



## FRIENDS OF THE COLUMBIA GORGE

*Via email*

May 18, 2020

Hearing Examiner  
Skamania County Community Development Department  
P.O. Box 790  
Stevenson, Washington 98648

**Re: Paradise Rock, LLC's application # SHR-20-01 for a Substantial Development permit, a Conditional Use permit, and Critical Areas variance to build a motel, trails, parking, and a septic system**

Dear Hearing Examiner:

Friends of the Columbia Gorge has reviewed and submits these comments on the above-referenced application. Friends is a non-profit organization with approximately 6,500 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside within the Columbia River Gorge National Scenic Area.

The proposed development is subject to review for compliance with the Skamania County Shoreline Management Ordinance (Title 20). The County must ensure that a complete application has been filed (SCC § 20.16.010).

### **Substantial Development Permits**

Section 20.20.020.A of Skamania County's Shoreline Master Program requires that no substantial development permit shall be undertaken on the shorelines except those which are consistent with the Shorelines Management Act of 1971, the provisions of WAC Chapter 173-14<sup>1</sup>, and the County's master program. Under § 20.20.030.B, uses which are classified in the master program as conditional uses may be authorized provided the applicant can demonstrate that: the proposed use will be consistent with the policies of RCW 90.58.020 and the policies of

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<sup>1</sup> It is likely that this should refer to WAC Ch. 173-27.

the master program, the proposed use will not interfere with the normal public use of public shorelines, and the proposed use of the site and design of the project will be compatible with other permitted uses within the area.

### **Critical Areas Variance**

Section 21A.03.040 of Skamania County's Critical Areas Ordinance outlines the requirements for obtaining a variance.

In addition to the criteria set out in SCC § 21.16.060(B), any applicant for a variance under this chapter must further show:

- That no practicable alternative exists to locating the proposed development within a waterbody or buffer area; and
- That on-site mitigation measures agreed to by the applicant are adequate to avoid significant degradation of the waterbody. SCC § 21A.040.020.C.3.

If the County determines that there is no practicable alternative to the proposed location, then it must ensure the mitigation is sufficient to fully offset the impacts to critical areas and the waters of the state.

**The proposed dock is proposed to be located partially within the Columbia River Gorge National Scenic Area and must be reviewed for consistency with the County's National Scenic Area Ordinance.**

Thank you for this opportunity to comment, which preserves our standing.

Sincerely,



Steven D. McCoy  
Staff Attorney