

To: Skamania County Community Development Department

Cc: Brian Nichols, County Commissioner District 1
Robert Farris, County Commissioner District 2
Asa Leckie, County Commissioner District 3
Connie Acker, Gorge Commission

Date: July 15, 2026

Re: Public Comment – J.L. Storedahl & Sons Skamania Quarry Project DEIS

Please accept these comments regarding the Draft Environmental Impact Statement (DEIS) for the J.L. Storedahl & Sons proposed Skamania Quarry Project. As a residence owner of 1441 Mabee Mines Road, my concerns focus primarily on the severe safety hazards, traffic impacts, and noise pollution this project will introduce to our quiet rural community.

I write this letter not as an industry expert, but as an earnest, deeply concerned community member. I ask the County to look past the speculative modeling of the DEIS and evaluate the immediate, physical realities this quarry will impose on the community.

1. The Core Threat: Unacceptable Safety and Traffic Hazards

The single most critical issue is that **our local road network is physically incompatible with heavy industrial haulage.**

The DEIS asserts that because McCloskey Creek Road, Mabee Mines Road, and Salmon Falls Road already serve as timber hauling corridors, quarry traffic will not exacerbate safety issues. This is a false and highly dangerous equivalence:

- **Frequency and Permanence:** Forestry is cyclical and temporary. Once a stand is harvested, timber trucks disappear for decades. The quarry, however, proposes up to **500 heavy truck trips (250 round trips) per workday, year-round, for 30 to 40 years.**
- **A Constant Barrier:** An average of 500 trips per day translates to a multi-ton gravel truck passing local driveways and blind curves roughly **every 68 seconds** during operating hours.
- **Extreme Topographical Risk:** Mabee Mines Road and Salmon Falls Road are steep, narrow, winding, and in some places lack shoulders. During winter, lower elevations like SR 14 may remain clear while Mabee Mines Road is covered in black ice and snow. Forcing fully loaded, dual-trailer gravel trucks to descend these steep, icy grades creates an immediate, life-threatening hazard for oncoming residents.

- **Vulnerable Road Users:** These are active public roads, not private industrial logging tracks. Local children walk to school bus stops here. Wild deer and elk herds regularly cross Mabee Mines and Salmon Falls Rds. Residents walk, bike and ride horses along Mabee Mines Road for health, community connection, and to manage their acreage. A massive truck every 68 seconds turns a peaceful walk into a terrifying, high-risk endeavor. Fully loaded gravel trucks require immense stopping distances, and on steep, blind corners, there is zero margin of error for a child, a cyclist, or a slow-moving school bus.

2. Inappropriate Application of Noise Criteria

The DEIS acknowledges that off-site truck transportation will cause significant noise impacts (Section 3.3). However, it dismisses this impact on pages 1-24 and 3.4-39 by stating that the sound levels will not exceed the **Federal Highway Administration (FHWA) Noise Abatement Criteria**.

As a layperson, this application is highly confusing. The FHWA Noise Abatement Criteria are typically used to plan and design active, federal-aid highway construction projects, not to evaluate daily, commercial haul truck noise on quiet, rural county roads.

Instead, the project should be evaluated against our local, binding regulations:

The West End Community Comprehensive Subarea Plan

The West End Plan provides updated guidance on land use and transportation in our specific community.

- **General Goal 1 (Primary Land Use):** Mandates the preservation of "**peace and quiet; lack of heavy traffic.**"
- **The Vision Statement:** Explicitly designates this community as a place where "**residents can find refuge from the bustle and clamor of the urban and suburban areas.**"
- **The Impact:** The DEIS openly admits that the noise and traffic may force local families to abandon their homes. Section 3.4.2 speculates that residential and recreational land uses may eventually have to convert to "pastureland" because residents will not be able to tolerate the project's intensity. Forcing residents out of their homes because they can no longer tolerate their environment is a direct violation of the West End Plan.

The Skamania County Public Noise Regulations (SCC Chapter 8.22)

The DEIS attempts to sweep away the project's massive hauling noise by claiming that local rules do not apply to public roads. Section 3.3-4 of the DEIS states:

"Noise from traffic on public roads is exempt from the noise limits identified in Table 3.3-1, according to SCC 8.22.130.G. WAC 173-60-050(4)(a) state regulations also

exempts from all provisions of WAC 173-60-040 sounds created by motor vehicles when regulated by Chapter 173-62 WAC."

It looks to me like this regulatory defense misinterprets the relationship between state and local laws, and relies on a local code section (**SCC 8.22.130.G**) that I can't find in Skamania County's active Public Noise Regulations (SCC Chapter 8.22). (Please see the section "State vs. Local Jurisdiction" in the Post Script (P.S.) for why I believe local regulations, not state, apply.)

The Misapplied Nonresidential Exemption

The DEIS tries to claim a county-level exemption on page 3.4-34, citing **SCC 8.22.070(F)**, which exempts motor vehicles regulated by state code. However, the DEIS ignores the crucial limit written directly into that statute. SCC 8.22.070 explicitly states:

*"The following vehicles and situations shall be exempt from the provisions of this chapter, **except Section 8.22.050.**"*

This exception is the key. While standard commercial vehicle noise might be generally exempt, **it is never exempt if it constitutes a "Public Disturbance Noise" under SCC 8.22.050.**

Section 8.22.050(C) of the Skamania County Code defines a public disturbance noise as:

"The creation of frequent, repetitive or continuous sounds in connection with the starting, operation, repair, rebuilding or testing of any motor vehicle, motorcycle, off-highway vehicle, or internal combustion engine, within a residential area, so as to unreasonably disturb or interfere with the peace, comfort and repose of owners or possessors of neighboring real property..."

The project's hauling operation will create a relentless stream of heavy-duty haul trucks which pass residential homes every 68 seconds, 250 times every workday, for 40 years. By creating a continuous wall of low-frequency rumble and compression braking within a quiet residential subarea, the project's hauling operation will directly and unreasonably destroy the "peace, comfort, and repose" of local families. I think this traffic constitutes a public disturbance under SCC 8.22.050 and should be **legally barred from claiming the SCC 8.22.070(F) exemption.**

3. The Health Cost of Noise

As documented by the Harvard Medical School publication *Noise and Health*, chronic noise is not just an annoyance; it is a physical stressor. It triggers the body's "fight-or-flight" response, releasing stress hormones like cortisol. Over time, this exposure is clinically proven to drive sleep disturbances, cognitive impairment, and a heightened risk of cardiovascular disease.

4. Specific Infrastructure & Ecological Impacts

The Cape Horn Trailhead (SR 14 & Salmon Falls Road)

The DEIS acknowledges that the Cape Horn Trail will be impacted by dust, noise, vibration, and traffic (Section 3.4.2). The pedestrian crossing between the trailhead and its parking lot sits directly on the proposed haul route. Expecting hikers to dodge loaded gravel trucks on a steep descent every 68 seconds is an obvious safety risk.

The DEIS's suggestion to "relocate" the trailhead to mitigate this is entirely backward (Section 3.4.3). The trailhead works beautifully for the public in its current location; forcing the community to move a highly valued recreational resource solely to accommodate a private quarry is unacceptable.

Impact on State Route 14 (SR 14)

The DEIS argues that because SR 14 is a state highway designed for truck traffic, quarry traffic will not impact it. This ignores SR 14's unique designation as a **Scenic Byway**. It features dedicated vista viewpoints designed for visitors to step out, park, and enjoy clean air and quiet beauty. The visual and auditory intrusion of constant dump trucks directly degrades the aesthetic value of this globally recognized scenic corridor.

Threat to Local Wildlife

Our community deeply values our native wildlife. We frequently see deer and a large, established elk herd grazing near the corner of Mabee Mines and Salmon Falls Road. The intense noise, ground vibration, and unrelenting traffic will disrupt these vital wildlife corridors, in direct opposition to the West End Plan's Goal to *"protect and encourage area indigenous wildlife."*

5. Systematic Violations of CUP Criteria (SCC 21.16.070)

Because the applicant is requesting a Conditional Use Permit (CUP), they must prove compliance with all county criteria. The DEIS proves the exact opposite:

CUP Criteria	The DEIS Failure	The Resulting Violation
Criteria 1: Consonance with the Plan	Treats the site as an isolated industrial zone, ignoring the surrounding residential, agricultural, and recreational context.	Violated. Fundamentally clashes with the Comprehensive Plan's mandate to protect rural character, quiet enjoyment, and local tourism.

Criteria 2: Community Health & Safety	Relies on the false equivalence of seasonal logging traffic to dismiss the severe, daily dangers of heavy quarry hauling.	Violated. Puts residents, children, school buses, and pedestrians at constant, severe risk of collision on narrow, blind, shoulderless roads. Please see “Expanded Comments on Violation of CUP Criteria 2” in the Post Script (P.S.) for more detailed comments.
Criteria 3: Public Services & Infrastructure	Offers no long-term, fully funded road maintenance agreements and understates the risk of quarry-related forest fires.	Violated. Places a massive financial burden on Skamania County taxpayers for road destruction, and strains volunteer-reliant local fire districts.
Criteria 4: Environmental Quality	Downplays the destructive impacts of blasting vibrations, domestic well contamination, and carcinogenic silica dust.	Violated. Introduces permanent acoustic, hydrological, and air-quality hazards to the surrounding ecosystem.
Criteria 5: Scenic & Aesthetic Resources	Relies on "vegetative screening" that will periodically disappear due to active, standard clear-cutting on adjacent private timberlands.	Violated. Exposes a massive, scarred industrial pit and noisy rock crushing to the Columbia River Gorge National Scenic Area.
Criteria 6: Compatibility with Land Uses	Attempts to frame heavy surface mining as a compatible resource use alongside low-density rural residential living.	Violated. Destroys neighborhood peace, degrades local property values, and permanently disrupts the quiet enjoyment of neighboring homes.

6. Conclusion

Ultimately, the Draft Environmental Impact Statement fails to capture the true human cost of this proposed quarry. By treating our vibrant rural neighborhood as an isolated, vacant industrial zone, the document completely overlooks the daily realities of the people who live, work, and raise families here.

A relentless, 30-to-40-year stream of heavy industrial haulers will permanently alter the character of the West End. It turns our quiet, shared county roads into a hazardous trucking pipeline, endangers our children and neighbors, and replaces our clean air and peace with constant noise, dust, and anxiety.

I urge the Skamania County Community Development Department to look beyond the applicant's speculative models and prioritize the physical safety, health, and well-being of the West End community. Please reject this destructive proposal and protect our rural community.

Thank you for your time, consideration, and service to our county.

Sincerely,
Ann Horinouchi
1441 Mabee Mines Rd
(503) 449-7107

P.S.

State vs. Local Jurisdiction:

The DEIS argues that because the Washington Administrative Code (WAC) exempts motor vehicle noise on public highways, the county cannot regulate it.

Under Washington State law, **the authority to regulate noise pollution rests firmly with local governments**. The Washington State Department of Ecology explicitly states that it does not enforce noise rules and holds no authority over local noise ordinances.

While the state provides model regulations, local jurisdictions have the legal authority to adopt their own, stricter rules to protect their citizenry. Washington State's WAC 173-60-060 explicitly preserves a county's right to regulate nuisance noise. Because Skamania County has exercised this authority by enacting SCC Chapter 8.22, I believe local county regulations—not distant state-level exemptions—are the correct and binding standards to evaluate the project's impact.

Expanded Comments of Violation of CUP Criteria 2:

Standard: "Not materially endanger the health, safety, and welfare of the surrounding community to an extent greater than that associated with other permitted uses in the applicable zoning district."

The applicant's entire defense for Criteria 2 relies on a single, flawed premise: because McCloskey Creek Road, Mabee Mines Road, and Salmon Falls Road already experience timber hauling, the project's traffic will not introduce new safety issues. This defense represents a disregard of local road conditions and a false equivalence between forestry and heavy industrial mining.

A. The False Equivalence: Timber Hauling vs. Industrial Quarry Haulage

The DEIS attempts to use forestry as a baseline to normalize the proposed traffic. However, the operational profiles of these two industries are incompatible:

Operational Characteristic	Typical Timber Harvest (Permitted Use)	Proposed Skamania Quarry (The Project)
Operational Continuity	Temporary & Cyclical: Active for a few weeks or months, then absent from the area for 30 to 40 years while trees regrow.	Continuous & Relentless: Runs every single working day, year-round, for up to 40 years.
Frequency of Trips	Low Density: Typically ranges from 5 to 15 truck trips per day during active harvest windows.	High Density: Up to 500 truck trips (250 round trips) per day during peak operations.
Time Windows	Often restricted to early morning hours to minimize conflict with school buses and local commuters.	Continuous throughout the day, directly overlapping with school runs, active recreation, and commute times.

To put this in perspective, 500 truck trips per day over an 8-to-10-hour operating window means a massive, loaded industrial vehicle will pass our residential driveways **every 68 seconds**. No standard "permitted use" in a rural forest zone—whether sustainable logging, agriculture, or rural residential living—generates this unrelenting level of heavy traffic.

B. Severe Topographical Hazards of the West End Haul Route

The physical design of Mabee Mines Road and Salmon Falls Road makes them inherently unsafe for a continuous stream of heavy commercial traffic:

- **Blind Corners & Short Sight Distances:** These roads are narrow, winding, and completely lack paved shoulders or escape lanes. They feature numerous blind curves where a slow-moving vehicle (like a tractor or mail truck) or a stationary hazard, like a panic frozen deer, cannot be seen by an oncoming driver until it is too late.
- **Dangerous Stopping Sight Distances:** A fully loaded, dual-trailer gravel truck weighing up to 80,000 pounds requires significantly more distance to stop than a passenger vehicle or even a standard logging truck. This hazard is severely compounded on the steep, downhill grades of our local roads.
- **Severe Microclimates:** During winter months, the higher elevations of Mabee Mines Road frequently experience freezing rain, snow, and black ice, even when lower areas like SR 14 are completely clear. Forcing heavy, dual-axle gravel trucks to navigate steep,

winding, icy descents past residential driveways is a recipe for catastrophic run-off-the-road accidents and head-on collisions.

C. Active Threat to Vulnerable Community Members

Our local county roads are shared public spaces. The DEIS completely ignores the human element of our community:

- **School Bus Routes:** Local children rely on school buses that must stop directly on these narrow roads to load and unload. A multi-ton gravel truck descending a steep grade every 68 seconds leaves zero margin for error when approaching a stopped school bus.
- **Pedestrians and Cyclists:** Because parts of Mabee Mines Road lack shoulders, residents walking for exercise, kids playing, and cyclists are forced to travel directly on the narrow asphalt lanes. The wind shear, noise, and physical presence of a massive dump truck passing inches from a pedestrian every minute creates an active, terrifying hazard that will completely eliminate our ability to safely walk or bike in our own neighborhood.
- **Driveway Access Blockades:** For residents with driveways directly accessing Mabee Mines or Salmon Falls Road, trying to safely pull out onto the road with a heavy truck passing every 68 seconds creates a constant, stressful, and highly dangerous barrier to everyday life.

D. The Silica Dust Health Hazard

Community health and welfare are not limited to traffic collisions; they include the air we breathe.

- **Carcinogenic Silica Dust:** Mining, crushing, and transporting basalt generates fine particulate matter, including crystalline silica dust. When hauled in open-top trucks, this dust becomes airborne along the entire haul route.
- **Inadequate Mitigation:** The DEIS's proposed mitigation—wetting down active areas—is notoriously unreliable during hot, dry Skamania County summers. This dust poses a severe, documented respiratory risk to local residents, particularly children, the elderly, and neighbors with pre-existing cardiovascular or respiratory conditions (such as asthma).

Conclusion for Criteria 2

Under SCC 21.16.070, the applicant is legally required to prove that their project will *not* materially endanger our health, safety, and welfare.

By introducing a multi-decade, high-frequency industrial trucking pipeline onto steep, icy, blind rural roads shared by school children, pedestrians, and wildlife, the J.L. Storedahl & Sons Quarry Project does not just "exacerbate" a safety issue—it introduces an entirely new, unmitigated, and life-threatening hazard to our community.