Skamania County Fire District No. 4

Comments on the J.L. Storedahl & Sons Skamania Quarry Draft Environmental Impact Statement

Submitted during the Draft EIS public comment period

To Whom It May Concern:

Skamania County Fire District No. 4 (SCFD4) appreciates the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the proposed J.L. Storedahl & Sons Skamania Quarry Project.

These comments are submitted from the perspective of emergency response, traffic incident management, responder safety, emergency access, evacuation planning, and public safety. The District takes no position regarding the economic merits of the proposed quarry. Rather, SCFD4's concern is whether the DEIS adequately evaluates the foreseeable emergency-service consequences of introducing long-term industrial truck traffic onto a rural transportation network that includes Mabee Mines Road, Salmon Falls Road, State Route 14 (SR 14), and constrained roadway segments within the western Skamania County transportation corridor.

The DEIS expressly includes transportation, public services, and emergency response within the scope of review (Skamania County, 2026, pp. 1-2, 3.6-18). It also identifies the proposed haul route as including SR 14, Salmon Falls Road, Mabee Mines Road, McCloskey Creek Road, Kellet Road, and the BPA easement, depending on the alternative (Skamania County, 2026, pp. 2-13 to 2-14, 3.6-18). The DEIS states that peak quarry operations could involve up to 250 daily round trips, or 250 trips into the site and 250 trips leaving the site, during peak season and economic conditions (Skamania County, 2026, p. 1-5).

SCFD4 acknowledges that the DEIS evaluates routine traffic operations, level of service, queueing, turning movements, and certain roadway conditions. The District's concern is narrower and operational: the DEIS appears to evaluate emergency response primarily under normal or near-normal traffic conditions rather than under foreseeable non-routine incidents that fire, EMS, law enforcement, public works, towing providers, and utility operators would be required to manage.

The DEIS emergency-response discussion states that the haul route provides access for emergency vehicles, that trucks can pull over so emergency vehicles can pass, and that alternate routes could be used if a truck temporarily blocks the route (Skamania County, 2026, p. 3.6-18). However, that conclusion does not appear to be supported by a detailed Traffic Incident Management (TIM) analysis addressing disabled tractor-trailers, rollovers, vehicle fires, fuel or hydraulic-fluid spills, hazardous-material incidents, utility emergencies, heavy-vehicle recovery operations, multi-hour roadway closures, responder staging, evacuation operations, or emergency access during prolonged transportation disruptions.

The DEIS states that emergency vehicles could use alternate routes if a quarry truck temporarily blocks the haul route. However, the DEIS does not identify how emergency dispatch centers or responding units would become aware of such a blockage before encountering it. In practice, emergency responders may not discover that a route is obstructed until arriving at the blockage, at which point they must stop, communicate with dispatch, reverse course, and identify an alternate route. The resulting delay includes not only the additional travel distance but also the time for detection, decision-making, and rerouting. For time-critical emergencies such as cardiac arrest, major trauma, respiratory failure, structure fires, or wildland fire starts, even a delay of several minutes can materially affect patient outcomes and incident stabilization. The DEIS does not quantify these delays or evaluate the reliability of emergency response under blocked-route conditions.

FHWA defines TIM as a planned and coordinated, multidisciplinary process to detect, respond to, and clear traffic incidents (Federal Highway Administration [FHWA], 2025a). FHWA also identifies roadway clearance time, incident clearance time, and secondary crashes as key TIM performance measures (FHWA, 2025b). These concepts are directly relevant because emergency services operate during incidents, not merely under average or routine traffic conditions.

1. Mabee Mines Road Emergency Access and Roadway Blockage

Mabee Mines Road is a critical component of the proposed haul route and would experience long-term industrial truck traffic associated with quarry operations. The DEIS identifies the study roadway segments as including McCloskey Creek Road from the proposed site access to Mabee Mines Road, Mabee Mines Road from McCloskey Creek Road to Salmon Falls Road, and Salmon Falls Road from Mabee Mines Road to Highway 14 (Skamania County, 2026, p. 3.6-3).

The DEIS concludes that the haul route has adequate width for trucks to pull over and allow emergency vehicles to pass (Skamania County, 2026, p. 3.6-18). At the same time, the DEIS identifies mitigation that includes a haul-route agreement addressing County roads, including Salmon Falls Road and Mabee Mines Road, to meet the 30-foot minimum roadbed width standard; a road-condition assessment; and a survey of the haul route to identify substandard pavement and shoulder widths (Skamania County, 2026, pp. 3.6-19 to 3.6-20).

Those two points warrant additional analysis. From an emergency-response perspective, the key question is not only whether a moving truck can pull over during routine operations. The more relevant question is how emergency access will be maintained when a truck cannot move, when both lanes are compromised, or when a commercial-vehicle incident requires heavy recovery, traffic control, spill control, fire suppression, or law-enforcement investigation.

FHWA truck-safety research found that truck crash rates on rural two-lane roads were significantly related to variables including traffic volume, truck volume, shoulder width, and horizontal alignment (FHWA, 1995). Because the DEIS itself identifies the need to survey and improve substandard pavement and shoulder widths along portions of the haul route, SCFD4 requests that the Final EIS evaluate Mabee Mines Road as an emergency-access corridor, not only as a routine traffic facility.

SCFD4 requests that the Final EIS evaluate foreseeable Mabee Mines Road blockage scenarios, including:

- Disabled gravel trucks.
- Truck rollovers or jackknife-type events.
- Vehicle fires involving heavy commercial vehicles.
- Fuel, hydraulic fluid, or other roadway spills.
- Mechanical failures in constrained roadway sections.
- Collision scenes requiring extended investigation or traffic control.
- Heavy-wrecker or heavy-recovery operations.
- Winter-weather or slide-related closures occurring during quarry operations.

The Final EIS should identify emergency pullouts, apparatus passing locations, turnaround areas, staging locations, traffic-control resources, and heavy-recovery resources available to maintain emergency access during roadway disruptions.

2. Utility Infrastructure and Emergency Access

SCFD4 understands that natural-gas transmission infrastructure exists within portions of the western Skamania County corridor. The District is not asserting that routine truck traffic will damage buried pipeline infrastructure. Instead, the concern is emergency response capability in the event of a utility emergency

within or adjacent to the transportation corridor. At the same time, quarry traffic, a truck collision, or a roadway blockage is also present.

PHMSA's Pipeline Emergency Responders Initiative emphasizes improved training, cooperation, and communication to advance emergency responders' ability to manage pipeline emergencies (Pipeline and Hazardous Materials Safety Administration [PHMSA], 2023). PHMSA's Pipeline Emergency Response Grant program similarly focuses on incident-response activities related to transportation of gas or hazardous liquids by pipeline and the ability of trained responders to protect people, property, and the environment from pipeline accidents or incidents (PHMSA, 2025).

The Final EIS should identify whether natural-gas transmission facilities, utility easements, or other critical infrastructure cross or parallel the haul route. If exact pipeline mapping is restricted for security or utility-protection reasons, the Final EIS should still document that the pipeline operator has been consulted and that emergency response procedures have been coordinated with SCFD4, Skamania County Public Works, WSDOT, law enforcement, dispatch, and utility representatives.

The Final EIS should specifically explain how emergency responders would access a gas leak, fire, evacuation zone, or utility emergency if truck traffic, a commercial-vehicle collision, or a roadway blockage were occurring simultaneously. This issue is an emergency-access and interagency-coordination concern, not an assertion that routine truck traffic will directly cause pipeline damage.

3. Salmon Falls Road Grade and SR 14 Operations

SCFD4 remains concerned regarding loaded aggregate trucks descending Salmon Falls Road toward SR 14. The DEIS evaluates study intersections, queueing, and level of service; it also concludes that, with mitigation, no significant adverse project-related transportation impacts are expected (Skamania County, 2026, p. 3.6-20). SCFD4 does not dispute that routine traffic engineering analysis is necessary. The District's concern is that routine level-of-service analysis does not fully address heavy-vehicle incident management on a rural descending roadway that functions as part of the emergency-response corridor.

The DEIS identifies Salmon Falls Road/SR 14, Salmon Falls Road/Canyon Creek Road/Ryan-Tavelli Road, and Salmon Falls Road/Mabee Mines Road as study intersections (Skamania County, 2026, p. 3.6-3). It also states that during peak-hour pedestrian volumes, vehicle queueing is not expected to impact operations on SR 14 or Salmon Falls Road. That gap analysis indicates adequate westbound traffic flow on SR 14 for single-unit and double-unit semi-truck turning movements (Skamania County, 2026, p. 3.6-18).

Those routine-operation findings do not answer the emergency-services question: how would the corridor function during a loaded-truck brake problem, rollover, collision, vehicle fire, spill, or recovery operation on Salmon Falls Road or at the SR 14 intersection? The Final EIS should evaluate downhill braking performance, potential for brake overheating, runaway-vehicle scenarios, winter-weather operations, loaded-truck stopping distances, sight distance, vehicle recovery, and responder access during roadway-blockage incidents.

The DEIS assumes that emergency services can respond to quarry-related transportation incidents but does not assess whether local agencies have the specialized resources needed to manage major commercial-vehicle emergencies. Neither Skamania County EMS & Rescue nor Skamania County Fire District No. 4 maintains the specialized heavy-rescue equipment needed for complex commercial-truck extrication, heavy lifting, or large-scale vehicle-recovery operations. Such incidents may require specialized mutual-aid resources from outside Skamania County, including heavy-rescue equipment and commercial recovery contractors. The resulting mobilization and travel times may substantially extend rescue, roadway-clearance, and Traffic Incident Management (TIM) operations. The Final EIS should evaluate the operational implications of reliance on distant mutual-aid resources for truck rollovers, brake-failure incidents, vehicle fires, hazardous-material releases, and other foreseeable quarry-related transportation emergencies.

SCFD4 also requests analysis of emergency vehicle delay during peak quarry operations and incident conditions at the Salmon Falls Road/SR 14 intersection, including how responders would access the scene, how civilian traffic would be managed, and how truck queues would be controlled during prolonged roadway incidents.

4. Cape Horn Bridge and Constrained SR 14 Segments

SCFD4 requests additional evaluation of constrained transportation infrastructure, including the Cape Horn Bridge corridor and other roadway bottlenecks along SR 14. The District is not aware of any DEIS analysis comparing the usable roadway width of Cape Horn Bridge with legal commercial-vehicle dimensions, anticipated gravel-truck configurations, emergency apparatus dimensions, or heavy-recovery vehicle requirements.

WSDOT identifies the legal commercial-vehicle width in Washington as 8 feet 6 inches before an oversize permit is required (Washington State Department of Transportation [WSDOT], 2026). That figure does not include all operational clearance considerations relevant to emergency response, such as mirrors, lane tracking, curves, roadway barriers, disabled vehicles, responder work zones, and tow/recovery equipment.

A truck collision, disabled vehicle, vehicle fire, or spill occurring on a constrained bridge segment can have consequences beyond ordinary traffic delay. Such incidents may delay emergency response, restrict mutual-aid access, impede evacuation, complicate heavy-recovery operations, and expose responders to traffic hazards for extended periods.

The Final EIS should obtain WSDOT bridge inventory data or bridge plans and evaluate the Cape Horn Bridge corridor and other constrained SR 14 segments under incident conditions. The analysis should compare usable roadway width with legal commercial-vehicle dimensions, anticipated gravel-truck configurations, emergency apparatus dimensions, and heavy-recovery vehicle requirements.

5. Traffic Incident Management

The strongest remaining concern for SCFD4 is the absence of a dedicated TIM and emergency-access analysis. The DEIS analyzes routine traffic operations and concludes that emergency-response impacts are not expected to be significant (Skamania County, 2026, p. 3.6-18). However, emergency responders do not operate only under average conditions. Firefighters, EMS personnel, law enforcement officers, public works crews, towing operators, utility operators, and dispatchers must manage collisions, fires, rollovers, hazardous materials incidents, utility emergencies, weather events, and roadway closures.

At peak operations, the project could generate up to 250 truck round-trip per day, or 500 one-way truck movements (Skamania County, 2026, p. 1-5). During roadway disruptions, truck queues may accumulate quickly and affect emergency access, evacuation capability, traffic-control operations, and the ability of towing or recovery resources to reach the scene. A one-hour closure during a 12-hour operating day could affect approximately 40-42 quarry-related truck movements, excluding background traffic, school buses, residents, recreation traffic, emergency vehicles, public works, law enforcement, and towing resources.

FHWA identifies roadway clearance time, incident clearance time, and secondary crashes as core TIM performance measures (FHWA, 2025b). Those measures are directly applicable to the proposed haul route because they focus on what happens after an incident occurs and how quickly the roadway can be made safe and operational again.

SCFD4 requests that the Final EIS include a dedicated Traffic Incident Management and Emergency Access Plan addressing:

- Roadway clearance time and incident clearance time objectives.
- Heavy-vehicle recovery procedures and resource availability.

- Responder access during blocked-road incidents.
- Civilian egress and evacuation during roadway disruptions.
- Alternate route feasibility and limitations.
- Traffic-control procedures for one-hour, multi-hour, and full-operational-period closures.
- Communications protocols among the quarry operator, dispatch, SCFD4, law enforcement, WSDOT, Skamania County Public Works, towing providers, and utility operators.
- Responder staging locations and apparatus turnarounds.
- Utility emergencies and pipeline incident coordination.
- Wildfire evacuation or major incident scenarios occurring during quarry operations.

6. Emergency-Service Demand

The DEIS concludes that significant impacts to emergency response are not anticipated (Skamania County, 2026, p. 3.6-18). SCFD4 respectfully requests additional analysis supporting that conclusion.

Table 3.6-3 relies on collision data from 2018–2022. This analysis period includes 2020 and portions of 2021, when travel behavior, tourism activity, and traffic volumes in the Columbia Gorge were substantially affected by the COVID-19 pandemic. Because the proposed project would operate under future conditions expected to resemble normal or peak tourism demand rather than pandemic-era conditions, the DEIS should provide supplemental analysis using pre-pandemic data, post-pandemic data, or sensitivity testing to demonstrate how collision rates and emergency response demands would change under normalized tourism and traffic volumes. Failure to account for pandemic-related traffic anomalies may lead to an underestimation of future transportation safety impacts associated with the proposed increase in heavy truck traffic (Czeisler et al., 2023; AAA Foundation for Traffic Safety, 2024).

The proposed quarry would introduce decades of heavy commercial truck traffic onto a rural transportation network characterized by constrained geometry, limited shoulders, residential access, recreational traffic, school-bus activity, and limited route redundancy. The DEIS proposes mitigation measures, including truck-driver safety expectations, required truck safety features, an annual road maintenance fee, a haul-route agreement, road-condition assessments, identification of substandard pavement and shoulder widths, school-bus coordination, and possible CB radios for school buses on the primary haul route (Skamania County, 2026, pp. 3.6-19 to 3.6-20). These proposed mitigation measures underscore the need for a parallel analysis of emergency services.

SCFD4 requests that the Final EIS evaluate reasonably foreseeable increases in:

- Commercial-vehicle collisions.
- Truck rollovers or loss-of-control incidents.
- Vehicle fires involving loaded or empty gravel trucks.
- Fuel, oil, or hydraulic fluid spills.
- Rescue operations involving heavy commercial vehicles.
- Traffic-control assignments during roadway closures.
- Utility emergencies occurring within the transportation corridor.
- Delayed EMS or fire response caused by truck queues or roadway blockages.
- Mutual-aid delays caused by constrained SR 14 or Cape Horn Bridge corridor incidents.

The Final EIS should evaluate whether mitigation measures or financial mechanisms are appropriate to offset increased demands on local responders. Possible mitigation could include pre-incident planning, annual joint exercises, operator-funded traffic-control equipment, radio or communications protocols, emergency-access improvements, signage, pullouts, responder training, and reimbursement mechanisms for extended traffic-control or heavy-vehicle incident operations.

Requested Mitigation and Final EIS Additions

SCFD4 respectfully requests that the Final EIS include the following additions and mitigation measures:

1. A Traffic Incident Management and Emergency Access Plan for Mabee Mines Road, Salmon Falls Road, SR 14, the Cape Horn Bridge corridor, and other constrained haul-route segments.
2. Roadway-closure scenarios for one-hour, multi-hour, and full-operational-period disruptions involving disabled trucks, collisions, fires, spills, and heavy-vehicle recovery.
3. Identification of emergency pullouts, apparatus passing zones, staging areas, apparatus turnarounds, and responder access points.
4. Formal coordination procedures among SCFD4, Skamania County Public Works, Skamania County Sheriff's Office, WSDOT, dispatch, towing/recovery providers, utility operators, and the quarry operator.
5. Utility-emergency access planning, including documentation that any affected natural-gas or critical-infrastructure operator has been consulted and that emergency procedures have been coordinated.
6. A Cape Horn Bridge and constrained-corridor emergency-access analysis comparing usable roadway width, legal commercial-vehicle width, anticipated gravel-truck dimensions, emergency apparatus dimensions, responder work-zone needs, and heavy-recovery access.
7. A heavy-truck downhill safety analysis for Salmon Falls Road, including braking demand, grade, curvature, sight distance, winter conditions, loaded-truck stopping distance, and recovery operations.
8. An analysis of truck queues at the Salmon Falls Road/SR 14 intersection during both peak operations and incident conditions.
9. Evaluation of emergency-service impacts and appropriate mitigation measures, including potential mechanisms to offset increased emergency-response and traffic-control burden on local agencies.
10. Provide funding for a commercially rated heavy-vehicle stabilization strut system and associated responder training for agencies responsible for emergency response along the haul route.
11. An annual pre-incident planning meeting or exercise involving the mine operator, SCFD4, law enforcement, public works, WSDOT, towing providers, utility representatives, and dispatch.

Conclusion

SCFD4 acknowledges that the DEIS evaluates routine transportation operations and includes mitigation measures intended to address roadway conditions along portions of the haul route. However, the District believes additional analysis is warranted regarding foreseeable emergency incidents, roadway blockages, heavy-vehicle recovery operations, utility emergencies, evacuation operations, and responder access.

These are the conditions under which fire, EMS, law enforcement, public works, utility operators, and towing providers must function, and they are not fully addressed through conventional level-of-service analysis. The Final EIS should evaluate emergency response and incident management issues with the same level of specificity applied to routine transportation operations, so that public safety, responder safety, and community resilience can be adequately protected throughout the life of the project.

SCFD4 appreciates the County's consideration of these comments and requests that the Final EIS include the additional analysis and mitigation described above.

Respectfully submitted,

Skamania County Fire District No. 4
Board of Fire Commissioners

References

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