

Exhibit C-49 S-16: Wallace Groda
Declaration with Exhibits A, B, C,
and D" attached

Exhibit 49, S-16

**BEFORE THE HEARING EXAMINER
FOR SKAGIT COUNTY**

In the Matter of the Application for a
Special Use Permit

No. PL16-0097, No. PL16-0098

**Concrete Nor'West/Miles Sand
and Gravel SUP**

DECLARATION OF
WALLACE GRODA,
WITNESS FOR
COUGAR PEAK, LLC

I, Wallace Groda, am over 18 years of age and competent to testify as to the
matters contained herein:

Reason for This Declaration, Background.

1. I had intended to testify in person at the Hearing Examiner hearing
as a witness for Cougar Peak, LLC, but had technical difficulties with the
Microsoft Teams connection; the Hearing Examiner granted me the opportunity to
submit this declaration, describing my testimony. My analysis herein is based on
my 20 years traveling Grip Road to and from my farm operation, my experience in
construction, and my career as a professional in the management of large-scale
refinery operations in Anacortes, the Bay Area and Texas, which included, among
other responsibilities, facility transportation management and investigation of

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1 serious industrial accidents, including complex analysis of post-accident loss
2 prevention and remediation.¹

3 2. I am the owner of a farm of approximately 37 acres located at
4 21804 Grip Road, Sedro Wooley, Washington.

5 3. I purchased the farm in 2003, after retiring from a career in the
6 refinery business. I operate a vineyard and equestrian facility.

7 4. The farm is located due east of the proposed Miles Sand and Gravel
8 Grip Road Mine, within one half mile.

9 5. As a landowner on Grip Road near the proposed mine, I have studied
10 the mine application and traffic analyses extensively and investigated certain
11 aspects of the proposal, as well as listened to the expert traffic testimony at
12 hearing.

13
14 Summary of Concerns.

15 6. Based on my familiarity with the neighborhood roadways to be used
16 by the proposed mine and my investigation of traffic risk, I conclude that, if
17 approved, the operations authorized by the proposed Mining Special Use Permit
18 will have direct, perceptible and substantial adverse road safety impacts on me, my
19 family, our employees, our immediate neighbors whom we care about deeply, and
20 our farm visitors, customers and suppliers, categorized generally as follows:

- 21 a) An increase in risk of death and injury to travelers on Grip Road to
22 and from the segment at our farm entrance, from the addition of 46
23 heavy truck/trailer trips per day on average, and up to 30 truck/trailer
24 trips per hour, as proposed;
25

26
27 ¹ Attached hereto as part of this declaration is a narrative of my professional background and experience.

- 1 b) A high likelihood that those proposed trips (and increased risks) will
2 be exceeded at the discretion of the mine owner, without any express
3 limitations on total trips per day or limitations on hours of truck
4 travel on Grip Road;
- 5 c) An increase in encounters between heavy trucks on Grip Road and
6 transport of school-aged children, traveling to and from school twice
7 per school day, as a result of adding the project vehicle trips; those
8 encounters will involve school buses, private cars, and child
9 pedestrian use of Grip Road (plus child bicycle travel during off-
10 school hours);
- 11 d) Increased risk of encounters due to the use of the 90 degree turns to
12 the east of the mine on Grip Road by the mine operation vehicles,
13 without any sight-distance or road widening improvements;
- 14 e) Exacerbated increases in risk described above due to:
- 15 i. Rural two-lane road surfaces that are substantially narrower
16 than the thirty four (34) foot width required by County road
17 standards. Exhibits 49, S-1B, S-1C, S-14;
- 18 ii. The intensity of the vehicle types that will serve the mine
19 (truck/trailer combinations approx. 75 feet in length).
20 Exhibits 49, S-15; Exhibits C-53, -54.
- 21 iii. The number of proposed daily and hourly trips, without any
22 proposed conditions limiting how often those rates may be
23 exceeded; Exhibits 18, 27.

24 Observations.

25 7. During my 20 years of ownership there, I have never witnessed a
26 commercial truck and trailer stay in its lane on Grip Road. Never.
27

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1 8. I have experienced many near misses at the blind intersection of
2 Grip and Prairie Roads and have narrowly missed being sideswiped on the road.
3 It will be significantly worse with the proposed increase in truck traffic.

4 9. The road is steep and narrow with shoulders that are either non-
5 existent or slight, nowhere near the 6 foot width per side required by County Road
6 Standards for a Rural Collector with 11-foot travel lanes. Exhibit 49, S-14 (Figure
7 B-6 County Road Standards).

8 10. Further, there is a steep drop off of 30 to 50 feet from Grip Road
9 west of the mine entrance, described in more detail below.

10 11. As one who has considerable experience regarding safety conditions
11 on Grip Road; based on my extensive review of the mining proposal; and based on
12 my experience in accident investigation and remediation work in my career,² it is
13 my considered conclusion that:

14 a) The discussions between the applicant and the County that resulted
15 in conditions requiring sight-distance improvements at the mine entrance
16 and at the intersection of Grip Road and Prairie Road did nothing to address
17 the obvious sight-distance deficiencies at the S-Curves and 90-degree turns
18 on Grip Road;

19 b) The proposed improvements do not offer safety measures that plan,
20 engineer, finance or otherwise improve the remaining risks associated with
21 substandard lanes and shoulder widths and insufficient sight-distance on
22 Grip Road; and
23
24

25
26 _____
27 ² Attached hereto as part of this declaration is a narrative of my professional background, including extensive experience
28 in large-scale industrial operations management and accident investigation and remediation.

1 c) As proposed, the conditions requiring improvements at the mine
2 entrance to Grip Road do not do anything to prevent accidents caused by
3 trucks entering and exiting the mine at slow speeds with 75-foot long
4 truck/trailer combinations; turn lanes should have been proposed at that
5 intersection to maintain adequate public safety.

6 Concerns re Safety of Neighbors, Caretaker and Their Children

7
8 12. Attached as Exhibit 49, S-16A, is a series of three maps depicting
9 the Sedro Wooley School District schools served by buses traveling on Grip Road
10 each morning and afternoon, derived from Google Maps. A schedule of school
11 bus service on Grip Road was already provided in the record at Exhibit 49, S-9.
12 Other testimony in the record describes the impacts to school children traveling to
13 and from school, morning and afternoons.

14 13. Increased risks of death or injury to children riding school buses on
15 Grip Road is a major concern for me, as a close friend of neighbors and employees
16 with school age children and one who travels Grip Road every day. The testimony
17 I heard from Jennifer Aven and Jessica Hoyer at hearing comport with the
18 frequent reports I hear from neighbors of close encounters with crossover traffic
19 on Grip Road. Testimony from traffic experts at hearing also corroborated the fact
20 that increased truck traffic from the proposed the mine operation will lead to a
21 higher volume of potential encounters with school buses. The more potential
22 encounters, the higher the risk of a serious accident. With the higher probability
23 of encounters and the severity of the occurrence if it does occur, I conclude that
24 the Examiner has an adequate basis to conclude and must reach the conclusion that
25 there is a significant risk to school children.

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1 14. I share the view of the mothers who testified that any increase in
2 risk to these children is unacceptable and the Hearing Examiner has the authority
3 and should exercise it to limit truck travel from the mine during the hours children
4 are most likely to be travelling Grip Road in school buses or private cars, for both
5 segments of Grip Road east and west of the mine entrance. That is the only way to
6 prevent an increase in accidents affecting them.

7 Risks Associated With Seasonal Weather.

8 15. Weather conditions can make Grip Road even more treacherous and
9 the Examiner again should exercise his authority to condition project operations to
10 eliminate the increased risk of encounters with heavy truck/trailers during those
11 conditions. The severity of an occurrence can be quite high as there are several
12 curves with deep drop offs. I've personally experienced that exposure around the
13 time of Thanksgiving 2009, when I encountered black ice while driving only
14 10mph with my Lexus LX400 (a superior off road vehicle) and dropped 50 feet off
15 the road. Accordingly, any approval of the special use permit should include
16 conditions preventing truck travel during ice and snow events.

17 Observations re Cyclists.

18 16. Based on my review of the testimony and evidence of traffic analysis
19 for this project, there was inadequate analysis and quantification of increased risk
20 to cyclists on Grip Road, during the peak recreational seasons. Traffic counts
21 were conducted in December or late August, rather than during peak summer
22 months. Based on my 20 plus years in the area, bicycle traffic is common on Grip
23 and Prairie. There are many groups and charity fund raisers, particularly on
24 weekends. The Hearing Examiner should exercise his authority to reduce safety
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1 risks due to mine truck/trailer traffic by imposing conditions limiting truck travel
2 during those cycling events.

3 17. Based on the testimony of Brad Barlow, the applicant's operations
4 manager, the applicant is only trying to get to 46 trips per day, on average over the
5 course of a year. They have a great amount of leeway to schedule their loading
6 and hauling around the public's high intensity cycling events using Grip Road, to
7 prevent increases in risk of death and injury. It is the County's duty to ensure that
8 any mining traffic be in line with prevention of that increased safety risk, in my
9 view.

10 Grip Road Crossover Curves.

11 18. These concerns of increased risk are specific, well-articulated and
12 real. As noted in Paragraph 6(e)(i), above, one of the bases for my concern about
13 increased risk of death and injury on Grip Road involve the threat of crossovers
14 and accidents at the sharpest curves on Grip Road. Our measurements of several
15 of these curves, along with the applicant's own Auto Turn analysis³ demonstrate
16 that crossovers on Grip Road will occur as a result of adding the mine traffic to the
17 roadway – in other words, crossovers are not hypothetical or speculative; they will
18 occur.

19 19. My identification of places where crossovers will occur and my
20 analysis of increased risk involve the following:

21 (a) West of the mine entrance: Two "S" Curves; and
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26 ³ Gary Norris, the applicant's traffic engineer, testified at hearing that he only conducted Auto Turn analysis for the Grip
27 Road segment west of the mine entrance, and did not perform the analysis for any Grip Road segments east of the mine
28 entrance.

1 (b) East of the mine entrance: Five sharp curves,
2 with an additional two sharp curves if truck/trailers turn onto Mosier Road
3 to get to Highway 9.

4 20. West of the Mine Entrance. My analysis of the Grip Road
5 crossovers and accident risk related to the travel route west of the mine entrance is
6 as follows:

7 a) I attest that the attached Exhibit 49, S-16B is a true and correct copy
8 of a map that Neil McLeod and I prepared using the applicant's "Auto Turn"
9 analysis map as a baseline and superimposing our measurements of road
10 widths in the field at the indicated locations.

11 b) While making those measurements, I observed in the field that this
12 section of the haul route has limited sight distance and has a 30-to-50-foot
13 drop from the road to the embankment floor.

14 c) I would consider this to be a very hazardous section of the road way
15 with a high potential for death of injury from encounters with 75-foot long
16 project truck/trailer combinations.

17 d) As the applicant acknowledged in their Auto Turn analysis, those
18 heavy truck combinations are likely to cross over the center-lane. In doing
19 so, they increase the potential for cars to leave the roadway to avoid
20 crossovers, in which case cars heading north or northeast risk descending
21 the steep drop-off.

22 e) What makes this road section notable is that it is one of the few
23 locations on Grip Road that has a significant shoulder. It would be feasible
24 and relatively inexpensive to widen the road to the full County road
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1 standard (34 feet), by removing a relatively small portion of a hillside knob
2 directly north of the 30-to-50-foot embankment drop-off and then by
3 paving the expanded shoulders. Cost should be minimal in light of the
4 extensive County right-of-way shown on the applicant's Auto Turn exhibit.

5 f) Without mandatory improvements, the number of crossover
6 encounters experienced by any one driver on just one of the Grip Road S
7 curves would increase over current conditions by a factor of up to 28.5
8 crossover encounters per hour (using the applicant's maximum prediction of
9 30 trips per hour x .95 trip distribution to the west of the mine entrance).
10 Since there are two S curves, the factor increases to 57 potential crossovers
11 per hour.

12 g) A single vehicle could experience encounters at both S curves as
13 they travel through this stretch of Grip Road, because at that high hourly
14 rate more than one truck/trailer combination could be on the road at the
15 same time (either two trucks heading the same direction, one behind the
16 other spaced so trucks are present at both S curves, or heading opposite
17 directions with similar spacing). At this high rate of truck/trailer volume,
18 this is not a hypothetical scenario; it is a likely occurrence presenting real
19 increases in risk of death or injury due to head-on crossover accidents.

20 h) In conclusion, in my view, the Hearing Examiner must impose
21 conditions to protect public safety on the Grip Road "S" curves west of the
22 mine entrance. As our measurements show, there is ample room within the
23 right-of-way to widen the roadway to the 34-foot width required in Table
24 B-6 of the County Road Standards. In light of the steepness of the hill, the
25 likelihood of increased risks described above, and the low-cost of the
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1 improvements, these proposed conditions are reasonable, capable of being
2 accomplished, and necessary, in my view.

3 21. East of the Mine Entrance. The applicant estimated in Exhibit
4 18 that at least 5% of the total truck/trailer traffic from the Grip Road mine would
5 travel Grip Road to the east of the mine entrance.⁴ Based on my use of that
6 roadway these past 20 some years, this is a highly used section of roadway to and
7 from Sedro Wooley and Highway 9. Based on my review and analysis, I conclude
8 that without substantial road improvements, the proposed addition of even 5% of
9 the mine traffic will create a significant new safety hazard for school buses and
10 other vehicle use on that long segment of Grip Road. My analysis of the Grip
11 Road crossovers and accident risk related to the travel route east of the mine
12 entrance is informed by the following:

13 a) The applicant's own statements identify a problem with safety on
14 Grip Road. At hearing, the applicant's Traffic Engineer Witness, Garry
15 Norris, testified that he did not conduct any sight-distance analysis for the
16 Grip Road turns east of the mine entrance.⁵ In Exhibit 18 at Page 20, the
17 applicant's traffic engineer also acknowledged that "Currently there is
18 virtually no paved shoulders along Grip Road [sic]" and "The Existing
19 Prairie road and Grip road pavement cross sections are not consistent with
20 current Skagit County Road Standards." On Page 21 of that same traffic
21 memorandum, he noted "Potential encroachment of the dump trucks/pup
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23
24 ⁴ At the proposed 46 truck/trailer trips average per day, that amounts to a minimum average of 2.3 truck/trailer trips per
25 day on Grip Road east of the mine entrance. However, under the extended hours scenario (30 trips/hour) proposed by the
26 applicant and the MDNS, Exh. C-9 (Feb. 2, 2022), the applicant's suggestion is that as many as 1.5 truck/trailers could be
27 using the road east of the mine *every hour*.

28 ⁵ Mr. Norris' traffic memorandum, Exhibit 18 (September 10, 2020) at Page 11, describes the extent of his sight distance
analysis on Grip Road, identifying only analysis of the "Grip road/Site access." None of the sight distance problems on the
Grip Road turns described here east of the mine are identified, analyzed or mentioned.

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1 combination on the shoulder and center line is a safety concern. It should
2 be noted the roadways are not consistent with current Skagit County Road
3 Standards for shoulder width." The applicant's recent Auto Turn analysis
4 on two Grip Road curves shows that, even with 11-foot wide roadway,
5 curving roadway leads to crossovers due to the long length of the
6 truck/trailer combinations.

7 b) Attached hereto as Exhibit 49, S-16(C) is a map showing locations
8 where measurements indicate to me that crossover problems are even more
9 severe than the ones identified by Mr. Norris' Auto Turn analysis for Grip
10 Road West. Notably, he testified that he did not conduct that analysis for
11 Grip Road east of the mine entrance. The map shows that at least five of
12 the turns on Grip Road east of the mine entrance exceed 85 degrees at the
13 inside of the curves (with two additional extreme curves along an alternate
14 route on Mosier Road to Highway 99). These sharp angles make it
15 impossible for 75-foot long truck/trailer combinations to turn without
16 crossing over the center-line.

17 c) Already entered into the record, Exhibit 49, S-1C, (attached hereto
18 for ease of reference) is a chart of measurements Neil McLeod and I took of
19 two 90-degree curves on Grip Road to the east of the mine. I hereby affirm
20 the accuracy of those measurements as depicted therein. The measurements
21 that Neil McLeod and I did on these Grip Road curves and on the 90-degree
22 turns used the same calibrations performed on Prairie Road by Miles'
23 consultant. We concluded that any truck/trailer combinations at the
24 measured locations on Grip Road would cross the center line by at least a
25 foot more when compared to the measurements found by Miles' consultant
26 for Prairie Road.
27

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1 d) The measurements performed by the applicant at Prairie Road
2 resulted in County-staff-proposed conditions for widening of certain Prairie
3 Road curves, based on the applicant's Auto Turn prediction of crossovers
4 from 2-3 feet. None were proposed for Grip Road east of the mine
5 entrance, despite the even-wider crossover potential.

6 e) The uniformity of the crossover problem on the five Grip Road
7 curves east of the mine entrance lead me to the conclusion that my family,
8 my employees, our invitees and neighborhood families and children will be
9 exposed to a much higher number of encounters with the mine truck/trailer
10 combinations due to crossovers than currently exist.

11 (i) The applicant has not agreed to cap the number of trips going
12 east from the mine entrance.

13 (ii) Even if the mine trips were limited to 5% of the total, during
14 extended hours, up to 1.5 trucks per hour would traverse this Grip
15 Road east segment.

16 (iii) At that rate, any given vehicle travelling Grip Road east of
17 the mine on any given hour during the extended hours mine
18 operation would have a high percentage chance of encountering a
19 gravel mine truck, whereas currently they would have zero
20 encounters. This comprises a significant increase in risk of a
21 crossover encounter.

22 (iv) The testimony of Jennifer Aven shows that a crossover
23 encounter at one of the five sharp corners requires a driver to take
24 quick evasive maneuvers to exit their lane. Because Grip Road
25 admittedly does not have paved shoulders, there is a risk of serious
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1 injury in those places where there is a ditch, a hillside, power pole or
2 tree.

3 (v) The odds of one of these encounters is additive, in that there
4 are five sharp corners in this road segment, Exhibit 49, S-16(C),
5 attached ("Grip Road East"), multiplied by 1.5 trucks per hour,
6 resulting in a risk of up to 7.5 *encounters in any given hour* that a
7 car or bus is traveling Grip Road East.

8 (vi) Even without the extended hours, the 46 trips per day on
9 average will result in 2.3 trucks per day on the Grip Road East
10 segment. Multiplying the number of trucks on average by the five
11 sharp curves, a driver can face 11.5 encounters on any given day.

12 (vii) Under either scenario, there is a substantial increase in the
13 number of possible encounters. In light of the severity of the
14 consequences if one of those encounters occurs, I conclude that the
15 level of risk is high and significant.

16
17 22. Based on this evidence and the risks identified earlier in this
18 declaration, I conclude that there is a substantial basis for the Hearing Examiner to
19 find that the applicant has not met its burden of showing adequate public road
20 safety related to crossovers on Grip Road, and then to exercise the authority under
21 County ordinances to either:

22 (a) deny the application;

23 (b) remand the proposal for study of a combined County/Applicant road
24 improvement project addressing each of the locations identified above; or
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26 (c) impose conditions limiting hours of use on Grip Road and requiring the
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1 widening of the identified Grip Road turns. To date, the applicant has not
2 proposed any such widening in writing, evidently inviting the Examiner to do so.

3 Mine Entrance.

4 23. Similarly, conditions in the field also make it feasible for the
5 applicant to improve the roadway at the mine entrance to reduce the higher risk of
6 accidents from truck/trailer entry from Grip Road turning left across traffic into
7 the mine (from the west) and exit from the mine onto Grip Road using left hand
8 turns (heading east). So far, no such improvements have been proposed by
9 County staff. Based on my field review and study of the application materials and
10 testimony, I reach the following conclusions:

- 11 a) At the mine entrance, Grip Road is a narrow, substandard County
12 road;
13
14 b) The mine entrance drive itself is a narrow entrance with
15 acknowledged limited sight distance. The proposed flashing beacons do
16 not reduce that limited sight distance or require installation of a turn lane;
17
18 c) Notwithstanding flashing beacons, the long truck/trailer
19 combinations will still necessarily cross the centerline of Grip Road when
20 exiting the mine and when entering from the west (direction of Prairie
21 Road);
22
23 d) While exiting the mine and heading east, the truck/trailer
24 combinations (up to 75 feet long) will need to swing out into opposing
25 lanes to make the hard left turn. (Note that when asked, Brad Barlow, the
26 applicant's representative, declined to accept a possible voluntary condition
27 prohibiting use of Grip Road to the east, insisting that they wish to serve
28 "local" deliveries through that route);

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1 e) The narrow width of the mine entrance presents a problem both for
2 truck turns into the mine from the east and truck turns out of the mine to the
3 west:

4 (i) Truck/trailers entering the mine from the east will need to
5 make a right hand turn into the mine entrance and will necessarily
6 swing wide and cross over into the eastbound lane of Grip Road in
7 order to make the sharp 90 degree turn to the right.

8 (ii) Similarly, trucks leaving the mine, heading west by making a
9 right hand turn, will also need to swing out wide into the eastbound
10 lane of Grip Road, in order to make the sharp 90 degree turn to the
11 right.

12 f) The solution is to impose a condition requiring the applicant to widen
13 the entrance to the mine haul road, move the security gate further from Grip
14 Road, and provide turn lanes to improve safety as well as minimize traffic
15 slowdowns.
16

17 24. The rationale for this safety measure can be seen by comparing what
18 the applicant has done at its other mine entrances, based on my visits and field
19 observations at those locations, as follows:

20 a) The Bellville mine entrance has turn lanes from both directions on
21 Highway 99, is 100 feet wide, and the security gate is 93 feet from the main
22 road.

23 b) The Kelleher mine entrance is 155 feet wide and the security gate is
24 200 feet from the road.
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1 By contrast, the Grip Road mine entrance is only 75 feet wide and the security
2 gate is 34 feet from the road.

3 Comment on Notices re Mineral Resource Overlay.

4 25. Concerning notice of mine activities mentioned by the applicant:
5 The applicant's attorney suggested at hearing that witnesses who expressed
6 concerns about proposed mine operations must have known that a mine operation
7 would have the kinds of impacts they identified, because in some cases a notice on
8 title was recorded indicating the presence of the Mineral Resource Overlay
9 comprehensive plan designation. I never understood those notifications to mean
10 that a mine applicant had a right to issuance of a mine permit if the operation
11 would endanger public road safety. I do not oppose approval of this mine in
12 general, but I do oppose approval without conditions that will reduce the risk of
13 increased harm to residents and others traveling Grip Road from the described 75-
14 foot long heavy truck/trailer combinations. In fact the comprehensive plan goals
15 and policies and the adopted code I have reviewed for operating within the
16 Mineral Resource Overlay area are quite clear that the projects are approvable
17 only if they protect public safety on the roadways. No notice cited by the
18 applicant ever eviscerated that law, as I understood the notices.
19

20 Personal Recommendations.

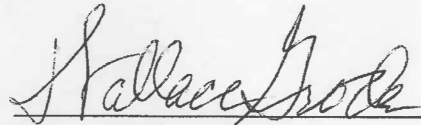
21 26. Attached as Exhibit 49, S-16D is a list of conditions I would like the
22 Hearing Examiner to consider. I present these as a local citizen rather than on
23 behalf of any other party. I appreciate the Examiner's consideration of those listed
24 conditions.
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1 Under penalty of perjury under the laws of the State of Washington, I
2 hereby declare the foregoing to be true and correct to the best of my knowledge,

3 Executed this 30th day of September 2022, in Sedro Wooley, Washington.
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8 Wallace Groda

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CV Mr. Wallace Groda

- Technically focused education with B.S. in Chemistry, minors in biology, physics and mathematics followed with chemical engineering courses emphasizing distillation, catalysis, heat transfer and refining economics.
- A career in refining and chemical operations starting at the Shell Anacortes Refinery. This was followed by assignments for experience development and managerial positions of increased complexity and responsibilities. Job locations included Deer Park, Texas; Shell Head Office (Houston); Martinez, California ; Houston Head Office; then to Director of Westhollow's Environmental Technology Center.
- Environmental Director responsibilities included management of research scientists and engineers to develop new technologies for emissions reduction, technical support for environmental projects for water treatment and combustion emissions reduction, site contamination remediation, and assisting locations on complex permitting activities.
- Special assignments included refinery debottlenecking projects, studies to buy and sell refineries, investigation of high impact accidents, implementation of process hazards analysis program for refining, shutdown and conversion of the Wilmington, CA refinery to an oil terminal, and finally, working on the leadership team to integrate Shell and Texaco operations following their merger.
- I retired from Shell in 1998 when recruited by Tesoro for the refinery manager's position after they purchased the Anacortes Refinery from Shell Oil following an FTC directive. I then moved to Anacortes.
- After four years, I agreed to delay my retirement and extend my employment as Corporate VP of Technology provided that I could work remotely from Anacortes. Tesoro had acquired three additional refineries and needed assistance in organizing the expanded operation network.

Exhibit 49, S-16(A)

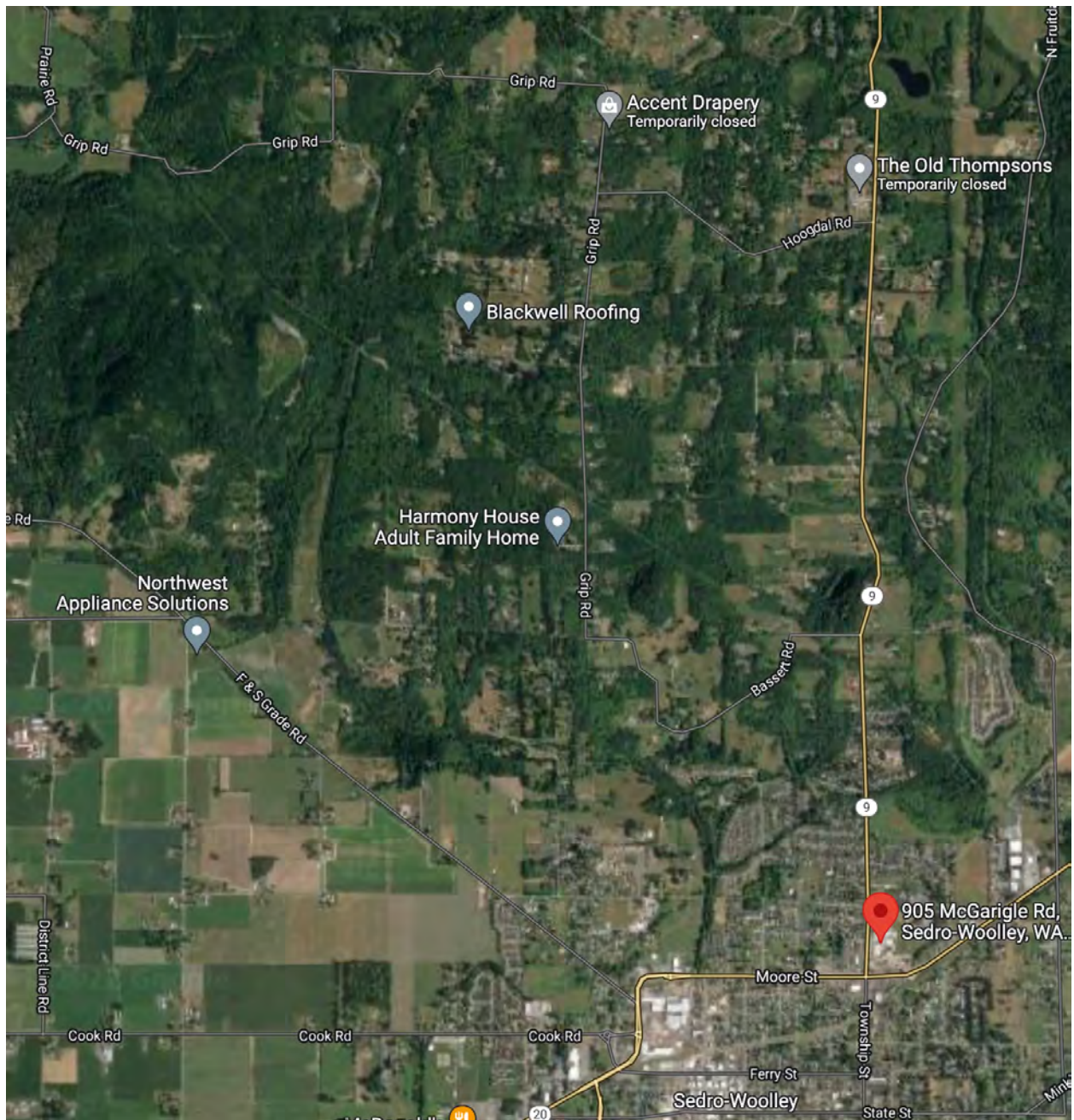
Maps Showing Location of Schools Served by Grip Road School Buses:

SEDRO WOOLEY HIGH SCHOOL:



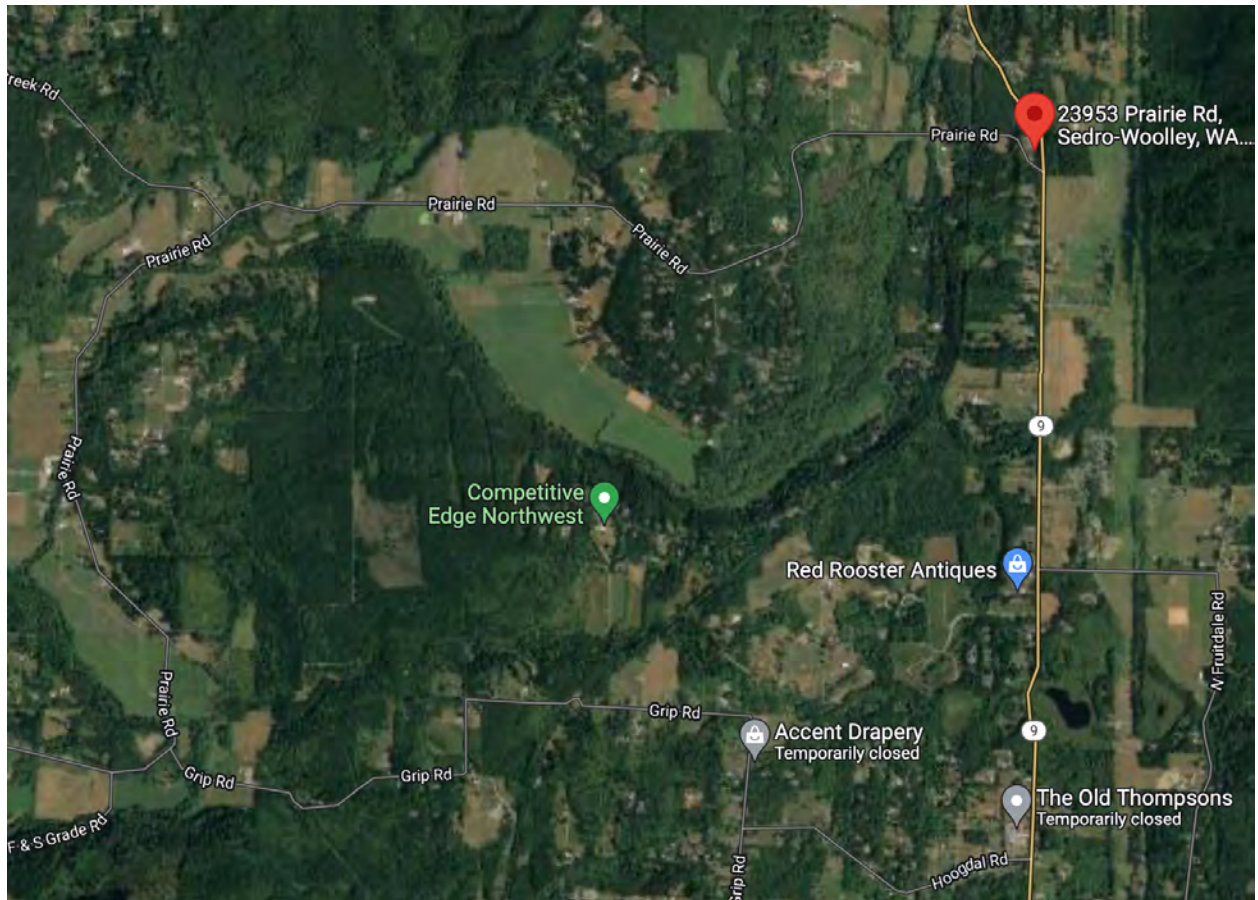
Maps Showing Location of Schools Served by Grip Road School Buses:

CASCADE MIDDLE SCHOOL:



Maps Showing Location of Schools Served by Grip Road School Buses:

SAMISH ELEMENTARY SCHOOL:



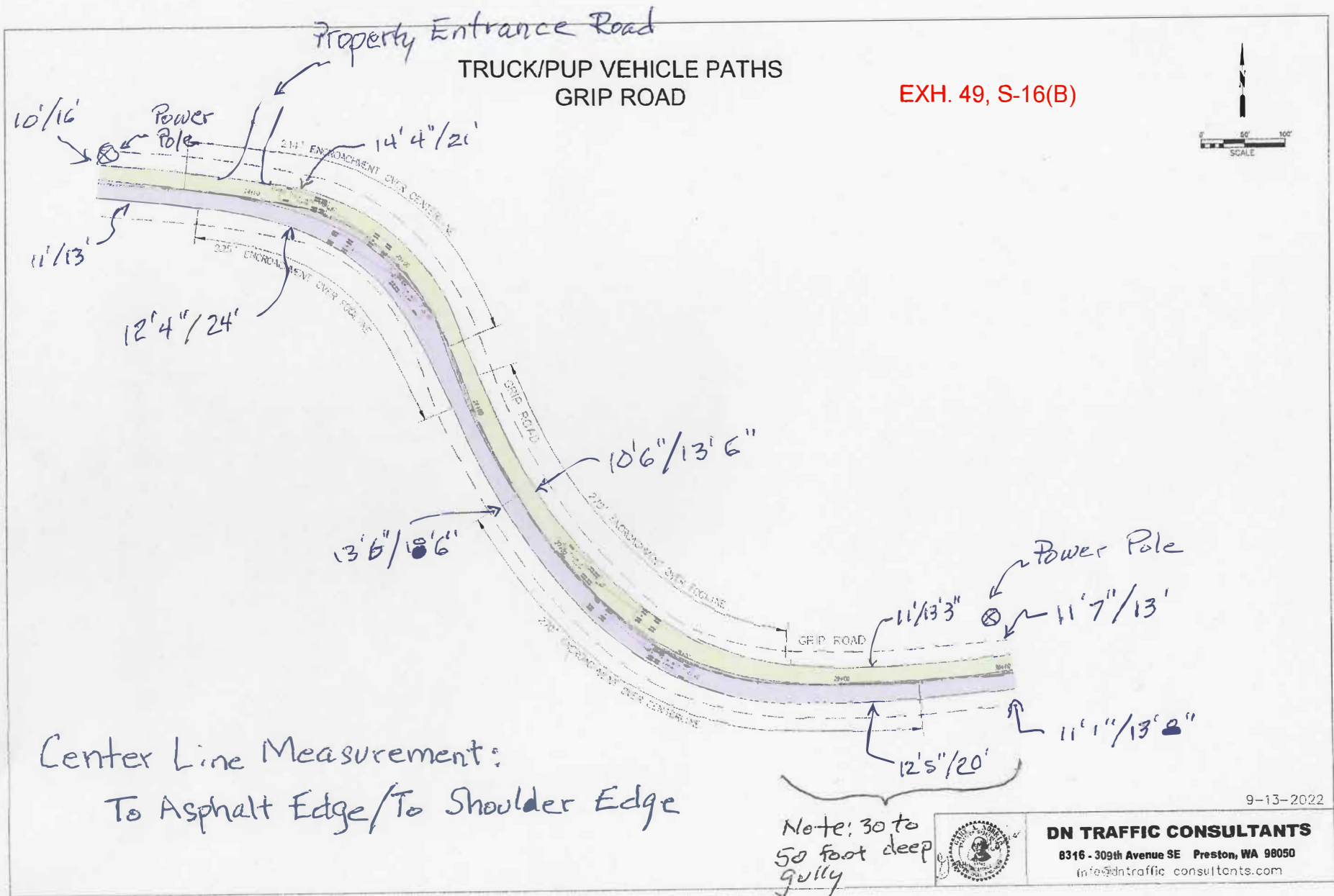


Exhibit 49, S-16(C)

Locations of Sharp Curves on Grip Road East of Mine Entrance

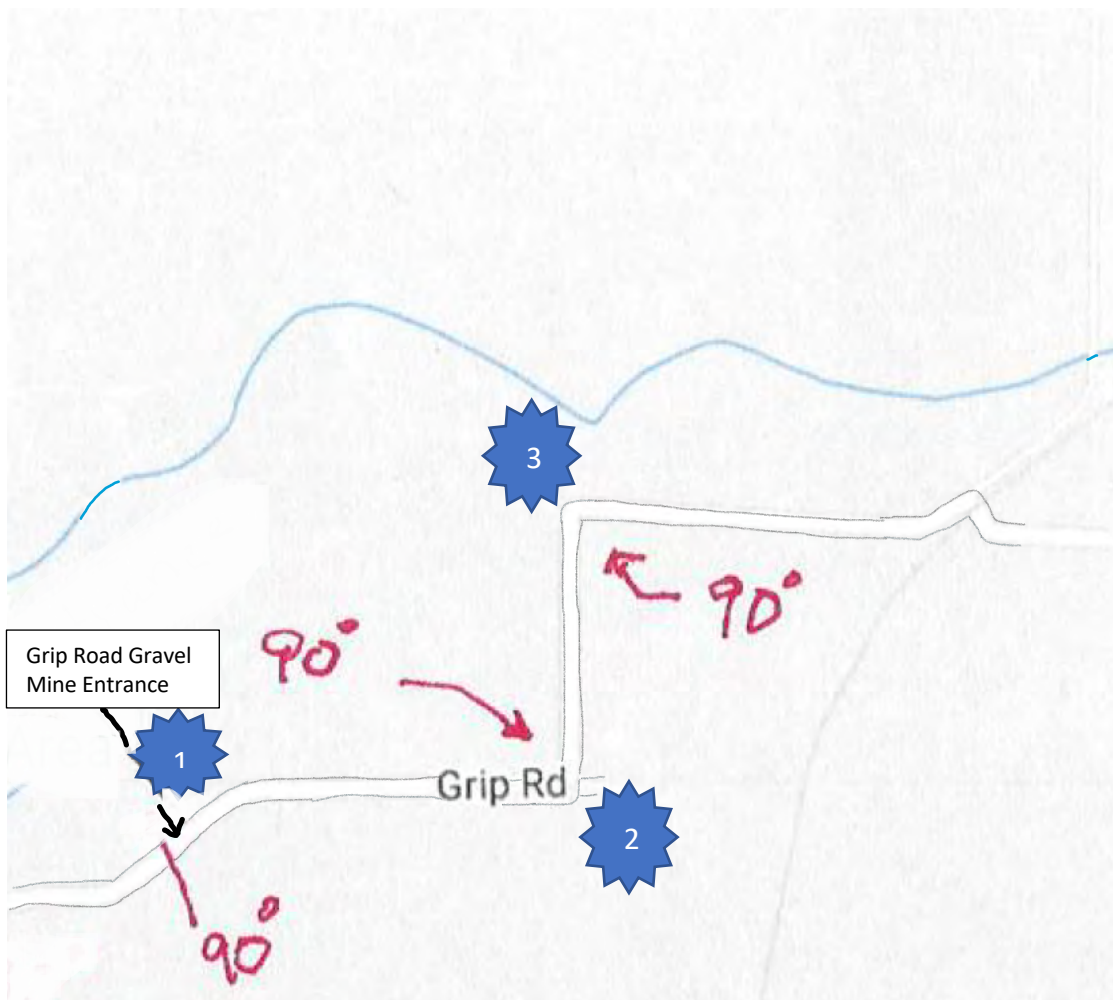
Legend:



= Sharp curve (Numbered)



= Observed inside angle of curve



[Map continued to east]

Exhibit 49, S-16(C)

Locations of Sharp Curves on Grip Road East of Mine Entrance

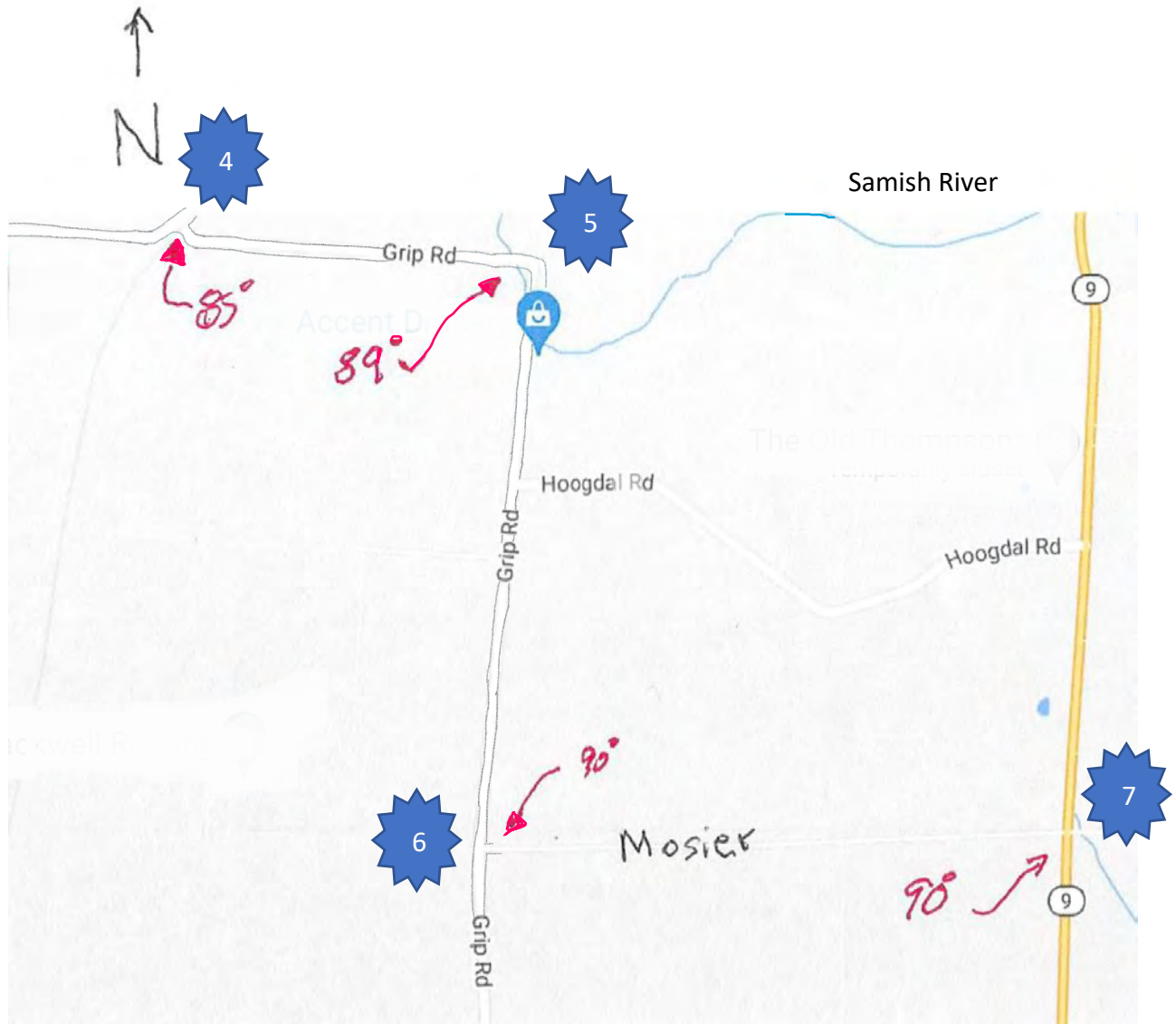


Exhibit 49, S-16(C)

Locations of Sharp Curves on Grip Road East of Mine Entrance

Base Source Map:

<https://www.google.com/maps/@48.5532824,-122.2508848,15.62z>

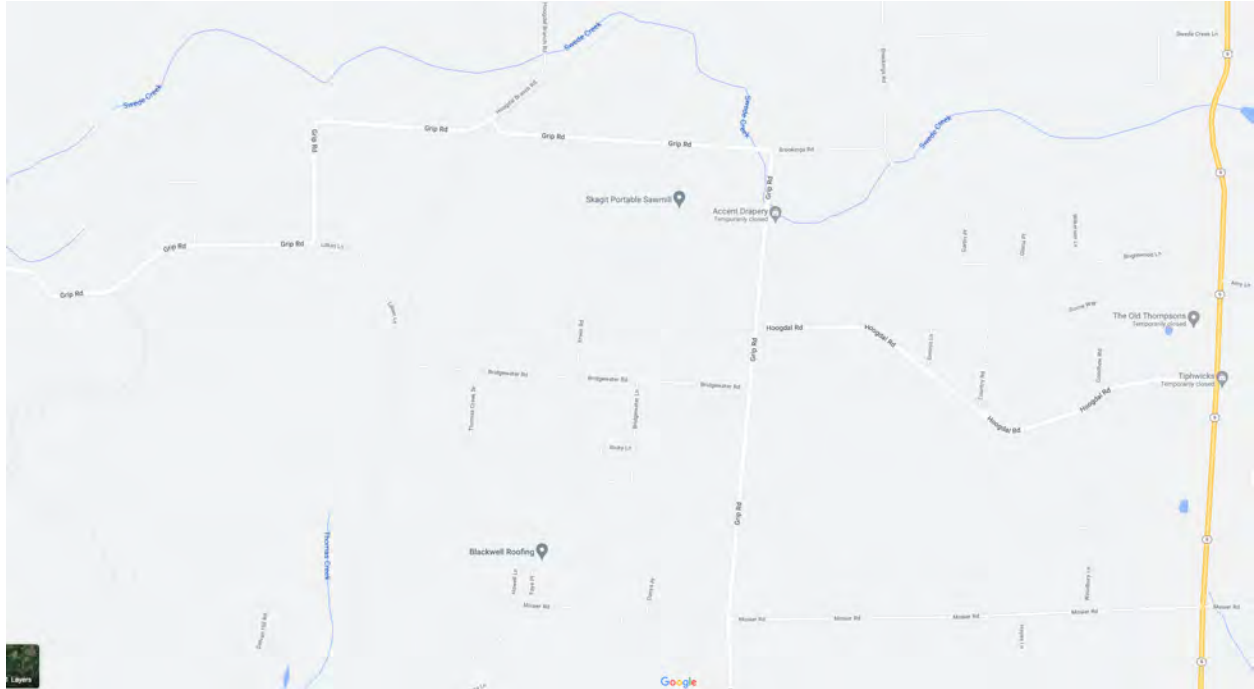


Exhibit 49, S-16(D)

Mitigation Conditions Proposed by Wallace Groda
Miles Sand & Gravel Grip Road Special Use Permit

I urge the Hearing Examiner to consider imposing the following conditions as part of any Special Use Permit approval, in order to mitigate mine traffic risk increases:

1. Widen Grip Road itself and its shoulders to County standards, to assure trucks and trailers do not cross center lines.
2. Widen the entrance to mine haul road (use entrances to Belville and Kelleher as examples).
3. Provide turn lanes from/to Grip Road similar to Belville. That would minimize traffic risk and delays significantly.
4. Remove more of the hillside at the Prairie Road intersection to improve sight/visibility of oncoming traffic.
5. Provide turn lanes from/to Prairie Road to minimize traffic risk and delays.
6. Provide a middle turn lane at the mine entrance so that trucks do not sit on Grip Road or try to enter Grip Road too quickly.
7. Provide definition of the haul route in specific terms and limit hauling east of the mine to trucks only and no trailers.
8. Limit hauling traffic hours, to minimize conflict with routine school bus times. Include a condition requiring the applicant to maintain a system of notifying drivers of the hours of current and updated scheduled school bus use of Grip Road.
9. Avoid make-up hauling on weekends when bicycle activities are determined to be highest, based on study, and require the applicant to refrain from travel when major events are scheduled to use Grip Road.
10. Require monitoring of the mine entrance road with pneumatic rubber cable traffic counters, to ensure the average trips per year are complied with, as well as limits on hours of truck travel.