

Ben Shumaker

From: Pat Albaugh <pat@portofskamania.org> on behalf of Pat Albaugh
Sent: Monday, August 14, 2023 8:21 AM
To: Leana Kinley; Scott Anderson; Ben Shumaker
Subject: FW: Draft 2023 Shoreline Public Access - Comment
Attachments: Shoreline Plan - Cascade Avenue comment.pdf

Good Morning,

The Port would like to reiterate our opposition to the proposed sidewalk along Cascade Avenue from the Port Office, in front of Bob's Beach parking lot, and to Teo Park. This area is extremely busy and would negatively impact waterfront access to the large crowds of people who already use the area.

Pat

Pat Albaugh
Executive Director
Port of Skamania County
509-427-5484
pat@portofskamania.org



From: Pat Albaugh <pat@portofskamania.org>
Sent: Monday, June 12, 2023 1:58 PM
To: 'Ben Shumaker' <ben@ci.stevenson.wa.us>; Leana Kinley (leana@ci.stevenson.wa.us) <leana@ci.stevenson.wa.us>
Subject: Draft 2023 Shoreline Public Access - Comment

Good Afternoon Leana and Ben,

There has been a steady stream of Bob's Beach regulars coming in to express concerns about a proposed section of Cascade Avenue sidewalk (see attached). The Port agrees with their assessment that a sidewalk from Teo Park has little value and would impede traffic flow and reduce parking. Please consider this the Port's opposition to that specific idea within the draft plan.

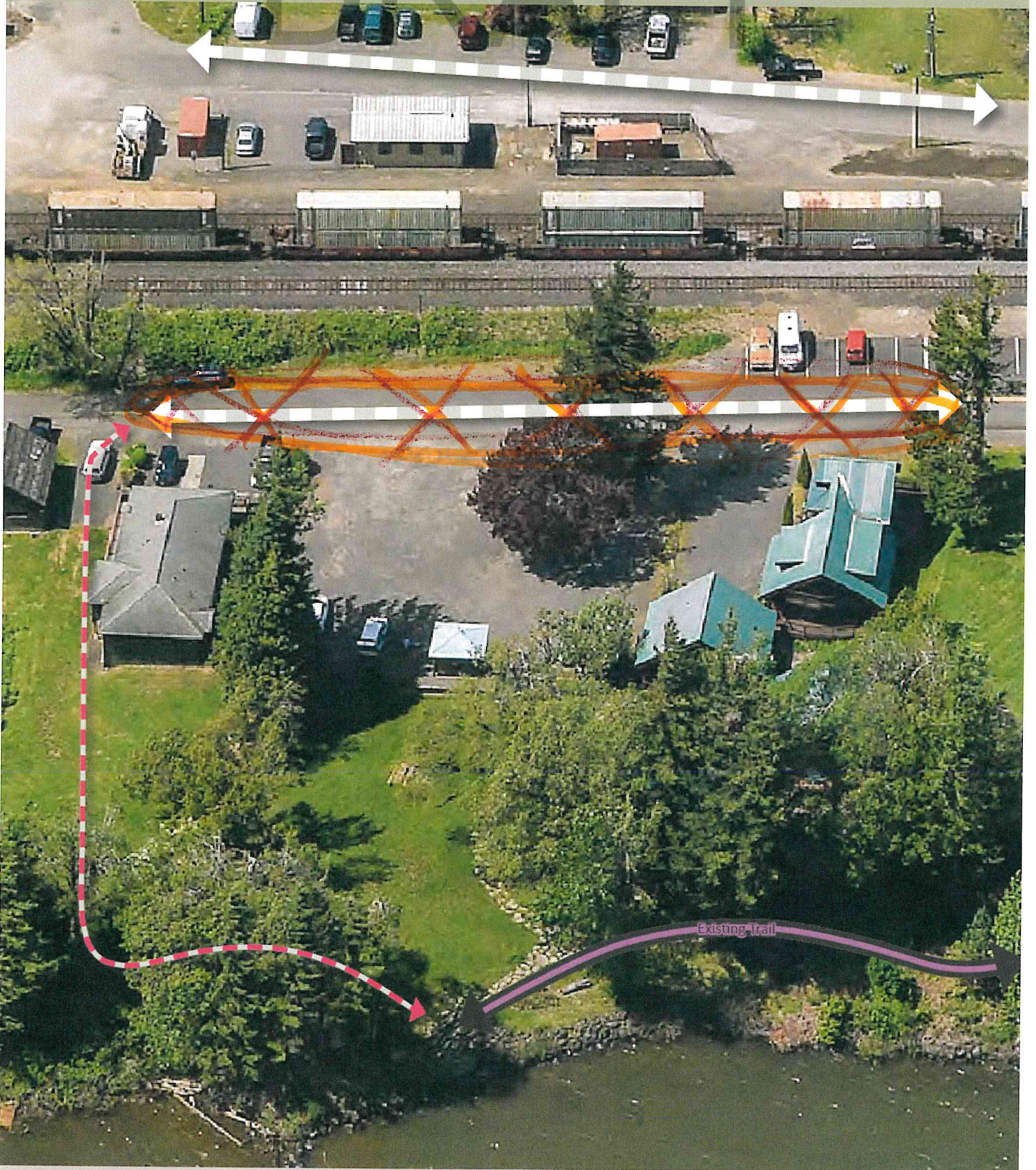
Thank you - Pat

Pat Albaugh
Executive Director
Port of Skamania County
509-427-5484

pat@portofskamania.org



DRAFT



Date: August 9, 2023

To: Stevenson Planning Commission, Planning Director

From: Bernard Versari

RE: Integrated Shoreline Public Access and Trail Plan – **Proposal #3 Pedestrian Connection to Waterfront West end**

I attended several meetings regarding this plan over the last few months. I met with City staff, participated in the Watershed Consultant's Charrette exercise at the Library, attended the consultant's draft presentation and final draft presentation to the Planning Commission in May and June, respectively, and I also provided comments to the City Council in June.

I was surprised to find out, upon reviewing the final draft Plan submitted at the May Planning Commission, that **several important changes had been introduced after the charrette without public participation**. Specifically, the **addition of an asphalt trail across Bob's Beach park and the addition of sidewalks along Cascade Ave near Bob's Beach**.

Public participation at and since the May Planning Commission meeting has clearly demonstrated the **public opposition to these proposals at Bob's Beach from the various users and the Port of Skamania County. Additional comments from the users of the park are also attached for this meeting and SEPA comments.**

None of these projects have been tested for feasibility. More consulting would be required. This is a concerning approach to planning, especially knowing that after approval by the City Council, after considering the recommendations of the Planning Commission (if any), the next steps would be to update the Comprehensive plan and regulatory documents, submitting grant applications, and hiring consultants for feasibility studies for projects that the users of this park clearly do not want.

Recommendations regarding Proposal #3:

It is therefore recommended that the following items be removed from the final report:

- 1- The asphalt trail extension going across Bob's Beach.**
- 2- The construction of sidewalks along Cascade Ave near Bob's Beach**

Discussion/Justifications for recommendations:

Trail extension going across Bob's Beach

Bob's Beach is a long established (30+ years) favorite river access point to Stevenson residents and visitors alike for various water sports, including windsurfing. This beautiful tree-shaded park offers a well maintained lawn for rigging and staging water related equipment for water sports enthusiasts. This park uniquely provides a safe direct low-bank access to the river through beautiful natural flagstone stairs.

An asphalt trail across this park would negatively impact the functionality of this unique river access park in the Columbia River Gorge. It would likely bring safety, equipment staging, water access and conflicts issues.

At the May Planning Commission meeting several people expressed their doubts that people would want to use an asphalt trail that would go behind the Port Office Building to loop to Cascade along the railroad tracks. Instead, people are likely to continue doing what they currently do, which is after having visited Bob's Beach, going back along the current river trail towards Russell or walking over the current stepping stones trail back to Cascade Avenue.

The white box shown on the SA.4 map, on page 40 of the Draft Plan, indicating where the end of the current stepping stones are located is incorrect and misleading. In fact, Bob's Beach already provides a looping trail for pedestrians between the river trail and Cascade Avenue on beautiful stepping stones. This **existing stepping stones trail** is safe, attractive and environmentally friendly (unlike the proposed **asphalt** trail across the water access).

This negative assessment of the proposed asphalt trail at Bob's Beach is clearly corroborated by the attached public comments from regular users of Bob's Beach, as well as by the prior comments provided to the Planning Commission.

Construction of sidewalks along Cascade Ave near Bob's Beach

Parking at Bob's Beach is at full capacity during the spring/summer months and should not be reduced for sidewalks. The proposal latest cost estimate on page 41 reflects 900' of new sidewalks (a large portion near Bob's Beach since this estimate was kept unchanged from a prior draft). Adding sidewalks to this area would likely reduce the amount of parking to the Bob's Beach parking capacity and the accommodations for vehicles with trailers (which is very common). Clearly, all users of Bob's beach and the Port of Skamania County are opposed to the sidewalk proposal.

Sidewalks would also likely add safety issues by facilitating trespassing across the railroad tracks instead of using the current Russell Street railroad crossing to/from the Port of Skamania Landing.

Additional comments in regards to milfoil management along the shorelines

It was encouraging to read in the Final Draft (SM-4 on page 77) that steps toward milfoil control plan will be initiated. Milfoil invasion is an issue that was identified during the development of the Shoreline Management Plan (SMP) and earmarked as a restoration action item (to be completed by 2022).

Milfoil has now invaded the entire Stevenson shorelines. However, the current Draft Shoreline Public Access and Trail Plan limits the restoration efforts to Rock Cove. The Final Draft should address the milfoil invasion throughout the Stevenson shorelines shallow and stagnant waters and should consider conducting feasibility studies of various control options. The attached comments support this conclusion.

Please consider the recommendations presented above for your review of the Final Draft of the Integrated Shoreline Public Access and Trail Plan.

Sincerely,

Bernard Versari

OPPOSITION TO THE FOLLOWING PROPOSALS INCLUDED IN THE STEVENSON INTEGRATED SHORELINE PUBLIC ACCESS AND TRAIL DRAFT PLAN:

- 1- CONSTRUCTION OF AN ASPHALT TRAIL EXTENSION ACROSS BOB'S BEACH
- 2- CONSTRUCTION OF SIDEWALKS ON CASCADE AVENUE ACROSS FROM BOB'S BEACH

THESE PROPOSED ITEMS SHOULD NOT BE INCLUDED IN THE STEVENSON INTEGRATED SHORELINE PUBLIC ACCESS AND TRAIL PLAN.

<u>NAME</u>	<u>EMAIL/PHONE</u>	<u>COMMENTS</u>
Deb Seagriss	dseagriss@gmail.com	waste of time & money
Robert C Hawkan	rhawkan92660@icloud.com	Impacts to the park and environment
DAVID CHENAULT	DR C567@GMAIL 360/566-5376	would create conflict w/ current usage
Terry Thomas	tthomas711@gmail.com	No benefits even to pedestrians
George Feliciano	503-260-5725	IT SEEMS UNNECESSARY AS THERE ARE PLENTY OTHER PLACES TO GO
Robert Rosenthal	530 400 4471	waste of \$
Michael Sullivan	503-317-0230	Bal idea!
Bruce Ross	208 841-2567	(EXISTING) WE NEED THE GRASS & PARKING
David Presser	509 281 3066	we use the area for parking
GREG GOTTLIEB	206 817 9179	interfere with historical use of Bob's beach
Peter Weddigen	604-764-5249	Don't kill the goose that lays your golden eggs!

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<u>NAME</u>	<u>EMAIL/PHONE</u>	<u>COMMENTS</u>
PAUL TRAVIS	ptofaulttravis.com	I THINK WE SHOULD DO MICROIL
Fred Rucitelli	100005 THAT LN rueitelli@comcast.net (gmail)	MANAGEMENT INSTEAD
Chris Rucitelli	crucitelli@roadrunner.com	An asphalt trail will lead to the water. I am opposed to this proposal. The microil is a hazard. Since there is a solution to get rid of it please do so at Bob's Beach & not just Rack Creek. Waste of money no one will use it extend microil treatment to Bob's beach
William Pollock	sandluna@aol.com	BAD IDEA
Greg Nelson	greg01@aol.com	DONT CHANGE
Kevin Murphy	Kmurph0113@gmail.com	The current set up with the walk way & Bob's is excellent. Why not go up near the old wash room? Waste of money

OPPOSITION TO THE FOLLOWING PROPOSALS INCLUDED IN THE STEVENSON INTEGRATED SHORELINE PUBLIC ACCESS AND TRAIL DRAFT PLAN:

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- 2- CONSTRUCTION OF SIDEWALKS ON CASCADE AVENUE ACROSS FROM BOB'S BEACH

THESE PROPOSED ITEMS SHOULD NOT BE INCLUDED IN THE STEVENSON INTEGRATED SHORELINE PUBLIC ACCESS AND TRAIL PLAN.

NAME EMAIL/PHONE COMMENTS

Chris Combs	c5combs22@outlook.com	I park all season long here
Lisa Young	lisayoung2003@yahoo.com	
Rich May	rich@mayandassociates.net	
Karen Berglund	farmgrl27@yahoo.com	
Ben Young	byoung1@cocc.edu	
Linda J. [unclear]	musicmom4ever@hotmail.com	Negative impacts on current recreational use + parking
Ken [unclear]	KENFS@HOTMAIL.COM	IMPACTS PARK SPACE & PROVIDES NO DESTINATION.
Chris Riccitelli	ericcitelli@roadrunner.com	Public is destination
Jamie Juster	jeanniejuster51@gmail.com	Detrimental to public recreation use.
Barb Cline	mtamma@gmail.com	Bad idea
Kevin Cline	kevincline8@gmail.com	Parking is already very limited
Amy Weissfeld	amyweissfeld@gmail.com	Negatively impacts water rec. access to water/Bob's beach. Very busy in summer. Better to goop trail up @ Stonehealer doc.



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
Telephone: (360) 696-6211 • Fax: (360) 906-6776

August 9, 2023

City of Stevenson Planning Department
7121 E Loop Road, PO Box 371
Stevenson, Washington 98648

Re: Stevenson Shoreline Access & Trails Plan

Dear Mr. Shumaker:

Thank you for the opportunity to comment on the Stevenson Shoreline Access & Trails Plan. The Washington Department of Fish and Wildlife (WDFW) has reviewed this proposal and offer the following comments for your consideration.

WDFW supports that this plan balances recreational access and enhancing natural areas. Several Priority Habitats, including riparian, aquatic, and oak habitat, are present throughout the proposed project areas. Specific recommendations are outlined below.

WDFW acknowledges that this plan was designed to align with the City's Shoreline Master Program (SMP), which provides the decision-making framework for land-use along shorelines. We believe that creating shoreline access can be done in a manner that avoids conflicts with environmental resources when done responsibly and appreciate that this is reflected in Goal 2. WDFW's mission is to *preserve, protect, and perpetuate fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational opportunities* and elements of this are reflected in this plan. We offer special considerations for the proposed trails that involve WDFW Priority Habitat and for natural area enhancement. We hope the City considers our recommendations during project implementation.

Priority Habitat

Riparian Areas

WDFW strongly supports restoring natural areas, including riparian habitat, and appreciate that it is identified in Goal 2. Riparian habitats provide a variety of ecosystem functions including, but not limited to: stream morphology, erosion and sedimentation process, fish and wildlife habitat availability, wood recruitment, stream temperature, shading, pollutant removal, and nutrient cycling (Quinn et al. 2020). WDFW recently released new riparian management recommendations and recommend using Site Potential Tree Height of 200 years (SPTH₂₀₀) to ensure the riparian ecosystem has the greatest functionality. SPTH₂₀₀ can delineate the area to prioritize for riparian restoration. Our new riparian management recommendations, *Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications* (Quinn et al. 2020) and *Riparian Ecosystems, Volume 2: Management Recommendations* (Rentz et al. 2020), are

linked below. Due to value of riparian habitat, native riparian vegetation should remain intact to the greatest extent possible, especially large, mature trees.

Additionally, we recommend the use of unpaved trails within riparian habitat as reflected on page 1 of the plan. Unpaved trails have a lesser ecological impact than paved trails since they allow for water to permeate the soil and (generally) produce less runoff, reducing the transport of pollutants into streams. Due to the likelihood of increased human presence as a result of this plan, we support signage at all trailheads explaining the importance of natural areas and having trash receptacles to support “leave no trace” recreation.

Aquatic Habitat

Project 5 – Public Access to Lower Rock Creek at Vancouver Avenue considers the total or partial removal of rip rap. WDFW supports rip rap removal to improve restore aquatic and riparian ecosystem functions. If shoreline erosion is a concern for neighboring property owners, biotechnical bank stabilization techniques may be a solution to support natural ecosystem functions while mitigating erosion concerns while improving existing conditions.

Additionally, two projects (Project 6 and Project 8) propose to evaluate culvert removal as a project component. The culvert on Kanaka Creek (FPSDI #999241) is a documented partial barrier to fish passage while the culvert on Foster Creek is not in our fish passage database, although is a likely barrier. WDFW strongly supports replacing the culvert with structures that allow unimpeded fish passage and can likely assist with a culvert assessment on Foster Creek. Please contact Amaia Smith directly if there is interest.

Oak Habitat

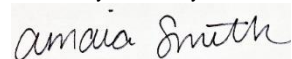
We are happy to see that the City of Stevenson is exploring oak planting for shoreline restoration and hope existing Oregon white oaks (OWO) are protected during plan implementation. OWO are considered a priority habitat because they provide valuable food and habitat for many native Washington animals, including oak-obligates. Protecting these trees is the best option for maintaining a healthy and diverse ecosystem. Information about enhancing OWO habitat is linked below and additional resources are available upon request.

Miscellaneous

Hydraulic Project Approval (HPA)

Each project in the Stevenson Shoreline Access & Trails Plan identifies required permits. For those that require an HPA permit, WDFW is available for a pre-application site visit to discuss project design, implementation, identify potential impacts to fish life and habitat, and discuss permitting pathways.

Thank you for your consideration,



Amaia Smith
WDFW Habitat Biologist
5525 S 11th St
Ridgefield, WA 98642

Resources:

Quinn, T., G.F. Wilhere, and K.L. Krueger, technical editors. 2020. Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications. Habitat Program, Washington Department of Fish and Wildlife, Olympia.

<https://wdfw.wa.gov/sites/default/files/publications/01987/wdfw01987.pdf>

Rentz, R., A. Windrope, K. Folkerts, and J. Azerrad. 2020. Riparian Ecosystems, Volume 2: Management Recommendations. Habitat Program, Washington Department of Fish and Wildlife, Olympia.

<https://wdfw.wa.gov/publications/01988>

Vesely, David, and Tucker, Gabe. 2004. A landowner's guide for restoring and managing Oregon white oak habitats. U.S. Department of the Interior, Salem, Oregon.

https://www.blm.gov/or/districts/salem/files/white_oak_guide.pdf

Ben Shumaker

From: KBethman <bbathmat@gmail.com> on behalf of KBethman
Sent: Tuesday, August 8, 2023 11:07 AM
To: ben@ci.stevenson.wa.us
Subject: SEPA 2023-03 Shoreline Access Plan - Comment

Good day Ben:

I am Kurt Bethman and I own property at 307 SW Attwell Drive
Comment on the Shoreline Access Plan SA.8

From **Proposed Next Steps:**

Include fish barrier removal study (**Foster Creek**) as part of this project. Work requires a moderate level of coordination between city, private property owner, and WSDOT

From **Permits Required:**

Shoreline Substantial Development Permit, Site Plan Application, and Critical Areas Checklist. Moderate permitting complexity is expected for this task. If launch and **Foster Creek culvert replacement are considered**, a US Army Corps of Engineers Section 404 permit, Ecology 401 Water Quality Certification and WDFW HPA permit will be required, making this a more complex effort.

How can I help to make the study and fish barrier removal happen?

Why? It would be fantastic to have salmon/steelhead make it into the creek from the cove and have a chance to continue their species life cycles. And, the other species that depend on salmon would benefit.

We've owned the property for almost four years. This is the first year (spring/summer) that I haven't seen salmonids in the creek. The creek has a crawfish / sculpins / and this year I found the creek to contain wester pearlshell mussels (freshwater mussels need salmonids to propagate). In 2021 I did see one salmon trying to get through the culvert from Rock Cove. I took a short video of the salmon (probably a Coho). At the same time as the video, there were two salmon skeletons along the shoreline of Rock Cove. Foster Creek is considered essential habitat, let's treat it that way



What can I do to help? I'd allow access to my property for any destruction/construction. I am retired and would volunteer to help in any capacity. Just let me know!

Thanks for your time,

Kurt Bethman
253-988-1517 (Okay to call / text)

Sent from [Mail](#) for Windows

Ben Shumaker

From: Leslie, Brent C (BPA) - TERR-REDMOND <bcleslie@bpa.gov> on behalf of Leslie, Brent C (BPA) - TERR-REDMOND
Sent: Monday, August 7, 2023 12:09 PM
To: ben@ci.stevenson.wa.us
Subject: Shoreline Public Access Plan (SEPA2023-03)

Hello Mr. Shumaker,

Any proposed use of a Bonneville Power Administration right of way would require a land use application.

Kind Regards,

Brent Leslie

Realty Specialist
Bonneville Power Administration | Department of Energy
Real Property Field Services | TERR-REDMOND
3655 SW Highland Ave
Redmond, OR 97756
Office: 541-516-3257
Mobile: 541-316-9731
bcleslie@bpa.gov
[Landowner Safety - Bonneville Power Administration \(bpa.gov\)](https://www.bpa.gov)



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Ben Shumaker

From: McConnell, Michelle (ECY) <micm461@ECY.WA.GOV> on behalf of McConnell, Michelle (ECY)
Sent: Monday, June 12, 2023 2:50 PM
To: Ben Shumaker
Subject: RE: Deliverable Uploaded | ECY feedback
Attachments: ecyAdditionalFeedback-DraftPlan.docx

Hello Ben,

Thanks for submitting deliverable DT3.1, the *Draft Integrated Shoreline Public Access & Trail Plan*. I've reviewed the document, and other related work products, and gathered input from my in-house Technical Review Team. The project has made significant progress in considering local shoreline public access. Because individual draft chapters/components of the Plan were not available for review during development, this is our first look and our feedback includes both high-level issues and more detailed suggestions.

The Draft Plan is dense and with a short turnaround time, our review is not exhaustive and not presented in a highly formal/polished manner. Overall, the graphic layout of the document is visually appealing. However, some key concepts and components appear to be missing or need to be more robust and must be substantively addressed for the Final Plan to satisfy the grant requirements. Please consider the following issues of concern:

Key Concerns

- WAC Planning Process - Chapter 1 Introduction and Chapter 4 Alignment with Long-Range Planning for Project #3 both reference the City's Transportation & Circulation Goal 7.4 but otherwise the Draft Plan does not directly address other relevant Comp Plan elements, such as urban development, downtown & waterfront, tourism, or parks & recreation. The Port of Skamania is a primary waterfront landowner and local development agency. The Port is noted in Chapter 2 History, a few mentions regarding Alignment with Long-Range Planning, and generally noted as a stakeholder, but its Comprehensive Scheme is not addressed, especially their Goal 3 specific to the City's waterfront. There's a few mentions of multi-modal or multi-use trails and bicycles are mentioned only, twice (Chapter 4 reference to City's 1991 document, and page 18 graphic). Chapter 4 Project #9 notes the existing trail is not ADA compliant but otherwise the Draft Plan does not address facilities and opportunities for disabled persons. Grant Task 3 specifies that the Plan will "*reflect the Public Access Planning Process standards of WAC 173-26-221(4)(c)*" that include "...The planning should:
 - Be integrated with other relevant comprehensive plan elements...
 - ... result in public access requirements for shoreline permits, recommended projects, port master plans, and/or actions to be taken to develop public shoreline access to shorelines on public property.
 - ...identify a variety of shoreline access opportunities and circulation for pedestrians (including disabled persons), bicycles, and vehicles between shoreline access points, consistent with other comprehensive plan elements.
- Appraisal & Acquisition – Chapter 4 Project Scorecards only summarize costs into three coarse-scale categories, essentially low, medium and high, that range 10-fold from less than \$50K to over \$500K.

Appendix A Cost Table itemizes project components, but is unclear if/how these preliminary estimates reflect appraised values or acquisition costs. It appears the Draft Plan does not include a *"preliminary land acquisition budget"* as required by grant Task 3:

- *"Appraisal. This Plan will serve as the foundation of a program supporting RECIPIENT'S acquisition of shoreline public access sites. Proactive methods are necessary to understand likely costs for property and/or easement acquisition. The RECIPIENT will rely on a project consultant for planning-level appraisal services to assist program budgeting."*
- SMP Amendment – Chapter 5 includes a brief considerations of amendment options such as consolidated location for provisions and an in lieu buy-in option. This content does not provide *"preliminary draft SMP amendment language"* as required by grant Task 3.
- Ecological Functions – The Draft Plan doesn't include this term, and the term 'natural characteristics' appears only in the appended Public Engagement Plan as one of the SMP's Public Access Policies. Some impacts and design alternatives are noted in Chapter 4 project summaries #4 – 7 including both ecological and neighborhood impacts. And the Chapter 5 Permit Path discussion addresses impacts and mitigation generally regarding the range of regulatory authorities (e.g. CAO, SEPA). Evidence is lacking for a *"mitigation sequence evaluation"* as required by grant Task 3:
 - *"Habitat Biology. The Plan will preserve natural characteristics of the shoreline and protect ecological resources. Prior to finalization, it will be reviewed through a mitigation sequence evaluation similar to all shoreline projects. The RECIPIENT will conduct a planning-level analysis of shoreline ecological functions and alternative locations/alignments to avoid and reduce impacts of public access sites and trails."*

If any of these concepts/components are omitted intentionally, please provide rationale for not including them as the City had initially proposed.

In addition to these key issues, please also consider our more detailed input regarding Substantive Content and General Document Improvement presented in the attached Additional ECY Feedback document as you and the consultant team work to finalize the Plan. In general, much of the language reads as vague or lacking specificity so that the meaning is unclear. Perhaps a description at the start of what the Plan is/isn't would be helpful to set expectations.

Overall, we're providing *a lot of feedback*, given in good faith to support the City's effort, but with the short time remaining we recognize there may be limits to how much can be addressed. Generally, this work product is not 'fully baked' enough. While ECY doesn't have approval authority under SMA for this type of plan like for SMP amendment, we do need to ensure the grant Agreement is satisfied in order to reimburse project costs, and are thinking ahead to the City's intended reliance on the Plan for a pending SMP amendment. If there are questions about anything feel free to reach out.

Best regards,



Michelle McConnell (she/her)

Regional Shoreline Planner

WA Department of Ecology | Shorelands & Environmental Assistance

Phone 360-701-5262

 **June 2023: Celebrating Pride Month!**

♥ **DEIR + EJ:** Learn more about [Ecology's Office of Equity & Environmental Justice](#) - [Washington is a pro-equity, anti-racist state.](#)

Public Record: This communication is public record and may be subject to disclosure as per the Washington State Public Records Act (RCW 42.56).

From: McConnell, Michelle (ECY)
Sent: Tuesday, June 6, 2023 11:54 AM
To: 'Ben Shumaker' <ben@ci.stevenson.wa.us>
Subject: RE: Deliverable Uploaded

Thanks for letting me know – we'll aim to provide any feedback in time for PC meeting next Monday evening.



Michelle McConnell (she/her)

Regional Shoreline Planner
WA Department of Ecology | Shorelands & Environmental Assistance

Phone 360-701-5262

 **June 2023: Celebrating Pride Month!**

♥ **DEIR + EJ:** Learn more about [Ecology's Office of Equity & Environmental Justice](#) - [Washington is a pro-equity, anti-racist state.](#)

Public Record: This communication is public record and may be subject to disclosure as per the Washington State Public Records Act (RCW 42.56).

From: Ben Shumaker <ben@ci.stevenson.wa.us>
Sent: Friday, May 26, 2023 2:41 PM
To: McConnell, Michelle (ECY) <micm461@ECY.WA.GOV>
Subject: Deliverable Uploaded

Hi Michelle- Deliverable 3.1 has been uploaded to EAGL.

Thank you,

BEN SHUMAKER

COMMUNITY DEVELOPMENT DIRECTOR

CITY OF STEVENSON, WASHINGTON

(509) 427-5970

In addition to the Key Concerns identified in our 6/12/23 email (re: WAC Planning Process; Appraisal & Acquisition; SMP Amendment; and Ecological Functions) please also consider the following more detailed input:

Substantive Content

Chapter 1

- Introduction needs to better describe the details of the WAC 173-26-221(4)(c) planning process, and how those standards connect to this planning effort and resulting Plan.
- If/what connections to Columbia River Gorge NSA and their Management Plan?

Chapter 2

- ~~"The Washington's sShoreline mManagement aAct (RCW 90.58) establishes public access as one of its three top policies. a focused priority use in the shoreline environments, per WAC 173-26-176(3)(a):...."~~
- The WAC -176 citation isn't wholly incorrect, but it's an odd place to start describing the background of the Plan since much of the language is quoted from statute. WAC -176 further describes the three policy goals set by the SMA: shoreline use, environmental protection, and public access. Having the Chapter 2 Background quote WAC 176(3)(a) about shoreline recreational uses, parks, marinas, public access is appropriate but (3)(b) is equally relevant with reference to public access and recreation, but is not referenced in Ch 2 Background. Take a look at the introduction to Policies on our [SMA webpage](#) to better understand the overall construct and how public access & recreation fit into the bigger picture.
- Given that the City's main waterfront is located on the Columbia River, this Plan needs to recognize the importance of/special considerations for shorelines of statewide significance.
- Page 4 – Cultural & Historic Resources – Draft Plan mentions cultural resources twice; once as an acknowledgement, and regarding Corps permits, there will need to be a cultural resource study. Note that this would apply only to in-water work (including in wetlands). This limited content doesn't appear to address Task 3 description that the Plan "will ensure preservation of sensitive ecological and cultural resources"
 - We have no qualms, but the term 'First Nations' seems more common in Canada. Perhaps this is the term preferred by tribal representatives involved in this planning process? Ask them or consider more commonly used US terms.
- Page 4 – "Further, Rock Creek Falls provides a breathtaking experience that is only readily accessible at certain times of year via the publicly-accessible riverbed when dry during summertime." Is this the intended meaning?

Chapter 3

- Phase 1 Inventory –
 - Page 5 – "Specific to the GIS methodology derived from the project's thematic maps, we assigned scores..." This is phrased in 1st person, but elsewhere in document uses 3rd person 'the project team'; Consider consistent phrasing throughout.
 - Page 6 - "Network analysis looked at the County and City walkability layer..." Is this referencing an existing data layer? Consider rephrasing for clarity.

- Page 6 - “Here, candidate projects look at enhancements to existing pedestrian amenities, as well as *candidate opportunities?* for improving gaps in walkable areas *that* approaching and *are* within shoreline jurisdiction, with these network connection types and possibilities scoring higher.” This sentence is really hard to follow; Consider rephrasing for clarity, especially the last part about connection types and higher scores.
- Phase 2 Public Involvement Summary – As presented, this section is more a mix of the involvement methods used and the substantive results. It may be more clear to better separate actions taken from outcomes. Overall, be sure the Summary ties back to the Public Engagement Plan and the specific actions anticipated by grant Task 2, including disadvantaged populations, tribal engagement, property owners, etc. Describe any shifts from anticipated to actual, and provide rationale for modified approach.
 - Charette - Approx 20 attendees at the April event. A charette is an ‘all-hands’ work session intended to result in decisions. One key aspect is involving all parties who can influence and will be affected by the decision, those needed for executing the chosen solution to both collectively and concurrently consider the issue/challenge, range of solutions, limitations & preferences, etc. Summary needs to better describe what key parties attended and the role they play, such as: project location property owners, designers, approval authorities, development/installation practitioners, end users, etc. If it was only interested public that attended/participated, then the event may be better described as a public workshop for gathering ‘sounding board’ input.
 - Project #1 – online resources seem mismatched with accessibility, consider rephrasing if increased public awareness is the target, or better describe linkage to disabled/disadvantaged users
 - Project #5 – better clarify if “public access” means visual, physical, etc.
 - Charette Results
 - 1 - Clarify it was play money, and the project totals need context such percent of total dollars ‘voted’; consider presenting both Projects 1 – 9 and the \$ voting results together, perhaps in tabular format
 - Page 9 – Bottom left: “Public engagement continuesd with...” The phrasing as present tense is confusing since referring to past events. Also, the location of this statement seems out of order referring to an April 10 meeting as after the April 19 charrette. Top right: Similar for next sentence ‘attendees will be notified’ is correct for the moment but the Final report should read as past tense. Given final revision after 6/12 and the grant deliverable due date of 6/16, is June 15 at Council still correct?

Chapter 4

- Page 10 – Last paragraph - The top recommended projects could be presented with more prominence (bullets/table) - their importance is a bit lost condensed into a short narrative list that’s visually hard to distinguish the separate items. Consider minimizing the photo graphic to give more room for text.
- Page 11 Intro to Recommended Projects – Task 3 describes the Plan will provide “a SMART (Specific, Measurable, Actionable, Reasonable, and Timely) indication of where various types of shoreline public access is expected.” For as specific as this term is identified it’s not clear if/where in the Plan this content is presented, perhaps this project intro is intended as such?
- Where Enhancement Options present Shoreline Public Access & Trail Plan Goal Met and also cite to RCW 90.58.020 is confusing. The Plan’s 3 Goals are established at page 2, but the RCW citation establishes the ‘preferred shoreline uses’ for shorelines of statewide significance. Consider rephrasing for clarity.

- #8 Rock Cove – wasn't there recently a private hotel/conference center development permitted for this location (e.g. SEPA 2020-01 Rock Cove Hospitality Center)? If yes, what public access features are part of the approved permit/site plan? If the project is not happening, perhaps a brief mention for clarity. Am I misremembering this?

Chapter 5

- Page 53 – *“A minimum shoreline setback of 25-50 feet, depending on the SED is required where development cannot occur. The SMP specifies that dirt or gravel public access trails to the water do not require any setback. However, it is not clear if paved trails would be allowed.”*
 - The SMP establishes a preference for pervious over impervious surfaces, but does not contain any prohibition of paved trails.
 - SMP Table 5.1 also requires 100' setback for WR/WE Recreational use in Natural SED, and differentiates between parallel trails and other access trails.
 - SMP 5.4.10 Residential Regulation (4)(d)(iv) allows 'unimproved/natural shoreline access trails' within the setback, with impervious surface limits
 - SMP 5.4.11 Transportation Policies (3)(b) prefers perpendicular alignment over parallel, and (3)(e) encourages 'trail/bike systems' for public visual and physical access; Regulation (4)(g) addresses pedestrian connections,
 - SMP Chapter 7 includes bikeways and trails as 'Transportation Facilities'
- Page 53 – *“The CAO does not appear to clearly establish any allowed uses in buffers but it is presumed that a shoreline access trail would be allowed, with mitigation for vegetation removal impacts.”*
 - SMP 4.4.1 incorporates SMC 18.23 CAO and notes that shoreline critical areas are regulated by the SMP
 - SMP 4.4.4 FWHCA Regulation (3) specifies the City can approved activities in the buffer with conditions and mitigation
- Page 53 - *“The city could also consider eliminating fixed width buffer widths for water oriented public access and recreation facilities adjacent to shorelines and rely instead on design and management standards to regulate the type of vegetation removal allowed and required mitigation actions.”* No – application of the CAO's 'TBD' buffer approach was a required change during the Comprehensive Update to ensure specific prescriptive standards. The City's overall strategy is that the shoreline setbacks establish areas where development is mostly excluded, critical area buffers establish areas where mitigation standards apply, and the vegetation removal standards apply throughout shoreline jurisdiction.
- Page 68 – Proposal #7 – clarify if the area is located in the City's Urban Area Boundary and the SMP predesignates the SED for if/when annexation occurs.

Appendix B Public Engagement Plan – this shows as a February 2023 version; not clear if/how this differs from the DT 2.3 version dated November 2022 named as the 'adopted' version?

General Document Improvement


- Table of Contents- suggest listing the projects under Chapter 4 heading, and internal hyperlinking, to aid document navigation.


- Narrative voice - Pages 5 and 10 use the 1st person 'we' and 'our', but elsewhere in document uses 3rd person 'the project team'; Consider consistent phrasing throughout.
- Shoreline jurisdiction – Earlier parts of the document reference the area of shoreline jurisdiction but it's not described until Chapter 5 as 200 feet. Consider presenting this key fact when the phrase is first used, e.g. page 6
- Similar to Page 29, where shoreline restoration/native veg planting is noted, connect to City's Shoreline Restoration Plan and any SMP provisions that encourage voluntary enhancement activities – noting such actions are separate-but-related to shoreline public access unless included as mitigation.

More details about Visuals/Graphics

- Screen clip of webpage and some other visuals are blurry; all figures should have titles
- Figure #s – Page 6 text incorrectly credits Ecology for Fig1 but maybe should be to the 'Map section' figure that has no number; other Figure #s would adjust
- Figure 2 "Themes" – image too small & hard to read; confusing that text refers to 'topics' but image refers to 'themes'; consider using one term consistently
- Overall - All aerial photo/map graphics would benefit from street name labels, and location inset images. Images include a red dashed line not identified in the Legend. Page 24 has no Legend for the three types of lines depicting... something. The Existing Conditions and Enhancement Options pages for each project would benefit from include the project number & name for clarity and to aid navigation – maybe continue use of the circular number icon.
- Page 17 Existing Conditions



- is in the legend, but I don't see it on the map itself.
- Because this is supposed to be a shoreline public access and trail plan, the map should show where the shoreline is in relation to this street. There's a shaded area in the lower right corner with a hint of a blue outline, so maybe that's what they intend to be the shoreline...?
- The map should be explicit about where the shoreline access is and what kind of access it is (e.g., is there a park or other recreation area? Is it public land?).
- Highway 14 should be labeled. It took me a while to find this small area on a larger map.
- Page 21 Existing Conditions –
 - Rock Cove shoreline trail should be identified since the legend identifies  as the existing pedestrian connections to Rock Cove shoreline trail and amenities.
 - The shoreline needs to be identified.
 - The pedestrian connection arrow on the left side just below the legend says "To Rock Cove." Does this mean the entire cove, a public access portion of it, the Rock Cove shoreline trail?
 - The map should have some street names.
 - Why do the two pedestrian connections on the right side by the yellow star have arrows pointing to the crosswalks?
 - What is the sinuous pedestrian connections that goes across three lots on the left side? What do the arrows mean?

- What is the red dashed line?
- The yellow star represents the “gateway” to the waterfront public shoreline access area. Where is the actual public shoreline access area?
- Page 22 Enhancement Options
 - #4 with the yellow star is labeled differently from how it’s labeled in the map on p. 23 (includes “central” on p. 24).
 - The purple-and-black pedestrian connection symbol is not on the legend.
 - The pedestrian connection on the left side says “To Rock Cove” but it has a double-headed arrow. Does this lead to Rock Cove (again, the cove itself? A public access area?) in both directions?
 - The pink-and-gray dashed line with arrows on both ends is not identified
 - The red dashed line is not identified
 - The #2 that I think is meant to be in the middle of the yellow star is not centered.
 - The shoreline trail is not identified (but the terminus of the stepping stones is...?)
 - The two parallel turquoise lines shown in the legend under #2 also appear on the left side of the map under/adjacent to the white box that says “Future Development...” and are not connected to anything or near the shoreline.
- Page 24 untitled image - This figure needs a title, legend, and some kind of description of what it is/how it ties into this section.
- Page 26 Existing conditions
 - Identify the red dashed line; the railroad underpass; and the shoreline
 - Do the arrows at the ends of the purple-and-black and orange-and-black lines mean these continue on outside of the map?
 - Label some streets
- Page 27 Enhancement Options
 - Identify the red dashed line; the shoreline; the railroad underpass
 - Label some streets, especially ones called out in the legend
 - The example sign idea is good, but maybe find one that’s in good shape.
 - The example of grated decking doesn’t seem to show grated decking, or maybe it’s just too small to tell.
 - The part of the legend that says “Commission study to create safe pedestrian crossing between SW Cascade Ave and Lutheran Church Rd 1 Engineering plans for 1st St Improvements across SR14” should be identified in the introduction and in the existing conditions map.
 - Maybe the engineering plans could go on a separate page?
- Page 30 Existing Conditions
 - Identify Rock Creek
 - The way this symbol  is located on the aerial makes it look like the armoring extends into the uplands and the creek below the OHWM. Maybe it’s in the right place but the implied edge of the creek isn’t?

- #4 is about the stormwater pipe according to the legend, but the photo itself is captioned "riprap armoring."
- Page 31 Enhancement Options
 - Identify Rock Creek
 - This is the first map to show the approximate creek edge. However, it doesn't follow what is implied to be the creek edge (the bit of blue on the edge of the shaded presumed creek area. Why are these two different? How accurate is the presumed shoreline area in the other maps? Is it based on OHWM? Something else?
 - Will the abandoned house be removed - this is not stated.
- Page 32 Project 5 scorecard - Under permits required, may require a shoreline variance for development this close to the river.
- Page 34 Existing Conditions
 - In the topo inset, identify where the location on the larger map is. Or maybe labeling the main streets on both this inset and the main map would take care of it.
 - Identify red dashed lines, the yellow star, and the creek
- Page 35 Enhancement Options - Identify main roads, red dashed lines, creek
- Page 38 Existing conditions
 - Consider legend identifying the county-owned land in green
 - Identify red dashed lines

Review Notes - The following table is really just informal staff notes to help us wrap our brains around what is expected vs. what is presented. It's draft/incomplete and not intended as anything final/comprehensive but we've opted to include it here in case it's helpful to your team in understanding how we consider work products in comparison to grant language:

	Grant Task 2 Public Involvement	Public Engagement Plan	Draft Public Access Plan
Project Website & Online Media	Project webpage posted ~Feb 15 City FB Posts – Feb 7; Apr 17	Rely on existing methods for project notifications incl. established channels and relationships, such as social media, email lists, community calendars, etc.	The public was notified of Open House #1 via: <ul style="list-style-type: none"> ● Facebook page (overall two posts) ● Skamania County Pioneer ● Project webpage (no updates posted)
Direct Mail & 1:1 Interviews	Frequent, direct communication to public and property owners	No mention	<ol style="list-style-type: none"> 1. Follow-up stakeholder meeting with upper Rock Creek property owners 2. Pre-charrette stakeholder meeting with County staff at Fairgrounds
Public Workshops/ Listening Sessions	For preliminary concept and concept refinements	Stakeholder Meetings <ol style="list-style-type: none"> 1. Public Open House – Feb 15 	Feb 22 Open House Apr 10 PC presentation Apr 19 Charette

		<ol style="list-style-type: none"> 2. Stakeholder Charrette – Apr 19 3. Public Open House 	May 8 PC presentation
Tribal Engagement	<p>Early & often - informal dialogue & formal consultation THPO input on Draft before Final</p>	<p>Table 3 Potential Stakeholders include:</p> <ol style="list-style-type: none"> 1. Cowlitz Tribe 2. Yakama Nation 3. Confederated Tribes of Warm Springs 	Chapter 2 at pg 4 – <i>“city officials performed First Nation consultation with all tribes listed here.”</i>
Disadvantaged Populations	<p>Engage public-at-large across the local range of socioeconomic sectors</p> <p>Determine stakeholders, how they will be affected, which groups are advantaged or disadvantaged, and specific involvement efforts best designed for each group.</p>	<p>No mention of “disadvantaged populations”</p> <p>Demographics described as:</p> <ol style="list-style-type: none"> 1. Working Families with School-Aged Children 2. Long-term Residents 3. Seasonal Residents and Tourists <p>Table 3 identifies Stakeholder Interest Groups</p>	Open House #1 notice posted at all low income housing multi-family complexes within City limits.

Ben Shumaker

From: Susan Krug <lvkrug30@yahoo.com> on behalf of Susan Krug
Sent: Wednesday, June 7, 2023 3:08 PM
To: Ben Shumaker
Subject: Planning Committee

Ben, Would you please pass this email on to the Planning Committee. Thanks for your time today.

The Krugs, Susan and Larry

Planning Committee,

We are pleased to learn the information gained via the Shoreline Public Access study, concerning the views or access to Rock Creek on the north side, were at the top of the list. The neighborhood and Rock Creek will be preserved from too many visitors. However, those visitors will be able to enjoy the beauty from the northside of Rock Creek and not through our properties on the south side of Rock Creek.

A special “thank you” to Ben for his work on this project.

The Krugs Susan and Larry

Ben Shumaker

From: Pat Albaugh <pat@portofskamania.org> on behalf of Pat Albaugh
Sent: Monday, June 12, 2023 1:58 PM
To: Ben Shumaker; Leana Kinley
Subject: Draft 2023 Shoreline Public Access - Comment
Attachments: Shorteline Plan - Cascade Avenue comment.pdf

Good Afternoon Leana and Ben,

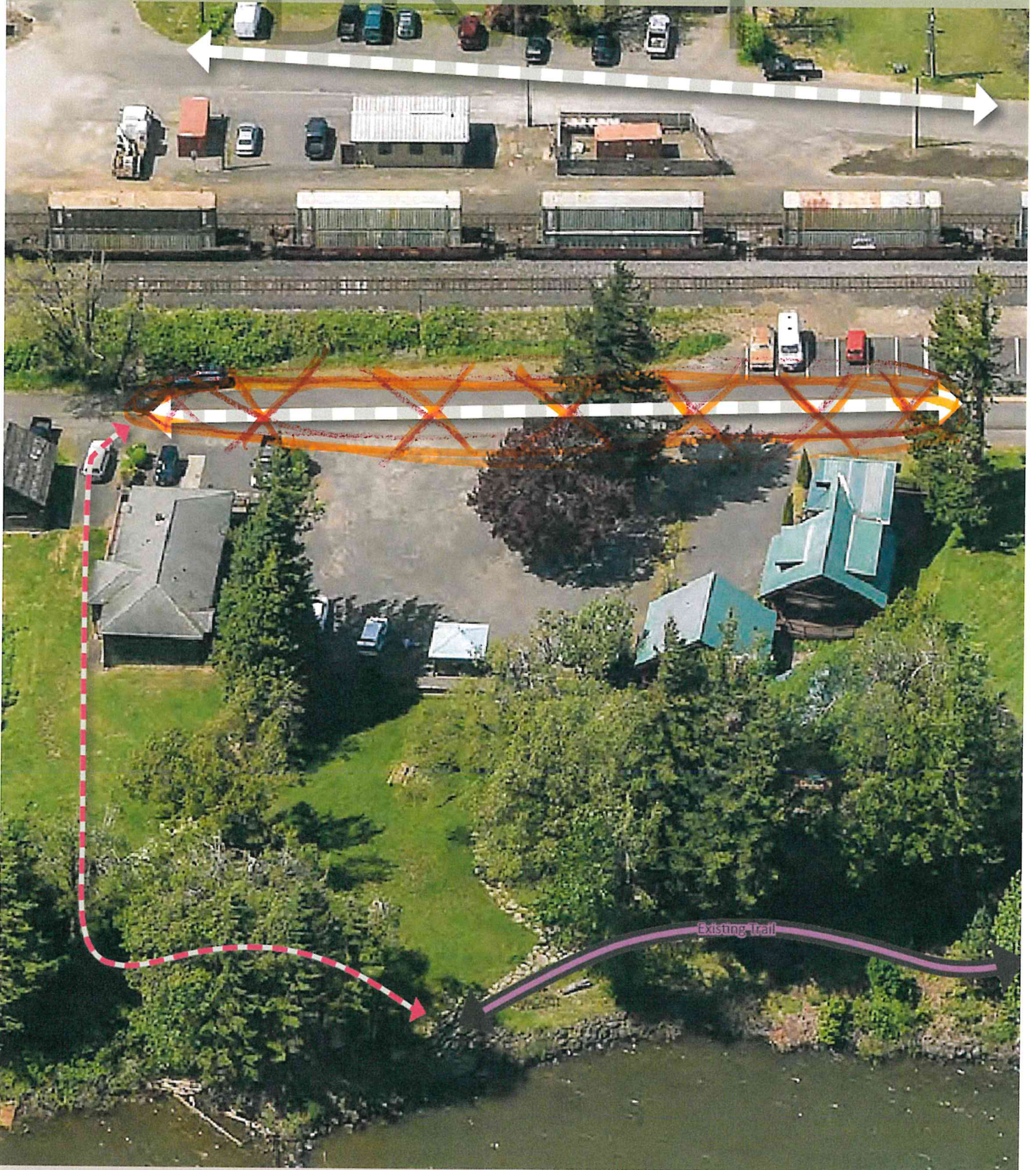
There has been a steady stream of Bob's Beach regulars coming in to express concerns about a proposed section of Cascade Avenue sidewalk (see attached). The Port agrees with their assessment that a sidewalk from Teo Park has little value and would impede traffic flow and reduce parking. Please consider this the Port's opposition to that specific idea within the draft plan.

Thank you - Pat

Pat Albaugh
Executive Director
Port of Skamania County
509-427-5484
pat@portofskamania.org



DRAFT



Date: June 12, 2023

To: Planning Commission, Stevenson Planning Director, City Manager

From: Bernard and Kristi Versari

RE: Integrated Shoreline Public Access and Trail Plan – **Proposal #3 Pedestrian Connection to Waterfront West end**

We have reviewed the most recent draft Integrated Shoreline Public Access and Trail Plan submitted for approval by the Planning Commission and City Council this week.

We urge the Planning Commission to revise Proposal **#3 Pedestrian Connection to Waterfront West end**. The current draft proposal includes the construction of sidewalks along Cascade Ave near Bob's Beach. **Adding sidewalks to this area would significantly reduce the amount of parking to the Bob's Beach public park/parking area. Parking at Bob's Beach is at full parking capacity during the spring/summer months and should not be reduced for a sidewalk.**

There would be **no public value enhancements from constructing sidewalks to the Port Office Building on Cascade Ave. nor by adding a short paved trail on Port properties since the current trail system already provides the desired trail loop** (ie Russell St. down to the landing with trail connections to the west and to the east back to Russell Street).

An additional concern is that sidewalks would likely add safety issues by facilitating trespassing across the railroad tracks instead of using the current Russell Street railroad crossing to/from the Skamania Landing.

Further, proposal #3 shows on page 22 of the Draft Plan a future railroad crossing which lines up with Seymour Street. However, Proposal #3 fails to discuss this added railroad crossing (is it an over pass, an underpass, who would pay for/benefit from it, etc?). There is no justification nor project costs presented for this proposal which is being submitted for your approval. **This new railroad crossing would be located only 300 feet from the recently completed (and EXPENSIVE!) crossing** along Russell Street to Cascade Avenue. Clearly, this proposed project is not needed for access to the waterfront.

Please carefully review this proposal submitted for your approval and consider its negative consequences as we have outlined above.

We appreciate your consideration.

Sincerely,

Bernard and Kristi Versari