



OLSON
ENVIRONMENTAL LLC
ENVIRONMENTAL SERVICES • GIS • HABITAT RESTORATION

June 17, 2020

Mr. Ben Schumaker
Planning Director
City of Stevenson
Stevenson, WA 98648

RE: Rock Creek Cove Hospitality Site – Critical Areas Review

Mr. Shumaker:

Olson Environmental (OE) has reviewed the Critical Areas Report dated June 16, 2020 to determine compliance with the City of Stevenson Municipal Code 18.13 which addresses Critical Areas and Natural Resource Lands. The report was prepared by Ecological Land Services (ELS) for the Applicant which is FDM Development. The Applicant is proposing a mixed-use hospitality development on the former Hegewald Lumber Mill site located between Rock Creek Drive and Rock Creek Cove. ELS identified riparian habitat associated with Rock Cove within the project area, therefore SMC 18.13.095 (Fish and Wildlife Habitat Conservation Areas – FWHCA) applies to this development. The Applicant is proposing minor encroachments into the riparian buffer which requires a Critical Areas Permit as outlined in SMC 18.13.035. In addition, an Oregon white oak tree was identified at the southeast end of the study area. This tree is not proposed to be removed for this project. The project area is also within a designated shoreline which is not part of this review. OE's findings are as follows:

Fish and Wildlife Habitat Conservation Areas Critical Areas Report

Critical Area report requirements are outlined in SMC 18.13.050 and specifically for FWHCA in SMC 18.13.095(C). ELS has identified a Type F stream in the north of the study area as shown in Figure 2 of their report. Rock Cove which surrounds three sides of the project area is a shoreline of the state (Type S) water. According to SMC Table 19.13.095-1, Type F streams have a 100 foot riparian buffer and Type S waters have a 150 foot riparian buffer. Riprap occurs along approximately 65 percent of the shoreline and maintained vegetation areas occur north and south of the existing entrance to the property (Fig. 2). The Applicant has presented the case that the riprap and maintained vegetation areas functionally isolate the 150 foot Type S riparian buffer (Fig. 2) based on SMC 18.13.095(D)(3) which identifies functionally isolated buffers as lawns, walkways, driveways, other mowed or paved areas, and areas which are functionally separated from a FWHCA and do not protect the FWHCA from

adverse impacts due to pre-existing roads, structures, or vertical separation, shall be excluded from buffers otherwise required by this chapter. If existing developments cause the width of the remaining buffer to be less than 50 percent of the base buffer, both conditions shall apply:

- a. If the reduced buffer exists in degraded condition, the reduced buffer shall be enhanced in accordance with 18.13.095D.5, unless the area in question is utilized for activities consistent with water dependent uses
- b. The buffer cannot be further reduced by averaging or on-site mitigation.

OE concurs that based on this definition the riprap functionally isolates the 150 foot buffer as shown in Figure 2. The maintained vegetation areas may functionally isolate however more detail needs to be provided to make that justification.

The remaining buffer in the riprap areas is less than 50 percent (75') of the base buffer (150'). If the maintained vegetation areas are considered functionally isolated the remaining buffer area north of the existing entrance and a portion of the buffer in the south-central portion of the project area are less than 50 percent (see attached graphic).

Based on ELS' description of the buffer at least portions of the remaining buffer are degraded. Therefore, SMC 18.13.095(D)(3)(a & b) apply. The degraded buffer in those areas where less than 50 percent of the base buffer remains shall be enhanced and the buffer cannot be further reduced by on-site mitigation.

OE recommends that the Applicant provide a more detailed habitat assessment report that includes the requirements of SMC 18.13.050, SMC 18.13.095(B)(1) and 18.13.095(C)(1) prior to final approval.

Conceptual Mitigation Plan

The Applicant has provided a conceptual mitigation plan that outlines the enhancement of the remaining riparian buffer and onsite mitigation for further reducing the buffer for the development. Very little detail is provided in the conceptual plan. Based on the information provided above only the buffer areas that have not been reduced by 50 percent by functional isolation can be further reduced through onsite mitigation. As per SMC 18.13.095(D)(5) onsite mitigation can be used to reduce the base buffer to 70 percent of the base buffer. For this project that would reduce the 150 foot base buffer to 105 feet. To reduce the buffer further requires off-site mitigation. As per SMC 18.13.095(D)(6), the riparian buffer can be reduced to 33 percent of the base buffer width through off-site mitigation. This would reduce the base buffer from 150 feet to 49.5 feet. It is OE's opinion that this project can meet the buffer reduction criteria by utilizing the off-site mitigation option which would allow the development

to occur outside of the 50 foot setback as required under the City's SMP. The Applicant shall provide a detailed mitigation plan that includes the requirements of SMC 18.13.095(D)(6) and 18.13.095(F). The Applicant has previously been provided a list of off-site mitigation options that would meet the requirements of SMC 18.13.095(D)(6).

Should you have questions or need more information, please contact me.
















Regards,

Kevin L. Grosz
Kevin L. Grosz, S.P.W.S.
Project Manager
Wetland/Wildlife Biologist

DRAFT

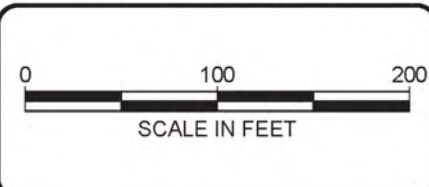


LEGEND:

-  Site Boundary
-  OHWM
-  Stream with Flow Direction
-  FWHCA Buffer for Type F
-  Functionally Isolated FWHCA Buffer for Type S
-  Reduced FWHCA Buffer For Type S (105')
-  Shoreline Management Plan Setback
-  Culvert
-  Oak Tree Location
-  Proposed Graveled Surfacing
-  Proposed Storm Line
-  Proposed Storm Outfall
-  Proposed Impacts (0.12 ac.)
-  Buffer Enhancement Area (1.03 ac.)
(1:8.6 Impact to Enhancement Area Ratio)
-  Associated Habitat Improvement (1.43 ac.)

NOTE(S):

1. Aerial from Google Earth™.
2. OHWM line was determined through a joint effort by Ecological Land Services and Washington Department of Ecology on December 30, 2019. OHWM flags were professionally surveyed by S&F Land Services December 30-31, 2019.
3. Site Plan provided by FDM Development, Inc.




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DATE: 6/11/20
 DWN: EF
 REQ. BY: AA
 PRJ. MGR: AA
 CHK: AA
 PROJECT NO:
 2682.02

Figure 3
 PROPOSED CONDITIONS MAP
 Rock Cove CAR
 FDM Development
 City of Stevenson, Skamania County, Washington
 Section 1, Township 2N, Range 7E, W.M.

DRAFT

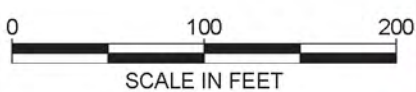


LEGEND:

- Site Boundary
- OHWM
- Stream with Flow Direction
- FWHCA Buffer for Type F
- Functionally Isolated FWHCA Buffer for Type S
- Shoreline Management Plan Setback
- Culvert
- Oak Tree Location
- Existing Graveled or Concrete Surfacing
- Existing Rip Rap

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Figure 2
 EXISTING CONDITIONS SITE MAP
 Rock Cove CAR
 FDM Development
 City of Stevenson, Skamania County, Washington
 Section 1, Township 2N, Range 7E, W.M.