

23 April 2021

Michael Cerbone
Assistant Director
Skagit County Planning and Development Services
1800 Continental Place
Mount Vernon, WA 98273

Re: Concrete Nor'west/Miles Sand & Gravel; PL16-0097 & PL16-0098, Notice of Withdrawn and Re-Issued Mitigated Determination of Non-Significance (MDNS)

Dear Mr. Cerbone,

I would like to comment on the SEPA determination issued by Skagit County Planning and Development Services in response to the mine development application submitted by Mile Sand & Gravel's.

While the conditions suggested in this MDNS are more substantial than in the previous one issued nearly five years ago, I am disappointed that these conditions reflect a limited understanding of the scale and scope of the project and offer only piecemeal and symbolic mitigation, rather than specific and prudent measures to protect our community's well-being.

First, we see no limitation on the volume of truck traffic. And this is a very important point. While the applicant suggests an average of 46 truck trips per day, it's clear that the average is a meaningless number when it comes to determining traffic safety impacts. Speed limits, for example, are set based on the maximum safe speed of travel, and principle for a maximum limit on mine traffic volume should be similar. The applicant's own analysis suggests that up to 30 truck & trailer combos or up to 70 single dump truck trips per hour might occur. It is reasonable to expect the SEPA determination to evaluate the traffic safety impacts of the project based on this maximum, and mitigation conditions should set hard limits on this number, frequency, and duration.

Second, the application and mitigation plan lack clear definitions and maps of all haul routes. There is a proposed route but there is no specified limitation of mine traffic strictly to the defined routes. Neither the County Government nor the public can evaluate the traffic safety impacts of the project and the adequacy of the MDNS without this information. We need a safety analysis of all haul route intersections and road segments to determine whether or not trucks traveling to and from the mine will stay within their lane of traffic, and the mitigation measures to be required for every location where they will not.

I am glad to see that the new MDNS recognizes and requires mitigation for the fact that truck & trailer combos are unable to navigate the two sharp curves on Prairie Road east of Old Highway 99 without encroaching on the opposing lane of traffic. However, this is not the only spot along the proposed haul route, or the other likely alternative routes, which are similarly difficult to traverse for truck & trailer combos. The S-curves on Grip Road are particularly challenging and

on a steep incline. Why haven't these other problematic spots been evaluated, and mitigation measures been required? What happens when a school bus meets a gravel truck on these shoulderless curves?

Third, our rural roads have seen a large number of traffic accidents in recent years. My wife and I commute to Bellingham on a daily basis and often pass accident scenes on Highway 99 and sometimes on Prairie Road. And everyone in our community has stories about near misses. Has any analysis been performed to see what's causing all these accidents? In the analysis provided by the applicant I haven't seen any indication how this additional traffic will impact existing traffic. Do speed limits or passing conditions need to be adjusted to improve safety? I have personally observed how slow-moving trucks can cause irritation and provoke unsafe passing behaviors in some drivers.

Fourth, what's the long-term impact going to be on our public infrastructure? Adding heavy mine traffic to our existing, substandard roads will cause increased damage and higher maintenance costs. These impacts must be evaluated and the applicant should be required to pay their proportional share of the costs. An important example is the slumping shoulder and roadway on the south side of the Grip Road hill S-curves, which have required frequent repairs over the last few years just with existing traffic levels. It's no secret that as the gross vehicle weight increases, the damage to road infrastructure increases exponentially.

Finally, I would like to express my disappointment in the "flashing light" solution to the Grip and Prairie intersection problem. This seems like such a band-aid solution. Instead of eliminating the source of the danger, you're just asking drivers to be on the lookout for danger. Yes, that may help raise driver awareness, but it's really only a half-hearted attempt to rectify the problem, when the applicant's own analysis shows there's a safe, albeit more expensive, solution.

I hope that you and your staff will take another deep and thoughtful look at the application, the concerns raised by community members and your own analysis. There's a lot of room for improvement here.

Respectfully,
Jed Holmes
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