

Rock Creek Cove Hospitality
Revised Land Use Application Narrative & Findings Document
Site Plan Review, Substantial Shoreline Development Permit, and Plat Vacation

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Tax Lot Number: 02070100130300 and 02070100130200

Parcel Size: 6.4 acres

Zoning Designation: Commercial Recreation (CR)

Summary of Request: The applicant proposes to construct 19 cabins that will serve as nightly and weekly lodging, as well as an event space to be used for private weddings, reunions, and parties. On-site parking, public pedestrian access, landscaping, and enhancements to the riverbank will also be provided. Additionally, a plat vacation is proposed to provide a more cohesive property under one ownership group.

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I. PROJECT OVERVIEW

EXISTING CONDITIONS

The project site is located off SW Rock Creek Drive, north of the existing Rock Cove Assisted Living Community, and includes parcels 02070100130200 and 02070100130300. The site is approximately 6.40 acres in size and zoned Commercial Recreation (CR) on the Stevenson Zoning Map. The development area is currently undeveloped (no buildings on site) but retains improvements from prior industrial land uses that include concrete and gravel surfaces, gravel roads accessing various points of the site, a graveled boat launch, and riprap embankments that span a majority of the shoreline.

VICINITY MAP



PROPOSAL

The project seeks to complement the existing tourism industry in Stevenson by proposing 19 cabins available for nightly and weekly rental. An event space will anchor the development and provide wide views of Rock Cove and the Columbia River Gorge. The development seeks to attract both local and regional visitors, with venue space available for weddings, company parties, family reunions, and corporate retreats.

In addition to the cabins and event space, the applicant proposes to restore water-side portions of the property for enhanced publicly accessible observation and enjoyment. This will equal to approximately 1.12 acres of buffer improvement along the shoreline.

II. RESPONSE TO APPLICABLE DEVELOPMENT AND CODE STANDARDS

Note: Responses to all applicable development standards are included below. Sections that are not applicable or do not require a response may be omitted from the narrative text.

CHAPTER 16:02: SHORT PLATS AND SHORT SUBDIVISIONS

SECTION 16.02.270: ANCILLARY PROCEEDINGS – PLAT VACATION

- A. *Whenever any person is interested in the vacation of any short plat or any portion thereof, or any area designated or dedicated for public use, that person shall file an application for vacation with the council. The application shall set forth the reasons for vacation and shall contain signatures of the owner(s) of that portion of the short plat subject to vacation. If the short plat is subject to restrictive covenants which were filed at the time of the approval of the short plat, and the application for vacation would result in the violation of a covenant, the application shall contain an agreement signed by all parties subject to the covenants providing that the parties agree to terminate or alter the relevant covenants to accomplish the purpose of the vacation of the short plat or portion thereof.*
- B. *When the vacation application is specifically for a city road, the procedures for road vacation in RCW Chapter 35.79 and the city's road vacation procedures shall be utilized for the road vacation. When the application is for the vacation of the short plat together with the roads and/or streets, the procedure for vacation in this section shall be used, but vacations of roads may not be made that are prohibited under RCW 35.79.*
- C. *The council shall give notice as provided in Section 16.02.110(C) and shall conduct a public hearing on the application for vacation and may approve or deny the application for vacation of the short plat after determining the public use and interest to be served by the vacation of the short plat. If any portion of the land contained in the short plat was dedicated to the public for public use or benefit, such land, if not previously deeded to the city, shall be deeded to the city unless the council shall set forth findings that the public use would not be served in retaining title to such lands.*

Response: The applicant is proposing a plat vacation on the project site to provide a more cohesive land use pattern. All of the land contained in the plat after the vacation will be under a single ownership group. All required procedures for a plat vacation, including a public hearing, will be complied with by the property owner.

CHAPTER 17.25: TRADE DISTRICTS

SECTION 17.25.040: USES

Use	CR
<i>Overnight Lodging (Hotel)</i>	<i>Permitted</i>
<i>Food Service</i>	<i>Permitted</i>
<i>Arts, Entertainment, and Recreation Uses (Public Assembly)</i>	<i>Permitted</i>

Response: The applicant proposes 19 cabins that will be available as overnight lodging, as well as an event space with a kitchen that is available for private events. All three of these uses are permitted in the Commercial Recreation zoning district as shown in Table 17.25.040 above.

SECTION 17.25.050: TRADE DENSITY

A. *Density and Lot Size. The maximum density and minimum lot dimensions for Trade Districts are contained in Table 17.25.050-1: Trade Density Standards.*

Table 17.25.050-1: Trade Density Standards					
District	Use	Minimum Lot Area	Minimum Lot Width	Minimum Lot Depth	Maximum Lot Coverage
CR	All	10,000 square feet	-	-	35%
Proposed		262,334 square feet	~450 feet	~580 feet	10.6% (27,983 square feet)

Response: The project site is 6.4 acres in size, or approximately 262,334 square feet. The lot is irregularly shaped due to its location adjacent to Rock Cove, with a width of approximately 450 feet and a depth of approximately 580 feet. The applicant is proposing interior lot landscaping, including trees, shrubs, and ground covering, as well as enhancement of the 1.2 acres of the property’s shoreline with additional native vegetation. In total, the lot coverage on the project site is approximately 10.6% or 27,983 square feet. Please see the attached landscape plan and site plan for details on lot dimension and coverage.

SECTION 17.25.060: TRADE DIMENSIONAL STANDARDS

- A. *Compliance Required. All structures in Trade Districts must comply with:*
- 1. The applicable dimensional standards contained in Table 17.25.060-1: Trade Dimensional Standards.*
 - 2. All other applicable standards and requirements contained in this title.*

Table 17.25.060-1: Trade Dimensional Standards									
District	Minimum Height of Building	Maximum Height of Building	Minimum Setbacks				Maximum Setbacks		
			Front	Side (Interior)	Side (Street)	Rear	Rear	Front	Side (Street)
CR	N/A	35 feet	25 ft	0 ft	20 ft	0 ft	20 ft	N/A	N/A
Proposed	32 feet		~60ft	~40 ft	N/A	~45 ft	~45ft	~60 ft	N/A

Response: The site has been designed to comply with all setback requirements to the maximum extent possible, while also provided a sufficient buffer from the ordinary high water line and the existing fish and wildlife conservation area. All minimum setbacks of the CR zone are met, while some of the maximum setbacks are greater than generally allowed to accommodate the critical natural areas and Rock Cove that surround the site. Please see the attached site plan, Sheet C2.00, for details on setbacks and site layout.

SECTION 17.25.070: TRADE DISTRICT DESIGN

A. *CR Design*



1. *Buildings shall be appropriately scaled and compatible with their locations and surrounding environment, including adjacent buildings, landscaping, water bodies and other natural features.*

Response: The applicant is proposing two different styles of cabins ranging from 629 square feet to 853 square feet. Each residential building and the larger event space are scaled to be compatible with all other buildings on site in height and mass. Please see the attached site plan and building elevations for details.

2. *Exterior building materials and finishes shall be compatible with the unique setting of the Columbia River Gorge. Preference should be given to nonglossy finishes and earthtone colors.*

Response: The proposed building materials will be primarily wood, and any paint or color used will be selected to compliment the surrounding nature by being earth toned. Please see the attached elevations for details on proposed building materials.

3. *Outdoor storage shall be visually screened by landscaping, fences, walls or enclosures.*
4. *Refuse containers shall be fully enclosed and covered. Enclosures shall be constructed of materials compatible with the main structure.*

Response: All storage areas will be visually screened from view by either landscaping or a wall.

5. *Screening and buffering shall be provided between dissimilar uses to minimize negative impacts, such as those from noise, traffic, lighting and glare.*

Response: The entire site will be used as a nightly and weekly lodging and event space. There are no dissimilar uses on the project site that will require additional screening or buffering.

6. *Screening and buffering shall be located along the perimeter of a lot or parcel.*

Response: Landscaping is provided along the entire perimeter of the site, including along Rock Creek Drive. Please see the attached landscape plan for details.

7. *The location and number of access points to the site, their relationship to existing streets and traffic, the interior circulation patterns, and the separation between pedestrians and vehicles shall be designed to maximize safety and convenience.*

Response: The applicant is proposing one vehicular access point on the site from Rock Creek Drive, the only street that borders the project site. The on-site vehicular circulation has been designed to provide easy access to visitors and employees, while keeping cars separate from pedestrians by providing sidewalks connecting all buildings and amenities on site. Please see the attached site plan, Sheet C2.00, for details.

8. *Pedestrian sidewalks, pathways and access ways shall be located and constructed to minimize conflicts with vehicular traffic and natural hazards.*
9. *Safety crossings and adequate sight lines shall be provided at pathway intersections with roads.*

Response: All proposed pedestrian pathways on site are proposed to be a minimum of eight feet wide and separated from the on-site vehicular parking and circulation by a curb. Where the pedestrian pathways cross

vehicular drive aisles, a clearly marked crosswalk will be provided. Please see the attached site plan, Sheet C2.00, for details.

10. Roads, buildings and other structural improvements shall be located and designed to minimize grading and modification of existing landforms and natural characteristics.

Response: The site has been designed and structures laid out to take into account the natural topography and features of the site. The parking area and cabin layout has been designed to limit grading to the maximum extent possible, while limiting any impact to the water edge. Please see the attached site plan, Sheet C2.00, for details.

11. Developments shall not contribute to the instability of a parcel or to adjoining lands.

Response: None of the proposed improvement will cause instability to the project site or adjacent properties.

12. Surface drainage systems shall be designed so as not to adversely affect neighboring properties, roads or water bodies.

Response: Surface drainage has been designed to prevent any draining to the neighboring properties or adjacent roads and water bodies. The applicant is proposing multiple stormwater facilities on the project site, including catch basins, rock outflows, and storm cleanouts. Please see the attached stormwater plan, Sheet C4.00, for details on surface drainage systems.

13. Developments within the designated shoreline areas of the CR district shall provide ample public visual and physical access to the water.

Response: The project site is located within the shoreline area of the CR zoning district and the applicant has designed the site to include a path on the eastern perimeter of the property to allow for visual and physical access to the water. This will be accessible to visitors and customers of the cabins. Please see the attached site plan, Sheet C2.00, for details on the path and access to Rock Cove.

SECTION 17.25.100: TRADE DISTRICT LANDSCAPING

A. CR Landscaping.

1. Minimum landscaping shall include 100% of the area between the building line and the street right-of-way line excluding drives, parking areas and pathways.

Response: All areas of the site not proposed for cabins, parking and maneuvering areas, pedestrian pathways and trails, or the event space are proposed to be landscaped. Please see the attached preliminary landscape plan for details.

2. New trees, shrubs, groundcover and other materials shall be compatible with other nearby landscaping.

3. New plantings shall be of such size, condition and density that they are initially effective.

Response: The proposed groundcover, shrubs, and conifer and deciduous trees will be chosen to be compatible with the surrounding landscaping and vegetation and be survive successfully after being planted.

4. *Wherever practical, natural vegetation and existing grade should be retained.*

Response: To the maximum extent practical, the natural vegetation on site is being preserved. This includes all land on site between the ordinary high water mark buffer and the shoreline. Please see the attached preliminary landscape plan for details.

5. *In areas where vegetation plays an important role in erosion control, aesthetic considerations or slope stabilization, any vegetation removed during construction, excavation or grading shall be promptly replaced.*

Response: All native existing native vegetation is being preserved between the shoreline and the ordinary high water mark buffer. This will ensure erosion control of the site during construction of the proposed development.

6. *Trees and shrubs which are intended to be retained on a site shall be protected during construction.*

Response: All tree and vegetation protection measures will be utilized during site grading and construction for vegetation proposed to be retained on the development site.

SECTION 17.25.130: TRADE DISTRICTS PARKING AND LOADING

A. *CR Parking and Loading.*

1. *Off-street parking shall be provided in accordance with the requirements of SMC 17.42 Parking and Loading Standards.*

Response: All applicable standards of Chapter 17.42 are met with the proposed off-street parking lot. Please see the response in Chapter 17.42 of this narrative for details on compliance.

2. *Parking areas, aisles, loading aprons and access ways shall be paved with an all-weather surface of a strength adequate for the traffic expected and shall be well drained.*

Response: All proposed parking areas, drive aisles, loading areas and accessways are paved with an all-weather surface of a strength adequate for the expected traffic and needed drainage on site.

CHAPTER 17.42: PARKING AND LOADING STANDARDS

SECTION 17.42.040: SIZE AND ACCESS REQUIREMENTS

A. *Each off-street parking space shall have a minimum width of 9 feet and a minimum length of 18 feet, except that each off-street parking space for compact vehicles shall have a minimum width of 8 feet and a minimum length of 16 feet.*

Response: All standard parking spaces on the project site are proposed to be 20 feet long and nine feet wide. Please see the attached site plan, Sheet C2.00, for details on the proposed parking spaces.

B. Aisles shall have a minimum width of 20 feet.

Response: The drive aisle on the project site is 24 feet wide, complying with the minimum width of 20 feet. Please see the attached site plan, Sheet C2.00, for details.

C. Up to one-third of the required off-street parking spaces on a site may be sized and designated for compact vehicles.

Response: None of the off-street parking spaces on site are proposed to be compact.

D. Each parking space shall be of usable shape and condition.

Response: All proposed off-street parking spaces on site are of a usable shape and comply with the minimum dimensional standards of 17.42.040(A). Please see the attached site plan, Sheet C2.00, for details.

SECTION 17.42.060: JOINT USE OF PARKING PERCENTAGE OF AREA PERMITTED

The planning commission may authorize the joint use of parking facilities for the following uses or activities under conditions specified:

- A. Up to 50% of the parking facilities required by this chapter for a theater, bowling alley, restaurant, retail, service or other similar uses, may be supplied by the off-street parking provided by other types of uses or by a community parking lot.*
- B. Reserved.*
- C. Up to 100% of the parking facilities required by this chapter for a church, auditorium, stadium, or sport arena incidental to a public, private or parochial school may be supplied by the off-street parking facilities serving primarily uses or by a community parking lot.*
- D. Up to 100% of the parking facilities required by this chapter for a hotel may be supplied by the off-street parking provided by other types of uses or by a community parking lot.*

Response: The primary use proposed on the project site is cabins, falling under the use of a hotel. However, the applicant is also proposing an event space, most similar to an auditorium use in the City of Stevenson Development Code. Auditoriums are permitted to provide up to 100% of the parking required by the off-street parking facilities serving the primary use. Because the hotel is the primary use on site, the applicant is proposing a single off-street parking lot to serve both the cabins and the event space on site.

SECTION 17.42.080: OFF-STREET FACILITIES – LOCATION REQUIREMENTS

Off-street facilities shall be located as specified in this section. Where a distance is specified, such distance shall be the maximum walking distance measured from the nearest point of the parking facility to the nearest point of the building that such facility is required to serve:

- A. *For a single-family dwelling: on the home lot with the building they are required to serve;*
- B. *For multiple dwellings: 150 feet;*
- C. *For retail, food service, and hotel uses: 1,000 feet;*
- D. *For all other uses: 300 feet.*

Response: The proposed parking area is located within ten feet of the nearest cabin and event space, complying with the above distance standards. Please see the attached site plan, Sheet C2.00, for details.

SECTION 17.42.090: TABLE OF MINIMUM STANDARDS – OFF-STREET PARKING

- A. *Off-street parking shall be provided in accordance with Table 17.42.090-1: Off-Street Vehicle Parking Requirements.*

Table 17.42.090-1: Off-Street Vehicle Parking Requirements	
<i>Use</i>	<i>Unspecified or All Other Districts (including CR)</i>
<i>Hotel</i>	<i>1 for each sleeping unit plus 1 space for each 2 employees on the evening shift</i>

Response: The proposed use will include nightly and weekly lodging for local and regional tourism, similar to a hotel use. Under Table 17.42.090-1, hotel uses require one parking space for each sleeping unit plus one space for each two employees on the evening shift. The applicant is proposing a total of 71 parking spaces which will sufficiently serve the 19 hotel cabins, employees, and any event hosted at the development site. Please refer to the attached site plan, Sheet C2.00, for details on proposed off-street parking.

SECTION 17.42.100: LOADING AND UNLOADING AREAS

- A. *Subject to subsection E of this section, whenever the normal operation of any development requires that goods, merchandise or equipment be routinely delivered to or shipped from that development, a sufficient off-street loading and unloading area must be provided in accordance with this section to accommodate the delivery or shipment operations in a safe and convenient manner.*

Response: The proposed project will include cabins available for nightly and weekly rentals, as well as an associated event space to be used by individuals, families, or businesses staying at the site. A permanent loading space is not anticipated to be needed, as there will be no regular delivery of goods, merchandise, or equipment delivered to the development.



CHAPTER 18.13: CRITICAL AREAS AND NATURAL RESOURCE LANDS

SECTION 18.13.095: CRITICAL AREA – FISH AND WILDLIFE HABITAT CONSERVATION AREAS

C. FWHCA Reports.

1. *Preliminary Assessments. In order to determine the extent of the appropriate buffers on a site when the nature of the fish and wildlife habitat conservation area is unclear, the applicant may submit a preliminary habitat assessment report as prepared by a qualified professional in accordance with SMC 18.13.050 - Critical area reports—Requirements. This report shall suffice for the purpose of the development application if no habitat buffer impacts are proposed. In addition to the minimum requirements for critical area reports contained in SMC 18.13.050, a preliminary FWHCA report should also contain the following information:*
 - a. *Confirmation or correction of the classifications for the FWHCA and/or stream type as defined in this chapter;*
 - b. *Characterization of riparian (streamside) vegetation species, composition, and habitat function;*
 - c. *Description of the soil types adjacent to and underlying the stream, using the Soil Conservation Service soil classification system;*
 - d. *Identification of the qualities of the area that are essential to maintain feeding, breeding, and nesting, and an assessment of potential project impacts to the use of the site by the species;*
 - e. *A discussion of any federal, state, or local species/habitat management recommendations, including the WDFW habitat management recommendations that have been developed for the identified species or habitat;*
 - f. *Recent photographs of the property, including detailed photographs of the habitat resource in question;*
 - g. *An outline of standard buffer widths, available buffer reductions, or potential opportunities for enhancement/mitigation.*

Response: Ecological Land Services, Inc. (ESL) prepared a Critical Areas Report and Conceptual Mitigation Plan for the preliminary review of this application that includes all of the above information. The City's environmental consultant, Olson Environmental LLC, provided review and comments on this report dated and provided findings that concur with the FWHCA buffer isolation. Please see the attached report for details.

D. Habitat Buffer Widths.

1. *Base Buffer Widths. The following buffer widths have been established in accordance with the best available science. They are based on category of fish and wildlife habitat conservation area.*
2. *Buffer Averaging. Buffer averaging to allow reasonable use of a parcel may be permitted when all of the following are met: [...]*

Response: The project site area is designated as a fish and wildlife habitat conservation area (FWHCA) and has Type F waters is 100 feet and Type S waters is 150 feet. There are no proposed buffer reductions for this project and the applicant is proposing all development to occur outside of the Shoreline Management Plan Setback and approximately 0.19 acres of improvements within the FWHCA Buffer for Type S. However, the applicant is proposing 1.12 acres of buffer enhancements (a 1:5.9 impact to enhancement area ratio).

3. *Functionally Isolated Buffers. 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% of the base buffer, both of the following conditions shall apply:*
 - a. *If the reduced buffer exists in a degraded condition, the reduced buffer shall be enhanced in accordance with 18.13.095.D.5. unless the area in question is utilized for activities consistent with water dependent uses.*
 - b. *The buffer cannot be further reduced through averaging or on-site mitigation.*

Response: There are portions of the site that have historically been used for development and have existing gravel or concrete surfacing that are located within the buffer. The applicant is not proposing to further impede the fish and wildlife conservation area of Rock Cove but is proposing permanent development in the already impacted area. Please see the attached site plan, Sheet C2.00, for details.

F. Habitat Mitigation.

1. *Compensatory Mitigation, Required. Compensatory mitigation for impacts to FWHCA's shall be used only for impacts that cannot be avoided or minimized and shall achieve equivalent or greater functions as those affected by the proposed project. Out-of-kind replacement of FWHCA type or functions may be considered if the applicant demonstrates it will best meet watershed goals formally identified by the city, such as replacement of historically diminished FWHCA types.*

Response: The proposed FWHCA enhancement increases the existing buffer functions and values. The applicant is proposing approximately 1.12 acres of buffer enhancement by densely planting the remaining buffer area with native shrubs and removing non-native invasive Himalayan blackberry. This is a 1:5.9 ratio of impact to enhancement, significantly exceeding the 1:1 enhancement ratio required for on-site FWHCA mitigation. Please see the attached Critical Areas and FWHCA Report for details.

2. *FWHCA Mitigation Plan. When a project involves FWHCA or FWHCA buffer impacts, enhancements, or reductions, a habitat mitigation plan by a qualified professional shall be required. At a minimum, the habitat mitigation plan must contain the following information:*
 - a. *Baseline Information. All the information required in the FWHCA Report prepared under SMC 18.13.095(C).*
 - b. *Site Plan. A copy of the site plan for the development proposal showing identified critical areas, buffers, and dimensions and limits of any areas to be cleared. This plan should include the proposed construction sequencing, grading and excavation details, erosion and sedimentation control features, and detailed site diagrams and any other drawings appropriate to show construction techniques or anticipated final outcome.*
 - c. *Project Impacts and Mitigation. A description of the mitigation sequence developed for the project according to SMC 18.13.055. This should involve a description of the existing and estimated future conditions of the enhancement area and/or compensatory mitigation site, including location and rationale for selection. Include an assessment of all appropriate technical information necessary to assess the compensatory mitigation proposed.*

- d. *Goals and Objectives. The environmental goals and objectives of the mitigation, and the goals and objectives must be related to the functions and values of the impacted critical area.*
- e. *Monitoring and Maintenance Program. A proposed Monitoring Program compliant with SMC 18.13.059 - Performance and monitoring standards.*
- f. *A bond estimate for the entire enhancement and/or compensatory mitigation project, including the following elements: site preparation, plant materials, construction materials, installation oversight, maintenance twice per year for up to 5 years, annual monitoring field work and reporting, and contingency actions for the monitoring period established under SMC 18.13.059 - Performance and monitoring standards.*
- g. *Where proposed activities, uses, and alterations are located below the OHWM, identification of how the preservation and enhancement of anadromous fish habitat will be achieved including, but not limited to, the following:*
 - i. *The allowable work window as designated by the WDFW.*
 - ii. *Alternative alignments or locations for the activity that were determined infeasible.*
 - iii. *Stream width and flow rate, stability of the channel including erosion or aggradation potential, type of substratum, discussions of infiltration capacity and biofiltration before and after alteration, presence of hydrologically associated wetlands, analysis of fish and wildlife habitat, and any proposed floodplain limits.*
 - iv. *Methods to minimize the degradation of the downstream functions or values of the fish habitat or other critical areas.*

Response: The attached Critical Areas and FWHCA Report prepared for the project site by Ecological Land Services includes all of the above requirements and information. Please see the attached report for details on compliance.

III. RESPONSE TO APPLICABLE STEVENSON SHORELINE MASTER PROGRAM AND APPROVAL CRITERIA

CHAPTER 3: SHORELINE ENVIRONMENT DESIGNATION PROVISIONS

SECTION 3.2: ENVIRONMENT DESIGNATIONS

3.2.5: ACTIVE WATERFRONT ENVIRONMENT

- 3. *Management Policies:*
 - a. *Prefer uses that preserve the natural character of the area or promote preservation of open spaces and sensitive lands, either directly or over the long term. Allow uses that result in restoration of ecological functions if the use is otherwise compatible with the purpose of the environment and the setting.*
 - b. *Give priority to water-oriented uses, with first priority to water-dependent, then second priority to water-related and water-enjoyment uses. For shoreline areas adjacent to commercially navigable waters, give highest priority to water-dependent uses.*
 - c. *Prohibit new non-water-oriented uses, except:*
 - i. *As part of mixed use development;*

- ii. *In limited situations where they do not conflict with or limit opportunities for water oriented uses;*
- iii. *On sites where there is no direct access to the shoreline;*
- iv. *As part of a proposal that result in a disproportionately high amount of restoration of ecological functions.*

Response: WAC 173-26-020 defines a water-enjoyment use as a use that provides for recreational use or aesthetic enjoyment of the shoreline for a substantial number of people as a general characteristic of the use and which through location, design, and operation ensures the public’s ability to enjoy the physical and aesthetic qualities of the shoreline. A hotel with cabins and a shared event space located on the project site will allow for groups and individuals to stay and have events with a view of Rock Cove and the Columbia River. The proposed development is located on a part of the shoreline with very limited access due to the steep slopes, and is not an ideal location for a water-dependent use.

- d. *Assure no net loss of shoreline ecological functions as a result of new development through shoreline policies and regulations. Where applicable, new development shall include environmental cleanup and restoration of the shoreline to comply in accordance with any relevant state and federal law.*

Response: The applicant is proposing approximately 0.19 acres of buffer impacts that include permanent development. As mitigation, the applicant is proposing approximately 1.12 acres of buffer enhancement by densely planting the remaining buffer area with native shrubs and removing non-native invasive blackberry. The proposed mitigation is in-kind buffer enhancement at a 5.9:1 ratio, significantly exceeded the 1:1 enhancement ratio required for the site and assuring no net loss in shoreline ecological functions. Please see the attached Critical Areas and FWHCA Report for details.

- e. *Require public visual and physical access and implement public recreation objectives whenever feasible and where significant ecological impacts can be mitigated.*

Response: As part of the site design, the applicant is proposing pedestrian pathways that connect to the right-of-way, cabins and event center, and around the perimeter of the site adjacent to the shoreline. Please see the attached site plan for details on public access.

CHAPTER 4: GENERAL PROVISIONS FOR ALL SHORELINE ACTIVITIES

SECTION 4.3: ENVIRONMENTAL PROTECTION & NO NET LOSS

4.3.2: REGULATIONS

1. *Management Sequence. In order to ensure that review activities contribute to meeting the no net loss provisions by avoiding, minimizing, and mitigating for adverse impacts to ecological functions or ecosystem-wide processes, applicants shall describe how the proposal will follow the sequence of mitigation as defined below:*
 - a. *Avoid the impact altogether by not taking a certain action or parts of an action;*

- b. *Minimize the impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps (e.g., project redesign, relocation, timing to avoid or reduce impacts, etc.);*
- c. *Rectify the impact by repairing, rehabilitating, or restoring the affected environment to the conditions existing at the time of the initiation of the project or activity;*
- d. *Reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action;*
- e. *Compensate for the impact by replacing, enhancing, or providing substitute resources or environments; and*
- f. *Monitor the impact and the compensation projects and take remedial or corrective measures when necessary.*

Response: The applicant will be impacting parts of the buffer on site, but will be mitigating the impact at a near 6:1 ratio. The site has been designed to avoid all buffer impact areas to the maximum extent possible. However, with the current design there is approximately 0.19 acres of buffer impacts that include permanent development. As mitigation, the applicant is proposing approximately 1.12 acres of buffer enhancement by densely planting the remaining buffer area with native shrubs and removing non-native invasive blackberry. The proposed mitigation is in-kind buffer enhancement at a 5.9:1 ratio, significantly exceeded the 1:1 enhancement ratio required for the site and assuring no net loss in shoreline ecological functions. Please see the attached Critical Areas and FWHCA Report for details.

- 2. *The mitigation sequence is listed in the order of priority. Applicants shall consider and apply lower priority measures only where higher priority measures are determined to be infeasible or inapplicable.*

Response: The applicant avoided impacts to the maximum extent possible (a) and where impacts could not be avoided the were minimized with site design (b). All buffer enhancements include the planting of native species and restoring the shoreline by removing invasive species (c). Please see the attached Critical Areas and FWHCA Report for details.

- 3. *SEPA Compliance. To the extent SEPA applies to a proposal, the analysis of environmental impacts and mitigation related to the proposal shall be conducted consistent with WAC 197- 11—SEPA Rules and SMC 18.04—Environmental Policy.*

Response: The previously submitted SEPA covers the proposed development. No new SEPA is required.

- 4. *Cumulative Impacts. As part of the assessment of environmental impacts subject to this SMP, new uses, developments, and modifications shall evaluate and consider cumulative impacts of reasonably foreseeable future development on shoreline ecological functions. Evaluation of cumulative impacts shall consider:*
 - a. *Current circumstances affecting the shorelines and relevant natural processes;*
 - b. *Reasonably foreseeable future development and use of the shoreline; and*
 - c. *Beneficial effects of any established regulatory programs under other local, state, and federal laws.*

Response: The applicant is proposing approximately 0.19 acres of impact to the shoreline on the project site. However, a total of 1.12 acres of enhancements are proposed within the shoreline area on site, creating a cumulative positive impact to the site. The enhancements proposed will benefit the site and surrounding ecology and include the planting of native species. Please see the attached Critical Areas Report and site plan for details.

5. *Mitigating for Impacts. When impacts related to a proposal require mitigation, the following shall apply:*
 - a. *The proposal shall achieve no net loss of ecological functions.*
 - b. *The City shall not require mitigation in excess of that necessary to assure the proposal 1) results in no net loss of ecological function and 2) does not have a significant adverse impact on other shoreline functions fostered by this SMP.*
 - c. *Compensatory mitigation shall give preference to measures that replace the impacted function directly and in the immediate vicinity of the impact. However, alternative compensatory mitigation located elsewhere in the same reach or watershed that addresses limiting factors or identified critical needs for shoreline resource conservation may be authorized, including appropriate actions identified in the Restoration Plan.*
 - d. *Unless waived by the City, authorization of compensatory mitigation shall require appropriate safeguards, terms or conditions (e.g. performance bonding, monitoring, conservation covenants) as approved by the City Attorney and necessary to ensure no net loss of ecological functions.*

Response: There is approximately 0.19 acres of impacts to the buffer and a total of 1.12 acres of buffer enhancements proposed on site. This is a 1:5.9 impact to enhancement area ratio and does not result in a net loss of ecological functions on site. Please see the attached Critical Areas Report and site plan for details.

6. *Environmental protection and no net loss shall be achieved by complying with the combination of use regulations, shoreline setbacks, critical area buffers, and vegetation removal restrictions:*
 - a. *Shoreline Allowances & Setbacks – Table 5.1 establishes a list of permitted, conditional, and prohibited uses in each shoreline environment designation (SED). This table also establishes the minimum shoreline setback applicable to each use, activity, or development within each SED where development cannot occur; and*

Response: The applicant proposes 19 cabins that will be available as overnight lodging, as well as an event space with a kitchen that is available for private events. This is considered a commercial use that is water-enjoyment and is permitted in the Active Waterfront as shown in Table 5.1. The minimum shoreline setback for this use and zone is 33 feet. The project has been designed to meet this setback, as shown on the attached site plan.

- b. *Critical Areas Buffers – Section 4.4 Critical Area provisions, including separately incorporated SMC 18.13 provisions that establish Wetland and Riparian buffer standards as additional areas where mitigation sequencing must be applied and unavoidable impacts must be mitigated; and*

Response: The project site is adjacent to a Fish & Wildlife Habitat Conservation Area and has provided a preliminary FWHCA assessment, determining necessary buffers and confirming there will be no net loss of ecological function with the proposed development. Please see the attached assessment for details.

- c. *Modifications & Vegetation – Shoreline modification standards, vegetation standards, and prescriptive mitigation measures of Chapter 6 apply to all vegetation impacts occurring within shoreline jurisdiction.*

Response: All applicable policies of Chapter 6 are met with the proposed development and vegetation mitigation. Please see the responses to the regulations of Chapter 6 for details.

SECTION 4.6: PUBLIC ACCESS

4.6.2: POLICIES

1. *Continuous public pedestrian access should be provided along the City’s shorelines, especially the Columbia River, Rock Cove, and Lower Rock Creek.*

Response: The project site is located on the western edge of Rock Cove and is providing continuous public pedestrian access along the perimeter of the project site and connecting to the public right-of-way on Rock Creek Drive and the existing easement on the southern property. All pathways are accessible to the public and will provide access to adjoining properties and rights-of-way. Please see the attached site plan for details on the provided connections.

2. *The system of public physical and visual access to Stevenson’s shorelines should be maintained, enhanced, and protected over time on both private and public lands.*

Response: The property owner will maintain all proposed public and private pedestrian pathways on the project site, including surfacing and landscaping.

3. *Public access and recreational facilities should be located in a manner that will preserve the natural characteristics and functions of the shoreline.*

Response: The proposed public access pathway is located along the perimeter of the project site and provides access to the shoreline of Rock Cove without negatively impacting the shoreline or natural vegetation since the pathway is located primarily outside of the buffer area. Please see the attached site plan for details.

4. *Private property rights, public safety, and navigational rights should be considered when providing public access opportunities.*

Response: The applicant has designed the site to be developed as a private business while also providing public access opportunities to the right-of-way, adjacent properties, and the shoreline on Rock Cove. Please see the attached site plan for details on site layout and public access.

5. *New development should identify and preserve key shoreline views and avoid obstructing such views from public areas.*

Response: The proposed development has been thoughtfully designed to preserve the shoreline views along Rock Cove. The applicant is providing public access via a pedestrian pathway that will circumnavigate the site adjacent to the shoreline and connect to the adjacent properties and rights-of-way.

6. *The City's should develop a comprehensive and integrated public access and trail plan (consistent with WAC 173-26-221(4)) that identifies specific public access needs and opportunities to replace these site-by-site requirements. Such plan should identify a preference for pervious over impervious surfaces, where feasible.*

Response: The applicant is proposing connections to existing public access easements to the south property and along Rock Cove. Please see the attached site plan for all pedestrian pathway and public access proposed with this development.

4.6.3: REGULATIONS

1. *Consistent with legal/constitutional limitations, provisions for adequate public access shall be incorporated into all proposals for Shoreline Permits that have one or more of the following characteristics:
 - a. *The proposed development or use will create a demand for, or increase demand for public access;*
 - b. *The proposed use is water-enjoyment, water-related, or non water-dependent, except for individual single-family residences not part of a development planned for 5 or more parcels;*
 - c. *The proposed use involves the subdivision of land into 5 or more parcels;*
 - d. *The proposed development or use will interfere with existing access by blocking access or discouraging use of existing access;*
 - e. *The proposed development or use will interfere with public use of waters of the state;*
 - f. *The proposed development or use will involve public funding or occur on public lands, provided that such access would not result in a net loss of ecological function. Public funding includes any funds from federal, state, municipal or local taxation districts.**

Response: The project site is a water-enjoyment use and is providing public access to and through the site to the shoreline. Please see the attached site plan for the location of this access.

2. *Additional public access will not be required where suitable public access is already provided by an existing public facility on or adjacent to the site and the Planning Commission makes a finding that the proposed development would not negatively impact existing visual or physical public access nor create a demand for shoreline public access that could not be accommodated by the existing public access system and existing public recreational facilities in the immediate vicinity.*
3. *Public access will not be required where the applicant demonstrates it is infeasible due to at least one of the following: [...]*
4. *To meet any of the conditions under Regulation 3 above, the applicant must first demonstrate to the satisfaction of the Planning Commission that all reasonable alternatives have been exhausted including, but not limited to, the following: [...]*

5. *For projects that meet the criteria of Regulation 3 above, the City may consider off-site public access or, if approved by the Planning Commission and agreed to by the applicant, the applicant may contribute a proportional fee to the local public access fund (payment in lieu).*
6. *If the City determines that public access is required pursuant to Regulation 1 above, the City shall impose permit conditions requiring the provision of public access that is roughly proportional to the impacts caused by the proposed development or use. The City shall demonstrate in its permit decision document that any such public access has a nexus with the impacts of the proposed development and is consistent with the rough proportionality standard.*

Response: The applicant is providing public access on the project site. Therefore, the above standards do not apply.

7. *When required, public access shall:*
 - a. *Consist of a dedication of land or a physical improvement in the form of a walkway, trail, bikeway, corridor, viewpoint, park, deck, observation tower, pier, boat launch, dock or pier area, or other area serving as a means of view and/or physical approach to public waters and may include interpretive centers and displays, view easements, and/or decreased building bulk through height, setback, or façade limitations;*

Response: To provide public access on the project site, the applicant is providing a pedestrian walkway that circumnavigates the site along the Rock Cove shoreline and provides access to viewpoints of the cove and Columbia River. The shoreline is relatively steep on the site, so it is not feasible to provide direct access to the water. In addition to the on-site pedestrian pathways, the applicant is providing connections via pathways to the right-of-way and the adjacent property to the south where an additional easement exists. Please see the attached site plan for details on the proposed public access.

- b. *Include features for protecting adjacent properties from trespass and other possible adverse impacts;*

Response: In addition to the pedestrian pathways, the applicant is providing extensive landscaping to buffer the site from the adjacent properties. These features will ensure public access is limited to the pedestrian pathways and not result in any trespassing or adverse impacts.

- c. *Be fully developed and available for public use at the time of occupancy of the proposed use or activity;*

Response: The pedestrian pathways will be fully developed with the site and be available for public use at the time of occupancy of the cabins and event space.

- d. *Result in no net loss of shoreline ecological functions.*

Response: The proposed public access pathways do not result in any net loss or negative impact to the shoreline ecological functions. Please see the attached report for details.

8. *When required, physical public access shall be constructed to meet the following requirements for location, design, operation and maintenance:*

- a. *Public access sites shall be connected directly to the nearest public street or non-motorized trail through a parcel boundary, tract, or easement, wherever feasible;*

Response: The proposed pedestrian pathways is connected directly to the right-of-way on Rock Creek Drive. Please see the attached site plan for details on public access to the site.

- b. *Signs indicating the public's right of access to shoreline areas shall be installed and maintained in conspicuous locations.*

Response: The property owner will ensure the public's right of access to the shoreline area are installed with the development of the site.

- c. *Public access easements and permit conditions shall be recorded on the deed of title and/or on the face of a plat or short plat as a condition running in perpetuity with the land, provided, that the Planning Commission may authorize a conveyance that that runs contemporaneous with the authorized land use for any form of public access other than parallel pedestrian access. Said recording with the County Auditor's Office shall occur at the time of permit approval.*

Response: All required easements and permit conditions will be recorded on the deed of title or the final plat.

- d. *Maintenance of the public access facility shall be the responsibility of the owner unless otherwise accepted by a public or nonprofit agency through a formal agreement approved by the City and recorded with the County Auditor's Office.*

Response: The property owner will maintain and be responsible for the public access pathway.

- e. *Public access sites shall be made barrier-free for the physically disabled where feasible, and in accordance with the ADA.*

Response: The applicant is not proposing any barriers, including gates or fences, along the public access pedestrian pathway on the project site.

- f. *Any trail constructed shall meet the conditions described for shoreline areas in any trail or parks plan officially adopted by the City Council.*

Response: All proposed pathways on the project site have been designed to meet all applicable standards of the City code. Please see the attached site plan for details.

CHAPTER 5: SHORELINE USE REGULATIONS

SECTION 5.3: SHORELINE USE TABLE

TABLE 5.1 – SHORELINE USE & SETBACK STANDARDS												
	Shoreline Environment Designation											
	AQUATIC		NATURAL		SHORELINE RESIDENTIAL		URBAN CONSERVANCY		ACTIVE WATERFRONT			
	Allowance	Setbacks (ft)	Allowance	Setbacks (ft)	Allowance	Setbacks (ft)	Allowance	Setbacks (ft)	Allowance	Setbacks (ft)		
P= Permitted, C=Conditional Use, X= Not Permitted, n/a= Not Applicable												
Agriculture & Mining												
Agriculture	X	n/a	X	n/a	X	n/a	X	n/a	X	n/a		
Mining	X	n/a	X	n/a	X	n/a	X	n/a	X	n/a		
Aquaculture												
Water-Oriented	C	n/a	X	n/a	X	n/a	C	0	C	0		
Non-Water Oriented	X	n/a	X	n/a	X	n/a	X	n/a	C	150		
Boating Facilities & Overwater Structures												
Non-motorized Boat Launch	See Adjacent Upland Environment		C		P		P		P			
Motorized Boat Launch			X		C		C		P			
Mooring Buoy			C		C		P		P			
Float			X		C		C		P			
Private Leisure Deck			X	n/a	X	n/a	X	n/a	X	n/a	X	n/a
Public Leisure Pier			X		C		C		P		P	
Single-User Residential Dock			X		C		C		C		P	
Joint-Use Moorage			X		X		P		P		P	
Marina			X		X		X		C		P	
Commercial & Industrial												
Water-Dependent	P				X ¹	0	P	0	P	0		
Water-Related, Water Enjoyment	C	n/a	X	n/a	X ¹	75	P	50	P	33		
Nonwater-Oriented	X				X	-	C ²	150	C ²	100		

Response: The proposed cabins and event space are considered a water-enjoyment use. This is a permitted use in the Active Waterfront designation as shown in Table 5.1 above and requires a 33 foot setback. All proposed development on the project site is located outside of the 33 foot setback. Please see the attached site plan for details on setback location and proposed development.

SECTION 5.4: SPECIFIC SHORELINE USE POLICIES & PROVISIONS

5.4.4: COMMERCIAL & INDUSTRIAL

3. Policies:

- a. Give first preference to water-dependent commercial and industrial uses over non-water dependent commercial and industrial uses; and second, to water-related commercial and

industrial uses over non- water-oriented commercial industrial uses. Existing non-water oriented commercial and industrial uses should phase out over time.

- b. *Prohibit new non-water-oriented industrial development on shorelines, unless the circumstances in WAC 173-26-241(3)(f) are found to exist.*

Response: The applicant is proposing a water-enjoyment use that is permitted in the underlying zone. There are no non-water-oriented industrial development uses proposed with this application.

- c. *Ensure shoreline commercial development provides public access to the shoreline where opportunities exist, provided that such access would not pose a health or safety hazard.*

Response: The proposed commercial development includes cabins and an event space. The applicant has incorporated pedestrian pathways and connections into the site plan to ensure public access to the shoreline. Please see the attached site plan for details on the access provided.

- d. *Encourage industrial development to incorporate public access as mitigation for impacts to shoreline resources and values unless public access cannot be provided in a manner that does not result in significant interference with operations or hazards to life or property.*

Response: There is no industrial development proposed on the project site. Therefore, the above standard does not apply to this application.

- e. *Limit overwater commercial development to that which is water-dependent, or if not water dependent, that which is accessory and subordinate as necessary to support a water dependent use.*

Response: There is no overwater development proposed on the project site. Therefore, the above standard does not apply to this application.

- f. *Locate and design industrial development in shoreline areas to avoid significant adverse impacts to other shoreline uses, resources, and values, including shoreline geomorphic processes, water quality, fish and wildlife habitat, and the aquatic food web. However, some industrial facilities are intensive and have the potential to negatively impact the shoreline environment. When impacts cannot be avoided, they should be mitigated to assure no net loss of the ecological functions necessary to sustain shoreline resources.*

Response: There is no industrial development proposed on the project site. Therefore, the above standard does not apply to this application.

- g. *Encourage restoration of impaired shoreline ecological functions and processes as part of new or expanded commercial development, especially for non-water-oriented uses.*

Response: As part of the proposed site development, the applicant is proposing to remove invasive species from the shoreline and plant native vegetation along the perimeter of the development. Please see the attached landscape plan for details on proposed restoration and plantings.

- h. Give priority to industrial facilities proposed in areas of the shoreline already characterized by industrial development over such facilities proposed in shoreline areas not currently developed for industrial or port uses.*

Response: There is no industrial development proposed on the project site. Therefore, the above standard does not apply to this application.

- i. Locate industrial development where restoration of impaired shoreline ecological functions and processes and environmental cleanup can be included in the design of the project.*

Response: There is no industrial development proposed on the project site. Therefore, the above standard does not apply to this application.

4. Regulations:

- a. Water-dependent commercial and industrial uses shall be given preference over water related and water-enjoyment commercial and industrial uses. Second preference shall be given to water-related and water-enjoyment commercial and industrial uses over non-water oriented commercial and industrial uses.*

Response: WAC 173-26-020 defines a water-enjoyment use as a use that provides for recreational use or aesthetic enjoyment of the shoreline for a substantial number of people as a general characteristic of the use and which through location, design, and operation ensures the public's ability to enjoy the physical and aesthetic qualities of the shoreline. A hotel with cabins and a shared event space located on the project site will allow for groups and individuals to stay and have events with a view of Rock Cove and the Columbia River. The proposed development is located on a part of the shoreline with very limited access due to the steep slopes, and is not an ideal location for a water-dependent use.

- b. Prior to approval of water-dependent uses, the City shall review a proposal for design, layout and operation of the use and shall make specific findings that the use qualifies as a water dependent use.*

Response: The proposed use is not a water-dependent use. Therefore, the above standard does not apply to this application.

- c. When allowed, industrial development shall be located, designed and constructed in a manner that assures no net loss of shoreline ecological functions.*

Response: The proposed use is not industrial development. Therefore, the above standard does not apply to this application. However, there is no net loss of shoreline ecological functions, as demonstrated in the attached critical area report.

- d. Commercial development that is not water-dependent shall not be allowed over water except where it is located within the same existing building and is necessary to support a water-dependent use.*

Response: The proposed development is a water-enjoyment use and is not proposed to be constructed over water.

- e. *Overwater and in-water construction of non-water-oriented industrial uses is prohibited. This provision is not intended to preclude the development of docks, piers, or boating facilities, or water-related uses that must be located in or over water (e.g., security worker booths, etc. that are necessary for the operation of the water-dependent or water-related use).*

Response: The proposed development does not include overwater or in-water construction. Therefore, the above standard does not apply to this application.

- f. *Only those portions of water-oriented industrial uses that require over or in-water facilities shall be permitted to locate waterward of the OHWM, provided they are located on piling or other open-work structures, and they are limited to the minimum size necessary to support the structure's intended use.*

Response: The proposed development does not include water-oriented industrial uses or require over or in-water facilities. Therefore, the above standard does not apply to this application.

- g. *Water-related and water-enjoyment uses shall avoid impacts to existing navigation, recreation, and public access.*

Response: The proposed development is a water-enjoyment use and has no anticipated impact to the navigation, recreation, or public access existing on site. The project site already has limited existing access and navigation since it is located on a part of the shoreline that has steep slopes. Please see the attached grading plan and site plan for details.

- h. *Non-water-oriented commercial and industrial development shall not be allowed unless: [...]*

Response: The proposed hotel with cabins and a shared event space located is a water-enjoyment use. Therefore, standard (h) does not apply to this project and the remaining code language has been omitted.

- i. *New commercial and industrial developments shall provide public access to the shorelines, subject to SMP Section 4.6.*

Response: The applicant is incorporating public access via pedestrian pathways that connect the Rock Cove right-of-way, shoreline, site features, and adjacent properties to provide public access on and through the project site. Please see the attached site plan for details on public access.

5.4.8: LAND DIVISIONS

3. Policies:

- a. *Land divisions should not result in a net loss of ecological functions.*
- b. *Land division should not complicate efforts to maintain or restore shoreline ecological functions.*

Response: The applicant is proposing approximately 0.19 acres of buffer impacts that include permanent development. As mitigation, the applicant is proposing approximately 1.12 acres of buffer enhancement by densely planting the remaining buffer area with native shrubs and removing non-native invasive blackberry. The proposed mitigation is in-kind buffer enhancement at a 5.9:1 ratio, significantly exceeded the 1:1 enhancement ratio required for the site and assuring no net loss in shoreline ecological functions. Please see the attached Critical Areas and FWHCA Report for details.

- c. *Land divisions involving the subdivisions of land into more than 4 parcels should provide community and/or public access in conformance with SMP Section 4.6.*

Response: The applicant is proposing a plat vacation, not a land division. The plat vacation will provide a more logical land use pattern by consolidating ownership of the property. Public access is also being provide around the site.

4. Regulations

- a. *Plats and subdivisions shall be designed, configured, and developed in a manner that assures no net loss of ecological functions results from the plat or subdivision at full build-out of all lots.*

Response: As mentioned, no net loss of ecological function will occur due to the plat vacation and proposed development. Please see the attached Critical Areas and FWHCA Report for details.

- b. *The layout of lots within 1) new plats and subdivisions, 2) plat amendments, or 3) boundary line adjustments shall:
 - i. *Prevent the need for new shoreline stabilization or flood hazard reduction measures that would cause significant impacts to other properties or public improvements or a net loss of shoreline ecological functions.*
 - ii. *Not result in lots containing inadequate buildable space due to critical areas and/or their buffers.**

Response: The proposed plat vacation will provide a more logical land use pattern by consolidating ownership of the property and will not require additional or new shoreline stabilization or cause inadequate buildable space. The proposed development will comply with all dimensional standards and includes mitigation and buffer enhancement on site.

- c. *To ensure the success of restoration and long-term maintenance, the City may require that critical areas and/or aquatic lands be placed in a separate tract which may be held by an appropriate natural land resource manager (e.g., homeowner’s association, land trust, natural resource agency, etc.).*

Response: Acknowledged by the applicant.

5.4.9: RECREATIONAL

2. Regulations:

- a. *Water-oriented recreational development shall be given priority and shall be primarily related to access, enjoyment, and use of the water and shorelines.*
- b. *Non-water-oriented recreational developments may be permitted only where it can be demonstrated that: [...]*

Response: WAC 173-26-020 defines a water-enjoyment use as a use that provides for recreational use or aesthetic enjoyment of the shoreline for a substantial number of people as a general characteristic of the use and which through location, design, and operation ensures the public’s ability to enjoy the physical and aesthetic qualities of the shoreline. A hotel with cabins and a shared event space located on the project site will allow for groups and individuals to stay and have events with a view of Rock Cove and the Columbia River. The proposed development is located on a part of the shoreline with very limited access due to the steep slopes, and is not an ideal location for a water-dependent use.

- c. *Non-water-oriented accessory uses (e.g., offices and parking areas that are part of recreational facilities) should be located landward of water-oriented facilities.*

Response: The proposed parking area serving the cabins and event center are located on the western portion of the site to provide maximum distance between the shoreline and the accessory uses. Please see the attached site plan for details on layout.

5.4.11: TRANSPORTATION & PARKING FACILITIES

3. *Policies.*

- a. *New non-water-oriented transportation facilities should be located outside shoreline jurisdiction unless there is no reasonably feasible alternative alignment or location as determined by an alternatives analysis.*

Response: The proposed use is a water-enjoyment use as described in this narrative. All parking proposed on site is in association with the proposed hotel use and there are no new non water-oriented transportation facilities located in the shoreline jurisdiction.

- b. *When it is necessary to locate transportation facilities in shoreline areas, they should be located where routes will have the least impact to shoreline ecological functions, will not result in a net loss of shoreline ecological functions, and will not adversely impact existing or planned water-dependent uses. Where feasible, a perpendicular alignment to shoreline should be preferred for transportation facilities over a parallel alignment which uses more shoreline area.*

Response: The proposed parking lot associated with the proposed cabins and event space are located as far away from the shoreline as possible. The parking lot will not adversely impact the shoreline’s ecological function and there is no net loss of the shoreline with the proposed site design. Please see the attached site plan for details.

- c. *Given that the City’s Columbia River Shoreline is bisected by the BNSF railroad and the SR 14, the City should explore opportunities for pedestrian over- and underpasses linking upland areas with the waterfront.*



Response: The project site does not border the BNSF railroad or SR 14. Therefore, the above standard does not apply.

- d. Pursuant to RCW 47.01.485, the City should review and act on WSDOT proposals within 90 days.
- e. Public visual and physical access areas should be encouraged as part of new transportation facilities (e.g., viewpoints, rest areas, picnic facilities, trail/bike systems adjacent to roads or railroads, etc.) where feasible and safe to do so. For bridges, public pedestrian access should be considered 1) on the bridge over the waterbody and 2) under or over the bridge parallel to the waterbody.
- f. The City should consider adopting special standards to ensure public and private roads within shoreline jurisdiction do not result in net loss of shoreline ecological functions.

Response: Acknowledged.

- g. Parking is not a preferred shoreline use and should be allowed only to support a use authorized under the SMP.

Response: The parking lot located on the project site is provided to support the primary use of the property (cabins and event space) which are permitted under the SMP. No parking is proposed as a primary use with this application.

- h. Parking facilities should be located outside of shoreline jurisdiction or as far landward from the OHWM as feasible. Parking facilities serving individual buildings on the shoreline should be located landward, adjacent, beneath, or within the principal building being served. When located within shoreline jurisdiction, the location and design of parking facilities should:
 - i. Minimize visual and environmental impacts to adjacent shoreline and critical areas including provision of adequate stormwater runoff and treatment facilities. Parking areas should be adequately fenced and/or screened along the waterward edges of parking facilities and along the sides of such facilities when they abut differing land uses; and
 - ii. Provide for pedestrian access through the facility to the shoreline.

Response: The parking lot proposed on site to serve the primary use of the property is located as far landward from the OHWM as feasible near Rock Creek Drive. The proposed event space and cabins are primarily located between the parking lot and the shoreline. The applicant is proposing landscaping around the parking lot to minimize the visual effect of the lot and ensure adequate stormwater runoff and treatment. Pedestrian pathways are provided through the parking lot, connecting the public right-of-way on Rock Creek Drive to the Rock Cove shoreline. Please see the attached site plan for details.

4. Regulations.

- a. Applications for redevelopment of transportation facilities in shoreline jurisdiction shall include:
 - i. Analysis of alternative alignments or routes, including, where feasible, alignments or routes outside of shoreline jurisdiction;

- ii. *Description of construction, including location, construction type, and materials; and, if needed,*
- iii. *Description of mitigation and restoration measures.*

Response: The applicant is not proposing to redevelop any transportation facilities with this application.

- b. *Proposed transportation projects shall plan, design, and locate where routes:*
 - i. *Will have the least possible adverse effect on unique or fragile shoreline features,*
 - ii. *Will not result in a net loss of shoreline ecological functions, and*
 - iii. *Will not adversely impact existing or planned water-dependent uses.*
- c. *Alternative designs for transportation facilities that have less impact on shoreline resources (i.e., narrower rights-of-way, realignment) shall be considered in compliance with the SMC.*

Response: The only transportation facility proposed with this application is an on-site parking lot to serve the primary use of the development. There will be no net loss of shoreline or adverse effect to the shoreline features with this application. Please see the attached environmental report and mitigation plan for details.

- d. *Roads and railroads of all types shall cross shoreline jurisdiction by the most direct route feasible, unless such a route would result in greater impacts on wetlands and fish and wildlife habitat conservation areas, or channel migration than a less direct route.*

Response: There are no proposed roads or railroads with this application.

- e. *Wherever feasible and in compliance with the SMC, transportation facilities, including local access roads and surface parking facilities, shall be shared across shoreline uses to reduce the need for redundant facilities.*

Response: The surface parking lot proposed on the project site with this application will serve the proposed development (cabins and event space) and provide sufficient parking for visitors and employees. Due to the unique shape of the project site, and amount of shoreline directly adjacent, it is not feasible to provide shared facilities on site.

- f. *New, replacement and enlarged transportation facilities shall provide public access pursuant to SMP Section 4.6.*

Response: The applicant is not proposing a new or replacement transportation facility.

- g. *The City shall seek opportunities to obtain public easements and construct pedestrian connections over or under the railroad and state highway. The City shall place the pedestrian connection in its capital improvement plan and may require it as a condition of approval for Shoreline Permits, including permits involving new or replacement bridges and other transportation facilities.*

Response: The applicant is providing public access to align with the City's desire to obtain opportunities for pedestrian connections. Please see the attached site plan for details.

- h. Primary parking facilities (pay parking lots, park-and-rides) are not allowed within shoreline jurisdiction. Accessory parking (including parking for vista purposes) and loading facilities necessary to support an authorized shoreline use are permitted.*

Response: The proposed parking lot is not a primary use on the project site, and will be used to serve the primary use (hotel and event space).

- i. All of the following conditions shall be met when an accessory parking facility is proposed in the shoreline jurisdiction:
 - i. The facilities shall be located landward, adjacent to, beneath or within the building being served.**

Response: The proposed parking lot is located landward on the project site and the proposed event space and cabins are located between the shoreline and the parking area.

- ii. Upland parking facilities shall provide safe and convenient pedestrian circulation from the parking area to the shoreline.*

Response: The applicant is providing pedestrian pathways connecting the public right-of-way, parking area, and shoreline in a convenient and direct manner. Please see the attached site plan for the provided circulation on site.

- iii. Loading spaces for development in the shoreline jurisdiction shall be located on the landward or side wall of non-water-dependent uses or activities.*

Response: There are no proposed loading spaces with this application.

- iv. All facilities shall provide parking suitable to the expected usage of the facility, with preference given to pavement or other dust-free all-weather surfaces.*

Response: The parking lot is constructed of AC pavement, a suitable material for the use and location of the site.

- v. All facilities shall be screened from adjacent, dissimilar uses through the use of perimeter landscaping, fencing, or some other approved material.*

Response: The applicant is providing landscaping along the perimeter of the site and parking lot to screen from adjacent uses. Please see the attached landscaping plan for details.

CHAPTER 6: SHORELINE MODIFICATION PROVISIONS

SECTION 6.4: SPECIFIC SHORELINE MODIFICATION PROVISIONS

6.4.1: VEGETATION REMOVAL

3. Regulations

- a. Vegetation removal shall be limited to the minimum necessary to accommodate approved shoreline development that is consistent with all other provisions of this SMP. This includes*

the design, location, and operation of the structure or development, including septic drain fields, which shall minimize vegetation removal and meet all applicable requirements.

- b. If removal of shoreline vegetation is unavoidable, vegetation removal shall be mitigated in accordance with the requirements in SMP Table 6.2 – Mitigation for Vegetation Removal within Shoreline Jurisdiction. Exceptions:
 - i. The removal of native vegetation within established gardens, landscaping that serve a horticultural purpose shall not require mitigation under SMP Table 6.2.*
 - ii. Mitigation plans prepared by a qualified professional may establish mitigation ratios that deviate from SMP Table 6.2.**

Response: The proposed mitigation plan has been prepared by a qualified professional landscape architect from Cascara Land Design. The mitigation ratios required under Table 6.2 have been met with the proposed plan. Please see the mitigation plan and landscape plan for details on compliance.

- c. No tree containing an active nest of an eagle, osprey, or other protected bird (as defined by WDFW or the Bald and Golden Eagle Protection Act) shall be removed and the nest shall not be disturbed unless the applicant obtains approval from WDFW.*

Response: None of the trees proposed to be removed have active eagle or osprey nests located in them.

- d. Vegetation removal conducted for the purposes outlined in SMC 18.13.025(D)(1)(a through d) shall comply with the regulations therein.*

Response: All applicable regulations are complied with for vegetation removal as demonstrated in the landscape plans and submitted application materials.

- e. Aquatic weed control shall be allowed only where the presence of aquatic weeds will affect native plant communities, fish and wildlife habitats, or an existing water dependent use adversely. Aquatic weed control efforts shall comply with all applicable laws and standards.*

Response: There is no aquatic weed control proposed with this application.

- f. Mitigation Area, Location. The location of the mitigation area shall:
 - i. Be on site unless there is insufficient area on site;*
 - ii. Improve an area of low habitat functionality;*
 - iii. Be within 50 feet of the OHWM or as close as possible to the shoreline waterbody; and*
 - iv. Prioritize south and west banks of waterbodies to provide shade.**

Response: The mitigation proposed is located completely on site and as close to the OHWM as possible. Please see the proposed mitigation plan for details.

- g. Mitigation Area, Monitoring.
 - i. The project shall be monitored annually for 5 years to document plant survivorship.*
 - ii. Monitoring reports shall be provided to the Administrator once per year.**

- iii. *The planted mitigation area shall achieve a plant survival standard of 80% at the end of 5 years.*
- iv. *Monitoring results may require additional/replacement planting to meet the survival standard. If the survival standard is not met, then additional planting may be required and the monitoring period extended.*
- v. *A conservation covenant may be established which prevents future development or alteration within the mitigation area.*

Response: The property owner will monitor the mitigation area and plantings to ensure survivorship of the proposed landscaping.

IV. CONCLUSION

This written statement and the accompanying supporting documents demonstrate compliance with the applicable approval criteria for a Site Plan Review and Shoreline Substantial Development Permit in the City of Stevenson. Therefore, the applicant respectfully requests that the County approve the application.