



**White Salmon Planning Commission Meeting**  
**A G E N D A**  
**April 09, 2025 – 5:30 PM**  
**119 NE Church Ave and Zoom Teleconference**

**[Meeting ID: 893 1967 2080](#)**

**Call in Number: 1 (253) 215-8782 US (Tacoma)**

**Call to Order/Roll Call**

**Approval of Minutes**

1. Meeting Minutes - December 11, 2024
2. Meeting Minutes - March 12, 2025

**Public Hearing**

A public hearing, with a virtual/telephonic attendance option, will be held during this Planning Commission meeting or as soon thereafter as possible. Any individual who wishes to testify in person or via teleconference will be allowed to do so.

3. Unit Lot Subdivision Ordinance ([Continuation from March 12, 2025](#))
  - a. Presentation
  - b. Public Testimony
  - c. Discussion
  - d. Action

**Discussion Items**

4. Implementation and Issues Arising During the Course of the Unit Lot Subdivision

**Adjournment**



**File Attachments for Item:**

3. Unit Lot Subdivision Ordinance (Continuation)

a. Presentation

b. Public Testimony

c. Discussion

d. Action



MEMO

TO: Mayor Marla Keethler  
City of White Salmon, Washington  
SUBJECT: Unit lot Subdivision Ordinance, and Citizen Testimony  
DATE: February 11, 2025

Please see attached the revised draft unit lot subdivision ordinance for consideration at Planning Commission and Council hearings.

As discussed, a previous version of this ordinance was submitted and subsequently tabled following critical comments contained in a letter from Peter Wright and several other co-signers. I believe the updated draft addresses their comments, with the exception of a call for a roundtable session of interested stakeholders. However, in the interest of time, I recommend that we proceed with the hearings, which will give ample time for further input from them or others.

To summarize their comments, and our approach in response (in bold italics):

1. The ULS process should be approved in a one-step process, not a preliminary and final plat as is the case with short plats. ***The revised ordinance uses a one-step process.***
2. The ordinance does not comply with State law. ***Dave Osaki from Commerce has provided guidance in this process including an ordinance template, and he assures that this is the appropriate process under State law. The ordinance has also been reviewed by the City Attorney.***
3. The ordinance appears to be a copy of an ordinance by the City of Port Townsend. ***The Port Townsend ordinance was provided by the Department of Commerce as a suitable model. However, following Peter Wright's letter, the Department of Commerce issued its own model language which has been used here instead.***
4. The ULS process should be separate from the short plat process. ***The revised ordinance is a stand-alone process.***
5. Condominium ownership structures introduce additional barriers. ***The question of condominium ownership structure is not addressed in the draft ordinance.***
6. Shared utilities should be allowed. ***This is a separate issue from the ULS ordinance, and given the irregular conditions city-wide, will need to be resolved with Public Works on a case-by-case basis.***

I look forward to discussing these issues further in the hearing.

**CITY OF WHITE SALMON  
ORDINANCE NO. \_\_\_\_\_**

**AN ORDINANCE OF THE CITY OF WHITE SALMON, WASHINGTON, AMENDING TITLE 16  
TO ADD CHAPTER 16.66; SEVERABILITY AND AN EFFECTIVE DATE**

**WHEREAS**, the City of White Salmon (“City”) acknowledges the need to provide legal mechanisms to implement its Housing Action Plan, to provide more infill housing opportunities, and to accommodate more diverse and affordable housing; and

**WHEREAS**, the City recognizes the current barriers to infill development, including the current limitations of its subdivision procedures; and

**WHEREAS**, the City recognizes the State of Washington RCW 58.17.060(3) requires that “All cities, towns, and counties shall include in their short plat regulations procedures for unit lot subdivisions allowing division of a parent lot into separately owned unit lots;” and

**WHEREAS**, the unit lot subdivision process is well-established in a number of other Washington cities, offering effective models for implementation in White Salmon; and

**WHEREAS**, the City has conducted public outreach and gathered public comments in accordance with the City’s Public Participation Plan, sufficient to establish regulations in accordance with RCW 36.70A;

**NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF WHITE SALMON DOES  
ORDAIN AS FOLLOWS:**

That the following amendments be made to White Salmon Municipal Code Title 16:

**SECTION 1. Amendment to Title 16, adding Chapter 16.66, “Unit Lot  
Subdivisions.”**

---

**Chapter 16.66**  
**UNIT LOT SUBDIVISIONS**

**16.66.010 Definitions**

The following definitions shall apply to this chapter:

A. “Lot, parent” - means a lot which is subdivided into unit lots through the unit lot subdivision process.

B. “Lot, unit” - means a lot created from a parent lot and approved through the unit lot subdivision process.

C. “Unit lot subdivision” means the division of a parent lot into two or more unit lots within a development and approved through the unit lot subdivision process.

**16.66.020 Purpose.**

The purpose of this chapter is to establish a process which allows greater flexibility in the development of single-family detached and attached housing on lots which do not strictly conform to the development standards of Chapters 16.60 or 16.65. This process may be used as an alternative to a conventional subdivision or short subdivision and shall be permitted in any residential zone allowing for the development of single-family detached dwellings. To use this process, developments shall contain at least two single-family dwellings.

**16.66.030 Applicability.**

- A. Site Plan Approval Required. All developments using the unit lot process are required to submit a site plan for review and approval as part of the land division application. The site plan must demonstrate compliance with the applicable regulations of Chapter 17 and this title.
- B. Conflict. In the event of a conflict between this chapter and any other provisions of Chapters 16 or 17 and this title, the requirements of this chapter shall control.

**16.66.040 Application procedures.**

- A. A lot may be divided into separately owned unit lots, provided the following standards are met.
  - 1. Approval Process. Unit lot subdivisions follow the application procedures for a short subdivision (4 or fewer lots) or subdivision (more than 4 lots), depending on the number of lots.

2. Applicability. . A lot to be developed with middle housing, detached accessory units, or multiple detached single-family residences, in which no dwelling units are stacked on another dwelling unit or other use, may be subdivided into individual lots as provided herein.
3. Development as a whole on the parent lot, rather than individual unit lots, shall comply with applicable design and development standards.
4. Subsequent platting actions, additions, or modifications to the structure(s) may not create or increase any nonconformity of the parent lot.
5. Access easements, joint use and maintenance agreements, and covenants, conditions and restrictions (CC&Rs) identifying the rights and responsibilities of property owners and/or the homeowners' association shall be executed for use and maintenance of common garage, parking and vehicle access areas; underground utilities; common open space; shared interior walls; exterior building facades and roofs; and other similar features shall be recorded with the county auditor.
6. Within the parent lot, required parking for a dwelling unit may be provided on a different unit lot than the lot with the dwelling unit, as long as the right to use the parking is formalized by an easement set forth on the face of the plat and recorded with the county auditor.
7. Portions of the parent lot not subdivided for individual unit lots shall be owned in common by the owners of the individual unit lots, or by a homeowners' association comprised of the owners of the individual unit lots.
8. Notes shall be placed on the face of the plat as recorded with the county auditor to state the following:
  1. The title of the plat shall include the phrase "Unit Lot Subdivision."
  2. Approval of the development on each unit lot was granted by the review of the development, as a whole, on the parent lot.
9. Effect of Preliminary Approval. Preliminary approval constitutes authorization for the applicant to develop the required facilities and improvements, upon review and approval of construction drawings by the public works department. All development shall be subject to any conditions imposed by the city on the preliminary approval.
10. Revision and Expiration. Unit lot subdivisions follow the revision and expiration procedures for a short subdivision.

**16.66.050 Approval criteria.**

In addition to the review criteria provided in Title 16 WSMC, the following criteria are the minimum measures by which each proposed unit lot subdivision will be considered:

A. Unit lot subdivisions shall be given preliminary approval, including preliminary approval subject to conditions, upon finding by the city that all the following have been satisfied:

1. The proposed unit lot subdivision conforms to all applicable city, state and federal zoning, land use, environmental and health regulations and plans, including, but not limited to, the following:
  - a. White Salmon comprehensive plan;
  - b. White Salmon zoning code;
  - c. Engineering design standards;
  - d. Critical areas ordinance (Chapter 18.10 WSMC);
2. Utilities and other public services necessary to serve the needs of the proposed unit lot subdivision shall be made available, including open spaces, drainage ways, streets, alleys, and other public ways.
3. Conservation of existing trees, and/or the planting of new trees, shall be provided consistent with Chapter 18.35 – City Tree Ordinance, and Chapter 18.40 – Special Provisions – Heritage Trees;
4. The probable significant adverse environmental impacts of the proposed unit lot subdivision, together with any practical means of mitigating adverse impacts, have been considered such that the proposal will not have an unacceptable adverse effect upon the quality of the environment, in accordance with Title 18 WSMC and Chapter [43.21C](#) RCW;
5. Approving the proposed unit lot subdivision will serve the public use and interest and adequate provision has been made for the public health, safety, and general welfare.

**16.66.060 Unit lot plat review process.**

- A. An application for a unit lot subdivision shall be processed according to the procedures for Type I-B land use decisions established in Chapter 19.10 WSMC, Land Development Administrative Procedures.
- B. The director shall solicit comments from the public works director, fire chief or designee, local utility providers, police chief, building official, school district, adjacent jurisdictions if the proposal is within one mile of another city or jurisdiction, Washington State Department of Transportation if the proposal is adjacent to a state highway, and any other state, local or federal officials as may be necessary.
- C. Based on comments from city departments and applicable agencies and other information, the city shall review the application subject to the criteria of WSMC 16.45 and 16.60, unless superseded by provisions herein. A proposed unit lot subdivision shall only be approved when consistent with all the provisions of

WSMC 16.45 and 16.60, unless superseded by the provisions herein.

- D. An applicant for a unit lot subdivision may request that certain requirements established or referenced by this chapter be modified. Such requests shall be processed according to the procedures for variances in Chapter 16.65.080 WSMC.

**16.66.070 Approval.**

- A. The administrator shall approve, approve with conditions, or deny the unit lot subdivision within the applicable time requirements. The decision shall be in writing and shall set forth findings of fact supporting the decision.
- B. Approval or approval with conditions shall authorize the applicant to proceed with preparation of the final unit lot subdivision, following the applicable procedures of WSMC 16.65.
- C. If the preliminary approval of the unit lot subdivision requires the meeting of conditions, construction of private roads, utilities and/or water systems, or the applicant needs time to obtain required certifications, then the applicant's unit lot subdivision shall be granted conditional approval for up to a two-year period, or as otherwise provided by state law, to provide time to complete the conditions.
- D. Upon fulfillment of the conditions of approval, and upon acceptance of such proof by the administrator, the administrator shall then authorize the recording of the unit lot subdivision.
- E. Recording. It is the responsibility of the unit lot subdivision applicant to record the unit lot subdivision map with the county auditor. The unit lot subdivision applicant shall pay the current recording fee. Upon recording the unit lot subdivision, the administrator shall obtain one copy of the unit lot subdivision for city records. The applicant shall not submit to the county auditor any unit lot subdivision plat that does not bear the city's certificate of approval. Filing a unit lot subdivision plat without the city's certificate of approval shall be a violation of this chapter.



**SECTION 2. Severability / Validity.** The provisions of this ordinance are declared separate and severable. If any section, paragraph, subsection, clause or phrase of this ordinance is for any reason held to be unconstitutional or invalid, such decision shall not affect the validity of the remaining portion of this ordinance.

**SECTION 3. Effective Date.** This ordinance shall take effect and be in force five (5) days after its approval, passage and publication as required by law.

**SECTION 4: Transmittal to the State.** Pursuant to RCW 36.70A.106, a complete and accurate copy of this ordinance shall be transmitted to the Department of Commerce within ten (10) days of adoption.

**PASSED** this \_\_\_ day of \_\_\_\_\_ by the City Council of the City of White Salmon, Washington, and signed in authentication of its passage.

\_\_\_\_\_  
Marla Keethler, Mayor

ATTEST:

\_\_\_\_\_  
City Clerk/Treasurer

APPROVED AS TO FORM:

\_\_\_\_\_  
City Attorney