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Tait, Meghan (ECY) <mtai461@ecy.wa.gov> To: Ben Shumaker <ben@ci.stevenson.wa.us> Fri, Sep 29, 2023 at 1:40 PM

Thank you for sending the critical areas report. Proposed development in the FWHCA does not trigger a variance per the City of Stevenson SMP. Below are my comments after reviewing the critical areas report.

The applicant must follow the required mitigation sequencing per SMP Section 4.3.2. This includes first avoiding impacts to the FWHCA, then minimizing impacts, and then providing compensatory mitigation for any unavoidable impacts. The applicant could increase avoidance of impacts to the FWHCA by reconfiguring the site plan and should avoid impacts to the greatest extent possible. The current site plan does not demonstrate proper mitigation sequencing as there is a large area outside of the FWHCA available for development. In addition, the proposed path should be located outside of the shoreline setback and FWHCA.

If the site plan is reconfigured, the buffer enhancement shall remain per City of Stevenson code 18.13.095(D)(3). This provision states that if the existing development causes the width of the remaining buffer to be less than 50%, the buffer remaining shall be enhanced. The buffer has been completely eliminated for much of the site following the functionally isolated buffer provision.

Thank you,

Meghan Tait

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