



Ben Shumaker <ben@ci.stevenson.wa.us>

SDP 968 SW Rock Creek Dr

Tait, Meghan (ECY) <mtai461@ecy.wa.gov>
To: Ben Shumaker <ben@ci.stevenson.wa.us>

Tue, Oct 3, 2023 at 11:02 AM

Hi Ben,

Thank you for providing the Department of Ecology the opportunity to review and comment on Rock Creek Hospitality located on parcels 02070100130300 and 02070100130200 in the City of Stevenson.

Functionally Isolated Buffer

The Fish and Wildlife Habitat Conservation Area (FWHCA) buffer is only functionally isolated when lawns, walkways driveways, or other mowed or paved areas, do not protect the FWHCA from adverse impacts due to pre-existing roads, structures or vertical separation (Stevenson CAO 18.13.095(D)(3)). The FWHCA buffer shall not be considered functionally isolated due to exposed dirt or vegetation clearing, such as the area of the property on the back side of the peninsula close to Rock Cove Drive. Any area where the remaining buffer is to be less than 50%, the reduced buffer shall be enhanced unless the area is utilized for activities consistent with water-dependent uses (Stevenson CAO 18.13.095(D)(3)(a)). The enhanced buffer area shall not count as mitigation and the buffer cannot be further reduced through averaging or on-site mitigation (Stevenson CAO 18.13.095(D)(3)(b)).

No Net Loss

The proposed development shall follow mitigation sequencing to achieve no net loss of shoreline ecological function. The required mitigation sequencing is first avoidance of impacts, including avoiding impacts to the FWHCA and native vegetation within shoreline jurisdiction, and then minimizing impacts to shoreline ecological function (SMP 4.3.2). The applicant should demonstrate how the project achieves no net loss, including how the site plan avoids and minimizes impacts to the FWHCA to the greatest extent possible.

Mitigation for vegetation removal within shoreline jurisdiction shall follow ratios outlined in SMP Table 6.2. The Critical Areas and FWHCA Report, dated May 3, 2023, prepared by Ecological Land Services Inc. does not address vegetation removal within shoreline jurisdiction or propose mitigation for vegetation removal following SMP Table 6.2.

Shoreline Public Access

If the proposed development is considered a water-related or water-enjoyment commercial use, the use must be open to the general public and the shoreline-oriented space within the project must be devoted to the specific aspects of the use that fosters shoreline enjoyment (WAC 173-26-020; SMP 7.2). It is unclear in the current site plan how the proposed development is providing public access.

Please let me know if I can provide further technical assistance or answer any questions.

Meghan Tait

Wetland/Shoreland Specialist

Shorelands & Environmental Assistance Program

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From: Ben Shumaker <ben@ci.stevenson.wa.us>
Sent: Friday, September 29, 2023 1:14 PM
To: Tait, Meghan (ECY) <mtai461@ECY.WA.GOV>

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