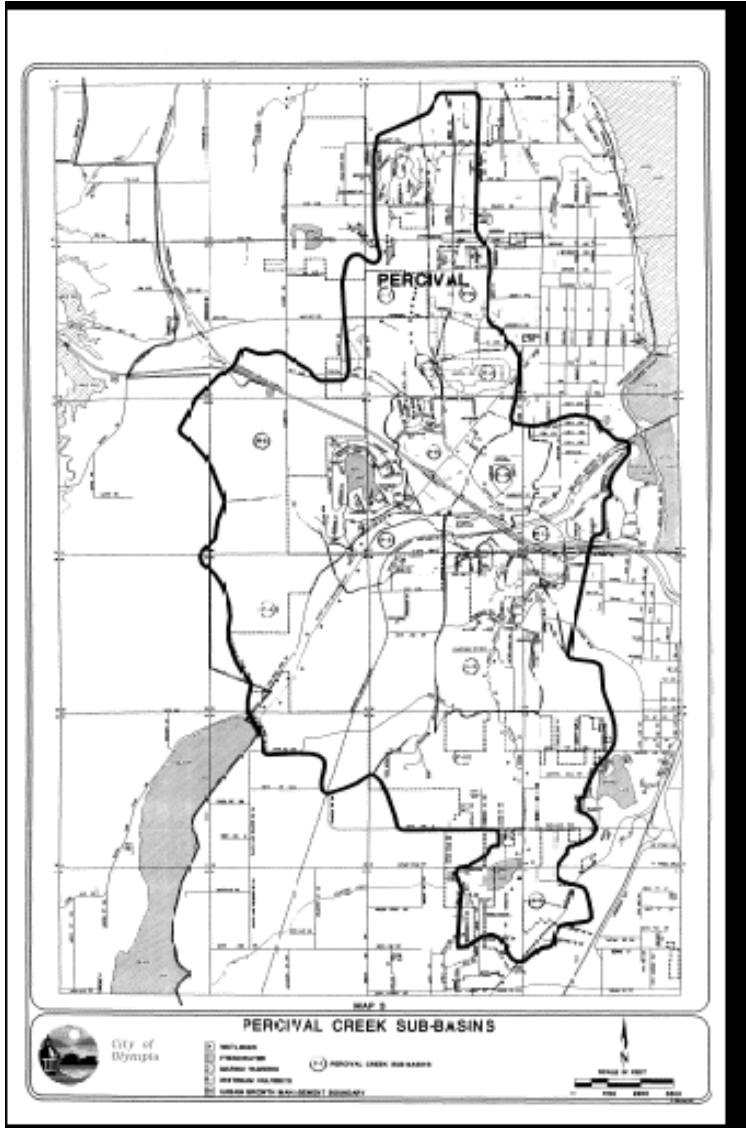
3. From Percival Creek Drainage Basin Plan, 1992:

http://www.co.thurston.wa.us/wwm/Basin%20Planning/Percival%20Creek/Percival_Creek_Plan.htm

54

Table A-7: Potential Effects of Urban Runoff on Stream Systems
(Ref: Kirkpatrick, 1990)

EFFECTS UPON:				
Hydrology	Stream Morphology	Large Organic Debris (LOD)	Riparian Zone	Water Quality
Increase Flow	Increase Channel Width	Decrease Number and Size of LOD	Decrease Riparian Vegetation	Increase Sediments
Increase Peak Flow	Increase Floodplain Elevation	Decrease Cedar and Fir Species	Decrease Naturally-Occurring Tree Speciation	Increase Bacteria
Increase Concentration Time	Increase Sediment Transport		Increase Soil Saturation	Increase Oil and Grease
Increase Flood Frequency	Decrease Streambed Stability		Increase Trace Metals	
Decrease Base Flow	Increase Erosive Energy		Increase Trace Organics (Pesticides, Plasticizers, Wood Preservatives)	
Increase Hydraulic Energy			Increase Orthophosphate	
				Increase Inorganic Nitrogen
				Increase Oxygen Demand
				Increase/Decrease Temperature
HABITAT RESPONSES:				
Flooding	Increase Quantity of Riffles	Decrease Fish Rearing Pools	Increase Readily Decomposable Tree Species	Decrease Spawning Success and Juvenile Fish Survival
Decreased Summer Flows	Decrease Quantity of Pools	Decrease Habitat Diversity	Decrease Barrier to High Flow Erosion	Increase Primary Production
Decreased Groundwater Recharge	Increase Quantity of Channel Scoured to Great Depth	Decrease Sediment and Organic Matter Storage Sites	Decrease Energy Dissipation	Increase Fish Disease
Displace Fry, Eggs, and Benthic Organisms	Increase Channel Erosion	Decrease Meanders, Secondary Channels, and Backwaters	Decrease Channel Stability	Decrease Benthic Organism Diversity
Decrease Ability of Wetlands to Store Flows	Contaminate Gravels with >10% Fine Sediments	Decrease Fish Refuge from High Flows	Decrease Shade, Food Sources, and Cover	
	Smother Eggs	Decrease Cover from Predators	Decrease Filtration of Run-off	
		Decrease Spawning Areas	Decrease Benthic Organism Diversity	
			Decrease Lower and Upper Bank Stability	



Thanks for listening – I hope this isn't too long for you. I will try to read the traffic study in more depth, as that is overall my biggest concern with this proposed development.

Sincerely,

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