

July 22, 2026

**Subject: Comments on Draft EIS — J.L. Storedahl and Sons, Inc. Skamania Quarry
(Conditional Use Permit, Kellet Road)**

To Whom It May Concern:

I am writing to submit my comments and concerns regarding the proposed J.L. Storedahl and Sons Skamania Quarry.

I live on Dharma Way, off Belle Center Road, one of the roads potentially affected by this proposal, and I spend a great deal of time in the surrounding forests and along the Columbia Gorge National Scenic Area's trails.

I am strongly opposed to this project, and I am asking the County to deny this Conditional Use Permit. The points below are not offered as issues to be balanced against the project's benefits; they are reasons this project should not move forward.

Proximity to Columbia Falls Natural Area Preserve and the Columbia River Gorge National Scenic Area

The permit boundary sits directly above the 1,234 acre Department of Natural Resources Columbia Falls Natural Area Preserve. The preserve was established because this area's basalt cliffs and talus slopes support the Larch Mountain salamander, a state-threatened species, along with several other state-threatened and sensitive plant species, some of which exist only in the Columbia River Gorge. Public access to the preserve is restricted to guided tours and research only because the habitat is so sensitive to disturbance.

The County's own Draft EIS confirms this adjacency directly, describing "ample foraging opportunities and preferred habitat in the Columbia Falls NAP and other forested areas adjacent to the site." The Draft EIS further states that the Larch Mountain salamander is known to occur within the preserve and that it may also occur in streams on the mine site itself, and may be present year-round in and adjacent to McCloskey Creek. In other words, the County's own analysis places the same state-threatened species the preserve exists to protect on the mine site itself, not merely adjacent to it.

Along part of this boundary, only the BPA powerline easement separates the preserve from the proposed mining activity. Along another stretch, near Duncan Creek, the preserve sits directly adjacent to the proposed mining area, on the same ridge and drainage, with no meaningful buffer between them.

Duncan Creek is a fish-bearing stream and tributary of the Columbia River and runs immediately northeast of the permit boundary. The application analyzes other nearby creeks in detail, but not Duncan, and that omission is itself a reason this project should not be approved.

I mention these sensitive natural areas not only as a concerned neighbor, but as an amateur botanist and naturalist with hands-on experience in native plant propagation, and as a volunteer in local habitat restoration work. I have seen firsthand how quickly rare native plant and animal populations decline when grading, blasting, or altered drainage disturbs the specific habitat

conditions they depend on. Blasting, heavy equipment operation, dust, and altered drainage patterns from 180 acres of active surface disturbance are not acceptable near a site this ecologically fragile.

The land under the proposed mine site, despite having already been logged repeatedly, is not yet a lost cause: the soil, seed bank, and underlying rock remain in place. There is ecological potential in the land, and it deserves better than being written off as a resource to be heavily extracted and permanently altered.

Quarrying would end that ecological potential outright. The proposal calls for removing roughly 240 feet of bedrock in depth and 24 million cubic yards of material over 30 to 40 years, permanently removing the ridge itself. A logged forest can still become an old forest again, given time. A quarry cannot become a ridge again, at any length of time.

Even the County's own reclamation plan confirms this. The final slopes are slated to be engineered at a fixed 2-horizontal-to-1-vertical benched grade: a stepped, terraced excavation wearing a layer of replanted trees. What the proposal calls "reclamation" is actually a permanent re-engineering of this landform, not a restoration of it.

In addition to ecological concerns regarding flora and fauna, this project would sit within view or earshot of Archer Mountain, the High Valley Trailhead, and the broader Duncan Creek and Nellie Corser (Mount St. Helens Wildlife Area) corridor. These are valued natural and recreation areas heavily used by people in our community, and the many thousands of tourists that visit the Columbia River Gorge National Scenic Area each year. Tourism and outdoor recreation now constitute the largest employment sector in Skamania County, and the scenic, quiet character that draws these visitors is central to the County's own economy.

The National Scenic Area was instituted in 1986 to preserve the exceptional natural character of the Columbia River Gorge, and although the mine site itself sits just outside the Scenic Area's boundary, the Draft EIS's own visual impact analysis found that portions of the site would be visible from numerous public viewpoints within the CRGNSA, including Beacon Rock, the Historic Columbia River Highway, and the Duncan Creek and Archer Mountain Trails. This project would alter the view from inside the very landscape the Scenic Area was created to protect, undermining the scenic and recreational character that anchors both the region's conservation purpose and its economy.

Traffic Safety

The applicant's own Transportation Impact Study anticipates up to 250 daily round trips, or 500 one-way truck movements. That works out to a loaded gravel truck passing roughly every 68 seconds during peak operating hours.

These trucks will travel a network of roads that were never built for this kind of continuous industrial traffic: Kellet Road, McCloskey Creek Road, Mabee Mines Road, and Salmon Falls Road. The applicant's own consultant found McCloskey Creek Road to be narrow and inconsistent in width, and concluded it would need to be widened to safely carry two-way gravel truck traffic.

The Draft EIS also identifies a second route, through Canyon Creek Road, Mt. Pleasant Road, Belle Center Road, and Gibson Road, as an alternate haul route that was considered and then eliminated from further study. Dharma Way, where I live, sits directly off that route. The Draft EIS does not analyze what would happen if the primary route were ever blocked, whether by an accident, a disabled truck, or winter conditions, and this eliminated alternative is the most obvious fallback. My household and over 100 others would be directly affected by exactly the kind of contingency the County's own document does not address.

These roads carry residents commuting to work, children waiting for school buses, cyclists, walkers, and horseback riders every day. They also serve the Cape Horn Trailhead, where hikers must cross the road at the bottom of a steep grade with limited sight distance.

The Cape Horn Trail is not some obscure local footpath. The Draft EIS itself describes it as "a popular, well-used trail" with "medium to heavy usage in the summer," and notes that its Park and Ride lot, which was built for only 36 vehicles, is regularly over capacity, with hikers' cars overflowing onto Canyon Creek Road and Salmon Falls Road. This is one of the most recognized trails in the entire Columbia River Gorge. Routing a fully loaded gravel truck down that same steep grade roughly every 68 seconds, all day, every operating day, for 30 to 40 years, is not a manageable tradeoff. It is a fundamentally incompatible use of the same narrow stretch of road, and the County's own crossing-volume data only confirms it.

The County's own Draft EIS timed actual gravel trucks turning onto SR-14 from Salmon Falls Road: the largest trucks took nearly two minutes to clear the curves down the highway, slowing several vehicles behind them each time. Multiply that by 250 round trips a day and this is not an occasional inconvenience; rather, it is the new baseline condition of that stretch of road given the 30 to 40 year duration of the proposed project.

That level of real-world scrutiny does not extend to the rest of the route. Winter conditions on Mabee Mines Road are frequently far worse than conditions on Highway 14, and the transportation study never examines how ice, snow, or fog would affect a fleet of heavily loaded trucks navigating those grades, at that intersection or anywhere else along the haul route.

A traffic study that measures real truck behavior under dry conditions at one intersection, but never once examines seasonal driving conditions anywhere on the route, is not a complete safety analysis. That gap is itself a reason this application should not be approved.

Noise

The County's own Draft EIS, using sound measurements taken by Coffman Engineers in 2023 and 2024, documents just how quiet this area currently is. Measured daytime ambient sound levels near Kellet Road range as low as 28 dBA, and near McCloskey Creek Road and Mabee Mines Road as low as 34 dBA.

The Draft EIS's own analysis finds that project truck traffic on the private haul route would likely increase the existing measured sound levels by up to 30 dBA during daytime hours, resulting in over 50 to 60 dBA. The Draft EIS itself calls this "a considerable sound-level increase" and states plainly that it "would represent a significant noise impact."

On the public road network, the Draft EIS's own updated modeling shows sound levels along Mabee Mines Road and Salmon Falls Road increasing by as much as 16 dBA compared to existing conditions. WSDOT's own policy defines any increase of 10 dBA or more as a "substantial increase," and the Draft EIS confirms these increases meet that threshold and are considered noise impacts under FHWA criteria.

The decibel scale is logarithmic, so a 16 to 30 dBA increase is not a minor or background change. It would replace some of the quietest ambient conditions the County's own consultant measured anywhere in this study with a permanent industrial soundscape, all day, every operating day, for decades.

The Draft EIS also states that blasting is expected to occur no more than once a week, but multiplied across the mine's proposed 30 to 40 year lifespan, that is somewhere between 1,500 and 2,000 blasting events. The Draft EIS attempts to underplay this as an occasional disruption, but the reality is that blast noise would become a permanent auditory disruption lasting decades.

Air Quality

The Draft EIS further acknowledges that haul trucks and mining equipment will emit diesel particulate matter, the kind of fine particle its own reference material describes as capable of reaching deep into the lungs and even entering the bloodstream, affecting both the lungs and heart. That exposure is described only as "minor to moderate," with no dedicated health study of what decades of exposure means for the people who live along the haul route.

Diesel particulate matter is not a minor to moderate irritant. In 2012, the World Health Organization's International Agency for Research on Cancer classified diesel engine exhaust as "Group 1": carcinogenic to humans, the highest classification level it assigns, based on sufficient evidence linking it to increased lung cancer risk. The lack of data in the Draft EIS regarding public health risk from diesel emissions should by itself trigger a denial of the application.

Water Quality

Blasting, grading, and 180 acres of surface disturbance on a ridge that drains toward McCloskey Creek, Hamilton Creek, Indian Mary Creek, and the unnamed tributary to Duncan Creek northeast of the site raise real questions about sediment, turbidity, and the long-term health of the water systems that local wells and streams depend on.

The application's own figures show a drainage network the analysis never fully accounts for, and that omission is in itself a reason to deny this permit.

Quality of Life and Property Values

This project would convert a quiet, rural, recreation-oriented corridor into a heavy-industrial haul route for the next three to four decades, changing the daily experience of everyone who lives and recreates along it.

Thirty to forty years is not a temporary inconvenience. This is not a temporary phase the County is being asked to approve; it is effectively a permanent redefinition of what this area is.

The Draft EIS's own greenhouse gas analysis estimates project emissions at about 7,294 metric tons of CO₂e per year, and reassures readers that this is a small fraction of the state's total. But over the mine's proposed 30 to 40 year lifespan, that is roughly 220,000 to 290,000 metric tons of CO₂e being released into our community as a result of the activity.

The proposed mine is also extremely likely to affect property values along the route, which in turn affects the County's own tax base. The County's own trip-distribution data shows 80 percent of truck traffic heading west toward the Clark County market, meaning this county absorbs the negative impacts of resource extraction while the economic benefit largely flows elsewhere.

Conclusion

Every impact described above comes directly from the County's own Draft Environmental Impact Statement: habitat for a state-threatened salamander potentially within the mining area, a ridge that would be permanently re-engineered rather than restored, an altered view from public viewpoints inside the Columbia River Gorge National Scenic Area itself, decades of noise increases the County's own consultant calls "significant", a known carcinogen in the air residents would breathe for decades, and a transportation network the County's own analysis never fully studied. This is not a project with a few loose ends to tie up before approval; it is a permanent, multi-decade transformation of a place that did not ask for one, and the County's own document supplies the evidence for why it should be denied.

For these reasons, I do not believe this project should be approved, and I am asking Skamania County to deny the Conditional Use Permit.

Thank you for entering this comment into the public record.

Sincerely,

Kristine Pemberton

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