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January 24th, 2020



City of Sedro Woolley  
Planning Department  
325 Metcalf Street  
Sedro Woolley, WA 98284

Re: SEPA Threshold Determination

Attention Planning Department:

This letter is intended to appeal the SEPA Threshold Determination regarding the PRD on a vacant 12.7 acre property which has an intended ingress/egress onto McGarigle Road. We will first turn our attention to page one (1) of the traffic impact analysis authored by Gibson Traffic Consultants. Under point two (2) Methodology it lists three intersections that were analyzed; SR-9 at John Liner Road/McGarigle Road; McGarigle Road at Independence Boulevard and McGarigle Road at Fruitdale. The TIA fails to address McGarigle at Carter Road; McGarigle Road to SR-9 and McGarigle from SR-9 to Site access.

A second key point of disagreement listed on page 1 of the TIA is the peak-hour traffic, which was identified as 4-6 PM using, quote a "typical afternoon commuter peak period". I refer to you what has been marked as exhibit 3, a letter from SWSD No. 101 dated 1/17/20 and signed by Superintendent Phil Brockman. The letter speaks for itself but let me single out the peak-hour times at Evergreen Elementary that are addressed in the second paragraph of this letter, quote: "The school begins at 9:00 AM with the peak arrival time in the morning for the students beginning at 8:30 AM and ending at 9:00 AM", end quote. Mr. Brockman continues on in that same second paragraph, quote: "In the afternoon the Evergreen STEM school day ends at 3:30 PM. In anticipation of picking the children up, parents and guardians begin to line their vehicles up about 3:00 PM. Again, the backup impacts McGarigle Road in both directions. The nine school district busses arrive to the school and line up just after 3:00 PM. There is quite a bit of congestion as both busses and private vehicles leave the school beginning at 3:30 PM until about 4:00 PM", end quote. Let me direct you to the third paragraph of Mr. Brockman's letter referencing Cascade Middle School and I quote: "Private family vehicles turn into the parking lot for student drop-off from McGarigle Road with a steady stream beginning about 7:30 AM and ending about 8:00 AM. The congestion on McGarigle Road and SR-9 is much greater at this time of day because of the location of the middle school. The entry to the middle school is only one block from Highway 9 waiting for their turn to enter the parking lot and student drop-off area for the school. The afternoon is very similar to the morning session. The busses are loaded on the south side of the school and exit onto Highway 20. The private vehicles begin lining up to pick up their children about 2:00 PM for a 2:15 PM end of school day. The congestion lasts until about 2:30 PM", end of quote.

In addition to failing to identify the incorrect peak-hour commuter time the SEPA Threshold Determination fails to address the environmental issues cited in RCW 43.21C.010, which reads as follows: “The purposes of this chapter are: (1) To declare a state policy which will encourage productive and enjoyable harmony between humankind and the environment; (2) to promote efforts which will prevent or eliminate damage to the environment and biosphere; (3) and [to] stimulate the health and welfare of human beings; and (4) to enrich the understanding of the ecological systems and natural resources important to the state and nation”. In addressing this RCW please let me draw your attention to <https://www.epa.gov/schools/idle-free-schools-toolkit-healthy-school-environment> Under RCW 43.21C.010(2)(3) the Gibson TIA fails to address not only the future potential of idling vehicles because of congestion on McGarigle Road caused by ingress and egress from the PRD but, in fact, an already existing, serious situation from idling vehicles between SR-9 and Carter Road.

Let me refer you again to exhibit 3, Mr. Brockman’s letter, quote: “In addition to the nine buses, there are many families driving their children in private vehicles to and from school that can back up traffic on McGarigle east to Fruitdale Road and west to Highway 9”. “In anticipation of picking their children up, parents and guardians begin to line their vehicles up about 3:00 PM. Again, the back-up impacts McGarigle Road in both directions”. To confirm the accuracy of what is stated in exhibit #3, please find attached exhibits 1 & 2. Exhibit #1 was taken by Linda Emerson when she was in her car on 11/1/19 at 3:30 PM while her car was parked on John Liner Road and this time can be proven. You will see from exhibit #1 that the cars heading east on McGarigle towards Evergreen and Cascade Schools are back up to Highway 9. For traffic heading westbound on McGarigle you will see a truck that is stopped on McGarigle waiting for the opportunity to enter Highway 9. **All of these vehicles are idling.** I also submit exhibit #2 taken at the same time as exhibit #1 on 11/1/19. Linda could not go forward to McGarigle Road and so she turned right onto SR-9 only to find a line of vehicles that were back up on SR-9 from McGarigle Road to the stoplight on Highway 20. The time was 3:32 PM on 11/1/19 providing clear evidence that the peak-hour commuter time identified as existing between 4 – 6 PM in The Gibson TIA was not only incorrect but grossly incorrect.

There is, therefore, a constant daily idling of vehicles that the Gibson TIA fails to address in accordance with RCW 43.21C.010 (2)(3) and here is a quote from the website I cited in paragraph one. “Idling vehicles contribute to air pollution and emit **air toxins**, which are pollutants known or suspected to cause cancer or other serious health effects. Monitoring at schools has shown elevated levels of benzene, formaldehyde, acetaldehyde and other air toxics during the afternoon hour coinciding with parents **picking up their children**. Children’s lungs are still developing, and when they are exposed to elevated levels of these pollutants, children have an increased risk of developing asthma, respiratory problems and other adverse health effects. Limiting a vehicle’s idling time can dramatically reduce these pollutants and children’s exposure to them”.

In this same website please let me direct your attention to the video Idle-Free Schools Introductory Video In this video the opening comments made by Rebecca Russo were as follows: “Many idling vehicles in one place can create a hot spot of pollution and, in fact, air monitoring quality at schools has shown that elevated levels of air toxins during the 3- 4 PM hour coincides with when the parents are picking up their children from school” Ms. Russo goes on further to say, “Vehicle exhaust, that’s the stuff that comes out of your vehicle’s tailpipe, contains over a thousand different compounds including air toxics. Air toxics from mobile sources of pollution are responsible for about fifty percent of the cancer risk nationwide”.

I would now like to address the matter of the safety of our students. Two of the signers of this written appeal are Larry Stiles and Margaret Miller. I will quote a portion of what they commented on. 'There are also extracurricular activities such as soccer, basketball and baseball just to name a few on evenings and weekends'. 'Safety and the health of our children is our main issue not to mention the overall quality of life in the neighborhood. The added noise, air pollution and congestion from the increased vehicle traffic must be avoided'. 'There is an ongoing campaign to get more kids walking to school. This foot traffic needs to be taken into account as it is important and growing and will not show up on the conventional traffic study as described, not to mention the regular pedestrian foot and bicycle traffic we have up and down McGarigle and Carter'.

Continuing with the matter of safety, SW School Superintendent Brockman further added in a separate comment and I quote: "Evergreen Elementary -- 600 students -- 9 busses with an average 30 of students per bus totaling about 300, 150 - 200 student walkers and 150 students that have parent pick-up or drop off" Everyone who has signed this letter have seen what Mr. Brockman was alluding to, student walkers. Some of the student walkers are heading west on McGarigle towards SR-9 and some are heading east on McGarigle Road in the direction of the PRD Site Access.

Mr. Robert Mataya who lives on Independence Boulevard noted and I quote: "The pollution concerns of the cars with motors continuing to run while parked in front of the school has an adverse effect on the close residential homes'. He goes on to say, quote, 'Also the traffic that will be using Carter Street brings on a whole new set of problems for the residents along that byway not only for the school children who walk along Carter and McGarigle Roads but also for residents and pedestrians along that route. Mr. Mataya also notes: "The other traffic concern, which we all discussed, is the severe and problematic traffic just outside the school where student pickup is taking place. It is unsafe for other residential traffic trying to pass in the oncoming lane to get to their destination farther along on McGarigle". Mr. Mataya concludes by saying, "Hopefully we can persuade the city planners to re-examine the traffic evaluation at the actual time when traffic is at it's peak between 2:00 PM and 4:00 PM. It would be, of course, much safer if they could find a different ingress and egress from the proposed development such as. Highway 20.

Mrs. Celeste Weaver who lives on Independence Boulevard stated, quote, "Last week I was coming south on Highway 9. When I got to McGarigle heading to my house I was unable to make a left hand turn onto McGarigle. The parent pick-up line for Evergreen Elementary was back up two blocks all the way to SR-9. There needs to be either fewer houses built in the BYK development or another entrance and exit, for example, onto Highway 20 with a right-of-way. Another problem is idling cars. This produces pollution. The more cars on McGarigle the more idling cars will be stuck in traffic, the more pollution will result. Why do we want pollution so close to an elementary school and a middle school.. The traffic study that was done had an erroneous peak traffic times. It was done incorrectly and the record needs to be set straight".

Mr. Frank Bresnan who lives on McGarigle Road across from Evergreen School stated that the line-up of cars bringing students to school in the morning and picking up students in the afternoon is consistent day after day causing a potential for traffic accidents between other cars and walking students. Mr. Bresnan stated that he has seen on several occasions near accidents happening in front of his home during the peak commuter times identified in Mr. Brockman's letter, exhibit 3. Mr. Bresnan has stated that during these peak commuter times it is difficult if not impossible for him to get out of his driveway. Mr. Bresnan further states that if ingress and egress is allowed on McGarigle Road from the proposed development that it will greatly compound the traffic congestion on McGarigle and Carter Roads.

Mariyn Kenney and James L. Johnson who live on the corner of McGarigle and Carter Road commented on current and existing safety concerns, quote: "At the time McGarigle was reworked the northern end of Carter Street was modified to better line up with Independence Street. Curbs were installed on both sides of the street. It is not uncommon for west bound drivers on McGarigle wishing to turn left onto Carter to cut that corner next to the stop sign on Carter. Lack of a center line may not give them a clear perspective. When crossing the street to get mail we are always very careful to listen for sounds of vehicles and to let them pass before crossing to street. If caught at the mailbox when there is a string of vehicles going east on McGarigle and making a right onto Carter I wave them past so not to leave them in a dangerous position on McGarigle while I return to my home. I have some mobility issues and don't always move very fast. We encourage our visitors to NEVER back out of our driveway. We've nearly been clipped leaving our home with our headlights first by folks cutting the corner short. Carter Street has no sidewalks. In the middle of Carter pedestrians can step onto asphalt strips or dirt strips along the side of the street. At the north where Carter intersects with McGarigle curbing means one must step up into the curb. For kids on bikes, parents with strollers and folks with walkers that does not happen. Adding untold numbers of vehicles makes all of this an accident waiting to happen.

Mrs. Linda Emerson who lives at 1226 McGarigle Road comments, quote "On two different occasions I found it impossible to drive down McGarigle to get to my home because of the traffic backup from parent pick-up on McGarigle Road and, therefore, I had to take SR-20 to Carter Road and turn left off of SR-20 onto Carter Road and proceed on Carter Road to my McGarigle Road home. On another occasion on December 1, 2019 I was leaving our home on McGarigle between 7:30 and 8:00 AM. I went my usual way turning left onto Carter Road to avoid the school traffic congestion westbound on McGarigle. On that particular morning traffic was backed up one quarter of the entire length of Carter Road. It took me a solid 8 minutes to get from where I was stopped on Carter Road to the stop sign at the entrance of SR-20. I can only assume that if ingress and egress from the proposed development is permitted onto McGarigle Road that many of those cars will be turning left onto McGarigle and then quickly turning left onto Carter Road, thereby compounding many times over what I experience traveling from my home to Carter Road.

In conclusion we find that the TIA authored by Gibson Traffic Consultants has erred in that the land use decision is quote "not supported by evidence that is substantial when viewed in light of the whole record before the court" and we reference RCW 36.70C.130(1)(c). The standard is whether evidence is sufficient to persuade a fair-minded person that the declared premise is true. It is, therefore, respectfully requested that a new TIA be ordered based on the factual evidence provided in this written appeal. The authors of this written appeal want the city planning department to know that our written appeal to the SEPA Threshold determination is a community/people-funded effort.

Sincerely,

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