

TO: City of Stevenson
Planning Commission
C/o Ben Shumaker – City Planner

FROM: Harper Houf Peterson Righellis, Inc.
Brad Kilby, AICP

DATE: November 28, 2023

RE: Rock Cove Hospitality Project



The applicant and property owner appreciate the opportunity to provide additional information to the Planning Commission to address the questions and concerns raised at the October 9th planning commission hearing, as well as letters from the Washington Department of Ecology and the Department of Fish and Wildlife related to the Shoreline Substantial Development Permit (SSDP) for the Rock Cove project.

The concerns raised by the Washington State departments of Ecology (DOE) and the Washington State Department of Fish and Wildlife (WDFW) are related to the location of, and the proposed impacts to the FWPCA functionally isolated buffer. Kate'Lyn Wills, a biologist and environmental scientist with Ecological Land Services has prepared a letter attached as *appendix 1* to this letter, responding to the concerns raised in their comment letters. It is noted that ELS determined the location of the buffer on site based on historical use, and the best available science. Throughout the many iterations of design that this project has gone through including the previously approved design, our team has always been guided by the sites' designation as "active waterfront" within the City's Shoreline Management Plan.

The proposed development takes place on a site that was previously utilized as the Hegewal Veneer Mill, which operated on the site from 1952 to 1973. An aerial photomap taken of the site while in operation is on display at the Columbia Gorge Interpretive Center Museum and is provided below, showing the sawmill, machine shop, gravel driveways, and wigwam burners developed on the site. After the mill closed, evidence of the development remained on site, including cleared vegetation and impervious surfacing (gravel and concrete). The current landowner has not placed any riprap on the property or shoreline. The riprap that is currently located along the shoreline of the property was likely placed there to protect the mill operations and would have likely pre-dated the Washington State Shoreline Management Act.



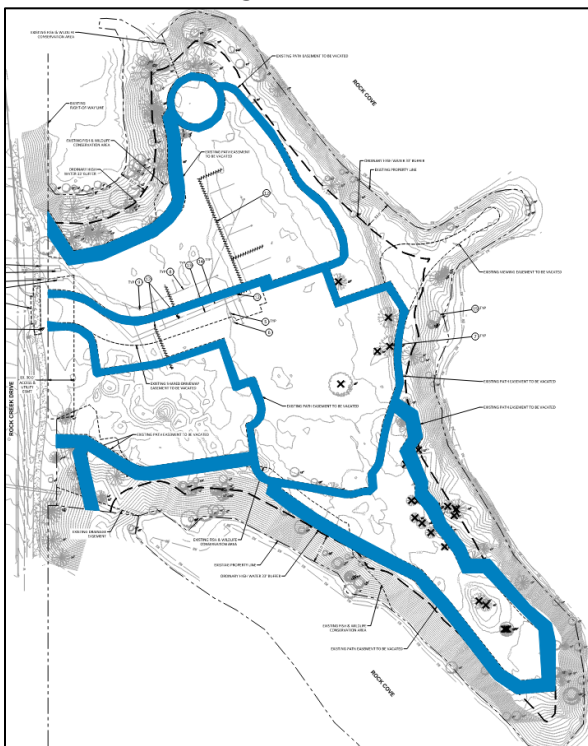
It was confusing to the property owner that the letters from both DOE and WDFW failed or neglected to reference the earlier alternatives that were considered for developing the property. According to the owner and design engineers, there have been several alternatives considered for developing the site, one of which has already obtained prior City approval. Nevertheless, after considering the two agency letters, the public testimony and Planning Commission concerns raised at the hearing on October 9th, the development team is providing a revised site plan (*appendix 2*) to reduce the impact to the FWHCA buffer which includes removal of the southwesterly cabin and the relocation or reorientation of several of the cabins to minimize intrusion into the designated FWHCA buffer. Further, all of the northern cabins and trail have been relocated outside of the buffer area. Please see the revised site plan provided as *appendix 2* to this letter.

The revised site plan results in a 15.8% decrease in impacts to the buffer and with implementation of the proposed enhancement plan provided with the *May 2023 ELS report*, will fully compensate for any impacts to the FWHCA ensuring there is no net loss of ecological function as a result of this project. Further, revised site plan has less area impact on the total project site than the previously approved site plan (SHOR2020-01) as well as previous versions of the site plan considered by the development team. The site plan submitted to the City of Stevenson with initial application had a lot coverage of 27,983 square feet, or approximately 10.6% of the site. With the proposed revisions in *appendix 2*, the new lot coverage has been reduced to 24,834 square feet, or approximately 9.5%.

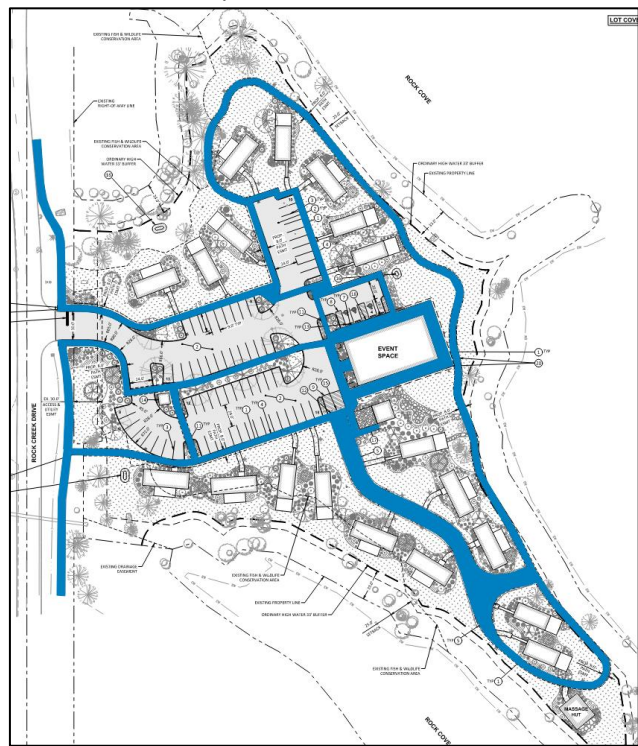
Shoreline Public Access

City staff and the Planning Commission focused on local connectivity in the prior approval to ensure public access to the shoreline. There was also discussion related to a pedestrian crossing across the ravine to connect to an existing easement located on the property south of this site. Since the proposed use on the project site is considered a water-enjoyment commercial use, the SMA and Stevenson SMP require that the site 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 foster shoreline enjoyment. The project site has been thoughtfully designed to provide public access and pathways through and around the site to ensure open access to the shoreline and Rock Cove. The provided pathways are aligned similarly with the existing public access easements on the site (see below for the pedestrian easements and proposed pedestrian access marked in blue).

Existing Easements



Proposed Access



The proposed site plan actually increases the amount of public access on to the and to Rock Cove with the proposed development. Please note that the site plan on the right above does not illustrate the proposed loss of the south westerly cabin and reorientation of other cabins that is reflected in the revised site plan provided with this document as *appendix 2*, but it does illustrate the proposed access locations on the site.

Related to the crossing of the ravine to connect the site to the property located south of the project site, we are providing an exhibit for a pedestrian bridge as *appendix 3* along with the following concerns design concerns from the project engineer and a rough order of magnitude cost to realize the crossing. First, the pathway would need to be an approximately 220-foot-long bridge to span the ravine and connect to the easement located on the adjacent property to the south. This span would not include the

needed construction of the pathway further onto the adjacent property, which would also require a structured walkway (bridge) due to steep grades.

The approximate grade difference across the two sides of the bridge is 13 feet, resulting in a 6% average slope along the walkway. To meet ADA requirements, the bridge would need consecutive ramp runs with landings for the entire length. The bridge's height would vary as it crosses the existing ravine, which, in the exhibit, roughly follows the property boundary. As it crosses the ravine's centerline, the bridge deck would sit up to +20 feet above the existing grade. The majority of the bridge would fall into the FWHCA and the bridge spans between bridge abutments were assumed to be spaced at 50' increments to minimize the impact to these areas.

The costs estimated to construct a pedestrian bridge platform in this location would be approximately \$450/ square foot. At a length of 220 feet and a width of 8 feet, the cost would come up to approximately \$792,000. The bridge would require foundations at either end and where landings are needed to meet ADA and at least 6 abutments to support the platform. The costs for the foundations and abutments are estimated to be approximately \$180,000. The total cost to provide the crossing would be approximately \$972,000. It's important to note that the bridge is almost entirely located within an environmental conservation area and there is a proposed connection to the property located along the existing pedestrian path adjacent to Rock Creek Drive. The proposed access is a viable alternative that minimizes impacts to the environmental area while continuing to provide pedestrian access from this site to the property located south of the site.

We appreciate you allowing the design team additional time to address the comments and concerns raised by staff and the agencies and look forward to discussing the project with you at the December 11th continued public hearing. Please do not hesitate to contact me if you have any questions or need any additional information. You can reach me on my cell at (503) 866-9845. Thank you for your time.

Harper Houf Peterson Righellis, Inc.

A handwritten signature in black ink that reads "Brad Kilby". The signature is written in a cursive, flowing style.

Brad Kilby, AICP
Planning Manager