

Dear Planning Commissioners;

The Wal-Mart Traffic Impact study has some major flaws. The first is that the counts were done when school is out. Free State High school is in session from 7:00am until after 3:00pm and then there are many sports and social activities during the remainder of the day. We were informed that the counts did not need to include the High School traffic because the school traffic was not a factor during peak hours. The peak hours at 6th and Wakarusa is created when the school traffic is highest and the constant traffic after school for the sports and social activities are taking place.

The staff has stated: "It is our understanding that there are other planned and approved development project to the west on 6th Street past George Williams Way, however, city staff indicated that these would likely not have a significant impact on traffic ". This is problematic, because as you look at the amount of development that has maxed the amount of possible build out and that has been approved along 6th street and you remember that the KDOT CORSIM study showed that the traffic problems along 6th street would create long waits at each intersection west of 6th and Wakarusa the statement made by the staff would seem completely inaccurate.

Page 12 and 13 of the TIS also shows that Wal-Mart is aware of this and states, "In addition, if delays are perceived by motorists as too long at this location, there are other alternatives that some traffic will likely shift to in order to balance the delays ". As traffic has been the concern of the neighborhoods surrounding this corner, the TIS only confirms that the traffic from the Wal-Mart development is excessive and that they are well aware of it.

The Wal-Mart Market Impact study has several major flaws as well. The most important flaw is that this study was done based on the St. Louis study and is based on Lawrence growing at a rate greater than 2%. And 990,000 more sq ft of commercial is needed by 2010. Since Lawrence may even be losing residents if not at least staying the same it seems that major commercial expansions is not needed and will only create more vacant commercial lots. The statement that Wal-Mart at 6th and Wakarusa is only 11% of the total 990,000 is also a concern when you think about the Wal-Mart being only one quarter of corner in all of Lawrence then this 11% of a additional 990,000 for the next four years becomes far more significant than the report leads one to believe. The comment "In June 2005, Lawrence reported a citywide retail vacancy rate of 3.9 percent. By way of comparison, Lawrence's 2005 office vacancy rate is reported to be 12.8 percent and the city's industrial vacancy rate was 6.2 percent" is also a misconception. Many of the vacant office spaces was vacant commercial, Tanger and Riverfront Malls, etc., and therefore the amount of development built as commercial that is now vacant is a lot higher than stated in this study.

The staff reports states, "It is important to note that the subject application was submitted prior to the July 25th adoption of the guidelines; therefore, the applicant was not required to comply with all of the standards."

The legal agreement states "The PARTIES agree that the project to be defined within the application shall incorporate enhanced design and construction standards at a level such that the physical appearance and layout of the site and the project will be of high quality and in keeping with the highest levels of aesthetics and design developed by Wal-Mart in other locations, and in keeping with and consistent with the design standards of the City."

These reports need to be redone with accurate numbers and follow the legal document and pay heed to the KDOT CORSIM study.

Gwen Klingenberg
WLNA Steering Committee member

