

From: Wallace Groda  
Sent: Thursday, February 4, 2021 11:55 AM  
To: Michael Cerbone  
Subject: Grip Mine Traffic Safety & Congestion Issues

Subject: PL16-0097 Grip Road Mining Use Permit & Response to the TIA

Mr. Michael Cerbone,

Have you come to any conclusions as how the permit will address the multitude of safety issues from both the public comments and the CNW consultant's T.I.A? Of particular concern are plans to deal with the noted intrusion of truck and trailer rigs into the oncoming traffic lanes. This continues to be a major safety issue with the community.

Excerpt from Traffic Impact Analysis for Grip Road Mine prepared by DN Traffic Consultants, Inc. from September 10, 2020 correspondence:

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To address this concern, Skagit County staff requested the Applicant evaluate the potential for trucks to travel outside their lane of travel and encroach on the shoulder or the opposite lane of travel through the 90 degree turns east of Old Highway 99. The Consultant prepared an AutoTurn analysis of these turns on Prairie Road approximately 1200 lineal feet and 1800 lineal feet east of the Prairie Road/Old Highway 99 intersection. Based on this analysis, it was estimated the dump truck/pup combination is expected to encroach approximately two (2) to three (3) feet onto the shoulder or over the centerline.

My concern with this issue is that it highlights (1) the likelihood of collisions and probable traffic fatalities and (2) that the analysis did not examine similar curves on Grip Road. The blind intersection at Grip and Prairie adds another layer of collision exposure to the public as well as traffic delays. Is it in any way possible that the problem of significant lane intrusions might go unaddressed in the permit? Will you require that no trailers are allowed until the roadways are either straightened and/or widened for assured traffic safety? And, are you planning any further analysis for the entire route for assurances that other collision curves and intersections are similarly remediated?

Traffic Congestion:

The T.I.A. did not address the impacts of gravel hauling on traffic congestion. I did some simple observations of gravel truck and trailer turns at intersections from stopped positions. With the proposed case of 30 truck and trailer roundtrips/hour (60 one-way trips/hour); the impact is that total blockage of each involved intersection will be about 12 minutes/hour. And that does not include the wait time for the truck rig to enter the intersection nor does it include the time to accelerate out of the intersection and reach traffic speed. There are a minimum of three intersections on the haul route, i.e the mine entrance on Grip Road, the Grip and Prairie Road intersection, and the Prairie Road and Highway 99 intersection. And if the commuter is going to I-5, there will be four

intersections with the Bow Hill turn to I-5. The intersection blockage and slow truck acceleration will compound and easily add a total of 35 to 50% more time to the community's commute time on Grip and Prairie Road with that situation. It will be worse at peak traffic conditions and continually worsen as the community grows.

Another compounding factor is that a truck and trailer rig cannot make a right turn at these intersections without going over the center line into the oncoming traffic. These narrow lane intersections will both add to the safety hazard and to the commute time.

Will you be considering this issue further with appropriate options to reduce traffic congestion? It seems that there are only two practical ways to address this dilemma; i.e. (1) limit operation to dump trucks only and/or (2) install turn and merge lanes at each of the three intersections.

#### Project and Maintenance Costs:

Who will be responsible for the costs of further traffic analysis, road safety mitigation, traffic congestion mitigation, and upgrades to the roads to handle the heavy rig weights? Will CNW be required to contribute to the increased maintenance for the roads? It seems inappropriate for the tax payer, especially our local community, to subsidize the CNW project only to get negative impacts from the mine operation on quality of life and property values.

Thanks,  
Wallace Groda  
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