



City of Stevenson

Planning Department

(509)427-5970

7121 E Loop Road, PO Box 371
Stevenson, Washington 98648

TO: Planning Commission
FROM: Ben Shumaker
DATE: May 13th, 2024
SUBJECT: Zoning Interpretation – Seasonal Employee Housing in the CR Commercial Recreation District

Introduction

This memo deals with the interpretation of Seasonal Employee Housing as an unlisted use in the CR Commercial Recreation District. The Stevenson Planning Commission is asked to interpret the Zoning Code based on a request depicted in Attachment 1. In conducting this interpretation, the Planning Commission is constrained by the process and standards of [SMC 17.12.020](#). The Planning Commission's interpretation can a) prohibit, b) allow staff review/approval as an accessory use, or c) allow Planning Commission review/approval via a conditional use permit.

Recommendation

The Planning Commission should evaluate this proposal based on its understanding of a) whether Seasonal Employee Housing is consistent with the purpose of the R3 District and b) and whether the use is of the same general character as other uses in the district. A draft interpretation is attached based on the assumption that Employee Housing could be conditionally allowed in the R3 District and that the use would be considered accessory at this location.

Approval Standards

Affirmative findings shall be made on the following criteria before any unlisted use is allowed in a zoning district.

1. The use (Seasonal Employee Housing) is consistent with the purpose of the applicable zoning district (CR Commercial Recreation);

GUIDANCE: Staff sees nothing to prevent an affirmative finding by the Planning Commission.

Use: The Seasonal Employee Housing use is not a listed use in SMC 17.13 – Use Classifications and Descriptions. Staff has developed the following as a working description to assist discussions:

Any living quarters, dwelling or housing accommodation located on the same lot with a commercial establishment and occupied by employees of that establishment on a seasonal basis.

Zoning District: The City has stated the purpose of the CR Commercial Recreation District as follows:

The commercial recreation district (CR) provides for the siting of facilities within Stevenson for the express purpose of expanding the tourism industry while adding to local citizens' opportunities for economic development. The establishment of the CR commercial recreation district is intended to enhance and diversify the business and tourism opportunities in Stevenson through development of commercial and other facilities that complement the natural and cultural attractions of the area without significant adverse effect to environmental features or to natural, cultural and historic resources and their settings.

Counterpoint: The purpose statement of the CR District specifies opportunities for locals in the pursuit of economic development opportunities. Seasonal employee housing implies employment of non-locals. The Planning Commission may choose to focus on this if it seeks to interpret this use other than as it is presented in Attachments.

AND

2. The use is expressly allowed in a less restrictive district (C1 and M1 Districts).

GUIDANCE: An affirmative finding cannot be made for this criterion.

District Allowances: Seasonal Employee Housing is an unlisted use and does not appear in the Zoning Code, including the Use Table for the C1 Commercial or M1 Industrial districts.

OR

3. The use is of the same general character as the principal and conditional uses authorized in such district.

GUIDANCE: Staff sees nothing to prevent an affirmative finding by the Planning Commission.

Character of Uses: The CR District allows similar uses a both P- Permitted (Hostel, Hotel, Campground), and C – Conditional (Multi-Family Dwelling, Townhome). The duration of stay in the contemplated use—longer than 30 days, less than continuous—separates it from the Hostel or Multi-Family use categories.

Accessory Use, Supplemental Standard

In limited circumstances, an unlisted use which satisfies the approval standards above may be interpreted as an accessory use in the district under consideration. Such circumstances require an additional affirmative finding that:

1. The proposed use (Seasonal Employee Housing) serves a purpose customarily incidental to the instant principal use (Mixed Use: Hotel, Public Assembly, Golf Course) on the property under consideration.

GUIDANCE: Staff sees nothing to prevent an affirmative finding by the Planning Commission.

Instant Principal Use: Staff will caution (repeatedly) to avoid discussion of a specific site and/or property while making a decision on this interpretation which must be viewed through a district-wide lens. The instant principal uses on the property are commercial establishments with seasonal employment needs. Housing such employees could be considered customarily incidental to such uses.

CONCLUSION: Subject to Planning Commission Analysis. If the Planning Commission makes an affirmative finding criterion 1 and 3, above, and it finds the use customarily incidental to the instant principal use on the requested property, Seasonal Employee Housing can be considered an accessory (A) use at this site in the CR District.

Prepared by,

Ben Shumaker
Community Development Director

Attachment

- Concept/Site Plans
- Draft Interpretation (C/A)

UTILITY LEGEND (SOUTH PARCEL PHASE 1 PERMIT)

	PRIVATE STORM DRAIN
	SANITARY SEWER LINE
	PRIVATE WATER LINE
	PRIVATE FIRE PROTECTION LINE
	GAS LINE
	ELECTRICAL LINE
	TELECOM LINE

UTILITY KEYNOTES

- ROUTE UTILITY SERVICE LINES TO EACH STRUCTURE AND CONNECT TO UTILITY MAIN LINE STUB OUTS, TYP.
- CONNECT TO UTILITY STUB CONSTRUCTED UNDER SEPARATE PERMIT

UTILITY LEGEND

	-285 LF STORM
	-140 LF SANITARY
	-145 LF WATER
	-140 LF GAS
	-41 LF DISPERSION TRENCH
	SD CATCH BASIN
	DRAINAGE BASIN LIMIT
	FLOW DRAINAGE ARROW

CONNECT PEDESTRIAN PATHWAY TO EXISTING WALK

WETLAND

1.0-FT GRAVEL STRIP

2.0-FT-WIDE GRAVEL STRIP AND 2.0-FT-WIDE COMPOST-AMENDED VEGETATED FILTER STRIP ON DOWNSLOPE SIDE OF ROADWAY

NO PARKING AREA FOR VEHICLE TURNAROUND

-41 LF STORMWATER DISPERSION TRENCH FOR STRUCTURES (TOTAL ROOF AREA = 2880 SF)

(4) 9x18 STANDARD PARKING STALLS

ENVIRONMENTAL BUFFER AREA

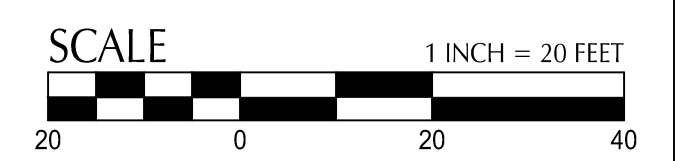
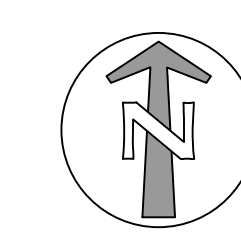
PROVIDE TREE PROTECTION FENCE AT EDGE OF ENVIRONMENTAL BUFFER AREA WHERE ADJACENT TO LIMITS OF WORK

RELOCATED FIRE HYDRANT (SOUTH PARCEL PHASE 1)

PHASE 2
16 BEDS

PHASE 1
16 BEDS

UTILITY ROUTING EXHIBIT
SKAMANIA LODGE
TEMPORARY EMPLOYEE HOUSING





City of Stevenson

Planning Department

(509)427-5970

7121 E Loop Road, PO Box 371
Stevenson, Washington 98648

Planning Commission Interpretation

Commercial Recreation District—Seasonal Employee Housing (ZON2024-02)

Issue:

The use table adopted at SMC 17.25.040 did not contemplate whether Seasonal Employee Housing uses would be compatible in the CR Commercial Recreation District. At their regular meeting in May, 2024, the Planning Commission addressed whether this use would have been permitted had it been previously contemplated and whether it is compatible with the other listed uses in the district.

Guiding Policy

This interpretation is guided by SMC 17.12.020 which requires the following approval standards and considerations, for which affirmative findings are required before an unlisted use could be allowed.

- 1) SMC 17.12.020(C)(1) – The use is consistent with the purpose of the applicable zoning district;

AND

- 2) SMC 17.12.020(C)(2) – The use is expressly allowed in a less restrictive district;
- OR
- 3) SMC 17.12.020(C)(3) – The use is of the same general character as the principal and conditional uses authorized in such district

AND

- 4) SMC 17.12.020(E)(1) – The proposed use serves a purpose customarily incidental to the instant principal use on the property under consideration.

Discussion

Use: The Seasonal Employee Housing use is not described in SMC Chapter 17.13. The following is a working description:

Any living quarters, dwelling or housing accommodation located on the same lot with a commercial establishment and occupied by employees of that establishment on a seasonal basis.

Zoning District: The purpose of the CR Commercial Recreation District is listed at SMC 17.25.020(A):

The commercial recreation district (CR) provides for the siting of facilities within Stevenson for the express purpose of expanding the tourism industry while adding to local citizens' opportunities for economic development. The establishment of the CR commercial recreation district is intended to enhance and diversify the business and tourism

opportunities in Stevenson through development of commercial and other facilities that complement the natural and cultural attractions of the area without significant adverse effect to environmental features or to natural, cultural and historic resources and their settings.

District Allowances: This use is not expressly allowed in any district (less restrictive or otherwise).

Character of Uses: In the CR District, 27 uses are either permitted (P) or conditional (C). Seasonal Employee Housing is of the same general character as 7 of those uses [Multi-Family Dwelling (C), Townhome (C), Vacation Rental Home (C), Bed & Breakfast (P), Hostel (P), Hotel (P), Campground (P)]. Additionally, there are 2 uses listed as prohibited (X) in the CR District. Seasonal Employee Housing is of the same general character as 1 of those uses [Single-Family Detached Dwelling].

Instant Principal Use: In the CR District mixed uses involving Hotel, Public Assembly, Golf Course, and Food Service are listed permitted uses. Seasonal Employee Housing is customarily incidental to this mix of uses.

Findings

Based on the discussion below, the following findings are made:

- 1) The Seasonal Employee Housing use is consistent with the purpose of the CR Commercial Recreation District.
- 2) The Seasonal Employee Housing use is not expressly allowed in a less restrictive district than the CR District.
- 3) The Seasonal Employee Housing use is of the same general character as the principal and conditional uses authorized in the CR District.
- 4) The Seasonal Employee Housing use is customarily incidental to the mixed uses involving Hotel, Public Assembly, Golf Course, and Food Service uses.

Interpretation:

In the CR Commercial Recreation District, the Seasonal Employee Housing use satisfies the criteria of SMC 17.12.020(C)(1 & 3). As a result, the use may be allowed upon issuance of a Conditional Use Permit. Furthermore, when proposed on property where mixed use development involving Hotel, Food Service, Public Assembly, and Golf Course uses is the instant principal use, the Seasonal Employee Housing use satisfies the criterion of SMC 17.12.020(E)(1) and may be allowed by the Zoning Administrator as an Accessory Use.

For the Planning Commission:

Chair

Date