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Comments – Walmart Draft Supplemental Environmental Impact Study

The following are my comments concerning a proposed Walmart Draft Environmental Impact Study. My comments refer to what I believe are inadequacies and flaws in the document. I believe that the document is misleading in many areas, that the manner in which data was collected is prejudicial and fails to accurately account for the real environmental impacts of a proposed Walmart store.

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Traffic Analysis

- 1. The Traffic Analysis did not include the time of day when nearby schools begin and release. Tumwater Middle school is across the street from the proposed site. If an injury or death occurred because of the resulting increased traffic, both the city and the Walmart corporation would be open to law suits. This is a serious omission in the DEIS.

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I believe that city planning is failing to protect the area around the school from inappropriate development that affects child safety and general health of the area. I believe that this is a moral issue and is a serious oversight in Tumwater City Planning.

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- 1. The Traffic Study omitted analysis representative of expected holiday shopping traffic. Retailers regard the holidays as the most significant source of their annual profit. Retailers would surely not consider their annual profit report to be complete without including their important holiday revenue. Omitting traffic analysis for this time is overtly an act of avoidance. This data is crucial to a full disclosure of local traffic impacts.

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- 2. The Level of Service Ratings are not adjusted properly. The analysis is unclear. It avoids and omits stating that several areas and intersections in the Tumwater area will fall from their current E rating to a Failure rating.

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- 3. Pedestrian Walkways: while the Walmart proposal includes walkways, it makes no mention of whether the areas will be desirable or safe to use. With increased traffic and burgeoning parking lots the area around the store will be unwelcoming and unsafe to pedestrians. It may be argued that pedestrians are provided for with sidewalks, but, as the area becomes increasingly blighted, the sidewalks will be nearly always unused.

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Tree Waiver

1. The Tree Waiver is not acceptable. The Draft EIS states that Costco and Fred Meyer were previously issued a tree waiver. That is not an explanation for a Tree Waiver. Two mistakes do not make the third acceptable. There is not an acceptable reason to give a Tree waiver. This is serious flaw in reasonable judgment.

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The Littlerock Sub Area Comprehensive Plan - INCONSISTENCIES

The LRSA Comprehensive Plan describes a vision that is the glaring opposite in character of the proposal that Walmart has submitted to the City of Tumwater. The DEIS makes statements about the Littlerock Sub Area Comprehensive Plan that contradict its intent. There are dishonest and misleading statements as to the vision and implied use of the LRSA.

Examples include: Page 3.6-7 The proposed project would be consistent with Pattern of development in the Littlerock Road area and would not effect the Livability of residential areas....

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Page 3.6-6 The project would be consistent with the direction and guidance of the subarea plan.....

3.5-7 No significant impacts to nearby areas would be expected....(refers to Kingswood Road relocation

3.5-6 Retail use on the site would not significantly impact....(the Middle-School or the Cemetery)

These words are used in the Comprehensive Plan to describe a vision for future use:

- A. Neighborhood Friendly**
- B. Safe**
- C. Walkable**
- D. Encouraging Small Businesses**
- E. Park-Like Setting**
- F. Protection of Existing Trees**
- G. Attractive**
- H. Livable**

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It is clear that the Planning Commission and Planning Department is failing and has failed this community by not enacting codes to protect it from intense, damaging and unsafe commercial activity. These failures will result in destructive impacts on the community and neighborhoods. Although planning has failed, the Littlerock Sub Area Comprehensive Plan defines a clear vision for a livable area

and is in direct conflict with the Walmart Proposal and its resulting environmental impacts.

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cont.

The proposal described in the DEIS is antagonistic to the basic idea of improvements to adjacent neighborhoods and unsafe for school age children. The Tumwater Middle School is located across the street from the proposed site. This extreme and intense commercial proposal is not consistent with the definition of Neighborhood Friendly for these reasons:

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- A. Unsafe for pedestrians around school and neighborhood. Traffic levels of service (LOS) too low for safety levels needed to protect neighborhoods and children.
- B. Traffic and parking lot size creates displacement of more calm characteristics in the current neighborhood and area, such as human scale ratio of homes and buildings along Littlerock up to Costco, moderate traffic, native sense of place with trees and fields.
- C. Aesthetic depletion through Clear-cutting Trees
- D. Approximately 20 acres of impervious surface
- E. Intense and damaging oversized commercial development will result in urban blight.

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Economic Study - DEIS

- 1. The DEIS does not arrive at accurate analysis of loss of existing businesses and revenue in Tumwater. As a result, the report paints a picture of a future for Tumwater that is flatly untrue. This is an unacceptable, flawed and unprofessional economic study. Failure to complete an unbiased truthful Economic Impact Study leaves the city unable to make decisions based on real data.

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Final Comment

I believe that Tumwater Planning Commission and Tumwater Planning Department lacks the ability to have important foresight into far reaching and serious impacts to the health of the city of Tumwater. They have failed to codify restrictions to size and nature of commercial permits within the LRSA, that protect the community from urban blight. As a result of their lack of understanding and foresight the city is now at the point where deterioration of the community will begin. Because of the Tumwater City Government's failure, the community must attempt to save itself.

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**Submitted by
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