

RESPONSE TO LETTER 1
Washington State Department of Ecology

1. Construction air quality impacts would be mitigated by incorporating best management practices (BMPs) into the project's construction plans and specifications using both Ecology and Olympic Region Clean Air Agency (ORCAA) regulations (see SDEIS Appendix J and the mitigation measures on page 3.10-6 of the SDEIS for details on the proposed BMPs).
2. The storage, handling and sale of potentially hazardous/explosive materials, such as propane and gasoline on the future lease lot under the Proposed Action and Alternative 1, would be in accordance with all applicable regulations, including WAC Chapter 296-24 (General Safety and Health Standards), WAC 173-180A through 180D (Facility Oil-Handling Standards), and WAC 173-360 (Underground Storage Tank Regulations), as applicable (see the mitigation measures on pages 3.4-4 and 3.4-5 of the SDEIS for details).
3. The project would comply with all applicable requirements related to the installation/construction of underground storage tanks and associated facilities.
4. See the response to Comment 3 in this letter.
5. See the response to Comment 3 in this letter.
6. See the response to Comment 3 in this letter.
7. Your comment is noted for the record. See the responses to Comments 2 and 3 in this letter.
8. The project would comply with all applicable regulations related to the storage, handling and sale of potentially hazardous materials (see the mitigation measures on pages 3.4-4 and 3.4-5 of the SDEIS for details).
9. Your comment is noted for the record.

RESPONSE TO LETTER 2
Olympic Region Clean Air Agency (ORCAA)

1. A Notice of Construction (NOA) would be submitted for the establishment of a gasoline dispensing facility (GDF) under the Proposed Action and Alternative 1. Should the proposed project include installation of a standby diesel generator with a capacity of 500 hp or greater, an NOC would be submitted for the generator.

RESPONSE TO LETTER 3

Intercity Transit (Bloom, Dennis)

1. Transit was not included as an area to be addressed in the SDEIS Transportation section, because the proposed project was not anticipated to result in significant impacts on transit. Per WAC 197-11-440(6)(a), an EIS is directed to analyze the probable significant impacts of a proposed project only. However, as part of the Updated Transportation Analysis prepared for this SFEIS, a section was included on existing transit service and facilities, impacts of the proposed project on transit service and facilities, and appropriate mitigation measures (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details). The analysis concluded that the proposed project would not have significant impacts on transit services and facilities with the following proposed mitigation measures:

- *The applicant would provide frontage improvements along Kingswood Drive and Littlerock Road, as required by TMC 12.12.010, and consistent with the City's planned improvements for Littlerock Road. Two new transit stops would be provided on the east and west side of Littlerock Road, immediately north of Kingswood Drive. The specific locations and design of the transit stops and related facilities would be determined through coordination with the City and Intercity Transit during the site plan approval process.*

2. As described on page 3.6-9 of the SDEIS, the proposal would include pedestrian walkways and connections throughout the project site. These pedestrian connections would be defined by marked pathways and landscape plantings. Pedestrian links would be established between the street, parking areas and the proposed store and along street frontages.

Pedestrian and non-motorized improvements along Littlerock Road are planned and will be completed as part of the City's Littlerock Road improvements. These improvements include sidewalks on both sides of the road. Adjacent to the project site, pedestrians will be able to cross Littlerock Road using the roundabout at the existing or relocated Kingswood Drive intersection.

An Updated Transportation Analysis was prepared for this SFEIS (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS). This analysis includes the following additional mitigation measure that has been proposed by the applicant to reduce the potential for accidents to pedestrians crossing Kingswood Drive to and from the parking area in the southwest portion of the site:

- *The following elements could be included in the design of Kingswood Drive to improve pedestrian crossing safety: roadway signage and pavement treatments; holiday traffic control, such as traffic control personnel at key onsite vehicle intersections or pedestrian crossings; crosswalk lighting (overhead lighting or in-pavement lights); and, a pedestrian refuge area, such as a median island in Kingswood Drive.*

Also see the response to Comment 1 in this letter.

3. Thank you for providing this information. The information has been incorporated into the Updated Transportation Analysis prepared for this SFEIS (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS).
4. See the response to Comment 1 in this letter. The applicant will consider your suggestion to provide a covered pathway through the parking lot to the proposed building and bike racks and/or lockers at the transit stops in the final design of the proposed project. As indicated on page 2-10 of the SDEIS, lighting would be provided throughout the proposed parking area and on the exterior of the building to provide for safety and security. The building and parking lots would be illuminated throughout the night (see SDEIS Figure 2-6 for the lighting plan for the Proposed Action).
5. Your comment is noted for the record.
6. Your comment is noted for the record.

RESPONSE TO LETTER 4

Bricklin, Newman, Dold LLP

1. It is acknowledged that the analysis of retail sales in the SDEIS included errors in the calculation of gross retail sales as a function of taxable retail sales. This error has been remedied in the Updated Economic and Fiscal Analysis prepared for this SFEIS. An analysis of retail spending and sales by specific retail sector has also been added to the Updated Economic and Fiscal Analysis. This analysis concludes that ongoing City public service costs of at least \$71,250 in current dollars would be adequately addressed by the \$671,000 in annual, non-bond obligation tax revenues generated by the Proposed Action (see the Updated Economic and Fiscal Analysis in **Appendix A** and the summary in **Section 1.5.10** of this SFEIS).
2. According to the Updated Economic and Fiscal Analysis, total retail sales compared to taxable retail sales in Tumwater indicate that the City does not have a measurable retail sales leakage problem. Rather, the City is a destination retail hub for non-resident spending. Destination spending by non-Tumwater residents in 2005 is estimated at between \$161 million, or roughly 40 percent of total estimated retail sales in Tumwater. Therefore, there is substantial capacity for more retail in Tumwater and no significant impacts would be anticipated from introduction of the proposed retail store in the City (see the updated calculations and analysis in **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
3. As a SEPA matter, an analysis considering specific retail sectors is not necessarily “standard” in an EIS. Page 2-3 of the SDEIS summarized what are considered SEPA versus non-SEPA issues. The SDEIS indicated that economic factors are not listed as elements of the environment to be addressed through SEPA in WAC 197-11-444. The Tumwater Municipal Code (Chapter 16.04.110) indicates that economy (along with community policy) is an element of the environment for the purpose of EIS content, but does not add to the criteria for threshold determination or perform any other function or purpose for satisfying SEPA requirements. The City of Tumwater determined that the SDEIS should analyze certain economic factors, such as: impacts on local businesses (and the potential for associated impacts to land use), employment generation, and fiscal impacts to the City of Tumwater.

The SDEIS noted that the SEPA environmental review process is designed to work with other decision-making factors to provide a comprehensive review of a proposal (WAC 197-11-055). The purpose of SEPA is to ensure that environmental values are given appropriate deliberation, along with other considerations. SEPA contemplates that social welfare, economic and other considerations will be taken into account in weighing and balancing decisions on a project. However, an EIS is not required to weigh and balance all of the possible effects and considerations evaluated by decision-makers in making final decisions about a project (WAC 197-11-448(2)). An EIS is not an agency's only decision-making document.

Finally, the SDEIS provided examples of considerations that are not to be analyzed under SEPA, as defined in WAC 197-11-448(3), including: method of financing proposals, economic competition, profits and personal income and wages, and social

policy analysis. Further, monetary costs and benefits are not to be analyzed (WAC 197-11-450).

However, in order to provide greater detail regarding the potential economic impacts to Tumwater from the proposed project, an analysis of retail spending by sector was included in the Updated Economic and Fiscal Analysis prepared for this SFEIS. Errors in the calculation of gross retail sales as a function of taxable retail sales have been acknowledged, discussed and remedied in the Updated Economic and Fiscal Analysis (see the Updated Economic and Fiscal Analysis in **Appendix A** and the summary in **Section 1.5.10** of this document).

4. The Economic and Fiscal Analysis in the SDEIS established a tight retail trade area, defined as only the City of Tumwater, for the purpose of conducting a very conservative analysis. Narrowly defining the trade area did not “bias” EIS findings as this comment suggests. Narrow definition of a trade area will actually tend to understate potential retail sales at a proposed store, because the smaller trade area will understate the number of households within the area and potential retail spending by those households.

In response to this comment, however, a broader though still-conservative trade area was drawn to reflect the likely origins of shoppers at a proposed Wal-Mart store in Tumwater (see the Updated Economic and Fiscal Analysis in **Appendix A**, and the summary in **Section 1.5.10** of SFEIS for details).

5. The Updated Economic and Fiscal Analysis in this SFEIS indicates that retail spending growth in the Tumwater area, based on household growth anticipated by the Thurston Regional Planning Council, would significantly exceed anticipated retail sales at the proposed Wal-Mart Supercenter (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details). Accordingly, the conclusion that existing grocery retail sales would be displaced by a Wal-Mart Supercenter is unfounded.

It should be noted that the Lacy Wal-Mart Supercenter referenced in this comment will serve a different part of Thurston County than the proposed Tumwater store (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for a discussion of each store’s distinct trade area).

6. As a SEPA matter, competition is not a factor to be evaluated in an EIS. Further, retail competition in and of itself may not be considered a negative economic impact. Rather, retail competition could be considered the normal function of a market economy (also see the response to Comment 3 in this letter for a discussion of SEPA versus non-SEPA issues).

The assertion that Mega Foods and Albertson’s grocery stores would necessarily close as a result of a Wal-Mart Supercenter is based on a flawed analysis of retail spending depth in Tumwater. The analysis by the commenter is based on the same small retail trade area for which the commenter criticizes the Economic and Fiscal Analysis in the SDEIS. The analysis by the commenter also failed to address anticipated household spending growth within the trade area, which was taken into account in the Updated Fiscal and Economic Analysis prepared for this SFEIS (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details)

The Updated Economic and Fiscal Analysis acknowledges that store closures have occurred after the opening of a Wal-Mart Supercenter, specifically in Lacey, Washington. However, as described in the updated analysis, within weeks of the closure a new grocery retail competitor subleased the retail space and was operational in the Fall of 2006.

Regarding the Chehalis and Centralia Wal-Mart stores and their impacts upon commerce in those two communities, both locations are outside of the Tumwater trade area, neither are suburban locations, and both likely have very different economies and population growth as a result. They are, therefore, not necessarily relevant to the economic effects of a Wal-Mart Supercenter in Tumwater.

7. See the responses to Comments 3 and 6 in this letter. This comment fails to consider anticipated household and retail spending growth in the Tumwater area, and also ignores the fact that the Southgate Shopping Center is a highly-visible retail center located along Capital Boulevard just north of the busy intersection of 54th Avenue SW/Interstate 5/Trosper Road SW. It, therefore, is not anticipated that this retail center, located in a rapidly growing part of Thurston County, would fall into decay.
8. The SDEIS analysis did not assume that no displacement of existing retails uses in the City could occur as a result of the proposed development. The SDEIS analysis acknowledged the potential for competition, but documented that household and spending growth in the Tumwater area would likely absorb or mitigate such pressure.

The SDEIS analysis results were based on the finding that if business revenue or employment losses do occur after the proposed Wal-Mart Supercenter opens in Tumwater, growth in area population and retail spending would render those losses short-lived (if they occur at all) due to growth in retail sales to serve the population growth. Therefore, the analysis concluded that net tax revenues generated by the proposed Wal-Mart Supercenter operations should not differ significantly from tax revenues on gross business revenues due to the growing local retail environment.

The Updated Economic and Fiscal Analysis elaborates on this point, and finds that new population and spending would significantly exceed potential retail sales at the proposed Wal-Mart Supercenter (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details). Fiscal impacts to the City of Tumwater would be expected to be positive.

9. As a SEPA matter, issues of wages are not considered a factor to be addressed in an EIS (see the response to Comment 3 in this letter). However, the hourly wage for employees of the proposed Wal-Mart Supercenter are expected to average \$10.10, compared to the Thurston County average retail wage of \$10.84. Although 7 percent lower, as would be expected of a discount retailer, the average wage would be competitive with the County average. Accordingly, the proposed development would not be expected to result in negative impacts on Tumwater wages. Also, see the response to Comments 8 in this letter for an explanation of the likely small difference between gross and net economic and fiscal impacts in a growing retail trade area (additional details and discussion are provided in Section IV of the Updated Economic and Fiscal Analysis in **Appendix A** to this SFEIS).

10. See the response to Comment 9 in this letter.
11. Your comments are noted for the record. See the response to Comment 9 in this letter. The assertion of a dishonest analysis in the SDEIS Economic and Fiscal Analysis is unfounded. The inadvertent error in calculating gross retail sales in the SDEIS analysis has been acknowledged and remedied in the Updated Economic and Fiscal Analysis prepared for this SFEIS (additional details and discussion are provided in Section IV of the Updated Economic and Fiscal Analysis in **Appendix A** to this SFEIS).
12. The assertion that the SDEIS Economic and Fiscal Analysis ignored salient factors that are relevant and germane to the analysis appears to be largely based on a misunderstanding of factors considered within the scope of SEPA. Please see the responses to Comments 3, 6, 7 and 9 in this letter.
13. Your comment is noted for the record. Please see the responses to Comments 3, 6, 7, 9 and 11 in this letter.
14. The conclusion that urban decay and physical deterioration would occur in Tumwater as a result of a Wal-Mart Supercenter is unfounded and does not account for actual retail development conditions. The proposed retail store would not be expected to result in urban decay in Tumwater or at any other location. As documented in the Updated Economic and Fiscal Analysis, local commercial real estate professionals with substantial experience in Tumwater and Lacey agree that few, if any, negative economic impacts or property impacts would be expected with development of the proposed store (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).

The Updated Economic and Fiscal Analysis demonstrates that total retail sales expected at the proposed Wal-Mart Supercenter would be more than outweighed by retail spending growth as a result of the robust population growth anticipated in the Tumwater area in the short-term. Accordingly, it is unreasonable to conclude that any real estate property in the area would deteriorate and decay.

15. Your comments are noted for the record. Considerable detail was included in the Tumwater Retail Store SDEIS regarding the proposed retention/replacement of trees. The tree retention regulations defined in Tumwater Municipal Code 16.08 were described on SDEIS pages 3.3-1 and 3.3-2. The proposed retention/replacement of trees with development of the Tumwater retail store were detailed on SDEIS pages 3.3-2 and 3.3-3. Based on the provisions in TMC 16.08.070(R), the Proposed Action would be required to retain 246 trees onsite (based on a corrected site area of 20.5 acres; see **Section 1.1.1** of this SFEIS for details). As described on SDEIS page 3.3-3, if approved by the City Code Administrator, the regulations allow that fewer trees may be preserved onsite, and the remainder replaced onsite and/or replaced/funded offsite at a ratio of 3:1. The applicant has indicated that strict compliance with TMC 16.08.070(R) would make reasonable use of the property impracticable. Therefore, as noted on SDEIS pages iv, S-40, 3.3-3, and 3.6-12, the applicant proposes that a waiver be granted by the Code Administrator for the balance of the trees not retained under the proposal.

In response to this and other comments on the SDEIS regarding the proposed site plan (including the proposed retention/replacement of trees), three new alternatives were included in this SFEIS: Alternatives 2, 3 and 4 (see **Chapter 1** of this SFEIS for

descriptions and analyses of these new alternatives). Updates to the Proposed Action and Alternative 1, including proposed tree retention, are also described in **Chapter 1**.

The purpose of an EIS is to reduce potential impacts of the proposal and alternatives. The new alternatives would be consistent with SEPA, which requires that EIS alternatives attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation (WAC 197-11-440(5)(b)). Among the applicant's objectives for the project are: to construct a retail supercenter that meets Wal-Mart's size and operational objectives, and to protect existing stands of significant trees onsite, to the extent feasible (see SDEIS page 2-8). Two of the new alternatives (Alternatives 3 and 4) would feature a smaller building and garden center area than the Proposed Action. All of the new alternatives (Alternatives 2, 3 and 4) would eliminate the lease lot and provide less parking than the Proposed Action. Varying configurations of Kingswood Drive were included in the alternatives. As shown in **Table 1-1**, more trees would be retained under Alternatives 1, 2, 3 and 4 (from 68 trees under Alternative 1 to 111 trees under Alternative 4) than under the Proposed Action (54 trees). Therefore, additional tree retention could be achieved under the alternatives. However, a waiver of the tree retention requirement would be required for all of the alternatives, similar to under the Proposed Action.

This SFEIS concludes that the proposed removal of trees would not represent a significant impact, given that: the site is already largely cleared; there are no critical areas or valuable wildlife habitat onsite; and, the site is surrounded by commercial uses and an intensive pattern of development. Therefore, with implementation of the proposed mitigation measures (identified on SDEIS page 3.3-5 and modified in **Chapter 1** of this SFEIS), no significant impacts based on tree removal would occur.

16. See the response to Comment 15 in this letter.
17. It is not the purpose of an EIS to determine if the tree retention waiver requirements have been met or are warranted. It is up to the City Code Administrator to determine whether the proposal meets the standards for a waiver. As described in the response to Comment 15 in this letter, additional tree retention could be achieved under the new EIS alternatives, as compared to the Proposed Action. Some tree retention would be possible under the Proposed Action and all of the alternatives (from 54 trees under the Proposed Action to 111 trees under Alternative 4).
18. It is acknowledged that the required tree retention waiver is not mentioned in SDEIS Chapter 2; however, the need for a waiver is noted in several other places in the SDEIS, including on pages: iv (the list of required permits and approvals), S-40, 3.3-3, and 3.6-12. See the response to Comment 17 in this letter.
19. The proposed tree retention waiver is discussed in several sections of the SDEIS (see the response to Comment 18 in this letter). However, the EIS is not required to present justification for the proposed waiver of the tree retention requirement; that will be provided in the application to the City to allow the proposed land clearing (pursuant to the application requirements described in TMC 16.08.050). Ultimately, the City Code Administrator will determine whether the requirements for a waiver in TMC 16.08.070(R) have been met.

The purpose of an EIS is to disclose probable significant impacts and inform decision-makers about reasonable alternatives and mitigation measures (WAC 197-11-400(2); see the response to Comment 15 in this letter for additional information on the purpose of an EIS). In this case the probable significant impacts relate to the clearing of trees. The direct impacts of the proposed clearing of trees are described on SDEIS pages 3.3-2 and 3.3-3; proposed mitigation measures are identified on page 3.3-5; and, any significant unavoidable adverse impacts are noted on pages 3.3-5 and 3.3-7. The potential indirect impacts of the tree clearing are also described in various other sections of the SDEIS (i.e. in Section 3.1, Earth related to the potential for clearing to result in erosion, in Section 3.2, Water Resources related to the potential for clearing to change drainage patterns, and in Section 3.8, Aesthetics/Light and Glare related to the potential for clearing to impact the aesthetic character of the site). The SDEIS concluded that with implementation of the proposed mitigation measures, no significant impacts would result to any of these environmental elements from the proposed clearing.

20. See the response to Comment 19 in this letter. As noted in the response to Comment 15 in this letter, TMC 16.080.070(R) does provide an alternative to retaining the required significant trees onsite. A waiver may be granted by the City Code Administrator for the balance of the trees not retained under the proposal if it is determined that strict compliance with TMC 16.08 would make reasonable use of the property impracticable. The Proposed Action and all of the alternatives call for a waiver to be granted. The Code Administrator will ultimately determine if the conditions of the waiver are met. The SEIS addresses the impacts of the proposed tree removal. Given that there are means to address the impacts of removing trees onsite (i.e., by retaining trees and planting additional trees onsite and planting/funding trees offsite), the SDEIS determined that the impact of removing the trees could be satisfactorily mitigated, and no significant unavoidable adverse impacts would be expected.
21. It is acknowledged that TMC 16.04.150(C) provides the means for the City to deny a permit or approval for a proposal on the basis of SEPA, so long as:
- 1) A finding is made that approving the proposal would result in probable significant adverse environmental impacts that are identified in a final EIS or final supplemental EIS;
 - 2) A finding is made that there are no reasonable mitigation measures capable of being accomplished that are sufficient to mitigate the identified impact; and,
 - 3) The denial is based on one or more policies identified in the Code section (including the policies in the Tree Protection ordinance).

The probable significant adverse impacts of the proposed clearing of trees onsite were described on SDEIS pages 3.3-2 and 3.3-3; proposed mitigation measures that are reasonable and capable of being accomplished were identified on page 3.3-5; and, any significant unavoidable adverse impacts were noted on pages 3.3-5 and 3.3-6. The SDEIS concluded that with implementation of the proposed mitigation measures, no significant impacts would result from the proposed tree clearing. The analysis in this SFEIS reaches the same conclusion (see **Chapter 1** for details)

Since the SDEIS and this SFEIS did not find that the proposed tree clearing would result in significant unavoidable adverse impacts, this would not be a basis for the city to deny a permit or approval.

22. The SDEIS lists the retention of 54 trees onsite as mitigation, in conjunction with a number of other mitigation measures, including the replacement of trees that are proposed to be removed at a 3:1 ratio, per the provisions in TMC 16.08.070(R). As indicated in Chapter 2 of this SFEIS, a total of 576 new trees are proposed to be planted onsite and planted/funded offsite.
23. The proposed waiver of the tree retention requirement is extensively discussed in the SDEIS and in this SFEIS (see the response to Comment 15 in this letter). The probable significant adverse impacts of removing 380 of the existing 434 trees onsite is also discussed in the SDEIS and updated in this SFEIS (see the response to Comment 19 in this letter). It is acknowledged that removal of existing trees onsite could impact the city's physical and aesthetic character to some degree. However, the SDEIS concluded, that no significant unavoidable adverse impacts would result from the removal of the trees on any elements of the environment, with implementation of the proposed mitigation measures. The removal of trees onsite was not discussed in the Noise and Air Quality sections of the SDEIS, because the impacts of the proposed tree removal on these elements were not anticipated to be significant. Per WAC 197-11-440(6)(a), an EIS is directed to analyze the probable significant impacts of a proposed project only. The proposal would not be expected to have probable significant impacts on energy; therefore, no analysis of this element was included in the SDEIS. SDEIS pages 3.6-2 through 3.6-5 discuss the relationship of the Proposed Action and Alternative 1 to the City of Tumwater Comprehensive Plan. The SDEIS concluded that the proposal would generally be consistent with the Comprehensive Plan.
24. Your comments are noted for the record. See the response to Comment 19 and 23 in this letter. SDEIS Figure 2-2 depicts existing site conditions, including the locations of evergreen and deciduous trees on the project site. Additional information on the types and number of trees onsite is provided in the Site Reconnaissance Report and the Tree Inventory/Forester's Report contained in Appendix F to the SDEIS.
25. Healthy versus unhealthy trees on site were determined by a qualified arborist using standard assessment methods. It is acknowledged that the Tree and Vegetation Protection Ordinance does not distinguish between healthy and unhealthy trees. It is also acknowledged that dead and dying trees can provide some environmental benefits (i.e. as wildlife habitat). However, retention of these unhealthy trees can result in negative impacts, including introducing diseases to otherwise healthy trees and presenting a safety risk from blowdown. The information on the number of healthy versus unhealthy trees onsite was presented in the SDEIS to better understand the condition of the vegetation onsite and was not used to reduce the number of trees required to be retained onsite.
26. See the response to Comment 19 in this letter.
27. The statement on SDEIS page 3.3-5 regarding future potential development on the project site was made in the context of the existing retail development in the site vicinity and the City's plans for future development in the area as expressed in the Comprehensive Plan. The site is located in an area that is characterized by large retail buildings and associated surface parking lots with easy access to a major transportation corridor (I-5). Costco and Fred Meyer are located to the north of the site, and Home Depot to the south of the site. The Littlerock Subarea Plan and the City of Tumwater

Comprehensive Plan envision a continuation of the trend of large-scale, auto-oriented development in the portion of the subarea to the north of Bishop Road, in which the site is located. Therefore, it is reasonable to assume that future development would likely follow this trend.

28. It is acknowledged that the City of Tumwater involved the community in developing a vision for the Littlerock Road Subarea, in which the project site is located. A number of meetings and workshops were held to solicit comments from the community on alternative plans for the subarea; a visioning survey was administered in July of 1996. The results of the meetings, workshops and visioning exercise indicated that there were differing opinions in the community about what a mixed use village is and whether it is appropriate for the Littlerock Road Subarea. Despite the differing opinions, a common vision for a number of key elements appeared to exist in the community. The strongest common vision related to provisions for roads, sidewalks, and open space. Maintaining existing trees and surrounding buildings with green areas also appeared to be very important to Tumwater residents. The strongest differences in opinions in the community related to the appropriateness of housing in the area (see the 1997 Littlerock Road Subarea Plan and FSEIS, page 10).

As described in the SDEIS Plans and Policies Section, page 3.6-6, the Subarea Plan is intended to serve as a guide for future development in the area, in keeping with the vision of the City of Tumwater Comprehensive Plan. The stated intent of the Comprehensive Plan for this area is to create a mixed use area with a “village” atmosphere. The subarea would be “transit-oriented, pedestrian friendly, safe, provide affordable housing and result in a well-designed community center.” The Subarea Plan was prepared to provide a specific description of how the subarea should be developed over the ensuing 20 years.

The Littlerock Road Subarea Plan describes several major features that should be incorporated into the subarea, and their particular locations, including mixed use areas, and general commercial areas. The plan directs that mixed use zoning should generally be located in the area south of Bishop Road (the project site is not located in this area). This zoning provides for a mix of commercial, residential and public uses in a pedestrian-friendly environment which supports full time use of facilities and businesses. The uses in this area are intended to promote a concentration of activity and encourage non-vehicular modes of transportation. The subarea plan directs that general commercial zoning should generally be located to the north of Bishop Road (the project site is located in this area). These areas include larger parcels that have direct vehicular access from the interstate, making them conducive to larger commercial developments. The subarea plan also indicates that the general commercial area should be subject to design guidelines, landscaping requirements, and dedication of open space. They should also be accessible from several directions and by several modes of transportation, and should provide a good visual transition into the adjacent mixed use and residential areas.

As indicated by the above, the subarea plan intends for the mixed use, village area to largely be located in the southern portion of the subarea, and the general commercial large-scale, more auto-oriented development to be located in the northern portion of the subarea. Certain village-type elements should be incorporated into the general commercial development.

The SDEIS (page 3.6-6) concluded that the project would be consistent with the direction and guidance of the Subarea Plan. The project would be integrated with adjacent existing retail uses, and would further the concentration of large-scale general retail operations in an area designated for such uses and in proximity to the freeway. The proposed project would provide pedestrian-oriented features to enhance access through the area and into the site. Proposed landscaping, signage and other design features are intended to create a visually-attractive setting and to allow an effective transition from the more intensive commercial area to the north and the residential area to the south in the subarea.

See SDEIS pages 3.6-7 through 3.6-11 for summaries of the design review guidelines that are relevant to the proposed project, and the relationship of the project to these guidelines. The SDEIS concluded that the project is intended to be consistent with these guidelines.

29. See the response to Comment 28 in this letter.
30. See the response to Comment 28 in this letter.
31. Your comments are noted for the record. See the response to Comment 28 in this letter.
32. As described on page 2-1 of the SDEIS, several environmental documents have been prepared in the past that are relevant to the proposed Tumwater retail store project. These include the Tumwater Town Center Draft and Final EISs (1993), the Kingswood Center EIS Addendum (2002), and the Littlerock Road Subarea Plan and Final Supplemental EIS (1997). Pursuant to WAC 197-11-630, the City adopted these documents for the Tumwater retail store proposal. "Adoption" means that an agency is using all or part of an existing environmental document to meet all or part of the agency's responsibilities under SEPA to prepare an EIS or other environmental document (WAC 197-11-708). Appendix A to the Littlerock Road Subarea Plan contains a summary of the results of the interviews and surveys with the key community leaders and the public at large on the Subarea Plan; Appendix B to the Subarea Plan contains a summary of the community visioning process for the subarea. As a result of adopting the Littlerock Road Subarea Plan, this information is part of the environmental documentation for the Tumwater retail store project.

The proposed design of the Tumwater retail store building is described on pages 2-10 and 3.8-2 of the SDEIS. Several features have been incorporated into the design of the proposed building to add interest and reduce the perceived scale of the building. The proposed building would be modulated across the main building facades. Recessed entry ways, awnings, varying rooflines, pilasters, changes in materials and colors, recesses are proposed. Exterior building materials would include: split-face concrete masonry units, simulated stucco in three earth-tone colors, and brick veneer in dark reds (see Figure 2-4 in the SDEIS for typical building elevations). These design features would be similar to, but with somewhat greater articulation than the adjacent Fred Meyer and Costco stores.

33. Your comments are noted for the record. See the responses to Comments 15 and 28 in this letter. It is acknowledged that an administrative modification to Tumwater Municipal Code Chapter 18.50.070 and TMC 18.50.080 is being requested to increase the allowed

number of parking spaces for the project (see the required permits and approvals on page iv of the SDEIS). Since publication of the SDEIS, the parking supply has been reduced under the Proposed Action to 1,063 spaces (versus the 1,138 spaces in the SDEIS) in order to provide more area for landscaping and tree retention/replacement and to improve the ingress/egress for customer vehicles and truck circulation onsite (see **Section 1.1.3** of this SFEIS for details). Alternatives 1, 2, 3 and 4 would provide less parking than the Proposed Action (from 961 spaces to 1,057 spaces). A parking supply analysis was prepared for this SFEIS and demonstrates that the proposed parking rate would generally be within the range of peak parking demand for a weekday peak period in December. In addition, the parking supply would be adequate to accommodate the peak non-seasonal demands for the weekday and Saturday conditions (see **Appendix B** and **Section 1.5.11** for details). Ultimately, the City Code Administrator would determine whether to grant the parking modification.

34. See the response to Comment 11 in this letter.
35. As described in the SDEIS Water Resources section on pages 3.2-2 and 3.2-3, proposed construction activities would disturb onsite soils and temporarily increase the potential for soil erosion. Without mitigation, surface water runoff during construction could transport eroded soils to nearby roads and the City's drainage system, and ultimately natural receiving waters. During construction, temporary erosion and sediment control (TESC) best management practices (BMPs) and a Stormwater Pollution Prevention Plan (SWPPP) would be implemented. A permanent stormwater control system would also be constructed. No flooding or erosion problems are known to exist within ¼ mile downstream of the site that would be exacerbated by operation of the proposed stormwater control system. As described on SDEIS page 3.2-4, the proposed development would be designed to prevent chemical and biological contaminants from entering groundwater and aquifers beneath the site. Proposed development would not affect drinking wells in the site vicinity, because the shallow groundwater flow direction from the site is generally away from existing wells and the project would adhere to applicable code requirements related to aquifer protection. Therefore, the SDEIS concluded that with implementation of the proposed mitigation measures (identified on page 3.2-5 of the SDEIS), no significant unavoidable adverse impacts to surface or groundwater resources would be expected.
36. See the response to Comment 32 in this letter. The proposed retention of 54 of the existing trees onsite, together with the planting of an additional 393 trees onsite and planting/funding of 183 trees offsite, would mitigate the impacts of clearing. The new alternatives analyzed in this SFEIS would increase the number of trees that would be retained and replanted, and buffer/landscaping that would be provided onsite, relative to the Proposed Action (see **Chapter 1** of this SFEIS for details).
37. Your comments are noted for the record. See the responses to Comments 28 and 32 in this letter. See the SDEIS Plans and Policies section, pages 3.6-2 through 3.6-4 for a summary of the goals, policies and objectives of the City of Tumwater Comprehensive Plan and the relationship of the proposal to these goals/policies/objectives. See pages 3.6-6 and 3.6-7 of the SDEIS for a summary of the intent and allowed uses in the General Commercial (GC) zone and the relationship of the proposal to the intent/allowed uses. For the reasons cited in this section, the SDEIS concluded that the proposal would be consistent with the Comprehensive Plan provisions and zoning classification of

the site.

The proposed retail store would be consistent with the existing uses to the north and south in the immediate site area (i.e. Home Depot, Costco and Fred Meyer). SDEIS page 3.5-7 discussed the potential for the proposed retail store to impact the existing residential areas to the south, northwest and east. The SDEIS indicated that the building size and activity level of the proposal would be greater than these residential uses. However, the project site is separated from the residential uses to the south by the approximately 300-foot wide intervening commercially-zoned parcel and the existing Home Depot center. The residential uses to the northwest, which are approximately 500 feet from the site, would be separated from the site by the intervening Costco and Littlerock Road. The residential uses to the east are separated from the site by Albany International, Tye Drive and I-5. The SDEIS concluded that considering the distance, and the intervening uses and transportation corridors between the site and existing residential uses in the vicinity, significant land use impacts to residential uses from the proposed commercial use would not be anticipated.

38. Your comments are noted for the record. See the responses to Comments 28 and 37 in this letter.
39. Your comments are noted for the record. See the response to Comment 28 in this letter.
40. The list of pipeline projects used in the SDEIS Transportation Analysis was provided by City of Tumwater Public Works Department staff, and was reviewed and approved by the City's transportation consultant. The specific pipeline projects were listed on page 12 of the analysis (see Appendix I to the SDEIS). Figure 4 in Appendix I to the SDEIS displayed the cumulative summary of pipeline traffic volumes for the PM peak hour. In addition to the nine pipeline projects, an annual growth rate of 3 percent was applied to existing traffic volumes to provide a potentially conservative (high) estimate of future baseline traffic (traffic in 2007 without the proposed project). The trip generation, distribution, and assignment for the respective pipeline projects was obtained from transportation analyses prepared for the projects or from the City. The technique used to forecast future traffic conditions in the SDEIS Transportation Analysis is consistent with the methodology used by the City on other transportation analyses for proposed development projects.
41. The trip distribution and assignment used in the SDEIS Transportation Analysis was determined in conjunction with the City of Tumwater Public Works Department staff, and was reviewed and approved by the City's transportation consultant. Approximately 38 percent of the project traffic traveling to and from the north was assigned to Tye Drive, because this roadway would provide direct access between the site and I-5. Project traffic traveling to and from the north using Littlerock Road, on the other hand, would need to pass through two traffic signals; thus, this route would not be as desirable as Tye Drive. The Updated Transportation Analysis prepared for this SFEIS (see **Appendix B** and the summary in **Section 1.5.11** of this document) includes information on Tye Drive's roadway characteristics.
42. As indicated in the response to Comment 41 in this letter, the trip distribution assumed in the SDEIS Transportation Analysis was determined in conjunction with the City of Tumwater Public Works Department staff, and was reviewed and approved by the City's

transportation consultant. The distribution assumed for the analysis was based on traffic information developed for the Home Depot store, located immediately south of the project site. The SDEIS Transportation Analysis assumed that approximately 35 percent of the project traffic would travel to/from the south. Based on existing counts, and traffic volumes to and from all of the access points to commercial development along Littlerock Road within the study area, a total of 40 percent of the traffic is estimated to travel to and from the south. Given the proposed improvements identified at the SB I-5 ramps to be implemented by the applicant (see Appendix I to the SDEIS for details), the minor shift in traffic to the north was determined to be appropriate and inconsequential in terms of transportation impacts.

43. As indicated in the response to Comment 41 in this letter, the trip distribution and assignment used in the SDEIS transportation analysis was determined in conjunction with the City of Tumwater Public Works Department staff, and was reviewed and approved by the City's transportation consultant (see the response to Comment 42 in this letter for additional information on trip distribution). The LOS analysis and mitigation requirements applied to the study area intersections, including the intersections of Trospen Road/Littlerock Road and Israel Road/Littlerock Road, are consistent with City of Tumwater standards. City of Tumwater's LOS criteria and standards do not require the consideration of a reserve capacity. The project's responsibility would be to mitigate for conditions exceeding the LOS standard. The mitigation proposed at the intersection of Trospen Road/Littlerock Road was identified through a detailed queuing assessment and review of the corridor operations using VISSIM. This model provides for a more detailed review of corridor operations. Since the queuing estimates are based on the results of the VISSIM model and the delay calculations based on the City's standard analysis using the Highway Capacity Manual methodologies, minor differences in the results may occur.

It is acknowledged that with the proposed project the delay at the Trospen Road/Littlerock Road intersection would increase; however, the LOS D at this intersection in 2007 with the project would be considered acceptable (the City of Tumwater's level of service/concurrency standard is LOS D). As explained on page 44 of Appendix I to the SDEIS, the proposed mitigation at the Trospen Road/Littlerock Road intersection would improve overall traffic flows. Although overall intersection delay at the Trospen Road/Littlerock Road intersection may increase slightly with the proposed project, vehicle queuing would remain the same or improve with the proposed improvements at this intersection, as compared to the baseline condition in 2007 without the project. With the proposed improvements at this intersection, traffic staging and the overall operation at the Trospen Road/I-5 interchange would improve.

44. A detailed comparison of the weekday AM and PM peak hour traffic volumes along Littlerock Road and Trospen Road is provided in this SFEIS. The results of this analysis show that the combination of existing plus project traffic would be higher in the weekday PM peak hour than during the weekday AM peak hour or during the school peak hour. An analysis was also conducted for this SFEIS at the school access points and the Kingswood intersection during the school afternoon peak egress times. The results of this analysis indicate that during the peak school egress times, the school access points and roundabout at Kingswood Drive would continue to operate at acceptable levels with the addition of the project-related traffic (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details).

45. The parking area to the south of Kingswood Drive under the Proposed Action (and Alternative 3) is primarily intended to be used by employees and as overflow parking (i.e. during the holiday season). It is acknowledged that there could be some safety issues for pedestrians crossing the parking lot; however, these impacts would not be expected to be significant. Once outside the parking area, the sidewalks along Kingswood Drive and the Kingswood Drive crossing would help minimize pedestrian/vehicular conflicts.
46. The potential traffic safety impacts for pedestrians crossing Kingswood Drive under the Proposed Action were discussed in the SDEIS on page 3.9-18. The following mitigation measure has been added to this SFEIS to address this potential traffic safety impact:
- *The following elements could be included in the design of the Kingswood Drive to improve pedestrian crossing safety: roadway signage and pavement treatments; holiday traffic control, such as traffic control personnel at key onsite vehicle intersections or pedestrian crossings; crosswalk lighting (overhead lighting or in-pavement lights); and, a pedestrian refuge area, such as a median island in Kingswood Drive.*
47. The roundabout shown on the proposed site plan at the intersection of Littlerock Road/Kingswood Drive is included in the City's plans for improvements to the Littlerock Road corridor. The roundabout is being designed by the City and will conform to current state and federal standards. The roundabout will include pedestrian facilities consistent with these standards, which includes sidewalks and marked crossings. The addition of a fourth leg to the intersection, given the proximity of the middle school and the interaction with the proposed retail store, is not expected to significantly increase the pedestrian demand across Littlerock Road or result in significant impacts.
48. Your comments are noted for the record. SDEIS Section 3.2, Water Resources, indicated that the depth of groundwater beneath the site occurred at elevations between 160.74 feet to 164.76 feet above mean sea level (MSL). Additional groundwater measurements were taken in February 2006 and found the depth of groundwater at elevations between 167.68 feet to 168.76 feet above MSL. The average groundwater depths across the site for the year studied were 161.5 feet to 165 feet. Only the measurements taken in February exceeded these averages. The proposed stormwater control infiltration vaults would be excavated to depth elevations ranging between 169.5 to 170.0 feet MSL. Therefore, the approximate separation distance between the shallow groundwater table and the bottom of the infiltration facilities would be at least 3.24 feet above the highest groundwater measurement taken. This separation would be adequate to protect the groundwater aquifer, per the standards in TMC 16.24, TMC 16.26 and TMC 18.39, and the City of Tumwater's Drainage Design and Erosion Control Manual for the Thurston Region (1994), as amended, and the North Thurston County Groundwater Plan (1991), as amended (Kleinfelder, Inc., 1995). According to geotechnical investigation conducted onsite in 2004, onsite soils are suitable for infiltration (see Appendix C to the SDEIS for details about onsite soils). The City determined that no further analysis, including a groundwater mounding analysis, is required for the proposed system.
49. The direction of groundwater flow beneath the site is toward the north/northeast (see Figures 1, 2 and 3 in Appendix E to the SDEIS). Therefore, proposed infiltration of stormwater would not exacerbate flooding problems in the south portion of the Littlerock

Road Subarea.

50. The SDEIS identified all domestic water wells located within ½ mile of the site that were registered with the County or State; other unregistered wells may also be located in this area. The SDEIS indicated on page 3.2-3 that proposed development of the site would not affect drinking wells within the ½ mile radius (nor at a greater distance), because the shallow groundwater flow is generally away from these wells. The project's adherence to applicable code requirements related to groundwater protection, which include those listed in TMC 16.24, TMC 16.26 and TMC 18.39, would also protect groundwater quality in the area, and in turn drinking water wells. In particular, the proposed stormwater control system would be designed and constructed in accordance with the requirements of the City of Tumwater's Drainage Design and Erosion Control Manual for the Thurston Region (1994), as amended (see Appendices D and E to the SDEIS for further information).
51. The proposed project would comply with all applicable code requirements regarding the onsite storage of chemicals and the proper disposal of stormwater runoff. The proposed stormwater control system would be designed and constructed in accordance with the requirements of the City of Tumwater's Drainage Design and Erosion Control Manual for the Thurston Region (1994), as amended. The system would include water quality treatment infiltration vaults. A separate onsite water quality treatment facility would be provided in the gas station canopy area. Any accidental spills of hazardous materials during operation of the project would be addressed by a Spill Prevention and Control Countermeasure Plan. With implementation of the mitigation measures listed on page 3.2-5 of the SDEIS, no significant impacts to surface or groundwater resources would be expected with operation of the proposed project.
52. The open space requirements of Tumwater Municipal Code Ch. 17.12 apply only to commercial subdivisions. At this point, a short subdivision is proposed for the Proposed Action and Alternative 2 (see the list of permits and approvals on SDEIS page iv). For those alternatives that do not include the future lease lot (new Alternatives 2, 3 and 4), Ch. 17.12 does not apply, because no subdivision would be required. For those alternatives that include the lease lot (the Proposed Action and Alternative 1), either (1) the open space requirements would be met through a combination of onsite open space and cash payment, pursuant to the provisions of TMC 17.12.210.F, or (2) a lot boundary adjustment would be used in lieu of a short plat, in which case Ch. 17.12 would not apply.
53. The determination that there are no wetlands onsite was based upon a site reconnaissance performed in November 2004 by Talasaea Consultants. They examined the potential wetland area shown on the County's data base, per the City's required methodology, and found it to be a closed depression that did not present the necessary combination of wetland hydrology, soils and vegetation to be considered a wetland (see Appendix F to the SDEIS for details).
54. In response to this and other comments on the SDEIS, three new EIS alternatives are analyzed in this SFEIS: Alternative 2 – same size retail store as the Proposed Action, realignment of Kingswood Drive, no future lease lot; Alternative 3 – smaller retail store than the Proposed Action, no realignment of Kingswood Drive, no future lease lot; and Alternative 4 – smaller retail store than the Proposed Action, realignment of Kingswood

Drive, no future lease lot. Per WAC 197-11-440(5)(b), “reasonable alternatives include actions that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation. The applicant’s objectives for the Tumwater retail store are listed on page 2-8 of the SDEIS. These objectives include constructing “a retail supercenter that meets Wal-Mart’s size and operational objectives,” creating “an economically viable retail store,” and “providing sufficient parking to accommodate the store size and likely community demand.” The new alternatives would meet the applicant’s objectives for the retail store, while potentially reducing environmental impacts relative to the Proposed Action (i.e. there would be some reductions in impacts to existing vegetation and traffic operation). See Chapter 2 of this SFEIS for descriptions and analyses of the impacts of these alternatives.

55. Your comments are noted for the record.

RESPONSE TO LETTER 5
Partlow, Nancy

1. Your comments are noted for the record. Per WAC 197-11-440(6)(a), an EIS is directed to analyze significant impacts of alternatives, including the proposed action, and discuss reasonable mitigation measure that would significantly mitigate these impacts.

The probable significant impacts of the Tumwater retail store proposal on surrounding land uses were analyzed on pages 3.5-6 and 3.5-7 of the SDEIS. The relationship of the proposal to existing residential uses, the middle school and cemeteries are discussed in this section. The SDEIS concluded that considering the distance, intervening uses and transportation corridors between the site and these existing uses, significant land use impacts from the proposed development would not be anticipated. The historic status of the Bush/Union/Pioneer Calvary Cemetery, across Littlerock Road to the west of the site, was noted on page 3.5-2 of the SDEIS. The proposed project would not impact the historic status of the cemetery.

The probable significant impacts of the Tumwater retail store proposal on the area transportation system, including Littlerock Road, were evaluated on pages 3.9-9 through 3.9-20 of the SDEIS. The SDEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.9-22 through 3.9-25 of the SDEIS, no significant impacts to the transportation system would be expected from the proposed development (see Appendix I to the SDEIS for details). The Updated Transportation Analysis prepared for this SFEIS also determined that the proposal would not result in significant impact to the transportation system with implementation of the SDEIS mitigation measures and the additional mitigation measures listed in **Section 1.5.11** of this SFEIS (see **Appendix B** to this SFEIS for details).

The probable significant impacts of the Tumwater retail store proposal on the Tumwater economy were analyzed on pages 3.7-5 through 3.7-11 of the SDEIS (see Appendix H to the SDEIS for details). The Tumwater Economic and Fiscal Analysis was updated for this SFEIS to address comments on the SDEIS. Both the SDEIS and SFEIS analyses concluded that the proposed project would not result in significant adverse impacts to the Tumwater economy (see **Appendix A** to this SFEIS for details)

2. Your comments are noted for the record. The project site is not listed on the National, State or City of Tumwater Registers of Historic places.
3. Your comments are noted for the record.

Noise measurements were collected on a mild, summer day, with winds below 10 MPH. Conditions of dry pavement and low wind speeds are required in order to collect accurate traffic noise measurements, as directed by WAC 173-58-040.

Field-measured noise values are typically only used for calibration and validation of the noise model. Notes and observations in the field were used to construct the model of the site vicinity, which factored in various features in the site area. Initial estimates of the ground types (e.g., pavement, soft ground, and field grass) and shielding (e.g., building row density, vegetation and terrain lines) were made while noise measurements were

collected in the field. Traffic counts were also taken at the same time as the noise measurements, documenting the number of heavy trucks, medium trucks and light duty vehicles passing the measurement locations during the 15-minute period that each noise measurement was taken.

In order for the model to be considered accurate, the existing sound levels calculated by the model must be within 2 dBA of the field measured sound levels after adjustment factors (based on the standard operating procedures for the model, as adopted by Washington State Department of Transportation and the Federal Highway Administration), such as ground type and topography have been applied and shielding objects have been included. After the model is found to be accurate, the AM and/or PM peak hour traffic of the existing year is run to determine the actual baseline conditions. For this project, the field measured free flowing traffic was found to contribute noise levels of 60 to 63 dBA.

In addition, as stated in the SDEIS Noise Analysis, noise levels were modeled with a number of assumptions in order to present the potential “worst case scenario”. Some of these assumptions include:

- Overall study area of future noise levels was assumed to be pavement;
- Highest PM peak hour traffic volumes were used on roadways in the site vicinity; and,
- Tree and vegetation communities were not included in the model.

See **Appendix C** and **Section 1.5.12** of this SFEIS for details.

4. The SDEIS Noise Analysis considered Littlerock Road the dominant noise source, because at any given receiver, when traffic passes along Littlerock Road, background noise sources are diminished and the noise levels at the receiver locations increase by more than 10 dBA (considered twice as “loud”) and decrease with the passing of traffic along this roadway. When noise along Littlerock Road diminishes, background noise, such as that from I-5 becomes the loudest noise source. That Littlerock Road is considered the dominant noise source in the Noise Analysis does not mean that background noise sources are not perceived as “loud” by residents in the area, however.
5. Traffic noise from the proposed retail store would not be regulated by any federal or state noise statues. Although the store would remain open 24 hours a day, project traffic, and its associated noise, would represent only a portion of the overall traffic noise on roadways in the site vicinity during the holiday season AM and PM peak travel periods.

The City of Tumwater will conduct a full traffic noise evaluation, in accordance with state and federal guidelines, before initiating any roadway or intersection improvements on Littlerock Road. The City’s noise impact study will predict noise levels through the roadway project design year (typically 25 to 30 years), and will include appropriate mitigation, if necessary. Traffic noise from the proposed project will be included in this analysis.

6. Your comments are noted for the record. The southeastern-most residence within the mobile home park, to the west of the cemetery, is located at a distance of more than 900

feet from Littlerock Road. Noise from the additional traffic from the proposal along Littlerock Road is not expected to be perceivable at this distance. Other noises associated with the proposed project are considered environmental noise, which is regulated under Washington State Department of Ecology (Ecology) noise regulations as defined in Washington Administrative Code (WAC) 173-60. Based on the noise measurements collected at a similar retail facility in July 2005, no significant operational noise impacts would result at receivers in the vicinity from the operation of compressors, HVAC units, loading or unloading trucks, or garbage compactors at the site. Although these noises could transmit to nearby receivers, and could be perceived by local residents, the noise levels would not exceed background noise levels or Ecology regulatory daytime noise thresholds (see Table 4 in Appendix K to the SDEIS for these regulations). Noise levels also would occur for far shorter periods than the Ecology provisions for nighttime hours (see Section 3.2.1 in Appendix K to the SDEIS).

7. Forklifts could be used at the proposed garden center. However, noise levels from operation of this equipment would not be expected to exceed background noise levels or Ecology regulatory daytime noise thresholds. See the response to Comment 6 in this letter.
8. Parking lot sweepers could be used at night in the project parking lots. However, noise levels from operation of this equipment would not be expected to exceed Ecology provisions for nighttime hours. See the response to Comment 6 in this letter.
9. A number of factors would contribute to the amount of noise (if any) heard at adjacent receivers, including: whether the auto service garage bay doors are opened or closed; the number and distribution of cars parked within the lots; and, the traffic along Littlerock Road. Excluding all of the above mentioned shielding sources that may reduce the noise from the tire store, air wrenches are expected to generate noise at from 81 to 90 dBA at 50 feet. Extrapolating the known decrease of noise over hard pavement, air wrench noise would be reduced to 60 to 68 dBA at 500 feet from the tire store, and 57 to 66 dBA at 800 feet from the store. Because the tire store is expected to operate between the hours of 7:00 AM and 8:00 PM, seven days per week, the short bursts of noise would not violate the Environmental Noise Regulation outlined in WAC 173-040, and discussed in the Noise Analysis, and no significant noise impacts would be expected (see Appendix K to the SDEIS).
10. The tire store is expected to operate between the hours of 7:00 AM and 8:00 PM, seven days per week.
11. Outdoor intercoms could be used at the project, including at the drive-through pharmacy. However, noise levels from operation of this equipment would not be expected to exceed background noise levels or Ecology regulatory daytime noise thresholds. See the response to Comment 6 in this letter.
12. There is no methodology for predicting noise levels from unexpected or variable noise sources, such as car stereos or RV generators. Complaints from City residents about nuisance noise, whether emitted from a Wal-Mart parking lot, a gas station, or a next door neighbor, would be responded to by City of Tumwater Police Department.

The citation in the Littlerock Road Subarea Plan Final EIS refers to the desire for 18-hour a day activity in the subarea. There is no requirement that activity be limited to 18 hours each day in the Subarea Plan or elsewhere in City of Tumwater regulations.

13. While the proposed parking lot boundary would be across the street from the cemetery, the proposed retail store would be located 500-600 feet away from the referenced receivers at the commercial property and cemetery. The dominant noise source would continue to be Littlerock Road. The parking area in the southern portion of the site would minimally contribute to the dominant noise source at the cemetery (Littlerock Road). Parking lot noise can range from 60 to 63 dBA at 50 feet during the activities of starting a car and opening and closing doors. These noise levels are at or below the noise levels along Littlerock Road. In addition, any parking lot noise of this level would need to occur at the spaces closest to the roadway, for this level of noise to transmit to the cemetery. Even at this distance, Littlerock Road and any parking lot noise occurring at the cemetery would be "louder" than parking lot activities from the proposed retail store. Therefore, noise from the proposed project would not be expected to impact the cemetery.

The multifamily development to the south would be separated from proposed development on the site by the approximately 300-foot wide intervening commercially-zoned parcel adjacent to Littlerock Road and the existing Home Depot center (the parking lot onsite would be the closest proposed use to this residential area). As described on page 3.11-9 of the SDEIS, with traffic from the Proposed Action, noise levels at the receiver located in the multifamily development would not be predicted to increase over the 2007 baseline condition without the project. This is because traffic volumes and lane configurations on Littlerock Road would be similar, and distances to the receiver would be great enough that any differences in noise levels between the 2007 baseline and 2007 with project traffic conditions would be imperceptible. Similarly, significant impacts to residential receivers from operational noise from the proposal would not result, even during the nighttime hours. The brief frequency of these noise levels would be within the noise limitations for Class A and Class B Environmental Designation for Noise Abatement (EDNAs) for daytime noise, would be below background noise levels, and would occur for periods that would be less than Ecology provisions during the nighttime hours (see Appendix K to the SDEIS for details)

14. The existing noise levels measured, and predicted with the noise model, along Littlerock Road and within the site vicinity, ranged from 58 to 63 dBA. The traffic immediately north and south of the Costco Driveway/Littlerock Road intersection (where cars would be accelerating and decelerating from the intersection) was predicted to increase approximately 3 dBA at all receivers. This average increase is typical for the receivers along the entire Littlerock Road corridor, mainly due to the expected traffic growth within the area, as demonstrated by the 2007 baseline traffic noise results (see Appendix K to the SDEIS for details).

With the installation of a roundabout at the Kingswood Drive/Littlerock Road intersection, residents in the area may experience a greater noise increase, because of the decelerating and accelerating required to negotiate the roundabout. This increase has the potential to exceed the noise abatement criteria of 66 dBA for residential receivers. As described in the response to Comment 5 in this letter, the City of Tumwater will be responsible for completing a full noise impact evaluation in accordance with state and

federal guidelines before initiating any roadway or intersection improvements on Littlerock Road.

15. With traffic from Alternative 1, a 1 to 3 dBA increase could be expected if a traffic control device were to be installed adjacent to the south end of the site. A similar noise increase could be expected with the installation of a roundabout. This increase may or may not be noticeable at the front entrance of the school. However, classrooms, and common areas facing east would not be affected by that level of noise increase.
16. Although the aerial photo in the SDEIS may not depict the most current conditions, noise measurements were taken during a period when the easement was cleared. For the noise modeling of future conditions with the proposed retail store in place, the entire site area was assumed to be covered by pavement, as a “worse case” scenario.
17. In order for vegetation to provide noise abatement that can be distinguished by the human ear, a minimum 100-foot dense stand of trees is required. For this reason, vegetation and plantings are almost never used for noise mitigation, and were not proposed for noise control in the SDEIS. Various trees and shrubs that remove the noise source from the line of site can produce a psychological noise reduction for the receiver, however.
18. Although construction noise can be irritating, the City of Tumwater and the Washington Administrative Code provide exemptions for construction noise. The proposed project would be required to fully comply with allowable noise levels and the permitted hours of construction as outlined in the TMC 8.08.
19. Although various noise levels and noise sources are regulated by local, state and federal agencies, vibration is not. The noise analysis for the Wal-Mart facility did not evaluate vibration from construction activities, because typical construction activities, including earth compaction, have been found to fall well below the threshold to cause any structural damage to adjacent buildings.
20. Your comment is noted for the record. See the response to Comment 19 in this letter.
21. Your comment is noted for the record. The aerial photo used to show the noise measurement/receiver locations was the most current and best quality available at the time of the SDEIS preparation. The Noise Analysis consultants researched other resources, specifically Google Earth; however, the images were found to be of much poorer quality.
22. Receiver 5 was verified to be located approximately 0.3 mile from the proposed store location. The distance to the current Kingswood Drive is approximately 800 feet. If Kingswood Drive were to be relocated, the apartments adjacent to the south entrance of Home Depot would be located approximately 150 feet from Kingswood Drive.
23. Despite the fact that Littlerock Road may be moved closer to the Big Rock Medical Center with the City’s proposed improvements to the roadway, these types of medical facilities are considered commercial establishments (because no one sleeps within the buildings), and the associated noise impact criteria is 72 dBA. Changes in the alignment or roadway configuration of Littlerock Road would not be expected to approach or

exceed this noise level.

24. As discussed on page 3.9-10 of the SEIS and described in greater detail in Appendix I to the SDEIS, the forecasted trip generation was based on trip generation data collected at other similar free-standing discount superstores in the northwestern U.S. Trip distribution was based on current population centers and was confirmed by City of Tumwater Public Works staff, and reviewed and approved by the City's transportation consultant. While the ITE Trip Generation Manual is used by the City for estimating project trip generation, the trip rates used in the SDEIS were based on local data that is actually higher than the ITE trip rates.
25. Your comments are noted for the record. The City has determined the SDEIS Noise Analysis was adequate, that the baseline condition was sufficiently conservative, and that no additional mitigation measures (beyond those identified on SDEIS pages 3.11-10 and 3.11-11) would be required. An Updated Noise Analysis was prepared for this EIS to: clarify the methods used for the noise analysis and to address the new alternatives - Alternatives 2, 3 and 4 (see **Appendix C** and **Section 1.5.12** of this SFEIS for details).
26. As described on page 3.8-3 of the SDEIS, light from the project would be visible from the uses adjoining the site and could be visible from more distant uses, depending upon the type of light fixture that is used. Lighting on the site would appear as a continuation of the existing lighting pattern along the east side of Littlerock Road. It is uncertain whether the intensity of the proposed lighting would resemble that at Home Depot or Costco, since no measurements were taken at those stores. However, as described on page 3.8-3 of the SDEIS, the proposed lighting system would be designed to minimize impacts to offsite uses. Exterior lighting fixtures would be shielded to reduce light spillage and glare, and lighting would be directed away from adjacent less intense land uses, consistent with TMC 18.50. As modified in this SFEIS (see **Section 1.5.7**), the exterior lighting has also been designed to ensure that lighting at all property lines would not exceed 0.5 foot-candles, as requested by City of Tumwater. The SDEIS concluded that with the proposed mitigation measures listed on page 3.8-4, no significant lighting impacts would be anticipated from the proposal. This SFEIS reaches the same conclusion.
27. Lighting from the proposed project would not be expected to impact wildlife at the wetlands behind the Middle School or Trosper Lake, located approximately ¼ mile west of the project site, because lighting fixtures would be shielded and directed toward the proposed building and parking lot, and away from adjacent less intense land uses, consistent with TMC 18.50. The lighting fixtures located in the BPA power easement would be similar to those used throughout the parking lots.
28. Your comments are noted for the record. See the response to Comment 26 in this letter.
29. As modified in this SFEIS (see **Section 1.5.7**), the 0.5 foot-candle limitation on lighting would apply to all property boundaries. Other mitigation measures related to lighting are also proposed, including shielding of exterior lighting fixtures to reduce light spillage and glare, and directing lighting away from adjacent less intense land uses, consistent with TMC 18.50.
30. Your comments are noted for the record. The analysis of light and glare impacts in the

SDEIS was largely a qualitative analysis. The City determined that this level of analysis was appropriate, because of the setting in which the project is located (the east side of Littlerock Road in which the site is located is largely built out in large-scale retail uses, which are existing sources of light). The photometric analysis of the proposed lighting system is summarized on page 3.8-3. More detailed drawings of the proposed lighting system will be included in the application submitted to the City for lighting plan approval.

31. The lighting fixtures would have from one to three lights mounted on each standard, depending on its location.
32. All lighting fixtures would be full cut-off fixtures with flat lenses. The lighting fixtures located on the perimeter of the site would be equipped with downshields.
33. Your comment is noted for the record. It is acknowledged that many of the trees proposed in the parking area would be deciduous and would provide limited glare reduction during the late fall, winter and early spring. However, evergreen trees are proposed to be planted in certain areas of the site; evergreen shrubs, groundcovers and lawn are proposed throughout the site; and, existing primarily evergreen vegetation is proposed to be retained in certain areas of the site. This evergreen landscaping would help to minimize glare throughout the year (see Figure 2-5A in the SDEIS).
34. The lighting fixtures proposed for the parking lots and store are considered dark sky friendly and have been approved by the International Dark Sky Association (IDA). They would feature flat lenses and those located on the perimeter of the site would be equipped with downshields to reduce upward and outward light spillage.
35. It is not known if the store would have a flag or if it would be illuminated. This decision would be made by the store manager.
36. The covered outside goods area of the garden center would be lit by fluorescent strip fixtures. The open area of the garden center would be lit by flood lights directed downward and towards the building. TMC 18.47.50 requires the garden center to be screened, which would help internalize the lighting.
37. Your comments are noted for the record.
38. Your comment is noted for the record.
39. Your comment is noted for the record. The proposed project would be consistent with the direction and guidance of the Littlerock Road Subarea Plan. It would be integrated with adjacent existing retail uses, and would further the concentration of large-scale general retail operations in an area designated for such uses and in proximity to the freeway (see page 3.6-6 of the SDEIS). In response to comments received on the SDEIS, three new EIS alternatives are analyzed in this SFEIS. Two of these alternatives, Alternative 3 and 4, feature a smaller retail store and garden center than under the Proposed Action (a 187,054 square-foot retail store and 19,755 square-foot garden center versus the 207,752 square-foot retail store and 20,602 square foot garden center under the Proposed Action). See **Chapter 1** of this SFEIS for description and analyses of these alternatives. As described in **Chapter 1**, Alternatives 3 and 4 would reduce impacts to certain elements of the environment relative to the Proposed Action

(i.e., impacts on existing significant trees and traffic would be reduced). Conversely, these alternatives would result in less revenue to the City and less positive impacts on the local economy than the Proposed Action. Like the Proposed Action, these alternatives would not be expected to result in significant impacts to any of the elements of the environment with implementation of the proposed mitigation.

40. Your comment is noted for the record. See the response to Comment 39 in this letter.
41. See the response to Comment 33 in Letter 4.
42. Your comment is noted for the record. The proposed building design is intended to be consistent with the Tumwater Municipal Code Design Review Guidelines (Chapter 18.43) to ensure that the proposal is visually compatible with surrounding uses and general community characteristics (see Figure 2-4 and Section 3.6 of the SDEIS for details). See the response to Comment 39 in this letter.
43. Your comments are noted for the record. The proposed building would be modulated across the main building facades. Building elevations would be articulated with recessed entryways, awnings, varying rooflines, pilasters, changes in materials and colors, recesses, and an articulated cornice would add interest and reduce the perceived scale of the building (see Figure 2-4 in the SDEIS). Under the proposal, 54 of the existing significant trees onsite would be retained and 393 new trees and other vegetation onsite would be planted. The retention of existing trees and placement of new trees would help to provide a softer more human scale to the development.
44. Your comment is noted for the record. It is acknowledged that many of the trees proposed to be planted in the parking area would be deciduous and would provide more limited buffering in late fall, winter and early spring. Under the current Proposed Action, approximately 23 of the existing coniferous trees would be retained onsite towards the front of the building, near Littlerock Road. Approximately 6 new large diameter, 20 to 25-foot tall coniferous trees would also be planted in front of the building.

The northwest corner of the proposed building would be approximately 200 feet and the proposed garden center would be approximately 100 feet from Littlerock Road. At its nearest point, the existing Fred Meyer store is approximately 280 feet and the existing Costco is approximately 255 feet from Littlerock Road. The corner of the proposed building would be closer to Littlerock Road than Fred Meyer and Costco, because the road curves in this area. The majority of the front and north side of the building would be over 300 feet from the roadway (see **Figure 1-1** in this SFEIS).

45. Your comments are noted for the record. See the response to Comment 44 in this letter. Under the current Alternative 1, approximately 16 existing coniferous trees would be retained onsite towards the front of the building, near Littlerock Road. Approximately 3 large diameter, 20 to 25-foot tall coniferous trees would also be planted in front of the building.
46. Your comment is noted for the record.
47. The Bonneville Power Administration easement and transmission towers are shown on several figures in the SDEIS, in particular on: Figures 2-1 (Existing Site Conditions), 2-2

(Site Plan, Proposed Action), 2-5A (Landscape Plan, Proposed Action), 2-7 (Site Plan, Alternative 2), and 2-8A (Landscape Plan, Alternative 1). The easement is described in several sections of the SDEIS as well, including on pages 2-5 and 3.5-1. The proposed landscape plan does not attempt to screen the power transmission towers; it would be nearly impossible to do so. In addition, BPA has restrictions on trees that can be planted within the easement. The main restriction is that no trees are to be planted that would grow to over 20 feet high. If they exceed this height, BPC is allowed to trim them to 20 feet or less. The power easement and transmission towers are an existing site feature over which the applicant has no control.

Potential impacts of development of the future gas station adjacent to the power easement are discussed on page 3.4-3 of the SDEIS. The SDEIS indicated that the proposed gas station would be located immediately north of the easement. This easement contains power transmission towers, the closest of which would be approximately 150 feet from the gas station. These electrical facilities would not interfere with operation of the gas station. The gas station under Alternative 1 would be approximately 900 feet from the closest power transmission towers. Alternatives 2, 3 and 4 would not include a future lease lot and gas station.

48. Your comments are noted for the record. The landscape perspectives shown in Figures 2-5B and 2-8B of the SDEIS were drawn from a viewpoint that shows two of the building elevations, and thus more of the scale/mass of the proposed building from Littlerock Road. A viewpoint in front of the store would only show one elevation, and would not have represented the scale/mass of the building as well. The front elevation of the store (as well as other elevations of the store) is shown in Figure 2-4 in the SDEIS. Also see the response to Comment 47 in this letter.
49. Due to the height of the BPA wires over the site, the wires would not require protective coverings over the parking lots.
50. Your comments are noted for the record.
51. Your comments are noted for the record. See the response to Comment 39 in this letter and the response to Comment 54 in Letter 4.
52. Your comment is noted for the record. The existing group of trees in the northeast corner of the site is the largest groups of trees onsite (see Figure 2-2 in the SDEIS). Therefore, the applicant considered it important to retain these trees. A group of trees would also be retained in the southwest corner of the site under the Proposed Action (see Figure 3.3-1 in the SDEIS).
53. Your comments are noted for the record. Figures 2-5B and 2-8B show both the north and west elevations of the site. The evergreen trees that would be retained and planted along Littlerock Road are shown on the right-hand side of the sketches. As shown by these sketches, more evergreen trees would be retained and planted adjacent to Littlerock Road under Alternative 1 than under the Proposed Action.
54. The landscape plans included in the SDEIS were intended to be conceptual plans. At the scale of the plans shown in this document it was not possible to include information on the individual plant species that are proposed to be planted. Detailed landscape

plans will be submitted to the City as part of the application for formal site plan approval.

As described in **Sections 1.1** and **1.2** of this SFEIS, the proposed tree retention/replacement under the Proposed Action and Alternative 1 have been revised. Detailed plans for the proposed tree retention/replacement will be submitted to the City with the application for a waiver of the TMC Chapter 16.08 tree retention requirement.

55. Your comments are noted for the record. See the response to Comment 47 in this letter.
56. Your comments are noted for the record. The probable significant air quality impacts of the proposal were discussed on pages 3.10-4 through 3.10-5 of the SDEIS, the probable significant noise impact of the proposal were discussed on pages 3.11-7 through 3.11-9 of the SDEIS, the probable significant aesthetic impacts of the proposal were discussed on pages 3.8-1 through 3.8-3 of the SDEIS. The SDEIS concluded that with implementation of the proposed mitigation measures, the Proposed Action would not result in significant air quality, noise or aesthetic impacts.
57. Your comment is noted for the record. See **Section 1.1.2** of this SFEIS for revised information on the proposed retention/replacement of significant trees onsite.
58. See the response to Comment 33 in Letter 4. It is not the purpose of the EIS to determine if the requirements of the proposed administrative parking modification have been met. An application will be submitted to the City that provides justification for the requested administrative parking modification to allow the increased amount of parking. The City Code Administrator will determine if the modification is warranted.
59. Your comments are noted for the record. The statement referenced in this comment is intended to convey the fact that extenuating circumstances, beyond the control of the applicant, may occur such that it may be impossible to complete the improvements to the Trospen Boulevard/Capitol Boulevard intersection prior to issuance of the certificate of occupancy for the project. The applicant fully intends to complete this improvement in as timely a fashion as possible.
60. Your comments are noted for the record. As noted on page 11 of Appendix I to the SDEIS, the City is currently in the process of securing the necessary right-of-way for the Littlerock Road corridor improvement project. Construction is anticipated to be completed in 2008.

Consistent with City of Tumwater and Washington State policies, since the Littlerock Road Corridor Improvement Project is included in the City's Transportation Improvement Program (TIP) and is planned to be constructed within 6 years, the SDEIS and SFEIS transportation analyses have assumed the Littlerock Road improvements are in place. Mitigation measures that have not been completed by Fred Meyer are not the responsibility of the applicant and are not relevant to this proposal, as the analysis is based on the current road configuration and any City-related improvements. Furthermore, conditions at other Wal-Mart sites and their completion of mitigation measures are also not relevant to this proposal.

61. With the mitigation proposed at the Trospen Road/Tyee Drive intersection, the eastbound approach would have more green-signal time, which would increase the capacity of this

approach, even without the addition of lanes on Trosper Road. A detailed analysis of this intersection was conducted in the SDEIS using micro-simulation (see Appendix I to the SDEIS). The results of this analysis with respect to the Trosper Road/Tyee Drive intersection eastbound approach is summarized in Table 3.9-5, and on page 3.9-19 of the SDEIS. The analysis indicated that with the proposed improvements and optimization of the signal timing, the eastbound queues would decrease in the future.

62. Your comments are noted for the record. The proposed mitigation at the westbound approach of the Littlerock Road/Trosper Road intersection would not require widening of Trosper Road. Rather, it would reconfigure the existing channelization to better accommodate future traffic with or without traffic from the proposal.
63. The existing unsignalized driveway along Littlerock Road to Fred Meyer is a private driveway and not governed by City LOS/concurrency standards. While intersection delay may increase for vehicles exiting this location with traffic from the proposed development, an alternate access exists at the traffic signal located south of the access point.
64. See the response to Comment 44 in Letter 4.
65. The proposed project and improvements would not result in significant impacts to the cemetery access. Access into the cemetery would be addressed by the City as part of the Littlerock Road corridor improvements.
66. Your comments are noted for the record. See the response to Comment 2 in Letter 3.

The site plan for the original Proposed Action (shown in Figure 2-3 in the SDEIS) and the revised site plan for the current Proposed Action (shown in **Figure 1-1** of this SFEIS) show the proposed onsite pedestrian and bicycle facilities. As shown on **Figure 1-1**, three main pedestrian/bicycle connections would be provided through the site: two from Littlerock Road through the north portion of the site, and one between the north and south portions of the site, crossing Kingswood Drive.

67. The applicant is not intending on meeting the requirements for design review approval through the proposed administrative parking modification.
68. The Proposed Action includes two paths from Littlerock Road to the front of the building that would accommodate both pedestrians and bicycles. Non-motorized improvements, including bicycle lanes, along Littlerock Road are planned and will be completed as part of the City's Littlerock Road corridor improvements. It is acknowledged that no bicycle facilities currently exist on Kingswood Drive, Tyee Drive, and Trosper Road, and none are planned for these roadways at this time. Bicycles must use sidewalks or share traffic lanes along these roadways.
69. See the response to Comment 44 in Letter 4.
70. The Tumwater Municipal Code is the official name of the document referenced in this section.

71. Your comment is noted for the record. A discussion of the relationship of the proposal to the Capital Boulevard Plan was not included in the SDEIS, as only key relevant plans, policies and regulations were included in the Relationship to Plans and Policies section of the document.
72. See the response to Comment 66 in this letter. More detailed plans, showing pedestrian and bicycle facilities, will be submitted to the City with the application for Formal Site Plan approval.
73. Your comments are noted for the record. It is acknowledged that technically speaking, appendices should be bound in a separate document if the appendices exceed twenty-five pages, per WAC 197-11-425. However, for easy reference, and to avoid duplication, EIS appendices are often bound together with the main body of an EIS
74. See the responses to Comments 66 and 72 in this letter.
75. Your comments are noted for the record. See the responses to Comments 28 and 36 in Letter 4.
76. Your comments are noted for the record. See **Section 1.1.2** of this SFEIS for a discussion of the proposed retention and replacement of significant trees on and offsite under the current Proposed Action.
77. Your comments are noted for the record.
78. Your comments are noted for the record. See the response to Comment 68 in this letter.
79. Your comments are noted for the record. The response to Comment 28 in Letter 4 summarizes the visioning process for the Littlerock Subarea Plan, and indicates that per WAC 197-11-630, the Subarea Plan was adopted as a component of the SEPA review for the proposal.
80. Your comments are noted for the record. Council meeting minutes are not usually included in an EIS. The Relationship to Plans and Policies section of an EIS typically provides a discussion of the relationship of a proposal to adopted, relevant plans, policies and regulations.

The relationship of the proposed project to the City Council's adoption of a moratorium on large-scale retail development in the Littlerock Road Subarea, in December 2004, was discussed on page 3.6-14 of the SDEIS. As indicated in **Section 1.5.6** of this SFEIS, the moratorium did not apply to the proposal, because permits for the project were filed prior to the effective date of the moratorium. The moratorium was repealed in July 2006.

The probable significant impacts of the Tumwater retail store proposal on air quality were evaluated on pages 3.10-4 through 3.10-5 of the SDEIS. The SDEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.10-6 of the SDEIS, no significant air quality-related impacts would be expected from the proposed development (see Appendix J to the SDEIS for details).

The probable significant impacts of the Tumwater retail store proposal on noise was analyzed on pages 3.11-7 through 3.11-9 of the SDEIS (also see Appendix K to the SDEIS for details). The Noise Analysis was updated for this SFEIS to explain the methodology used in the analysis and to analyze the new EIS alternatives. Both the SDEIS and SFEIS analyses concluded that with implementation of the proposed mitigation measures listed on page 3.11-10 and 3.11-11 of the SDEIS, no significant noise-related impacts would be expected from the proposed development (see **Appendix C** to this SFEIS for details)

81. Your comments are noted for the record.
82. As a SEPA matter, competition is not a factor to be evaluated in an EIS. Further, retail competition in and of itself may not be considered a negative economic impact. Rather, retail competition is the normal function of a market economy. See the response to Comment 3 in Letter 4 for a discussion of SEPA and non-SEPA issues.

The Updated Economic and Fiscal Analysis prepared for the SFEIS provides discussion of the recent closure of the Mega Foods in Lacey. It is documented that several weeks after the announced closure, the affected retail space was subleased by Grocery Outlet, a discount grocery that directly competes with Wal-Mart Supercenters. The new grocery store opened in Fall of 2006.

The Final EIS also documents the fact that commercial real estate professionals had for some time expected the closure of the Mega Foods before the opening of the grocery component of the Wal-Mart store in Lacey. Accordingly, the conclusion that Wal-Mart in Lacey caused the closure of the Mega Foods after only two weeks of operations is not likely.

Finally, see the response to Comment 8 in Letter 4, which states that the SDEIS and SFEIS acknowledge that some businesses may close after a Wal-Mart Supercenter opens in Tumwater, although closures and lost jobs would be short-lived, if at all, given the growing nature of retail spending in the Tumwater area and the demand for retail development to capture that spending.

83. As a SEPA matter, issues of wages and retail competition are not factors to be addressed in an EIS. See the responses to Comments 3, 6 and 9 in Letter 4.
84. See the response to Comment 83 in this letter.
85. See the response to Comment 83 in this letter.
86. See the response to Comment 80 in this letter.
87. Your comments are noted for the record. See the response to Comment 54 in Letter 4 and the response to Comment 39 in this letter.

RESPONSE TO LETTER 6
Laverents, Kate

1. Your comments are noted for the record. The probable significant transportation-related impacts of the Proposed Action were described on pages 3.9-9 through 3.9-21 of the SDEIS. An Updated Transportation Analysis was prepared for this SFEIS to address comments on the SDEIS, including: minor changes to the Proposed Action and Alternative 1; comments on the methodology used in the SDEIS analysis; additional analysis of the Tumwater Middle School access; new analysis of transit; new analysis of the Troser Road/Lake Park Drive intersection; and new analysis of Alternatives 2, 3 and 4 (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS). The SDEIS and SFEIS transportation analyses concluded that with the proposed mitigation listed on page 3.9-22 through 3.9-25 of the SDEIS together with the new mitigation measures listed in **Section 1.5.11** of this SFEIS, no significant transportation-related impacts would be anticipated with the proposed project. The SDEIS and SFEIS reached the same conclusion for the other elements of the environment: with implementation of the proposed mitigation measures, no significant impacts would result.
2. Your comments are noted for the record.
3. Your comments are noted for the record.
4. As described on page 3.6-6 of the SDEIS, the Littlerock Road Subarea Plan is intended to serve as a guide for future development in the area, in keeping with the vision of the City of Tumwater Comprehensive Plan. The plan is intended to provide greater definition of future land use and development within the subarea, and to begin to identify the steps necessary to implement the plan and provide for the mitigation of impacts of future development in this area.

The back of the proposed building would not be visible from Littlerock Road. As shown in the landscape perspective of the Proposed Action in Figure 2-5B, the view of the project from Littlerock Road would primarily be the front and north side of the store (also see the building elevations in Figure 2-4 of the SDEIS). As described on page 2-10 of the SDEIS, the proposed landscape plan features plantings along the site perimeter, as well as in islands within the parking areas. A landscape berm ranging in height from one to three feet is proposed along the site's entire Littlerock Road frontage, and several large diameter evergreen trees would be planted along the site's Littlerock Road frontage to create a landscape buffer.

5. The permanent stormwater control system for Alternative 1 would be constructed according to the City of Tumwater's Drainage Design and Erosion Control Manual for Thurston County (1994), as amended, and the North Thurston County Groundwater Management Plan (1991), as amended. Stormwater would be directed to underground stormwater quality treatment vaults that would be sized to treat runoff from the post development 100-year, 24-hour storm. From the treatment vaults, stormwater would be directed to two infiltration vaults and an open water pond. The infiltration vaults and pond would be designed to retain/infiltrate the 100-year, 24-hour storm event into the soil. Stormwater from roof areas would bypass the water quality treatment facilities. A separate onsite water quality treatment facility would be provided in the gas station

canopy area, as required by code (see Figure 3.1-2 in the SDEIS and Appendix D to the SDEIS for details).

6. An 8-foot high site-obscuring screen wall would be constructed along the portion of the eastern site boundary adjacent to the Albany International property. This wall is not intended to be a noise reduction wall. Rather, it is intended to provide a visual separation between the proposed project and Albany International to the east.
7. See the response to Comment 33 in Letter 4.
8. TMC Chapter 13.22, entitled "Zero Effect Drainage Discharge" provides for deviations from the generally applicable City standards for drainage under certain circumstances. The proposal is not seeking any of the deviations provided for in Chapter 13.22. The permanent stormwater control system for Proposed Action would be designed and constructed according to the City of Tumwater's Drainage Design and Erosion Control Manual for Thurston County (1994), as amended, and the North Thurston County Groundwater Management Plan (1991), as amended.
9. The permanent stormwater control system for the Proposed Action would be constructed according to the City of Tumwater's Drainage Design and Erosion Control Manual for Thurston County (1994), as amended, and the North Thurston County Groundwater Management Plan (1991), as amended (see page 3.2-3 of the SDEIS for a description of the proposed stormwater control system). All applicable regulations related to the storage, handling and sale of potentially hazardous materials would be followed. Any accidental spills of hazardous materials during operation of the project would be addressed by a Spill Prevention Control and Countermeasure (SPCC) Plan that would be developed as part of the Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollution Discharge Elimination System (NPDES) permit. In the event of a storm greater than the 100-year, 24-hour storm, stormwater would overflow onto the onsite parking lot. No existing flooding problems are known to exist within ¼ mile downstream of the site that would be exacerbated by the overflow. The SDEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.2-5, 3.4-4 and 3.4-5, no significant impacts to surface or groundwater resources would result from the proposed project (see Appendices D and E and the summaries in Sections 3.2 and 3.4 of the SDEIS for further information).
10. Your comments are noted for the record. See the response to Comment 9 in this letter regarding the potential for the project to result in significant impacts to water resources. See the response to Comment 80 in Letter 5 regarding the potential for the project to result in significant noise impacts.

The proposed retail store would be a single-story building, consistent with existing single-story commercial facilities adjacent to the site (i.e. Home Depot, Costco and Fred Meyer).

11. Your comments are noted for the record. Average truck activity from the proposed project would include 3 to 5, 18-wheel trucks per day and 10 to 15 direct store deliveries by smaller vendor trucks per day. The level of truck activity projected for an average day is not expected to create any safety or operational impacts on Littlerock Road or other roadways in the area. Typically, deliveries would occur outside the peak commute hours

when traffic volumes are lower. Therefore, it would not be necessary to designate Littlerock Road as a “no truck route.” An analysis of the operation of truck routes through the site verified that the truck turning radii could be adequately accommodated (see Appendix I to the SDEIS for further details on truck access).

The potential asphalt plant referenced in this comment would be located south of the proposed site, along 88th Avenue. Information is not available about the specific market area for the plant, but it is anticipated that a considerable number of trips would be oriented to/from I-5 via either Tumwater Boulevard or 93rd Avenue. The analysis period for the Tumwater Retail Store SDEIS and SFEIS focused on the weekday PM peak hour, which is typically outside the haul period for asphalt trucks. In addition, background growth rates and future forecasts incorporated into the SDEIS and SFEIS analyses included an increase in the number of heavy vehicles. Based on this information, the impacts of the potential asphalt plant have been adequately addressed in the SEIS.

12. See the response to Comment 44 in Letter 4.
13.
 - a. As described on page 3.5-7 of the SDEIS, the building size and activity level of the proposal would be greater than that of the residential uses in the area. However, considering the distance, intervening uses and transportation corridors between the site and existing residential uses in the vicinity, the proposed project would not result in significant land use impacts to residential uses in the area.
 - b. See the response to Comment 15 in Letter 4 and **Section 1.1.2** of this SFEIS for a description of the proposed retention/replacement of trees under the Proposed Action.
 - c. The SDEIS Transportation Analysis did not determine that extension of Tyee Drive would be warranted with development of the Proposed Action.
 - d. The proposal would adhere to the requirements in the North Thurston County Groundwater Management Plan (1991), as amended.
 - e. See the response to item a above.
14. Your comments are noted for the record. Less parking is proposed under Alternative 1 than under the Proposed Action. However, an administrative parking modification would be required for the proposed parking under Alternative 1, similar to under the Proposed Action (see **Section 1.2.2** of this SFEIS for details). The proposed gas station under Alternative 1 would not be located on a wetland, as there are no wetlands located onsite (see Appendix F of the SDEIS for details). In response to this and other comments on the SDEIS, three new alternatives were analyzed in this SFEIS. See the response to Comment 87 in Letter 5.
15. As the Economic and Fiscal Analysis in the SDEIS and the Updated Economic and Fiscal Analysis in this SFEIS indicate, visitor traffic along I-5 represents a small portion of the retail spending that the proposed Wal-Mart Supercenter would capture in Tumwater. The majority of customers would be residents of Tumwater and areas nearby Tumwater that would find the proposed Wal-Mart location more convenient than other supercenters in the Thurston County area (see Section IV in **Appendix A** to this SFEIS for a detailed discussion of area households, Tumwater visitors and resulting retail spending).

16. See the response to Comment 52 in Letter 4.
17. Your comments are noted for the record. See the response to Comment 14 in this letter. The Site Reconnaissance Report, contained in Appendix F to the SDEIS, was prepared by Talasaea Consultants, Inc., a qualified wetland biologist. Both the National Wetland Inventory maps (USF&WS) and Thurston County geodata web site were reviewed for the report. Talasaea determined that there are no wetlands onsite, based upon a site reconnaissance performed in November 2004. They examined the potential wetland area shown on the County's data base and found it to be a closed depression that did not present the necessary combination of wetland hydrology, soils and vegetation to be considered a wetland, per the City's required methodology.
18. Liquefaction is the process in which soils lose strength or stiffness during vibratory shaking, such as that caused by earthquakes, and temporarily behaves as a liquid. The seismically induced loss of soil strength can result in failure of the ground surface and associated damage of structures. While the Geotechnical Engineering Report prepared for the SDEIS noted the potential for the geologic units beneath the site to be susceptible to liquefaction, the report determined the actual risk of liquefaction on the project site to be low. All structures constructed on the site, including the proposed retail store and gas station, would meet International Building Code design standards for seismic design. The stormwater control system would also be designed in accordance with applicable regulations. Therefore, the project would not be expected to impact water in a wellhead protection area.
19. We have no record of the 1992 Kleinfelder letter referenced in this comment. The 2002 AMEC study did not specify the direction of groundwater flow. Barnes Lake is located approximately ½ mile to the northwest of the site (see Appendices D and E to the SDEIS for further information on groundwater flow). As indicted on page 3.2-2 of the SDEIS, the general direction of shallow groundwater flow from the site is toward the northeast. With implementation of the mitigation measures listed on pages 3.2-4 and 3.2-5 of the SDEIS (including installation of temporary and permanent stormwater control systems), no significant impacts to surface or groundwater resources would be expected from the proposed project.
20. See the responses to Comments 9 and 19 in this letter. The Glenwood Park neighborhood is located to the southwest of the site. Since the general direction of groundwater flow from the site is towards the northeast, the proposed project would not be expected to impact these wells.
21. See the response to Comment 50 in Letter 4.
22. The Geotechnical Investigation conducted by AMEC in 2002 did not identify groundwater elevations. The 7 to 14-foot depth indicated in this comment refers to the depths of their explorations, not the groundwater depth. Based on groundwater depth measurements performed for the SDEIS, depth to groundwater ranges between a high of 13.5 to a low of 22.9 feet below the ground surface. The corresponding groundwater elevations at the site range between 160.7 to 164.76 feet above mean sea level (MSL) (see Appendix E to the SDEIS for details). The proposed stormwater control infiltration vaults would be excavated to depth elevations ranging between 169.5 to 170.0 feet MSL. Therefore, the approximate separation distance between the shallow groundwater table beneath the

site and the bottom of the proposed infiltration facilities would range between 4.7 and 9.3 feet. This separation would be adequate to protect the groundwater aquifer (see Appendices D and E to the SDEIS for details).

23. See the response to Comment 50 in Letter 4, and the response to Comments 9 and 19 in this letter.
24. As described in the Updated Economic and Fiscal Analysis prepared for this SFEIS: Tumwater is a destination retail hub for non-resident spending; retail spending in the City and the broader retail trade area is expected to grow; and, retail spending growth is estimated to be more than enough to accommodate the Wal-Mart Supercenter. The proposed Wal-Mart is located within convenient access to I-5, a regional transportation corridor along which much of the growth in population in the area is expected to occur. "Below average visits" to the proposed retail store are not expected (see Appendix H to the SDEIS and **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
25. See the response to Comment 12 in Letter 6.
26. The weekday PM peak hour trip generation for the proposed project was developed based on rates identified for similar facilities in the Pacific Northwest (see SDEIS page 3.9-10 and Appendix I to the SDEIS for a detailed explanation of the trip generation forecast).
27. See the response to Comment 42 in Letter 4
28. See the response to Comment 42 in Letter 4.
29. As shown in SDEIS Table 3.9-4, the Littlerock Road/Kingswood Drive roundabout would operate at an acceptable LOS A in the PM peak hour in 2007, with or without the project traffic.
30. Your comments are noted for the record. See the responses to Comments 15 and 19 in Letter 4. The landscape perspective shown in Figure 2-5B in the SDEIS depicts the replacement trees at approximately 5-years growth.
31. Figure 2-2 in the SDEIS depicts existing site conditions, including the location of evergreen and deciduous trees on the project site. Additional information on the types and number of trees onsite is provided in the Site Reconnaissance Report and the Tree Inventory/Forester's Report contained in Appendix F to the SDEIS. It is unclear when the aerial photo referenced in this photo was taken.

The SFEIS concludes the proposed removal of trees would not represent a significant impact, given that: the site is already largely cleared; there are no critical areas or valuable wildlife habitat onsite; and, the site is surrounded by commercial uses and an intensive pattern of development. Therefore, with implementation of the proposed mitigation measures (identified on page 3.3-5 of the SDEIS and modified in Chapter 1 of this SFEIS), no significant impacts based on tree removal would occur.

32. The evergreen trees to be retained and planted along Littlerock Road are shown on the

right-hand side of the landscape perspective. Also see Figures 2-5A and 3.3-1 in the SDEIS for the proposed landscape plan and tree retention plan, respectively.

33. See the response to Comment 4 in this letter. If residential receivers to the west receive the majority of noise from I-5, then the proposed project is not expected to contribute perceivable noise at these locations, because increased traffic on Littlerock Road would not exceed the background noise generated by I-5 at those locations.
34. Your comment is noted for the record.
35. Under the Proposed Action and all of the alternatives loading facilities would be located along the east side of the store. This arrangement allows the main building to serve as a noise shield to Littlerock Road and adjacent residential areas.
36. See the response to Comment 12 in this letter.
37. As noted on page 3.12-4 of the SDEIS, the demand for police service from the proposed retail store was based on an average of the annual calls in 2003 and 2004 received by the City of Chehalis Police Department from the existing Wal-Mart Supercenter located in that city.
38. As a SEPA matter, competition is not a factor to be evaluated in an EIS (see the response to Comment 3 in Letter 4 for a summary of what are considered SEPA versus non-SEPA issues). Further, retail competition in and of itself is not considered a negative economic impact. However, an analysis in Section IV of the Updated Economic and Fiscal Analysis documents that growth in local retail spending would only partially be captured by the proposed Wal-Mart Supercenter (see **Appendix A** to this SFEIS for details).
39. A detailed analysis of expected household and retail spending growth through 2010, based on official projections of the Thurston Regional Planning Council, is provided in the Updated Economic and Fiscal Analysis prepared for this SFEIS. The analysis determines that there would be more than enough population growth and resulting retail spending growth to sustain a Wal-Mart Supercenter, with additional uncaptured retail spending available for other retailers (see **Appendix A** to this SFEIS for details).
40. As a SEPA matter, wage issues and retail competition are not issues to be addressed in an EIS. It would be up to the individual stores to develop a competitive strategy in reaction to lower prices. See Appendix H to the SDEIS for a detailed discussion of how various retailers have chosen to compete with Wal-Mart Supercenters in other locations.
41. See the response to Comment 9 in Letter 4 for an explanation of the likely small difference between gross and net economic and fiscal impacts in a growing retail trade area (see Section IV of the **Appendix A** to this SFEIS for details).
42. As a SEPA matter, wages are not a factor to be considered in an EIS. See the response to Comment 9 in Letter 4. However, a review of the Washington Employment Security Department average wage data available on-line indicates that the average retail wage quoted includes all retail occupations. See the Washington Workforce Explorer Labor Market Information website for further details.

(<http://www.workforceexplorer.com/cgi/dataanalysis/?PAGEID=94&SUBID=149>).

43. As a SEPA matter, retail competition is not considered a factor to be addressed in an EIS, and is not necessarily considered a negative economic impact. The referenced study by Dr. Stone of Iowa State University indicates that downtown districts, if they are the primary retail hub of a community, may face strong competitive pressure from a Wal-Mart store. As described in the SDEIS, Tumwater does not presently have an established downtown retail area, although Tumwater does feature historic homes and older neighborhoods in different parts of the community. Therefore, the proposed store would not compete with an established downtown retail area in Tumwater.

To the contrary, commerce along Littlerock Road and Trosper Road, proximate to project site, is the primary retail hub of Tumwater. Accordingly, the Stone study does not serve as a good indicator of the impacts to specific types of retailers in Tumwater from the proposed Wal-Mart store, because of the vastly different economies and retail configurations in Tumwater and rural Iowa towns.

44. See the response to Comment 43 in this letter.
45. See the response to Comment 43 in this letter.
46. See the response to Comment 43 in this letter.
47. A detailed analysis of Tumwater area retail sales growth, due to expected population growth in Thurston County, is provided in the Updated Economic and Fiscal Analysis in this SFEIS. The analysis estimates that the potential retail sales at the proposed Wal-Mart store would be significantly less than the total growth in area population retail spending. The growing retail spending capacity in the Tumwater area does not support the commentor's statement that there is retail "saturation" in the area (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for further information).
48. As a SEPA matter, retail competition in and of itself is not a factor to be addressed in an EIS (see the response to Comment 3 in Letter 4 for a description of SEPA versus non-SEPA issues). Rather, retail competition is the normal function of a market economy. The Updated Economic and Fiscal Analysis, prepared for this SFEIS, documents that the proposed Wal-Mart store would account for a small portion of retail spending growth in the Tumwater area over the next few years. The SDEIS and this SFEIS acknowledge that some businesses may close after a Wal-Mart store opens in Tumwater, although closures and lost jobs would be short-lived, if at all, given the growing nature of retail spending in the Tumwater area and the demand for retail development to capture that spending (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
49. The SDEIS concluded that a Wal-Mart Supercenter in Tumwater would not pose "unprecedented" competition. See the response to Comment 48 in this letter regarding local competition, retail sales growth and the potential share captured by a Wal-Mart Supercenter in the Tumwater area.
50. See the response to Comment 43 in this letter. The Stone study, in describing rural Iowa communities, does not serve as a good indicator of competitive conditions in suburban

Tumwater, Washington. The Updated Economic and Fiscal Analysis in this SFEIS provides estimates of Tumwater area retail sales growth and the small share that a Wal-Mart Supercenter would be expected to capture (see **Appendix A** to this SFEIS for details).

51. Full time equivalents (FTEs) refer to a combination of full time and part-time employees. The basis of an FTE is a 40-hour work week. Therefore, two part-time employees, each working 20 hours per week, equal 1 FTE.
52. Your comments are noted for the record. The relationship of the Proposed Action to Thurston County Countywide Planning Policies is discussed on pages 3.6-1 and 3.6-2 of the SDEIS. These policies were developed by the County in collaboration with its cities and towns. The policies provide a framework for ensuring coordination and consistency between county and municipal comprehensive planning and plan update efforts. The City of Tumwater has adopted a Comprehensive Plan to guide future development, consistent with the Countywide Planning Policies.
53. Your comment is noted for the record. The SDEIS analyzed the potential impacts of the proposed project on residential areas to the south, northwest and east of the site, and concluded that considering the distance, intervening uses and transportation corridors between the site and these existing residential uses in the vicinity, significant land use impacts to residential uses from the proposed commercial use would not be anticipated (see page 3.5-7 of the SDEIS).
54. Your comment is noted for the record.

RESPONSE TO LETTER 7

Nickerson, Donna

1. Your comments are noted for the record. The SDEIS did not indicate that the impacts of the proposed project would be “too severe to mitigate.” The SDEIS and this SFEIS conclude that with implementation of the proposed mitigation measures, the project would not be expected to result in significant impacts to the environment.
2. See the response to Comment 8 in Letter 4, for an explanation of the likely small difference between gross and net economic and fiscal impacts in a growing retail trade area. The estimated annual City tax revenues from the proposed project would be more than enough to reimburse the City for the estimated additional annual public service costs attributable to the proposal (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
3. See the response to Comment 48 in Letter 6.
4. See the response to Comment 2 in this letter.

As a SEPA matter, quality of life issues in the context of retail development are not considered factors to be addressed in and EIS. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non SEPA issues.

5. The probable significant impacts of the Tumwater retail store proposal on air quality were evaluated on pages 3.10-4 through 3.10-5 of the SDEIS. The analysis indicated that the proposed project would contribute to delays at the Littlerock Road/South Costco Driveway intersection and at the Kingswood Drive/Southwest Project Driveway. Such delays would result in an increase in idling cars and would increase CO levels; however, it is not expected that delays at either of these locations would result in exceedances of the National Ambient Air Quality Standards (NAAQS) (see Table 3.10-1 in the SDEIS for these standards). A traffic signal is proposed for the Littlerock Road/South Costco Driveway which would reduce the level of delay and idling at the intersection. The SDEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.10-6 of the SDEIS, no significant air quality-related impacts will be expected from the proposed development (see Appendix J to the SDEIS for details).
6. It is beyond the scope of this EIS to analyze the potential impacts from the construction and operation of warehouse buildings by the applicant. The impacts of that development would be subject to SEPA review in the jurisdictions in which they are located.
7. Your comments are noted for the record. As indicated on page 3.2-3 of the SDEIS, no existing flooding problems are known to exist within ¼ mile downstream of the site that would be exacerbated by stormwater drainage from the proposed project (see Appendix D to the SDEIS for details on the proposed stormwater control system). The “No Impact Development Standards” are voluntary measures that pertain primarily to residential developments. Therefore, the proposed project does not incorporate these measures.
8. It is acknowledged that the impervious surface areas associated with the proposed project (i.e. roofs, parking lots and driveways) would decrease the area onsite available

for groundwater recharge. However, approximately 3.0 acres of buffer/landscape area (15 percent of the site) would be provided where groundwater recharge could occur. Also, the proposed stormwater control system features infiltration of stormwater into the soils, following water quality treatment. As a result, no significant impacts to groundwater recharge would be anticipated with the project (see Appendices D and E to the SDEIS for additional information).

9. Your comments are noted for the record. See the response to Comment 15 in Letter 4.
10. Your comments are noted for the record.

The probable significant noise impacts of the Tumwater retail store proposal were summarized on pages 3.11-7 through 3.11-9 of the SDEIS (see Appendix K to the SDEIS for details). The Noise Analysis was updated for this SFEIS to explain the methodology used in the analysis and to analyze the new EIS alternatives. Both the SDEIS and this SFEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.11-10 and 3.11-11 of the SDEIS, the proposed project would not result in significant noise-related impacts (also see **Appendix A** to this SFEIS for details).

The potential light impacts of the Tumwater retail store proposal were summarized on page 3.8-3 of the SDEIS. The SDEIS concluded that with implementation of the proposed mitigation measures listed on page 3.8-4 of the SDEIS, the proposed project would not result in significant glare impacts.

11. The Proposed Action, Alternative 1 and Alternative 2 would feature a 207,752 square-foot retail store and a 20,602 square-foot garden center; Alternatives 3 and 4 would feature a 187,054 square-foot store and a 19,755 square-foot garden center. See **Chapter 1** of this SFEIS for details. It is acknowledged that the garden center is a year-round facility. Both the proposed store and the garden center were taken into account in the analysis prepared for the SDEIS and updated for this SFEIS (i.e. the economic fiscal, transportation, noise and air quality analyses; see **Chapter 1** of this SFEIS for details).

RESPONSE TO LETTER 8
Buchner, Sherry

1. Your comments are noted for the record.
2. See the response to Comment 44 in Letter 4.
3. Your comments are noted for the record.
4. Holiday peak traffic conditions are unique to only a handful of weekends per year. Due to the infrequency and limited duration of these periods, it is not standard professional practice to base traffic analyses and mitigation measures on peak holiday traffic. A mitigation measure was included in the SDEIS regarding employee parking during holiday periods, however (see SDEIS page 3.9-25)
5. The LOS for study intersections was discussed on pages 3.9-11 through 3.9-17 of the SDEIS. Of the 13 study area intersections, four are anticipated to operate at LOS F with the proposed project in 2007. The I-5 SB Ramps/Trosper Road intersection is forecast to degrade from LOS E to LOS F as a result of the project, without mitigation. The Littlerock Road/South Costco Driveway would continue to operate at LOS F with or without the project. As noted on SDEIS page 3.9-24, mitigation measures are proposed for these intersections that would improve intersection operation to an acceptable level. The I-5 NB and SB Ramps/Tumwater Boulevard intersections would operate at LOS F with or without the proposed project. As noted on SDEIS page 3.9-24, the project would contribute to further improvements at this intersection in the form of SEPA mitigation fee payment (see Appendix I to the SDEIS for further information).

An additional intersection, the Trosper Road/Lake Park Drive intersection, was analyzed in the Updated Transportation Analysis prepared for this SFEIS. This intersection is forecast to operate at LOS F in 2008, with or without the proposed project. The City has proposed a Capital Improvement Project that would improve operation of this intersection to an acceptable level. An additional proposed mitigation has been added in this SFEIS as follows:

- *The applicant would contribute on a pro-rata basis to the City's planned improvements to the Trosper Road/Lake Park Drive intersection, based on the proposed project's contribution of new PM peak hour trips through this intersection.*

(see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details).

6. Your comments are noted for the record. See the response to Comment 2 in Letter 3.
7. Your comments are noted for the record. See the response to Comments 15 and 17 in Letter 4.
8. Your comments are noted for the record. See the response to Comment 28 in Letter 4.
9. Your comments are noted for the record. See the response to Comment 28 in Letter 4.

10. Your comments are noted for the record.
11. Your comments are noted for the record. As indicated on page 3.9-18 of the SDEIS, generally, as traffic volumes increase throughout the area, the potential for traffic accidents would also increase. However the City's Littlerock Road corridor improvement project will significantly improve operations and traffic/pedestrian safety on this roadway. North of the site along Trosper Road no significant increase in the number of accidents is anticipated. Mitigation to improve safety and operations of minor street improvements is proposed at the south Costco shared access.

Under the Proposed Action and Alternative 3, some pedestrians would need to cross Kingswood Drive, because the site is bisected by this roadway. The need for pedestrians to cross this roadway would increase the potential for pedestrian/vehicular conflicts. An Updated Transportation Analysis was prepared for this SFEIS (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS). This analysis includes the following additional mitigation measure that has been proposed by the applicant to reduce the potential for accidents to pedestrians crossing Kingswood Drive to and from the parking area in the southwest portion of the site:

- *The following elements could be included in the design of Kingswood Drive to improve pedestrian crossing safety: roadway signage and pavement treatments; holiday traffic control, such as traffic control personnel at key onsite vehicle intersections or pedestrian crossings; crosswalk lighting (overhead lighting or in-pavement lights); and, a pedestrian refuge area, such as a median island in Kingswood Drive.*

12. Your comments are noted for the record. As indicated on page 3.5-6 of the SDEIS, the proposed retail store would be similar to the Home Depot retail center to the south, and the Costco and Fred Meyer retail centers to the north, and would not introduce a new type of us or scale of building development to the area.
13. The project site would not be clear-cut under the Proposed Action; 54 of the existing significant trees onsite would be retained. An additional 393 trees would be replanted onsite under the Proposed Action (more trees would be retained/replaced onsite under the EIS alternatives; see **Section 1.5.3** of this SFEIS for details). It is acknowledged that clearing of the majority of the existing trees onsite would change the aesthetic character of the site. However, the SDEIS concluded that with implementation of the mitigation measures listed on page 3.8-4 of the SDEIS, no significant aesthetic impacts would be anticipated.
14. Approximately 3 acres of the site would be in landscaping/buffers under the Proposed Action. Therefore, approximately 17.5 acres of the site would be covered in impervious surface area, including roof, parking areas and driveways.
15. Your comment is noted for the record. See the response to Comment 14 in Letter 4.
16. See the response to Comment 8 in Letter 4 for an explanation of the likely small difference between gross and net economic and fiscal impacts in a growing retail trade area (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details)

17. Your comments are noted for the record.

RESPONSE TO LETTER 9
Carpenter, John

1. Your comment is noted for the record. This correction has been made in the Errata in Chapter 3 of this SFEIS.
2. Your comment is noted for the record. This correction has been made in the Errata in Chapter 3 of this SFEIS.

RESPONSE TO LETTER 10
Cook, Virginia (June 4)

1. Your comments are noted for the record. See the response to Comment 1 in Letter 3. As noted in that response, the following new mitigation measure has been added in this SFEIS:
 - *The applicant would provide frontage improvements along Kingswood Drive and Littlerock Road, as required by TMC 12.12.010, and consistent with the City's planned improvements for Littlerock Road. Two new transit stops would be provided on the east and west side of Littlerock Road, immediately north of Kingswood Drive. The specific locations and design of the transit stops and related facilities would be determined through coordination with the City and Intercity Transit during the site plan approval process.*

RESPONSE TO LETTER 11
Cook, Virginia (June 10)

1. Your comments are noted for the record. See the response to Comment 1 in Letter 10.

RESPONSE TO LETTER 12
(Duff, Georgia A.)

1. Your comments are noted for the record. The potential impacts of the proposed project on transportation were described on pages 3.9-9 through 3.9-21 of the SDEIS. An Updated Transportation Analysis was prepared for this SFEIS. The SDEIS and this SFEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.9-22 through 3.9-5 of the SDEIS, together with the new mitigation measures listed in **Section 1.5.11** of this SFEIS, no significant transportation-related impacts would result from the proposed project (see Appendix I to the SDEIS and **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details).

2. Your comments are noted for the record. The SDEIS included an analysis of the potential impacts of the proposed project on access to Tumwater Middle School (see page 3.9-18 of the SDEIS). The Updated Transportation Analysis prepared for this SFEIS included additional analysis of the middle school access (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details). These analyses concluded that the main Tumwater Middle School access point would operate at acceptable levels in the AM peak hour and afternoon school peak period in 2007 (LOS C and LOS D, respectively), with the Proposed Action.

See the response to Comment 2 in Letter 3 for information on proposed pedestrian facilities.

See the responses to Comments 66 and 68 in Letter 5 for information on proposed bicycle facilities.

3. Your comments are noted for the record.

RESPONSE TO LETTER 13
Dupler, Eileen

1. Your comments are noted for the record.

RESPONSE TO LETTER 14

Sara Glass

1. Your comments are noted for the record. See the response to Comment 44 in Letter 4. For the transportation analysis, the PM peak hour period is considered to be from 4:00 PM to 6:00 PM.
2. The SDEIS Transportation Impact Analysis study area was determined in conjunction with the City of Tumwater Public Works Department staff, and was reviewed and approved by the City's transportation consultant. It was agreed that major intersections in the site vicinity and known congestion points along likely project travel routes would be evaluated as part of the study. See Figure 3.9-1 in the SDEIS for the location of the study intersections. An additional intersection, the Troser Road/Lake Park Drive intersection, was analyzed in this SFEIS (see **Appendix B** and the summary in **Section 1.5.10** of this SFEIS for details on the analysis of this intersection).
3. Queues at the Littlerock Road/Troser Road intersection are listed in Table 3.9-2 of the SDEIS. The roundabouts further south on Littlerock Road are not intended to address queuing along the Troser Road corridor.
4. The applicant would coordinate with the City to develop a plan for providing offsite parking during the holiday season, as needed.
5. An area in the parking lot immediately adjacent to the garden center would be dedicated for seasonal merchandise during certain seasons of the year. If this temporary area is categorized by the City as a storage area, screening to meet the requirements of TMC 18.47.50 would be provided via fencing or the planting of landscaping around the perimeter of the parking lot.
6. Your comments are noted for the record. As described in **Section 1.1.3** of this SFEIS, the revised site plan shows changes to the amount and layout of parking for the Proposed Action. The current proposal would provide a total of 1,063 new parking spaces versus the approximately 1,138 spaces under the original proposal. This change in parking is proposed to provide more area for landscaping and tree retention/replacement, as well as to improve the ingress/egress for customer vehicles and truck circulation onsite.

Approximately 3 acres of the approximately 20.5-acre site would be provided in landscaping/buffer area under the Proposed Action.

7. The approximately 359 calls for police service annually under the Proposed Action estimated in the SDEIS was based on an average of the annual calls in 2003 and 2004 received by the City of Chehalis Police Department from the existing Wal-Mart Supercenter located in that city. The expected types of calls would include: shoplifting, unruly behavior, and parking lot accidents. The Tumwater Municipal Code does not prohibit the sale of guns at this location. State law restricts the regulations that local governments can impose on the sale of firearms. The applicant has stated that they would not sell firearms at this particular store.

8. Your comment is noted for the record.

RESPONSE TO LETTER 15
Grasser, Ken

1. See the response to Comment 59 in Letter 5.
2. See the response to Comment 48 in Letter 6.
3. As a SEPA matter, issues of wages are not considered a factor to be addressed in an EIS. See the response to Comment 9 in Letter 4 for a discussion of the average hourly wage for employees of the proposed Wal-Mart Supercenter versus the Thurston County average retail wage.

The Updated Economic and Fiscal Analysis prepared for this SFEIS documents that according to local commercial real estate professionals, closure of the Mega Foods in Lacey had been expected for some time by industry experts, despite the decision to close two weeks after the Lacey Wal-Mart grocery component expansion. Further, they indicated that impacts to properties in Thurston County from the Lacey Wal-Mart Supercenter have been more positive than negative (see Section IV in **Appendix A** to this SFEIS for details).

4. Your comments are noted for the record. See the response to Comment 2 in this letter.

RESPONSE TO LETTER 16

Gubbe, David

1. Your comment is noted for the record. The City is currently in the process of securing right-of-way for the Littlerock Road improvement project. The project is expected to be completed in 2008, shortly after completion of the proposed project.
2. Your comment is noted for the record. The Transportation Analyses prepared for the SDEIS and the Updated Transportation analysis prepared for this SFEIS did not determine that the extension of Tyee Boulevard was necessary to address the transportation-related impacts of the proposed project. Based on discussions with City Public Works Department staff, Tyee Drive will likely be extended south as other future development in the area occurs (see Appendix I to the SDEIS and **Appendix B** to this SFEIS for details).
3. Your comment is noted for the record.
4. Your comment is noted for the record.
5. See the response to Comment 2 in this letter.

An analysis of the Trospen Road/Lake Park Drive intersection was included in the Updated Transportation Analysis prepared for this SFEIS. This analysis determined that in the PM peak hour in 2008, with or without the project, this intersection would operate at LOS F. With the signalization of this intersection proposed by the City, the intersection would operate at an acceptable LOS C with a delay of 21.8 seconds (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details). The following mitigation measure has been added to this SFEIS to address the project's impacts to this intersection:

- *The applicant would contribute on a pro-rata basis to the City's planned improvements to the Trospen Road/Lake Park Drive intersection, based on the proposed project's contribution of new PM peak hour trips through this intersection.*

Traffic on Second Avenue and the Second Avenue/Linwood Drive intersection was not analyzed in this EIS, because traffic from proposed project is not anticipated to result in significant impacts to this roadway/intersection.

6. See the response to Comment 5 in this letter.
7. See the response to Comment 5 in this letter.

RESPONSE TO LETTER 17

Jenson, Jamie and Gary

1. The study referenced in this comment analyzed the county-level impact of Wal-Mart stores opening nationwide over a historical 21-year period. Due to the county-level nature of the analysis, it is neither comparable to the City-level Economic and Fiscal Analysis in the SDEIS and in the Updated Economic and Fiscal Analysis in this SFEIS of the proposed Tumwater Wal-Mart Supercenter, nor would it be appropriate to draw specific conclusions about individual City-level employment (see Appendix H to the SDEIS and **Appendix A** to this SFEIS for details).
2. See response to Comment 1 in this letter regarding the applicability of the broader county-level Basker study versus the narrower, City-level analysis conducted for the proposed Wal-Mart Supercenter in Tumwater.
3. Tax revenue generated by a Wal-Mart Supercenter in Tumwater are estimates based on the likely quantity of retail sales that the store would generate on an annual basis, given retail sales estimates at other Supercenters in the country. Should commerce be less than expected at the proposed store, revenues as well as public safety and other public costs would be less than projected. However, if the store is more successful than expected, City of Tumwater revenues would be greater than expected, as would public safety and other public costs.
4. Your comments are noted for the record. The types of calls for police service from the proposed project (i.e. shoplifting, unruly behavior, and parking lot accidents) would not be expected to impact operation of Tumwater Middle School, located to the west of the site across Littlerock Road.

The SDEIS Transportation Analysis showed that the three roundabouts proposed along Littlerock Road are forecast to operate at LOS B or better in 2007 with the proposed project (see Table 5 in Appendix I to the SDEIS). While the roundabouts at the intersections of Kingswood Drive and Tumwater Boulevard would introduce a slight increase in delay due to the new "control", the roundabout at Israel Road would replace an existing traffic signal that already results in traffic delay. Based on the forecasted operations of the roundabouts with traffic from the proposed project, no significant impacts to police response times would be anticipated.

5. The referenced study is an economic development and planning strategy document specifically prepared for use in Central Ohio. Accordingly, that region's unique economy, land use system and tax structure (including a local/City income tax that is not legal in Washington) is not comparable to that in Tumwater, Washington. It would, therefore, be inappropriate to draw specific fiscal conclusions about Tumwater from that document given those differences.

The tax revenue and public cost estimates in the Economic and Fiscal Analysis for the SDEIS and in the Updated Economic and Fiscal Analysis prepared in this SFEIS take into account local and state tax laws, and specific information provided by City of Tumwater staff about public service costs (see Appendix H to the SDEIS for details on the methodology used for the fiscal impact analysis).

6. As a SEPA matter, issues of wages and healthcare cost/provision are not considered factors to be addressed in an EIS. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non-SEPA issues. See the response to Comment 9 in Letter 4 for a comparison of average retail wages in Thurston County to the expected hourly wages at the proposed Wal-Mart Supercenter.
7. A comparison of the weekday AM, afternoon school peak period, and PM peak hour traffic volumes in the site vicinity was prepared for this SFEIS. The results of this analysis confirm that the greatest traffic volumes occur in the PM peak hour, and it was, therefore, the appropriate time period for the transportation analysis (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details.)
8. The referenced analysis of retail in Midcoast Maine; the quantity of business profits that stay in Maine versus going out of state; and, the relative difference in charitable donation between large and small firms provides little guidance for the City of Tumwater. Tumwater's rapidly growing suburban orientation, location on the I-5 corridor, and very different economy, land use system and tax structure all combine to make comparisons between Midcoast Maine and Tumwater inappropriate. As a matter of SEPA, percentage of business profits staying locally and charitable donations are not considered factors to be addressed in an EIS.
9. Your comments are noted for the record.

RESPONSE TO LETTER 18
Jorgensen, Walt

1. See the response to Comment 48 in Letter 6.
2. The indirect and induced employment generated by the proposed Wal-Mart Supercenter estimated in the Economic and Fiscal Analysis in the SDEIS took into account the fact that suppliers to the store would not necessarily be located in the Tumwater area. As described in Appendix H to the SDEIS, significant new employment is not expected to be generated elsewhere in Tumwater.
3. A fiscal impact analysis of the proposed Wal-Mart Supercenter, identifying public revenues and costs, was conducted for the SDEIS. This analysis was updated for this SFEIS. The analyses determined that the public service costs due to the proposed project would be more than offset by the tax revenues generated by the project (see Appendix H to the SDEIS and **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).

An analysis of return on investment and an inventory of all specific entities that would benefit from a Wal-Mart Supercenter in Tumwater are not considered factors to be addressed in an EIS.

4. "Quality of life" is not considered a factor to be addressed in an EIS. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non-SEPA issues. The Economic and Fiscal Analysis in the SDEIS described the likely effect on local area retail prices after a Wal-Mart store is opened in an area. The Updated Economic and Fiscal Analysis in this SFEIS discusses jobs, labor income and business revenues generated by the proposed store and its effects on the local economy. These analyses also describe the likely significant increase in City tax revenue relative to expected public service costs generated by development of the proposed Wal-Mart Supercenter (see Appendix H to the SDEIS and **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
5. Your comments are noted for the record. An Updated Economic and Fiscal Analysis was prepared for this SFEIS (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).

RESPONSE TO LETTER 19

Kelly, Dana

1. Your comments are noted for the record. In the final conditions of approval for the project generated by the City, the specific timing of transportation improvements will be identified. State law requires that, if a development will cause levels of service to decline below adopted standards, then transportation improvements or strategies to accommodate the impacts of development must be provided concurrent with the development. State law defines "concurrent" to mean that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years.
2. Your comments are noted for the record. The scope of the SDEIS Transportation Analysis, including the study area, was determined in conjunction with City Public Works Department staff, and reviewed and approved by the City's transportation consultant. The intersections included in the study area are major intersections in the site vicinity and known congestion points along likely project traffic travel routes (see page 9 of Appendix I to the SDEIS). Project traffic traveling west of Littlerock Road would constitute approximately 6 percent of the total entering traffic volumes. Given that traffic volumes typically fluctuate between 5 and 10 percent, the City determined that no additional analysis of intersections in this area was necessary.
3. The City's Littlerock Road corridor improvements include curb, gutter, sidewalks, and bike lanes. Adequate facilities will exist in the future to accommodate the demands from bikes, pedestrian, and vehicle traffic on this roadway. It is acknowledged that no bicycle facilities exist on Trospen Road and none are planned at this time.
4. Your comments are noted for the record. In order to estimate future baseline traffic volumes in the study area in 2007, a 3.0 percent annual growth rate was applied to the existing traffic volumes in the SDEIS Traffic Analysis. This increase in traffic volumes accounted for an increase in general background traffic growth. Historical traffic counts showed a 1.0 percent annual growth rate; therefore, a 3.0 percent annual growth rate was considered conservative. Traffic from nine pipeline projects (developments that are planned and would generate traffic in the study area) was also included in the SDEIS analysis. See page 12 of Appendix I to the SDEIS for a list of these pipeline projects.

See the response to Comment 2 in this letter.

5. Your comments are noted for the record.

RESPONSE TO LETTER 20

Lazar, Jim

1. The proposed mitigation measures listed on pages 3.9-22 through 3.9-25 of the SDEIS, together with the additional mitigation measures listed in **Section 1.5.11** of this SFEIS, would mitigate the transportation-related impacts of the project, and no significant transportation-related impacts would be expected. Per the direction from the City, emphasis was placed on mitigating the SB approach to I-5 to address the potential impacts of the project on the interstate.
2. Your comments are noted for the record. The mitigation measures proposed for the project are consistent with the improvements identified by the City as part of the long-term plans for the Trospen Road corridor. Access would continue to be provided via the east leg of the Trospen Road/Capitol Boulevard intersection, but would be restricted to right-in/right-out-only. The associated revision to the signal operations would provide a significant improvement to the operations of Capitol Boulevard. An appraisal of property values relating to a transportation improvement project is not considered a factor to be addressed in an EIS.
3. Your comments are noted for the record. See the response to Comment 1 in this letter. Construction of a full interchange at Kingswood Drive would not be warranted as a result of traffic from the proposed development.
4. The Updated Economic and Fiscal Analysis prepared for this SFEIS contains an analysis of expected growth in Tumwater area retail spending compared to potential retail sales generated at the proposed Wal-Mart Supercenter. That analysis finds that there would be more than enough population growth, and resulting retail spending growth from those new households, to support the proposed store in addition to existing retail (see Section IV in **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
5. The Updated Fiscal and Economic Analysis includes a discussion of when a large new retailer would divert sales from other retailers rather than generate new sales. Specifically, that phenomenon only occurs when an area is either not growing in population, such as a highly urbanized area in parts of Seattle, or is declining in population, such as rural areas formerly dependent on timber industry. The Tumwater area resembles neither of these scenarios, as it is anticipated to experience significant growth over the next five years, as projected by the Thurston Regional Planning Council. Significant new retail spending in the Tumwater area will result, and estimates in the Updated Fiscal and Economic Analysis indicate it would be more than enough to support the proposed Wal-Mart Supercenter in addition to existing retail (see Section IV in **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
6. See the response to Comment 9 in Letter 4 for an explanation of the likely small difference between gross and net economic and fiscal impacts in a growing retail trade area (see Section IV in **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).
7. See the response to Comment 48 in Letter 6.

8. See the responses to Comments 4, 5, 6, and 7 in Letter 20. The assertion of no or minimal net positive impacts is only true in a stagnant or declining local economy and declining local trade area. The Tumwater area is documented in the Updated Fiscal and Economic Analysis in this SFEIS as a growing part of the County that will see significant increases in retail spending over the next five years that will significantly exceed total potential retail sales captured at the proposed Wal-Mart Supercenter. It is, therefore, unreasonable to assert or expect that net impacts to the City would either be minimal or even negative (see Section IV of **Appendix A** to this SFEIS for specific estimates of household growth, retail spending growth, and comparisons to achievable retail sales at the proposed Wal-Mart Supercenter).

RESPONSE TO LETTER 21
Mandeville, F.W. "Bill"

1. Your comments are noted for the record.
2. The trip distribution percentages shown on SDEIS Figure 3.9-3 represent the percentage of project trips assigned to the surrounding roadway system, based on travel patterns identified in the transportation analysis prepared in 2002 for the Home Depot store (located to the south of the project site). When calculating the percent increase in traffic at a given intersection, including project-generated traffic, the total entering volume for all legs of the intersection must be added. Therefore, the traffic volumes represented in SDEIS Figure 3.9-6 are correct.
3. The installation of the proposed traffic signal at the Littlerock Road/Costco driveway intersection would not adversely impact the operations of adjacent intersections. The LOS results reported in the SDEIS Transportation Analysis (see Appendix I to the SDEIS) reflected the impacts of the proposed signal on overall traffic operations in the site vicinity. With appropriate signal timing, the proposed signal would maintain the current traffic platoons generated by the adjacent signalized intersections.
4. The results of the SDEIS and SFEIS Transportation Analyses showed that the proposed mitigation measures listed on pages 3.9-22 through 3.9-25 of the SDEIS, together with the additional mitigation measures listed in **Section 1.5.10** of this SFEIS, would mitigate the transportation-related impacts of the project. No other mitigation measures would be required.
5. Your comment is noted for the record. See the response to Comment 4 in this letter.
6. Your comment is noted for the record. See the response to Comment 58 in Letter 5.
7. Your comment is noted for the record. See the response to Comments 29 and 30 in Letter 5.
8. Your comments are noted for the record. As a SEPA matter, issues of social services are not considered factors to be addressed in an EIS. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non-SEPA issues. See the response to Comment 9 in Letter 4 for a discussion of hourly wages expected at the proposed Wal-Mart Supercenter compared to the Thurston County average retail wage.
9. Your comments are noted for the record. See the response to Comment 8 in this letter.
10. Your comments are noted for the record. See the response to Comment 8 in this letter.
11. Your comment is noted for the record.

RESPONSE TO LETTER 22

O'Halloran, Kathy A.

1. Your comment is noted for the record. See the response to Comment 32 in Letter 4 for information on the adoption of existing environmental documents to meet all or part of the SEPA requirements for the proposed project.
2. Your comments are noted for the record. See the response to Comment 3 in Letter 3 for information on the proposed pedestrian facilities. See the response to Comment 28 in Letter 4 for information on the City's visioning process for the Littlerock Road subarea.
3. Your comments are noted for the record. It is acknowledged that relocation of Kingswood Drive would result in one contiguous parking area. However, as noted on page 3.12-4 of the SDEIS, Alternative 1 (which features the relocation of this roadway) would eliminate the need for shoppers to cross Kingswood Drive and would reduce the potential for pedestrian vehicle accidents. New alternatives 2 and 4 would also feature relocation of Kingswood Drive.
4. Your comments are noted for the record. See the response to Comment 28 in Letter 4 for a discussion of the community visioning process for the Littlerock Subarea, and the relationship of the proposal to the adopted Subarea Plan.
5. Your comments are noted for the record. See the response to Comment 1 in this letter. The Tumwater Retail Store SEIS supplements the Tumwater Town Center EIS (1993). See page 2-1 of the SDEIS for a discussion of the 1993 EIS. A supplemental EIS (SEIS) is not necessarily less comprehensive than a standard EIS. Per WAC 197-11-620, a SEIS is prepared in the same way as a draft and final EIS, except that scoping is optional. A SEIS should not include analysis of actions, alternatives or impacts that is in the previously prepared EIS(s). Although scoping is optional for a SEIS, the City undertook scoping for the Tumwater Retail Store SEIS in order to elicit comments from the community on the contents of the document (see pages 2-2 and 2-3 of the SDEIS for a summary of the scoping process and comments). The SEIS is a relatively full scope EIS, with the majority of the elements of the environment listed in WAC 197-11-444 addressed in the document.
6. Your comments are noted for the record. With implementation of the proposed mitigation measures identified on pages 3.9-22 through 3.9-25 of the SDEIS, together with the additional mitigation measures identified in **Section 1.5.11** of this SFEIS, no significant unavoidable adverse impacts to transportation would be expected with the proposed project. State law requires that, if a development will cause levels of service to decline below adopted standards, then transportation improvements or strategies to accommodate the impacts of the development must be provided concurrent with the development. State law defines "concurrent" to mean that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years.

The improvements proposed at the Trospen/I-5 southbound ramp intersection and other locations throughout the study area are proposed by the applicant and are required to be completed in order for the project to be in compliance with City LOS standards. This is

true, with the exception of the improvements at the Trospen Road/Capital Boulevard intersection. As noted on page 3.9-24 of the SDEIS, the applicant would endeavor to construct the proposed Trospen Road/Capital Boulevard improvements, but if necessary right-of-way is not available or construction is prevented by circumstances outside the applicant's control, the City would accept a letter of credit for the cost of these improvements. Completion of these improvements would not be a precondition to issuance of the certificate of occupancy for the project.

7. Your comments are noted for the record. Additional analysis of the Tumwater Middle School access is provided in the Updated Transportation Analysis prepared for this SFEIS. As indicated in the response to Comment 44 in Letter 4, the results of this analysis indicate that during the peak school egress times, the school access points and roundabout at Kingswood Drive would continue to operate at acceptable levels with the addition of the project-related traffic (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for details).
8. Your comment is noted for the record.
9. Your comments are noted for the record. The proposed mitigation measures listed on pages 3.9-22 through 3.9-25 of the SDEIS, together with the additional mitigation measures listed in **Section 1.5.11** of this SFEIS, would mitigate the transportation-related impacts of the project, and no significant transportation-related impacts would be expected. An appraisal of property values relating to a transportation improvement project is not considered a factor to be addressed in an EIS.
10. See the response to Comment 48 in Letter 6.
11. Your comments are noted for the record.

RESPONSE TO LETTER 23

Peterson, Helen B.

1. Your comments are noted for the record.

The probable significant transportation impacts of the proposed project were evaluated on pages 3.9-9 through 3.9-21 of the SDEIS (see Appendix I to the SDEIS for details). The Transportation Analysis was updated for this SFEIS. Both the SDEIS and this SFEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.9-22 through 3.9-25 of the SDEIS, together with the additional mitigation measures listed in **Section 1.5.11** of this SFEIS, the proposed project would not result in significant transportation-related impacts.

The probable significant air quality impacts of the proposed project were evaluated on pages 3.10-4 through 3.10-5 of the SDEIS. The SDEIS concluded that with implementation of the proposed mitigation measures listed on page 3.10-6 of the SDEIS, the proposed project would not result in significant air quality-related impacts (see Appendix J to the SDEIS for details).

The probable significant water resources impacts of the proposed project were evaluated on pages 3.2-2 through 3.2-4 of the SDEIS. The SDEIS concluded that with implementation of the proposed mitigation measures listed on page 3.2-5 of the SDEIS, the proposed project would not result in significant water resource-related impacts (see Appendices D and E to the SDEIS for details).

The probable significant impacts of the proposed clearing of trees onsite were described on SDEIS pages 3.3-2 and 3.3-3. The proposed retention/replacement of trees has been adjusted since issuance of the SDEIS (see **Section 1.1.2** of this SFEIS for details). Both the SDEIS and this SFEIS concluded that with implementation of the proposed mitigation measures listed on pages 3.3-5 of the SDEIS, as updated in this SFEIS, the proposed project would not result in significant impacts from tree clearing.

2. See the response to Comment 48 in Letter 6.
3. Your comments are noted for the record.
4. Your comments are noted for the record.
5. Your comment is noted for the record. See the response to Comment 2 in this letter, and the response to Comment 2 in Letter 4.
6. Your comment is noted for the record.

RESPONSE TO LETTER 24
Pidone, Scott and Deon

1. Your comments are noted for the record.
2. A detailed analysis of the future traffic operations of the future roundabouts was included in the intersection analysis contained in Appendix I to the SDEIS and summarized on SDEIS pages 3.3-9 through 3.3-19. The roundabouts along Littlerock Road are forecast to operate within acceptable City standards and meet the City's concurrency requirements in 2007 with traffic from the proposed project.
3. As noted in **Section 1.1.2** of this SFEIS, the Proposed Action would continue to require clearing of the majority of the existing trees onsite; however, the number of trees to be replanted both on and offsite has been adjusted since issuance of the SDEIS. Under the current Proposed Action, 54 of the existing significant trees onsite would be retained; 393 trees would be planted onsite; and, 183 trees would be planted/funded offsite. Three new alternatives have been evaluated in this SFEIS that would retain and plant a greater number of trees onsite (see the response to Comment 15 in Letter 4 and **Chapter 1** of this SFEIS for details).
4. Your comments are noted for the record. See the response to Comment 3 in Letter 15. As a SEPA matter, social policy matters are not considered issues to be addressed in an EIS. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non-SEPA issues.
5. Your comment is noted for the record.
6. Your comment is noted for the record.

RESPONSE TO LETTER 25

Rother, George

1. Your comments are noted for the record. See the response to Comment 5 in Letter 22.
2. See the response to Comment 3 in Letter 3 and the response to Comment 28 in Letter 4.
3. Your comments are noted for the record. Street vacation approval was listed on page iv of the SDEIS as an approval that would be required for Alternative 1. An EIS often evaluates several related actions in one document. However, it is not the purpose of an EIS to determine if the requirements for street vacation approval have been met or are warranted. It is up to the City Code Administrator to determine whether Alternative 1 (if it is selected as the preferred action) meets the standards for the vacation.
4. As a SEPA matter, issues of wages and healthcare cost and provision are not considered factors to be addressed in an EIS. See the response to Comment 9 in Letter 4 for a comparison of the average retail wages in Thurston County with the expected hourly wages at the proposed Wal-Mart Supercenter.
5. See the response to Comment 48 in Letter 6.
6. Your comments are noted for the record. See the response to Comment 3 in Letter 24.
7. Your comments are noted for the record. The existing White Oak tree onsite would be retained based on the proposed landscape and tree retention plans (see Figures 2-5A and 3.3-4 in the SDEIS).
8. Your comments are noted for the record. See the response to Comment 6 in Letter 22.

Significant new population growth and associated retail spending in the Tumwater area is anticipated in the future, and estimates in the Updated Economic and Fiscal Analysis prepared for this SFEIS indicate that there would be more than enough retail spending to support the proposed Wal-Mart Supercenter in addition to existing retail (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).

9. The probable significant impacts of the project on police service were discussed on page 3.12-4 of the SDEIS. The SDEIS concluded that the Proposed Action would not be expected to result in significant impacts to police service with implementation of the proposed mitigation measures listed on page 3.12-5 of the SDEIS. Homeowner insurance premiums are not considered a factor to be addressed in an EIS.
10. All of the intersections analyzed in the SDEIS and in this SFEIS would operate at an acceptable level of service (according to City standards) of LOS D or better with implementation of the proposed mitigation measures listed on pages 3.9-22 through 3.9-25 of the SDEIS, together with the additional mitigation measures listed in **Section 1.5.11** of this SFEIS (see Appendix I to the SDEIS and **Appendix B** to this SFEIS for details). As a result, the proposed project would not be expected to result in significant

impacts to police, fire and medical response times. See the response to Comment 9 in this letter regarding insurance premiums.

11. See the response to Comment 10 in Letter 25. Robust growth in the Tumwater area and resulting growth in local area retail spending has been shown in the Updated Economic and Fiscal Analysis in this SFEIS. The analysis also discusses the likely impact upon existing retail properties in the area based on the evaluation of local commercial real estate professionals in the area. The analysis concludes that there is little, if any, risk of business closures and property decline or decay as a result of the opening of the proposed Wal-Mart Supercenter in Tumwater. Proximity convenience to retail and services typically has a positive impact on residential property values (see Section IV of **Appendix A** and the summary in **Section 1.5.10** for details).

RESPONSE TO LETTER 26
Sears, Mary E.

1. Your comments are noted for the record. See the response to Comment 11 in Letter 25. As a SEPA matter, quality of life is not considered a factor to be addressed in an EIS. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non-SEPA issues.

2. Your comments are noted for the record.

RESPONSE TO LETTER 27
Swanson, Janet

1. Your comments are noted for the record.

RESPONSE TO LETTER 28

Tobeck, Corrine M.

1. As a SEPA matter, business competition is not considered a factor to be addressed in an EIS. A detailed analysis of the competitive nature of each existing business is beyond the scope of SEPA. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non-SEPA issues.

Even though Wal-Mart stores often allow overnight use of their parking lots for recreational vehicles and overnight travelers, parking lots do not provide utility hook-ups, private spaces, and other amenities offered by fee campgrounds. Campers price-sensitive enough to prefer no utilities and no amenities in comparison to a fee-campground are already likely to park overnight at the Lacey Wal-Mart Supercenter or other locations that do not charge a fee. Accordingly, it is unlikely that a new Wal-Mart Supercenter in Tumwater would pose a significant reduction in revenues for existing campgrounds, because of the amenity difference, and the difference in patronization.

2. As noted on page 3.12-4 of the SDEIS, the City of Tumwater allows overnight parking in private parking lots, such as the lot at the proposed retail store. The estimated demand for police service from the proposed store documented in the SDEIS (approximately 359 calls for police service annually) was based on an average of the annual calls in 2003 and 2004 received by the City of Chehalis Police Department from the Wal-Mart store located in that city. These calls included calls that could be attributable to overnight recreational vehicle camping.

The proposed retail building would include a number of features to reduce the need for police service (and protect neighboring uses), including:

- A closed circuit camera (surveillance) system inside and outside the store operating 24 hours per day;
- An “in store” holding area for police use;
- A trained risk control team to identify and correct safety issues; and
- Building and parking lot lighting (enhanced lighting could be provided, if deemed necessary by a risk analysis).

RESPONSE TO LETTER 29
Archer, Jim and Caroline

1. Your comment is noted for the record.

RESPONSE TO LETTER 30
Bangs, Bobbie

1. Your comments are noted for the record.

RESPONSE TO LETTER 31
Brannberg, Julie

1. Your comment is noted for the record.

RESPONSE TO LETTER 32
Briggs, Ben

1. Your comments are noted for the record.

RESPONSE TO LETTER 33
Burge, Clyde

1. Your comments are noted for the record.

RESPONSE TO LETTER 34

Cooper, Kathy

1. Your comments are noted for the record.
2. The project site is zoned General Commercial (GC) by the Tumwater Municipal Code. The proposed retail development and associated services (a retail center, associated parking, and a future lease lot [gas station]) are permitted uses in the GC zone (see Draft Supplemental EIS **Section 3.6, Plans and Policies**, page 3.6-7, for additional discussion of the relationship of the Proposed Action to the provisions of the GC zone).
3. Your comments are noted for the record. Please see SDEIS **Appendix I** and Section 3.9, Transportation, pages 3.9-22 through 3.9-25 for a list of the transportation improvements that the applicant proposes to implement as necessary mitigation for project impacts. These mitigation measures include improvements at the following locations: the Trospen Road/I-5 southbound ramp intersection (Tyee Drive), the Trospen Road/Little Rock Road intersection, and the Trospen Road/Capitol Boulevard intersection. With the proposed mitigation, the Proposed Action would not be expected to result in significant unavoidable adverse impacts to traffic operations at these locations.

RESPONSE TO LETTER 35
Courie, Gary

1. Your comment is noted for the record.

RESPONSE TO LETTER 36
Gipson, Pearl

1. Your comments are noted for the record.

RESPONSE TO LETTER 37
Keahey, Dennis

1. Your comments are noted for the record.

RESPONSE TO LETTER 38
Lancelotti, Julie P.

1. Your comments are noted for the record.

RESPONSE TO LETTER 39
Mou, Haisheng

1. Your comment is noted for the record.

RESPONSE TO LETTER 40
Pettibone, C. Alan and Marianne

1. Your comments are noted for the record.

RESPONSE TO LETTER 41
Richardson, Karin

1. Your comments are noted for the record.

RESPONSE TO LETTER 42
Riley, Mickey and Wilma

1. Your comments are noted for the record.

RESPONSE TO LETTER 43
Sampson, Diane

1. Your comments are noted for the record.

RESPONSE TO LETTER 44
Soudah, Roger and family

1. Your comments are noted for the record.

RESPONSE TO LETTER 45
Unwin, Nat and Donna Faye

1. Your comments are noted for the record.

RESPONSE TO LETTER 46
Welsh, Bruce and Sharon

1. Your comments are noted for the record.

RESPONSE TO LETTER 47
Willardson, Lesley (Adam)

1. Your comment is noted for the record.

RESPONSE TO PUBLIC MEETING COMMENTS

Sharon Carrier

1. As indicated on SDEIS page 3.9-10, the Proposed Action is expected to generate a total of 9,716 new daily and 793 net new weekday PM peak hour vehicular trips (see SDEIS Table 3.9-3 for a summary of the trip generation estimated for the Proposed Action).

Existing traffic volumes for weekday PM peak hour conditions at the 13 study area intersections were collected in October and November 2004, and January and September 2005; Saturday peak hour traffic counts were collected in January 2005. SDEIS Figure 3.9-1 presents the existing PM peak hour traffic volumes at the study intersections (see Appendix I to the SDEIS for further information on existing traffic volumes in the study area).

Additional weekday AM, school peak period and PM peak hour traffic volumes were collected along Littlerock Road and Trospen Road on September 12 and 13, 2006, for this SFEIS. This information confirmed that the PM peak hour is the period with the greatest traffic volumes in the site vicinity, and thus represents the appropriated period for the transportation analysis (see **Appendix B** to this SFEIS for additional information on the new traffic volume counts).

Bill Dunning

2. Your comments are noted for the record.

George Rother

3. According to Tumwater Municipal Code 16.08, the applicant is required to preserve the greater of 20 percent of the existing trees onsite (20 percent of the 434 existing trees onsite equals 87 trees) or 12 trees per acre (20.5 acres at 12 trees per acre equals 246 trees). Or, in lieu of preservation of 246 trees, and if approved by the Code Administrator, the applicant may preserve fewer trees and replace the remainder that would be required at a 3:1 ratio either onsite or offsite. The applicant is requesting a waiver of the Tumwater Municipal Code Chapter 16.08 tree retention requirement to allow tree replacement, both onsite and offsite (including through payment into the City's tree fund) to fulfill a portion of the tree retention requirement.

As described in **Section 1.1.2** of this FSEIS, the current proposal is to retain 54 trees on site. Therefore, 192 trees would require replacement. At a replacement ratio of 3:1, 576 trees would need to be replaced both on and offsite. The applicant proposes to plant 393 trees onsite and plant or fund 183 trees offsite.

4. Under the Proposed Action the site would not be clear-cut; 54 of the existing, healthy trees onsite would be retained and an additional 393 trees would be planted onsite and 183 trees would be planted or funded offsite. The trees proposed to be retained have a diameter of six inches or more measured four and one-half feet above ground level (as

defined by Tumwater Municipal Code Chapter 16.08). Approximately 65 of the existing trees located onsite that are proposed for removal are considered to be unhealthy (see Appendix F to the SDEIS for further information).

Kate Laverents

5. See the response to Comment 19 in Letter 6.
6. See the response to Comment 50 in Letter 4.
7. See the response to Comment 20 in Letter 6.
8. See the response to Comment 22 in Letter 6.
9. In response to this and other comments on the Tumwater Middle School access, an Updated Transportation Analysis was conducted for this SFEIS on the primary school parking lot access. The SDEIS included an analysis of the weekday PM peak hour traffic at this access point (see SDEIS Appendix I and the summary of the analysis provided on SDEIS page 3.9-18); however, no analysis was conducted for the weekday AM and afternoon school peak period, when the school-related traffic would be at its highest levels. The SFEIS Updated Transportation Analysis addresses these other timeframes. According to the updated analysis, the traffic exiting the school parking lot would operate at an acceptable LOS D or better during both the AM peak hour and afternoon school peak hour (see **Appendix B** and the summary in **Section 1.5.11** of this SFEIS for further information).
10. In the Transportation Impact Analysis prepared in support of the SDEIS, project traffic was assigned to the surrounding roadway system. Thirty (30) percent of the future project traffic is anticipated to travel south of the site destined for southbound I-5, south on Littlerock Road, and east of I-5 via E Israel Road and Tumwater Boulevard (see SDEIS Figure 3.9-3). Four intersections to the south of Bishop Road were included in the transportation analysis (see Appendix I of the SDEIS for additional information).
11. See the response to Comment 4 in Letter 5, and the response to Comment 33 in Letter 6.
12. See the response to Comment 3 in Letter 5.
13. See the responses to Comments 5 and 6 in Letter 4.
14. It is acknowledged that the Economic and Fiscal Analysis was prepared prior to the opening of the grocery component of the Lacy Wal-Mart Supercenter. An Updated Economic and Fiscal Analysis was prepared for this SFEIS that takes into account the expansion of the Lacy Wal-Mart (see **Appendix A** and the summary in **Section 1.5.10** of this SFEIS for details).

Patty Furu

15. It is assumed that the completion of the frontage road referred to in this comment is the possible extension of Tye Drive to Bishop Road or beyond. The transportation analysis prepared in support of the SDEIS (see Appendix I to the SDEIS) determined that construction of this road would not be necessary as a result of the additional traffic on area roadways generated by the proposal. The City assumes that this roadway will be extended with other future development in the area.
16. The City plans to construct improvements to the Littlerock Road corridor, from Troser Road south to approximately Tumwater Boulevard, irrespective of the Wal-Mart proposal. The improvements planned for the Littlerock Road corridor are described on page 11 of Appendix I to the SDEIS. The applicant would provide frontage improvements along Littlerock Road and Kingswood Drive, including sidewalks and transit stops.
17. The average truck activity at the proposed store is estimated to include three to five 18 wheeler trucks per day and 10 to 15 direct store deliveries by smaller vendor trucks per day. Trucks could use either Littlerock Road or Tye Drive for deliveries. The level of truck activity projected for an average day is not likely to create any safety or operational impacts on roadways in the site vicinity. Typically, deliveries occur outside the peak commute hours when traffic volumes are lower. An analysis of the operation of truck routes in the site vicinity verified that truck turning radius could be adequately accommodated by the proposed site plan (see Appendix I to the SDEIS for further details, including Figure 11 which depicts the truck access turning templates).

Margaret Napier

18. Trucks could use either Littlerock Road or Tye Drive for deliveries. See the response to Public Meeting Comment 17 for further information.

Sherry Buckner

19. Your comment is noted for the record. As described in the Cover Letter to the SDEIS, the intent of the public meeting was to accept written and/or oral public comments; it was not intended as a forum to describe the proposal and present information and analysis from the SDEIS.
20. The statements in the Economic and Fiscal Impact Analysis prepared in support of the SDEIS were not intended to be critical of the existing, viable businesses in the City. However, as described on page 21 of Appendix H to the SDEIS, the City of Tumwater does not presently have an historic downtown core (i.e. a Main Street retail configuration) that serves as the City's primary shopping location. Tumwater's primary retail sector follows a suburban retail configuration, best represented by retail already developed along Littlerock Road (i.e. Fred Meyer, Costco and Home Depot).

In rural communities where local retail follows an historic Main Street retail configuration, it is acknowledged that Wal-Mart stores can have negative impacts on these

communities. However, negative impacts to a downtown retail core in Tumwater as a result of the proposal are not anticipated, because none currently exists.

See the responses to Comments 8 and 28 in Letter 4.

21. See the response to Comment 5 in Letter 8.

22. See the response to Comment 1 in Letter 16.

The applicant is proposing mitigation measures on Littlerock Road at the following locations: 1) Trospen Road/Littlerock Road - reconfigure the northbound and westbound approaches and modify the signal phasing, and 2) Littlerock Road/Costco shared access – install traffic signal and channelization. The applicant would also provide frontage improvements, including sidewalks and transit stops, along Littlerock Road.

George Rother (2)

23. In the final conditions of approval for the project generated by the City, the specific timing of these improvements will be identified. State law requires that, if a development will cause levels of service to decline below adopted standards, then transportation improvements or strategies to accommodate the impacts of the development must be provided concurrent with the development. State law defines “concurrent” to mean that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years.

24. See the response to Comment 11 in Letter 7.

25. As described on page 3.3-1 of the SDEIS, and in Appendix F to the SDEIS, there are presently 434 trees onsite (the Tumwater Municipal Code defines trees as having a diameter of six inches or more measured four and one-half feet above ground level). Of these, it has been determined that 65 trees onsite are unhealthy; therefore, the total number of healthy trees onsite is 369.

26. See the response to Comment 4 in Letter 19.

Nancy Partlow

27. Per WAC 197-11-440(5)(b), “reasonable alternatives include actions that could feasibly attain or approximate a proposal’s objectives, but at a lower environmental cost or decreased level of environmental degradation.” The applicant’s objectives for the Tumwater retail store are listed on page 2-8 of the SDEIS. As indicated in this comment, under Alternative 1, Kingswood Drive would be relocated along the southern boundary of the site. The realignment would allow for a contiguous parking area and a more efficient and safe access and circulation pattern within the site. Under Alternative 1, fewer trees would be removed from the site than under the Proposed Action (see **Section 1.1.2** of this SFEIS for details). Therefore, for certain elements of the environment, Alternative 1 would reduce impacts to the environment, relative to the Proposed Action.

28. Under Alternative 1, the proposed building would be located approximately 200 feet farther south than under the Proposed Action. Your comment regarding the scale on the figures is acknowledged. The figures in the SDEIS were reduced to fit onto an 8 ½ by 11 inch page, and the scale was reduced accordingly. The numbers on the scales have been enlarged in the SFEIS for better legibility (see **Figures 1-1, 1-2, 1-3, 1-4 and 1-5** in this document).
29. The proposed store would be open 24 hours a day. See the response to Comment 9 in Letter 5.

Brent Chapman

30. The Oregon White Oak tree located in the western portion of the site, along Littlerock Road, is proposed to be retained under the Proposed Action and all of the alternatives (see SDEIS Figures 3.3-1 and 3.3-2). A certified forester retained for the project would ensure that all trees to be retained onsite would be adequately buffered in order to protect the trees' root zones and ensure their long-term health. However, the Oregon White Oak tree onsite is located in close proximity to Littlerock Road. If it is determined that the tree is no longer viable as a result of the City's Littlerock Road improvement project (which will proceed irrespective of the proposal), this tree may need to be removed.

The landscape plans for the proposed project will be prepared by a qualified local landscape architect to ensure that an appropriate species of groundcover is used beneath the existing Oregon White Oak, as well as elsewhere onsite.

31. Your comments are noted for the record. The landscape plans for the proposed project will be completed by a qualified local landscape architect to ensure that an appropriate species of groundcover is used beneath existing trees, as well as elsewhere onsite.

Jeff Holcomb

32. See the response to Comment 24 in Letter 5. The trip generation rate for the proposed retail store is based on trip generation data presented in the Institute of Transportation Engineers Trip Generation manual (7th Edition). The discount superstore land use identified in the manual includes a grocery component, as well as general retail sales (see Appendix I to the SDEIS for further information). The trip generation used in the SDEIS was determined in conjunction with the City of Tumwater Public Works Department staff and was reviewed and approved by the City's transportation consultant.
33. The increase in calls for police service from the proposal (approximately 359 calls for police service annually, was based on an average of the annual calls in 2003 and 2004 received by the City of Chehalis Police Department from the existing Wal-Mart Supercenter located in that city. The additional approximately 359 calls for police service would represent an approximately 1.6 percent increase in calls for service in the City of Tumwater. If the increase in calls is used as the basis for a similar increase in the need for commissioned personnel within the Tumwater Police Department, the 1.9

percent increase would represent an additional 0.4 full time equivalent (FTE) staff (based on the existing 25 commissioned staff in the Department; see page 3.12-4 of the SDEIS for further information). The City of Chehalis Wal-Mart Supercenter was considered to be comparable to the proposed Wal-Mart Supercenter in Tumwater, because of the similarities in the locations and demographics of the two stores. Crime statistics from a store located in California would not necessarily be comparable to the proposed store in Tumwater.

Sherry Buckner (2)

34. The Littlerock Road improvement project is a City-funded project. Funding comes from a variety of sources, including: City funds, grants, traffic impact fees paid by developers, and mitigation improvements for intersections that would be financed by the applicant (see the response to Public Meeting Comment 22 for further information on the improvements proposed for Littlerock Road by the applicant).

Mary Sears

35. Your comments are noted for the record. As described on pages 3.5-6 and 3.6-6 of the SDEIS, the proposed retail store would be integrated with adjacent existing retail uses and would further the concentration of large-scale general retail operations (including Home Depot, Costco and Fred Meyers) in an area designated/zoned for such uses and in proximity to the freeway. This is the type of development was envisioned for the portion of the Littlerock Subarea to the north of Bishop Road (which includes the project site) in the Littlerock Road Subarea Plan (1997). The portion of the subarea to the south of Bishop Road was intended for a mix of commercial, residential and public uses. As a SEPA matter, quality of life conditions are not considered factors to be addressed in an EIS. See the response to Comment 3 in Letter 4 for a discussion of SEPA versus non-SEPA issues.

George Rother (3)

36. Your comments are noted for the record. The Tumwater Comprehensive Plan and the Littlerock Subarea Plan identify the project site as an area appropriate for large-scale retail development (see the response to Comment 28 in Letter 4).
37. See the response to Comment 28 in Letter 4.
38. Consistent with the GC zoning classification of the site, the proposal and all of the EIS alternatives would feature commercial development on the site. The Proposed Action and Alternatives 1 and 2 would include a 207,752 square-foot retail building; Alternatives 3 and 4 would include a 187,054 square-foot retail building.
39. Your comments are noted for the record.

Mary Sears (2)

40. The relationship of the proposed project to the City Council's adoption of a moratorium on large-scale retail development in the Littlerock Road Subarea, in December 2004, was discussed on page 3.6-14 of the SDEIS. As indicated in **Section 1.5.6** of this SFEIS, the moratorium did not apply to the proposal, because permits for the project were filed prior to the effective date of the moratorium. The moratorium was repealed in July 2006.

Brent Chapman (2)

41. The 45-day extended comment period for the SDEIS ended on June 30, 2006. This SFEIS responds to the comments received on the SDEIS, pursuant to WAC 197-11-560. The SFEIS provides additional information on potential environmental impacts and proposed mitigation measures for the Tumwater retail store proposal (beyond that provided in the SDEIS).

Sharon Carrier (2)

42. Your comment is noted for the record. City staff will confirm that you are a party of record and you will receive all future notices of meetings, and other actions on this project.

Unidentified Commentor

43. At this point, the Proposed Action described and analyzed in the SDEIS (see Chapter 2 of that document) and updated in this SFEIS (see **Chapter 1** of this document) is the proposal.

Margaret Napier

44. The City could issue a building permit after the seven-day "wait period" following issuance of this SFEIS. If an appeal is filed concerning the adequacy of the SFEIS during the seven-day wait period, then the decision on the project would be postponed. Any person "with standing" can file an appeal of the adequacy of the SFEIS (i.e. anyone who has submitted written or oral comments on the SDEIS).