



White Salmon Planning Commission Meeting and Workshop A G E N D A

September 25, 2024 – 5:30 PM

119 NE Church Ave and Zoom Teleconference

[Meeting ID: 854 3387 7521](#)

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

Call to Order/Roll Call

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.

1. Tree Protection Ordinance

- a. Presentation
- b. Public Testimony
- c. Discussion
- d. Action

Adjournment

Planning Commission Workshop (Will begin after Planning Commission Meeting)

1. Parking

The Planning Commission will engage in a discussion on parking policies and their impact on housing development with Dr. Michael Mehaffy. While essential for managing vehicle accommodation, parking policies can often become obstacles to the creation of much-needed housing in urban areas.

Prior Outreach includes a Let's Talk Parking vs. Housing (August 27, 2024):

www.whitesalmonwa.gov/planning/page/lets-talk-parking-vs-housing-0



File Attachments for Item:

1. a. Presentation
- b. Public Testimony
- c. Discussion
- d. Action

TECHNICAL MEMORANDUM

Date:	September 19, 2024
To:	White Salmon Planning Commission
From:	Alex Capron, AICP, Senior Planner Deb Powers, Senior Arborist
Project Name:	White Salmon Tree Code Update
Project Number:	2205.0244.05

Tree Ordinance Update – Recommendation to PC

The recommended tree protection code amendments to WSMC 18.40 Ord. 2023-11-1153 to be brought before the Planning Commission follows the public hearing on August 28th and September 11th, 2024. A response matrix to written and verbal public comments accompany this memo.

A summary of code changes based upon Planning Commission recommendations noted in the August 28, 2024 Draft Planning Commission Meeting Minutes and Planning Commissioner Morneault’s August 30, 2024 comments are shown in the table below. To facilitate the Planning Commission’s discussion and consideration of code amendments, code concerns are listed by a reference number and grouped by general code topic:

#	Code Concern	Proposed Code Amendment & Other Options
1.	<i>Definitions/DBH</i> The instructions for measuring multi-stemmed trees are complicated (Trabant, Morneault).	WSMC 18.40.020.3 - Added example, removed jargon, added diagrams (subject to Code Publisher approval). Option: consider moving arboricultural standards into a reference document identified in code (City of Olympia Urban Forestry Manual).
2.	<i>Definitions/Hazard & Nuisance Trees</i> The definitions for hazard versus nuisance trees are not distinguishable from each other and are unclear.	WSMC 18.40.020.4 – Clarified hazard tree criteria, added an example.
3.	<i>Definitions/Significant Tree</i> Define significant trees to exclude prohibited tree species (Hohensee).	WSMC 18.40.020.12 – Added “with the exception of prohibited trees” to definition.

#	Code Concern	Proposed Code Amendment & Other Options
4.	<p><i>Definitions/Significant Tree Applicability</i></p> <p>Limit significant trees (defined as minimum 18" DBH) to native species (Price).</p>	<p>WSMC No change recommended; note prior Tree Board and Planning Commission discussions and public feedback prioritize mature/large tree protection, as reflected in the minimum 18" DBH significant tree definition, without species criteria, as climate resiliency models support broadening tree species diversity. A limited number of native tree species are represented in the special tree definition.</p>
5.	<p><i>Definitions/All Trees</i></p> <p>List tree types and definitions together to enable easier reading and comprehension (Morneault).</p>	<p>Option for PC discussion: reorganize definitions so that grove, hazard, heritage, nuisance, prohibited, significant and special trees are listed alphabetically as a subsection under "Trees".</p>
6.	<p><i>Definitions/TPZ</i></p> <p>An unclear tree protection zone definition may lead to insufficient tree protection on development sites (Trabant).</p> <p>Clearly specify effective tree protection during construction and account or explain the broad range in TPZs (Trabant, Morneault).</p>	<p>WSMC 18.40.020.11 - Added an example explaining the range of minimal to sufficient tree protection zones. The range is based on industry standards as a guideline for the absolute minimum (6x DBH) to adequate (18x DBH) tree protection on construction sites.</p> <p>WSMC 18.40.020.11 – Clarified tree protection zone (TPZ) definition and provided an example. Note that TPZ is determined by a qualified professional arborist, subject to City approval and enforcement.</p>
7.	<p><i>Definitions/Tree Management</i></p> <p>Clarify the difference between topping, pruning and removal and who makes the determination when thresholds are exceeded (Morneault).</p>	<p>WSMC 18.40.020.10 The topping definition was reorganized to better describe the technique.</p> <p>No change recommended to the 25% threshold for pruning, so that it can apply to topping, over-thinning, lion-tailing or other mal-pruning practices (left out to maintain code simplicity).</p> <p>Code Enforcement makes the determination whether code standards/thresholds have been exceeded.</p>
8.	<p><i>Definitions/Misc.</i></p> <p>Define "regulated" tree (Morneault).</p>	<p>No code change recommended; there is no longer any code applicability for "regulated" tree. In earlier drafts, the term regulated was used instead of the current "significant" tree.</p>

#	Code Concern	Proposed Code Amendment & Other Options
9.	<p><i>Tree Removal, No Development/Cost</i></p> <p>Consider how to reduce cost of arborist reports required for hazard/nuisance tree removal (Trabant, Morneault).</p> <p>To minimize arborist report costs, include "education, training, and/or experience" in the qualified professional arborist definition (18.40.020.9) (Morneault).</p>	<p>WSMC 18.40.030.D – Allow photos/other documentation in lieu of arborist report for hazard or nuisance tree removal approval. Note that tree removal notifications do not involve permit fees.</p> <p>No code change recommended; the draft code includes "a person with relevant experience and training..." which gives the City discretion to adjust qualifications.</p>
10.	<p><i>Tree Removal, No Development/Lot Size</i></p> <p>Consider lot size in tree removal allowances (Trabant, Price).</p>	<p>WSMC 18.40.030.C – Added language to allow additional significant/special tree removals for every 7,200 square foot increase in lot area.</p>
11.	<p><i>Tree Removal, No Development/Nuisance</i></p> <p>Add "outside the property where the tree is located" after "private" in the nuisance tree definition (18.40.020 6) (Morneault).</p>	<p>No code change recommended; code intends to allow property owner tree removals using nuisance criteria, not settle civil matters between property owners related to tree damage.</p>
12.	<p><i>Tree Removal, No Development/Emergency</i></p> <p>Specify that emergency tree removal should apply to "declared" emergencies in 18.40.030.E (Morneault).</p>	<p>No code change recommended; WSMC 18.40.030.E applies to imminent tree failure that may not be a result of a declared emergency. The code gives City officials discretion to grant approval for emergency tree removal requested by the property owner, not the authority to condemn trees on private property.</p>
13.	<p><i>Firewise Guidance/Land Management</i></p> <p>Consider fire overlay zone for peripheral areas to balance land management desires with fire protection (Brown).</p>	<p>WSMC 18.40.025 – Added code language as a voluntary measure for residents concerned about defensible space and seeking Firewise guidance per the Underwood Conservation District and West Klickitat Regional Fire Authority.</p>
14.	<p><i>Firewise Guidance/Land Management</i></p> <p>Consider that white oak protection should not be required within city limits, consider climate resiliency and habitat benefit (Brown).</p>	<p>No change recommended; current code revisions reflect Columbia Land Trust and WA Department of Fish and Wildlife feedback related to white oak habitat and climate/fire resiliency, within reason. For example, WDFW best management practices recommend that dead white oaks remain in the landscape as wildlife habitat, which conflicts with local fire authority best practices.</p>

#	Code Concern	Proposed Code Amendment & Other Options
15.	<p><i>Firewise Guidance/Liability-Insurance</i></p> <p>Address potential liability issues that the code may cause due to compromised fire safety on adjacent properties.</p> <p>Address insurance question from prior meeting (Morneault, Reyburn).</p>	<p>WSMC 18.40.025 - See new code language regarding fire safety per the Underwood Conservation District and West Klickitat Regional Fire Authority.</p> <p>Legal and insurance concerns will be discussed at the September 25, 2024 Planning Commission meeting.</p>
16.	<p><i>Tree Removal, Development/Site Design</i></p> <p>Consider slopes with development (Hohensee).</p>	<p>WSMC 18.40.040.B.3 – Added “when also omitting steep slope areas as area available to development” to description of tree retention limits.</p>
17.	<p><i>Tree Removal, Development/Replanting</i></p> <p>The tree replacements requirements for development removals under 18.40.050.A and C seem to conflict with each other, and/or the City appears to have too much discretion to require additional replacement trees. (Morneault).</p>	<p>WSMC 18.40.050.C – deleted so that only A, the minimum number of replacement trees required per tree removal applies, and the City cannot require additional replacement trees.</p>
18.	<p><i>Tree Removal, Development/Fees in Lieu</i></p> <p>Fees in lieu of replacement trees on development sites should be paid at the time of permit issuance, not before (Morneault).</p>	<p>No code change recommended; “before” or “by” means no issuance until requirement is met. Otherwise, a bond or other assurance is needed, or fees paid to receive Certificate of Occupancy, which is unfair to property owner.</p>
19.	<p><i>Heritage Tree/Nomination Process</i></p> <p>Clarify the process so property owner permission is required first (Morneault, Hohensee).</p>	<p>WSMC 18.41.030.A-D – Rearranged the sequence of the process to clarify that the nomination cannot move forward without property owner approval, regardless of who nominates the tree.</p>
20.	<p><i>Heritage Tree/Criteria</i></p> <p>Clearly define heritage trees (Price).</p>	<p>See WSMC 18.40.020.5 and 18.41.020 for amended heritage tree criteria, which is extremely flexible by design. Note prior Tree Board and Planning Commission discussions resulted in striking size and species criteria to encourage Heritage Tree nominations.</p>
21.	<p><i>Overall Code Complexity/Administration</i></p> <p>Consider feedback on overall code complexity and possible difficulty with</p>	<p>WSMC 18.40-41 – Reduced industry jargon and use of unclear verbiage from draft code. Added examples and diagrams.</p>

#	Code Concern	Proposed Code Amendment & Other Options
	staff implementation. A more streamlined, user-friendly code is desired (Hohensee).	Option: City could conduct a staff run-through of the draft code for ease of implementation.
22.	<i>Misc. - Public Tree Care</i> Observations that street trees are not pruned properly (Trabant).	No change recommended; WSMC Chapter 18.40-41 does not apply to public trees. Option: City could consider developing/updating standard operating procedures for public tree management.
23.	Question: Is white oak "woodland" that is referenced in 18.40.030.C.1.c defined? (Morneault).	Answer: Yes, as a critical area; see WSMC 18.10.312 (as referenced in the code).
24.	Question: Does hazard tree criteria (or exceptions for an arborist report?) apply to the development scenario in 18.40.040.B.2? (Morneault).	Answer: No; an arborist report related to a development tree retention plan includes an inventory, tree protection measures, proposed tree replacements as required, etc.; it is not a hazard tree assessment.

Related Topics

Tree removal allowances. Based on the number of comments related to tree removal not associated with development (definitions, applicability, cost, etc.), and concerns related to defensible space/land management for fire safety, it should be noted that under the draft code, property owners can:

- Remove any ornamental tree species under 18 inches DBH, as these are not regulated; they do not fit significant tree criteria*.
- Remove any native trees that do not fit the minimum size (DBH) and species criteria for special trees*.
- Remove a certain number of healthy significant or special trees each year under the tree removal allowances outlined in 18.40.030.B.

The nuisance and hazard tree removal requirements apply only if property owners wish to exceed the significant and special tree removal allowances. The draft code attempts to balance property rights, fire prevention, affordable housing needs and environmental quality by allowing tree removal and promoting better tree care on private property.

*Except in critical areas and buffers, with heritage tree, etc. per WSMC 18.40.030.C.1.

Code Compliance comments. White Salmon's Code Compliance staff inquired about the current and draft code, and suggested clarifications to the heritage tree nomination process, which are reflected in its reorganization. Code Compliance staff also requested information on how the civil penalty fines for unauthorized tree removals had been calculated. Facet assumes the \$5,000 amount was likely derived

from comparisons to similar sized cities' penalties for unauthorized tree removals ranging between \$1,000 up to \$25,000 per tree, not including restoration costs.

Input from local fire authorities. Both the West Klickitat Regional Fire Authority and Underwood Conservation District approved WSMC 18.40.025 Applicability language on defensible space, anticipating that Wildland-Urban Interface (WUI) areas may be redefined when the Washington State Department of Natural Resources (DNR) completes its mapping and mandates WUI on a local level in 2025. There was a strong recommendation to utilize DNR/Firewise guidance to improve tree health and elimination of ladder fuels, remove or manage nuisance, hazard and unhealthy trees, and to allow the removal of "small DBH trees to improve health of mature trees and canopy," the latter of which justified increasing the trunk diameter (DBH) of certain special (native) trees. Basically, the draft code, by allowing removals and promoting tree health, aligns with fire safety guidance provided by the local fire authorities.

Oregon white oak trees. In response to numerous public comments discussing the association between Oregon white oak habitat and fire adaptability: note that the current draft code reflects information received from the Columbia Land Trust, East Cascades Oak Partnership and the Washington Department of Fish and Wildlife on best management practices. The enclosed brochure provides general public education on Oregon white oaks.

Encl: Draft code, ECO brochure, West Klickitat Fire Authority and Underwood Conservation District e-mail correspondence and Public Comment Response Matrix

Key: **Bold Underlined** = added language
~~Bold Strikethrough~~ = deleted language
[REDLINE] - Changes for 9/25 Planning Commission recommendation

Chapter 18.40 – TREE PROTECTION.

18.40.010 - Purpose.

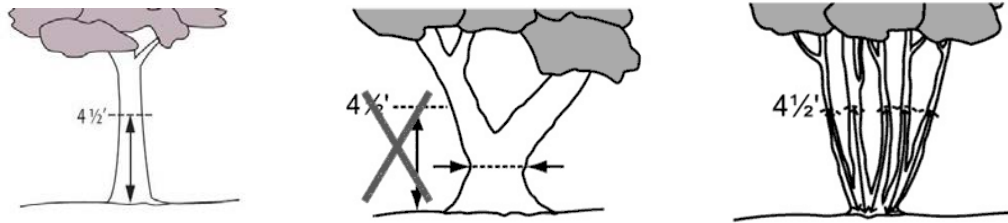
The purpose of this Chapter is to establish a process and standards to provide for the preservation, replacement, and protection of trees located in the City of White Salmon to:

- A. **Implement the policy goals and objectives outlined in the City’s Comprehensive Plan and Community Forest Management Plan and support efforts towards greater climate and wildfire resiliency (placeholder for Climate Action Plan);**
- B. **Promote site planning, building and development practices to prevent indiscriminate removal or destruction of trees, avoid unnecessary disturbance to trees and vegetation, and provide for replanting in order to maintain canopy cover, reduce erosion, and minimize risk of wildfires;**
- C. **Preserve and enhance White Salmon’s aesthetic, community character, biodiversity, and wildlife habitat provided by native vegetation and mature trees;**
- D. **Protect the native Oregon white oak through retention and replacement; and**
- E. **Promote best practices to maximize ecosystem services provided by trees, including improved air quality, stormwater filtration, and carbon storage and sequestration, as well as trees’ contributions to the livability, public health, safety, and quality of life in White Salmon.**

18.40.020 - Definitions.

The requirements provided in this section supplement those identified in Title 17 and 18. The most restrictive definitions and those protective of the environment shall prevail.

1. **American National Standards Institute (ANSI) - the ANSI A300 industry consensus standards developed by the Tree Care Industry Association and written by the Accredited Standards Committee (ASC) for the management of trees, shrubs, and other woody vegetation.**
2. **Diameter at breast height (DBH) – diameter or thickness of a tree trunk measured at 4.5 feet above grade. If the tree is a multi-stem tree, the total DBH is the square root of the sum of the DBH for each individual stem squared per ANSI A300 standards. **Example with three trunks: Total DBH = the square root of (stem1)² + (stem2)² + (stem3)².** If the ~~tree trunks split main union is~~ at or below 4.5 feet above grade, the measurement will be taken below the ~~splitmain union~~.**



3. Grove – three or more significant and/or special trees with overlapping or touching branches.
4. Hazard tree – A tree with a combination of structural defects and/or disease which makes it subject to a high probability of failure, in proximity to high-frequency targets (persons or property that can be damaged by tree failure), that cannot be lessened with reasonable and proper arboricultural practices, nor can the target be removed or restricted; or a tree or tree part assessed by a qualified professional as having an extreme or high overall risk rating using the ISA Tree Risk Assessment Qualification (TRAQ) method in its current form. For example, an unhealthy tree with a large trunk cavity leaning over a house.
5. Heritage tree – any tree that because of its age, size, unique type, or historical association that is of special importance to the city, as nominated pursuant to WSMC 18.41.020.
6. Nuisance tree – a tree causing significant physical damage to a private or public structure and/or infrastructure, including but not limited to the sidewalk, curb, road, water or sewer or stormwater utilities, driveway, parking lot, building foundation, or roof; or is severely infested with an insect, pest, and/or other pathogen that significantly impacts the long-term viability of the tree.
7. Prohibited tree – trees that are exempt from tree protection provisions in this chapter, including red alder (*Alnus rubra*), black cottonwood (*Populus trichocarpa*), holly (*Ilex aquifolium*), Tree of Heaven (*Ailanthus altissima*), or other invasive trees listed by the state or county weed control board (not including trees located within critical areas).
8. Pruning – the practice of selectively removing branches from a tree using approved practices to achieve a specified objective based on ANSI A300 Tree Care Standards best practices. Pruning that exceeds twenty-five percent (25%) of a tree’s live canopy within twelve (12) consecutive months constitutes tree removal.
9. Qualified professional arborist – a person with relevant education and training in arboriculture or urban forestry, having the International Society of Arboriculture (ISA) Arborist Certification and for purposes of hazard tree evaluation, TRAQ (tree risk assessor) qualification.
10. Topping – indiscriminate cuts to reduce the height or crown size of an established tree that typically leave a stub, without regard to long-term tree health or structural integrity. ~~used to reduce the height or crown size of an established tree.~~ Topping is not an acceptable pruning practice pursuant to 2023 ANSI A300 Tree Care Standards. This definition does not apply when the sole purpose is to create snag(s) for wildlife habitat.

11. **Tree protection zone (TPZ) – an area defined during site development by a qualified professional arborist that is equal to 6-18 times the DBH, where construction activities and access are limited to protect tree(s) and soil from damage necessary to sustain tree health and stability. TPZ denotes the location of tree protection fencing. For example, a 12-inch DBH maple tree has a minimum tree protection zone that is determined by multiplying 12 inches DBH x 6 = 72 inches, which equates to tree protection fence placement located 6 feet from the face of the tree trunk. A sufficient tree protection zone for the same tree is 12 inches DBH x 18 = 216 inches, which equates to sufficient tree protection fence placement located 18 feet from the face of the tree trunk.**
12. **Significant Tree – a regulated tree with a DBH of more than 18 inches with the exception of prohibited trees.**
13. **Special Tree – a regulated tree with a DBH that is equal to or greater than the diameters listed in the Special Tree Table below:**

<u>Special Tree Table</u>	
<u>Native Species</u>	<u>DBH Threshold</u>
<u>CASCARA — Rhamnus purshiana</u>	<u>8 in</u>
<u>Pacific DOGWOOD — Cornus nuttallii</u>	<u>86 in</u>
<u>Ponderosa Pine - Pinus ponderosa</u>	<u>12 in</u>
<u>Vine MAPLE — Acer circinatum</u>	<u>108 in</u>
<u>Oregon white oak or Garry OAK — Quercus garryana</u>	<u>6 in</u>

18.40.025 - Applicability.

For properties seeking Firewise assistance, written recommendations provided by the Underwood Conservation District and West Klickitat Regional Fire Authority are accepted for establishing defensible space limits for a given site. Properties located within the wildland-urban interface (WUI), the International Wildland-Urban Interface Code, 2021 Edition, published by the International Code Council and as adopted by the State Building Code Council in Chapter 51-55 WAC is adopted by reference thereto as though fully set forth herein and shall be applicable within the city.

18.40.030 - Significant tree removals and maintenance, not associated with development.

- A. **To ensure that trees function well in their intended landscape, the City of White Salmon promotes the proper care of trees on private property to ensure trees reach their normal life expectancy and contribute to optimal benefits to the community. For that reason, tree topping is prohibited and may be considered tree removal per WSMC 18.40.020(6).**
- B. **Tree removal allowance. Any private property owner of developed property may remove up to a specified number of significant and/or special trees with the submittal of a tree removal notification to the city.**
- C. **On any single legal parcel **less than 7,200 square feet** where no exterior construction, demolition, grading, material storage, or other development activity is proposed, one significant or special tree may be removed per 12-month period or a maximum of two trees may be removed per 24-month period. **One additional significant or special tree may be removed for every additional 7,200 square foot lot area.****
 - 1. **A tree or tree(s) may not be removed without permit under the following conditions:**
 - a. **The tree is a heritage tree (see WSMC 18.41);**
 - b. **The tree is located within a critical area or critical area buffer;**
or
 - c. **The tree is in an Oregon White Oak woodland as protected under WSMC 18.10.312 ([Ord. 2023-11-1152, effective January 1, 2024](#))**
- D. **Removal of hazard or nuisance trees. Removal of hazard or nuisance trees does not count toward the tree removal allowances if the nuisance or hazard condition is supported by a qualified professional arborist and approved by the city. The city may request an arborist's report prepared by a qualified professional arborist to be submitted to the city and paid for by the applicant. **The City may approve the removal of hazard or nuisance trees from private property without the submission of an arborist report if the applicant provides photographic evidence or other documentation demonstrating that the tree is dead, dying, defective or fits nuisance tree criteria.****
- E. **Emergency tree removal. In case of emergency, when a tree is imminently hazardous or dangerous to life or property, it may be removed by order of the police chief, fire chief, the director of public works or their respective designees without a permit, so long as notification before or immediately after the event is provided.**

18.40.040 – Significant and Special tree retention associated with development.

- A. **The City's objective is to mitigate the impacts of incremental canopy loss due to development by establishing clear standards for the retention of significant and special trees and for planting and maintenance of new trees.**

- B. Retention of significant and special trees. Development proposals shall retain significant and/or special trees to the maximum extent feasible. Deviation requests Requests for modifications to development standards can be accomplished pursuant to WSMC 18.40.060. Removal of a significant and/or special tree shall be limited to the following circumstances:**
- 1. If the tree is dead or meets the criteria of a hazardous tree, as determined by a qualified professional arborist.**
 - 2. A significant and/or special tree can be removed if its presence reduces the building area of the lot by more than fifty percent after all potential alternatives have been considered, including a possible reduction to setbacks and minimum yard depth and width requirements.**
 - 3. If retention of the tree limits the structural footprint to less than the following, when also omitting steep slope areas as area available to development:**
 - a. Single-family home: 1,000 square feet**
 - b. Townhomes or multi-family units: 900 square feet per unit**
 - c. Accessory Dwelling Unit: 700 square feet**
 - d. Businesses/Commercial: 1,200 square feet or the amount of square footage necessary to support the existing or proposed use, as shown by the applicant in a site development permit.**
 - 4. Retention of a significant and/or special tree or grove will prevent creation of a residential lot through a subdivision or short subdivision.**
 - 5. A significant and/or special tree cannot be removed to facilitate construction access and will only be considered for removal if it impedes the ability of the landowner to develop permitted buildings or permanent access as described by an approved driveway permit, pursuant to WSMC 13.01.070.**
- C. Any properties undergoing development activities, including but not limited to grading, excavation, demolition, or other construction activity, within the tree protection zone of significant and/or special trees shall be required to develop a tree retention plan, to be submitted for review by the Planning Administrator.**
- 1. Tree retention plans shall be prepared by a qualified professional arborist and include the following:**
 - a. A site plan containing the following information:**
 - i. Footprint of the house(s), driveway(s), utilities, streets and any other proposed improvements;**
 - ii. Grade changes;**
 - iii. Surveyed location of significant and/or special trees or heritage trees (subject to WSMC 18.41);**
 - iv. Trees to be removed noted with x's or ghosted out indicating proposed tree removals; and**
 - v. Location of tree protection fencing drawn to scale at the TPZ for retained trees.**
 - b. A tree inventory containing the following information:**

- i. All significant/special trees on the subject property listed by common name and genus/species, identified by numbers that correspond to the site plan, size (DBH), general health condition rating, and indications of proposed tree removals.
 - ii. The inventory shall include trees on adjacent properties with canopies extending onto the subject parcel that may be impacted by the proposed development.
- D. Tree protection with development. Reasonable efforts to protect significant and/or special trees shall include the following:
 - 1. Tree protection fencing placed along the TPZ. Fencing shall be constructed of chain link (or other approved material) and at least six feet high.
 - 2. Avoidance of grading, excavation, demolition, or other construction activity within the TPZ.
 - 3. The city shall consider modifications to the TPZ at the recommendation of the qualified professional arborist.

18.40.050 - Tree replacement requirements.

- A. Each significant and/or special tree removed under an approved development permit must be replaced according to the following table:

Table 1. Significant/Special Tree Replacement Ratios.

<u>Zone</u>	<u>Number of Replacement Trees Required per Tree Removed</u>
<u>R1</u>	<u>2</u>
<u>R2</u>	<u>2</u>
<u>R3</u>	<u>1</u>
<u>Commercial</u>	<u>1</u>
<u>RL</u>	<u>3</u>
<u>MH</u>	<u>1</u>
<u>All others</u>	<u>1</u>

- B. In addition to the replacement requirements in Table 1, Oregon white oak trees shall be replaced by a minimum of two (2) replacement trees for every tree removed.

~~C. The Planning Administrator may require up to four (4) replacement trees per significant and/or special tree removed on a tree-by-tree basis in all zones.~~

- ~~D-C.~~ Fee in-lieu. A fee in-lieu of tree replacement may be allowed if a parcel cannot adequately accommodate the number of replacement trees required to be planted, subject to approval by the Planning Administrator.

- 1. The base fee per tree is established in the schedule of land use and site work permit fees. At a minimum, the fee must be set to account for the cost of a tree, installation (labor and equipment), maintenance for three years, and fund administration.

2. Fee-in-lieu is required for each replacement tree that is required but is not planted on site.
3. The fee must be paid prior to the issuance of a development permit.
4. Funds collected through fee in-lieu may be used for the purposes of:
 - a. Planting and maintaining trees on publicly owned property within the City;
 - b. Irrigation and related work necessary for the successful establishment of new trees;
 - c. Establishing and maintaining a monitoring program for the removal and replacement of trees;
 - d. Urban forestry education;
 - e. Other purposes relating to public trees as determined by the City Council.

18.40.060 – Development Incentives and Deviation Requests for Modifications to Development Standards.

1. In order to retain significant and/or special trees or grove of trees anywhere on the property, an applicant may opt to utilize development incentives, seeking relief from stormwater flow control, subject to WSMC 13.01.050.B(5).
2. Where retention of significant and/or special trees or grove of trees anywhere on the property conflicts with development of an ADU, an applicant may opt to utilize deviations modifications to development standards seeking relief from off-street parking standards from proposed ADU(s), per Title 17 – Zoning and WSMC 17.72.
 - a. The applicant must provide a brief memo describing why this deviation request for modifications is necessary and there is no feasible alternative, including but not limited to:
 - i. Shift or flip (mirror) the location of proposed building footprints and driveways;
 - ii. Relocate utilities when feasible, taking into account gravity and location of existing mains;
 - iii. Avoid rockery/retaining walls located within TPZs to maintain existing grades.

18.40.060 Enforcement. City enforcement of the tree protection regulations contained in this chapter may include:

- A. It is unlawful for any person to remove a heritage, significant and/or special tree or impact said tree in such a way that its removal becomes necessary. Any person who vandalizes, grievously mutilates, destroys or excessively prunesunbalances a heritage, special or significant tree without ~~a~~ authorization or beyond the scope of an approved permit shall be in violation of this chapter.

- B. Stop work on any construction project which threatens a **heritage**, significant and/or special tree until it is shown that appropriate measures have been taken to protect the tree or an exception is granted for its removal; and/or
- C. Stop work on any arborist work or construction project that does not display a permit for removal or major pruning of a **heritage**, significant and/or special tree.
- D. As part of a civil action brought by the city, a court may assess against any person who commits, allows, or maintains a violation of any provision of this chapter a civil penalty in an amount not to exceed five thousand dollars per violation. Where the violation has resulted in removal of a tree, the civil penalty shall be in an amount of at least five thousand dollars per tree unlawfully removed, or the replacement value of each such tree, whichever amount is higher. Such amount shall be payable to the city. Replacement value for the purposes of this section shall be determined **usingutilizing** the most recent edition of the Guide for Plant Appraisal, published by the Council of Tree and Landscape Appraisers.

Chapter 18.41 – HERITAGE TREES.

18.41.010 - Purpose. The city acknowledges that heritage trees provide valuable local habitat and that the preservation of such trees is critical to maintaining the character of White Salmon. The purpose of this chapter is to define the process for nominating or removing heritage trees and to establish the heritage tree registry.

18.41.020 - Applicability.

- A. Heritage trees include:
 - ~~1. Oregon White Oaks with a trunk diameter larger than fourteen inches,~~
 - ~~2. All other tree species with a trunk diameter greater than eighteen inches, and~~
 1. Any tree designated as a heritage tree by the city council in accordance with the nomination process detailed below.

18.41.030 - Heritage tree nomination process.

- A. Heritage trees may be designated in accordance with the following nomination and designation process:
 - ~~1. Any party may nominate a heritage tree; however, the nomination must acknowledge approval with written consent by the landowner of the ground sustaining the tree, prior to being accepted by the city for review.~~
 - ~~4-2. Nominations for heritage tree(s) must fit the size criteria defined in this chapter, be outstanding specimens, or of distinctive age, form, location, or of ecological, cultural or historical significance. Trees with smaller trunk diameters may also be nominated for heritage status.~~
 - ~~2. Any party may nominate a heritage tree; however the nomination must be approved by the landowner of the ground sustaining the tree and be accepted by the city onto the inventory list of heritage trees compiled and maintained by the city.~~

3. Nomination applications must include a map showing the tree's location on the property, photograph, and a narrative description of the location, species, trunk diameter, approximate age, and the specific characteristics and reasoning on which the nomination is based.

B. The city shall inspect the tree(s), consult with a qualified professional arborist to verify the nominated tree does not fit hazard tree criteria, and decide whether or not the tree(s) are to be designated as a heritage tree or tree grove. Notice of the city's decision shall be mailed to the land owner and any other parties participating in the nomination process.

B-C. Heritage trees that have been designated by the city shall be added to an inventory of heritage trees compiled and maintained by the city.

C-D. At the request of the property owner, the Council may be asked, but is not required to, reverse the designation of a heritage tree.

18.41.040 - Heritage tree registry. The city shall maintain a registry of heritage trees or groves designated within the city limits in response to the voluntary nomination process. The registry may include a map identifying the location of the trees, date tree was designated and a brief narrative description of each heritage tree.

18.41.050 - Heritage tree removal.

- A. Heritage trees may only be removed if they meet the circumstances outlined in WSMC 18.40.040.B(1).**
- B. Removal of a heritage tree requires public signage of the pending removal, including permit number and date of removal, no less than 14 days before the removal date.**
- C. Removal decisions by the administrator are not contestable by the public, but illegal removals are reportable by the public.**

18.41.060 - Heritage tree declassification. A heritage tree may be removed from heritage tree status at the request of the property owner after providing written notice to the city and receiving city approval.

13.01.050 Stormwater runoff control standards.

- A. The review and approval of construction permits for regulated activities subject to this chapter shall be based on the conformance of the development plans with the standards of this section. The city official may impose any conditions of approval needed to assure that the development plan meets the appropriate standards.
- B. Generally, the city stormwater runoff control standards are based on low impact development (LID) techniques that minimize impervious surfaces and infiltrate stormwater on site. Tight line conveyance of stormwater onto adjacent property will be allowed only if there is no other feasible alternative and only if the proposed location and volume of runoff will not change.
1. If the development proposes more than two thousand square feet of impervious surface, the developer shall calculate the estimated runoff volume for the design storm specified by the city official. The runoff volume shall be calculated as follows: $\text{impervious area (sf)} \times 0.10 \text{ (ft)} = \text{runoff volume (cf)}$.
 2. Infiltration facilities must be constructed capable of infiltrating the design storm runoff volume.
 3. If the development proposes less than two thousand square feet of impervious area, the developer shall provide for and install industry standard LID facilities to control runoff from all impervious surfaces.
 4. In either instance the developer/homeowner is encouraged to consider potential to size and locate detention tanks to allow storm water to accumulate during wet months for re-application to the site as landscape irrigation during dry months. This source may only supplement rather than eliminate reliance on potable water for landscape irrigation but as costs of water increase so does the incentive to decrease reliance on potable water for landscape irrigation.
 5. The developer/homeowner may receive a runoff volume credit for retaining significant and special trees on-site. Significant and special trees are defined within WSMC 18.40 (Ord XX).
 - a. The credit is such that the square footages for impervious surface requiring stormwater treatment is offset by the canopy square footage of on-site significant trees at a 2:1 ratio. For example, a 1,000 square foot canopy equates to 500 square feet fewer of impervious surface that has to be treated on-site per WSMC 13.01.050.B(1).

(Ord. No. ~~2012-11-903~~, ~~§ 1(Atch)~~, ~~11-26-2012~~)

Chapter 17.72 OFF-STREET PARKING AND LOADING

17.72.010 Standards generally.

It is the intent of this chapter to allow for parking and loading standards.

(Ord. No. 2012-11-905, 11-26-2012)

17.72.020 Purpose of provisions.

The provision of off-street parking and loading space in accordance with the needs and requirements of particular property use is a necessary public policy in the interest of traffic safety, minimizing congestion, and to provide harmonious development.

(Ord. No. 2012-11-905, 11-26-2012)

17.72.030 New uses—Minimum requirements.

New uses in all districts shall meet the minimum standards of this title.

(Ord. No. 2012-11-905, 11-26-2012)

17.72.040 Parking spaces—Size and access.

- A. Each off-street parking space shall have a net area of not less than one hundred sixty square feet, exclusive of access drives or aisles, and shall be of usable space and condition. If determined on a gross-area basis, three hundred square feet shall be allowed per vehicle.
- B. If the required parking space for a one-family or two-family dwelling is not provided in a covered garage, then such space shall not be less than two hundred square feet, and shall be so located and/or constructed that it may later be covered by a garage in accordance with the provisions of this title and the city building code.

(Ord. No. 2012-11-905, 11-26-2012)

17.72.050 Parking spaces—Location.

Off-street facilities shall be located as hereinafter specified. Where a distance is specified, such distance shall be the maximum walking distance, measured from the nearest point of the parking facility to the nearest point of the building that such facility is required to serve.

- A. For one-family and two-family dwellings: on the home lot with the building they are required to serve;
- B. For multiple dwellings: one hundred fifty feet;
- C. For hospitals, sanitariums, homes for the aged, asylums, orphanages, club rooms, fraternity and sorority houses, as approved by city council.

-
- D. For residential units in all zones except R-L, assigned parking in remote lots may be substituted for the required off-street parking if they are located within 200 feet of the subject property, and a binding agreement is furnished to the City for review and approval under 17.72.070.

(Ord. No. 2012-11-905, 11-26-2012)

Commented [AC1]: Existing Ord 2023-11-1155, effective Jan. 1, 2024 (or as amended).

17.72.060 Parking spaces—Expanded or enlarged uses.

Whenever any building is enlarged in height or in ground coverage, off-street parking shall be provided for expansion or enlargement, in accordance with the requirements of the schedule set out in Section 17.72.090; provided, however, that no parking space need be provided in the case of enlargement or expansion where the number of parking spaces required for such expansion or enlargement since the effective date of the ordinance codified in this title is less than ten percent of the parking space specified in the schedule for the building. Nothing in this provision shall be construed to require off-street parking spaces for the portion of such building existing as of September 12, 1973.

(Ord. No. 2012-11-905, 11-26-2012)

17.72.070 Joint use—Authorized when.

The City may authorize the joint use of parking facilities for the following uses or activities under the conditions specified:

- A. Up to fifty percent of the parking facilities required by this chapter for a theater, bowling alley, dancehall, restaurant, or other similar uses, may be supplied by the off-street parking provided by other "daytime" types of uses;
- B. Up to fifty percent of the off-street parking facilities required by this chapter for any "daytime" buildings or uses may be supplied by the parking facilities provided by uses herein referred to as "nighttime" uses;
- C. Up to one hundred percent of the parking facilities required by this chapter for a church or auditorium incidental to a public or parochial school may be supplied by the off-street parking facilities serving primarily "daytime" uses.
- D. Up to one hundred percent of the parking facilities required for residential uses in all zones except R-L, when the joint use facility serves primarily "daytime" uses.
- E. If the required amount of off-street parking has been proposed to be provided off-site, the applicant shall provide written contracts with affected landowners showing that required off-street parking is and will continue to be provided in a manner consistent with the provisions of this chapter. The contracts shall be reviewed by the city for compliance with this chapter, and if approved, the contracts shall be recorded with the county records and elections division as a deed restriction on the title to all applicable properties. These deed restrictions may not be revoked or modified without authorization by the city.

(Ord. No. 2012-11-905, 11-26-2012)

Commented [AC2]: Existing Ord 2023-11-1155, effective Jan. 1, 2024 (or as amended).

17.72.080 Joint use—Location and other conditions.

- A. The building or use for which application is being made to utilize the off-street parking facilities provided by another building or use shall be demonstrated to the city to be within suitable walking distance for the nature of the use being served.

(Supp. No. 26)

Created: 2023-09-15 10:52:09 [EST]

B. The applicant shall show that there is no substantial conflict in the principal operating hours of the two buildings or uses for which joint use of off-street parking facilities is proposed.

(Ord. No. 2012-11-905, 11-26-2012)

17.72.090 Number of spaces for designated uses.

The following table sets out minimum standards for parking spaces:

Use	Spaces Required
Residential structures	2 for each dwelling unit unless otherwise specified; 1 for each ADU unless otherwise specified, or zero for ADU's so long as the criteria under WSMC 18.40.060 – Development Incentives and Deviation Requests (Tree Protection Chapter) are met.
Auto courts, motels	1 for each sleeping unit
Hospitals and institutions	1 for each 4 beds
Theaters	1 for each 4 seats except 1 for each 8 seats in excess of 800 seats
Churches, auditoriums and similar open assembly	1 for each 50 square feet of floor area for assembly not containing fixed seats
Stadiums, sports arenas, and similar open assembly	1 for each 6 seats and/or 1 for each 100 square feet of assembly space without fixed seats
Dancehalls	1 for each 50 square feet of gross floor area
Bowling alleys	6 for each alley
Medical and dental clinics	1 for each 150 square feet of gross floor area
Banks, business and professional offices with on-site customer service	1 for each 400 square feet of gross floor area
Offices not providing customer services on premises	1 for each 4 employees or 1 for each 800 square feet of gross floor area
Warehouse, storage and wholesale business	1 for each 2 employees
Food and beverage places with sale and consumption on premises	1 for each 200 square feet of gross floor area
Furniture, appliance, hardware, clothing, shoe, personal service stores	1 for each 600 square feet of gross floor area
Other retail stores	1 for each 300 square feet of floor area, or at a ratio of 1 inside to 1 outside
Manufacturing uses, research, testing, assembly, all industries	1 for each 2 employees on the maximum working shift and not less than 1 for each 800 square feet of gross floor area
Uses not specified	Determined by planning commission

Commented [AC3]: Existing Ord 2023-11-1155, effective Jan. 1, 2024 (or as amended).

(Supp. No. 26)

Created: 2023-09-15 10:52:09 [EST]

(Ord. No. 2012-11-905, 11-26-2012)

(Supp. No. 26)

Created: 2023-09-15 10:52:09 [EST]



EAST
CASCADES
OAK
PARTNERSHIP

Lifting up Nature & People

Our outlook on oaks
& why we need you

Oregon White Oaks

(Quercus garryana)

“We were taught that everything around you has a life. That without it, you wouldn’t have a life and you wouldn’t have an identity. So we have to respect this old tree that is there for us, and we give thanks for it.”

*Levina Wilkins, Yakama Elder,
in a 2018 presentation to ECOP*



Why Oregon white oaks matter

Oaks are simply the most noticeable part of a complex system of air, water, soil, plants, and animals that together, make an **oak system**. When we talk about oak systems, we're not just talking about trees—we're talking about the songbirds in the canopy, the cavities in the oaks, the lichens on the branches, the grasses and wildflowers in the understory, and the pollinators buzzing between them, and so much more.

How ECOP supports your relationship with oaks

East Cascades Oak Partnership (ECOP) is a group of people from agencies, tribes, non-profits, and the interested public who, like you, know and love the Columbia River Gorge and the East Cascades.

We explore questions about **wildfire and drought**. We worry about quality forage for livestock and wonder what we can do to make life easier for **wildlife** and **pollinators**. We're a team informed by sound **science, community input, and traditional ecological knowledge**. Collectively, we design and provide tools and resources that can help each of us make choices that are good for oaks and for you. That's why you're such a critical part of our equation!

We're talking with the people who live and work here to find answers and we're building tools to help everyone get the most from what we learn.

When we make space for oak trees to live and grow, they provide us with a thriving variety of life

They uphold biodiversity

Our oak habitats support more than **300 species** of plants and animals; from lichens that grow in the crevices of ancient oaks and songbirds perched in their leafy crowns, to pollinators that feed on flowering plants and large black bears who forage for acorns before hibernation.

They are powerfully resilient

With deep, hearty tap roots, oaks can **survive drought** where pine and fir trees cannot. Their **natural fire resistance** can lower the temperature of wildfires burning near homes and they often re-sprout when they're burned or cut, hastening recovery after a disturbance.

They provide food and shelter for animals while they support recreation

Oaks support **first foods** important to Indigenous people and house abundant game like deer, elk and turkey. They provide **shade and forage** for the livestock at the heart of our agricultural economy and a stunning backdrop for the hiking and biking trails that are key to tourism



An unspoken fixture of the Columbia River Gorge and East Cascades, Oregon white oaks appear to be everywhere. But across the entire planet, this species of oak **only grows** here in the Pacific Northwest.

While they're plentiful here, they have **lost ground** across huge portions of their historic range. This means our home is an **essential region** for Oregon white oaks—and it's why we're called to **uphold their legacy**.

The Role of Oaks in the East Cascades



Sun exposure and rainfall dramatically impact what grows where in the East Cascades.

Fire-Adapted
Oaks have thick bark and waxy leaves that resist burning, and often sprout back after being burned.

Safe Homes
Oak cavities and bark provide safe homes for wildlife. Acorns provide the richest plant protein in the woods.



Lively Landscape
A steep decline in rainfall over lively terrain creates a tapestry of unique habitats, generating biodiversity and climate resilience!

Providers
Foods and medicines grow and live near the oaks — including deer, elk, roots, and berries.

Not Just Oaks
Flowering plants and grasses grow under the oaks. They feed pollinators and house insects — the base of a food chain.



ECOP partners believe our quality of life is entwined with that of the Oregon white oak. Each of us has a role to play in this work; whether we're a rancher raising food for our neighbors, a timber grower providing wood products to the mill, or a hunter feeding our families. We're buoyed by our relationships with our partners and the work we're doing, together.

We hope you'll join us by:

Attending future ECOP events.

Sharing your own stories and questions with us.

Connecting friends and neighbors with our organization.

Partnering on collaborative projects to improve the oak systems around you, helping us to create practical management tools.

Participating in planning processes and providing public comment on the issues that affect oaks.

Learning about the role of wildfires and fire management.

Get connected:

www.ColumbiaLandTrust.org/ECOP
oaks@columbialandtrust.org

 **#EastCascadeOaks**



RE: Firewise Concerns in White Salmon

From Wesley Long <chief@kcf3.com>

Date Wed 9/18/2024 11:12 AM

To Alex Capron <ACapron@facetnw.com>; Deb Powers <DPowers@facetnw.com>; dan@ucddwa.org <dan@ucddwa.org>

Cc Erika Castro-Guzman <erikac@ci.white-salmon.wa.us>; davidl@ci.white-salmon.wa.us <davidl@ci.white-salmon.wa.us>

You don't often get email from chief@kcf3.com. [Learn why this is important](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Alex,

I am OK with the verbiage.

To clarify our pending fire service organization is titled West Klickitat Regional Fire Authority. If that matters to your documents.

Enjoy your day!

Wesley W. Long – Fire Chief
Klickitat County Fire District 3
P.O. Box 151
Husum WA 98623
509-493-2996
509-637-5559 c
“Return With Honor”

Any and all correspondence associated with this email is subject to public record per Washington State Law.

From: Alex Capron <ACapron@facetnw.com>

Sent: Tuesday, September 17, 2024 3:02 PM

To: Wesley Long <chief@kcf3.com>; Deb Powers <DPowers@facetnw.com>; dan@ucddwa.org

Cc: Erika Castro-Guzman <erikac@ci.white-salmon.wa.us>; davidl@ci.white-salmon.wa.us

Subject: Re: Firewise Concerns in White Salmon

Excellent, thanks so much Wes!

Dan & Wes:

We understand that you cannot regulate inside City limits. However, would you be willing to have this amendment be included in City tree code as a voluntary measure for residents concerned about defensible space and seeking Firewise guidance from you and UCD?

Applicability.

18.40.025. For properties seeking Firewise assistance, written recommendations provided by Underwood Conservation District or West Klickitat Fire District are accepted for establishing defensible space limits for a given site. Properties located within the wildland-urban interface (WUI), the International Wildland-Urban Interface Code, 2021 Edition, published by the International Code Council and as adopted by the State Building Code Council in Chapter [51-55](#) WAC is adopted by reference thereto as though fully set forth herein and shall be applicable within the city.

Appreciate your feedback!

Best,

Alex Capron, AICP (he/him/his)

Senior Planner

O: 425-822-5242

D: 425-650-1319

E: acapron@facetnw.com

[\[facetnw.com\]facetnw.com](https://facetnw.com)

Formerly DCG/Watershed

From: Wesley Long <chief@kcf3.com>

Sent: Wednesday, September 11, 2024 1:49 PM

To: Deb Powers <DPowers@facetnw.com>; dan@ucddwa.org <dan@ucddwa.org>

Cc: Alex Capron <ACapron@facetnw.com>; Erika Castro-Guzman <erikac@ci.white-salmon.wa.us>; davidl@ci.white-salmon.wa.us <davidl@ci.white-salmon.wa.us>

Subject: RE: Firewise Concerns in White Salmon

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hello Deb,

Thank you for reaching out.

I would steer you towards <https://wildfireready.dnr.wa.gov/> which has numerous avenues to seek guidance for wildland urban interface fire preventions tips. Specifically for the topic of trees, the strongest recommendation would be to utilize DNR/Firewise guidance to improve tree health and elimination of ladder fuels.

As for tree safety. Occasionally I do see a few items worthy of consideration in this process:

1. Standing dead trees: Pose hazards for obvious reasons.
2. Beetle Kill/infested trees: Threats to healthy vegetation. Increased fire/fuel loads
3. Root systems ADA, pedestrian sidewalk damage (I'm sure this is already covered)
4. Mature trees that pose damage to structures, leaking roofs or other. Property owners should be afforded the opportunity to mitigate predicted or ongoing damage to higher value of their domiciles by mature trees overhead. Grandfather clause?
5. Removal of small dbh trees to improve health of mature trees and canopy.
6. Most predominant item: 'low hanging fruit' and ladder fuels which can carry ground fires into trees with continuity. This applies to all areas for which tree loading per acre is overgrown and/or densely populated.
7. Current open space that occupies forest. This is not in my authority to regulate inside or out of city limits. However forest health affects a geographical area and global view of forest health and/or trees should remain the approach. While there are none inside the city limits that I know of, abandoned and/or unhealthy fruit production trees that become infested with multitude of pests and other should have a venue to protect surrounding healthy trees and be removed.

For clarity, I have been in contact with a citizen who also asked that I attend the public comment meeting regarding this topic. And for further clarity, I have not read the links in entirety at this point. I will when I have the chance.

Happy to discuss when I return from fire assignment in Ellensburg area. Just let me know.

Wesley W. Long – Fire Chief

Klickitat County Fire District 3

P.O. Box 151

Husum WA 98623

509-493-2996

509-637-5559 c

“Return With Honor”

Any and all correspondence associated with this email is subject to public record per Washington State Law.

From: Deb Powers <DPowers@facetnw.com>
Sent: Wednesday, September 11, 2024 12:49 PM
To: dan@ucddwa.org; Wesley Long <chief@kcf3.com>
Cc: Alex Capron <ACapron@facetnw.com>; Erika Castro-Guzman <erikac@ci.white-salmon.wa.us>; davidl@ci.white-salmon.wa.us
Subject: Firewise Concerns in White Salmon

To: West Klickitat Fire District Chief Wes Long, Underwood Conservation District Firewise Coordinator Dan Richardson.

Hello Chief Long and Mr. Richardson:

I work for Facet, who is the consultant assisting the City of White Salmon update its tree code. Our role is to help the city develop codes that strike a balance between growth/development with environmental quality/livability and safety. The latest draft of the code allows tree removal on private property and has rules for tree retention with development, as described in this [handout](#).

The City has received numerous public comments concerned with both tree retention and fire safety, so we wanted to reach out to the local fire authorities to get your feedback. The City understands that WA Department of Natural Resources Wildland Urban Interface regulations are pending adoption and may likely mandate WUI defensible space on a local level in 2025. Until then, there is some hesitancy to specifically address fire safety standards in the tree code until the state requirements are established. Instead, City leaders are interested in referencing existing West Klickitat Fire District and/or Underwood Conservation District plans/programs in the code that would encourage residents to follow those protocols until the state mandates require the city to include specific WUI defensible space standards in the code next year.

Can you recommend any such references, publications or adopted plans? If you find it would be helpful, here is a [link](#) to the draft code.

Additionally, we are considering the following new code provision as a way to address Firewise considerations. Would you agree with this approach, or do you have suggested edits to offer?

Applicability.

18.40.025. For properties seeking Firewise assistance, written recommendations provided by Underwood Conservation District or West Klickitat Fire District are accepted for establishing defensible space limits for a given site. Properties located within the wildland-urban interface (WUI), the International Wildland-Urban Interface Code, 2021 Edition, published by the International Code Council and as adopted by the State Building Code Council in Chapter [51-55](#) WAC is adopted by reference thereto as though fully set forth herein and shall be applicable within the city.

Thank you and please let us know if you have any questions about the draft code or the code amendment process. Alex Capron is Facet’s Project Manager so feel free to reach out to him at acapron@facetnw.com.

We are looking to finalize the draft code by Wednesday, September 18th in-advance Planning Commission's recommendation to City Council, so receiving your feedback before then would be helpful.

Respectfully,

Deb Powers (she, her)
Senior Arborist | Urban Forester

T: 425.400.8499

E: dpowers@facetnw.com

[facetnw.com]facetnw.com

Formerly DCG/Watershed



Seattle | Kirkland | Mount Vernon | Whidbey Island | Federal Way | Spokane





Outlook

RE: Firewise Concerns in White Salmon

From Tova Tillinghast <tova@ucdwa.org>**Date** Tue 9/17/2024 3:50 PM**To** Alex Capron <ACapron@facetnw.com>

You don't often get email from tova@ucdwa.org. [Learn why this is important](#)

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Hi Alex,

I'm sorry I didn't get back to you sooner (I've been out sick among other things). Dan shared with me this request.

Yes, we are fine with being listed and available to make recommendations around defensible space. Whether or not defensible space is a mandate, the city should strongly encourage that with a focus NOT on trees, but on flammable bushes, ladder fuels, leaf and needle debris, stacked firewood, and building materials, etc. Tree are not the reason cities and towns burn down, and there are many other factors in play that can address community safety.

I have not had the time to review or follow this process, so please take the following recommendations as appropriate:

There should be some protections for large-diameter trees, especially white oaks. As in, no cutting down oaks larger than "X" diameter. As we all know, larger trees are extremely important for shade/cooling, carbon storage, wildlife habitat and are more fire resistant than smaller trees. In Portland, the requirement for leaving a tree is 20 inches and larger in diameter, completely or partially on private property should be retained. <https://www.portland.gov/trees/trees-development/tree-plan-requirements-development-permits/site-tree-preservation>

We've been actively working on controlling and managing the invasive Tree of Heaven (*Ailanthus altissima*) within and around the City of White Salmon. First, identify the tree species (check the leaf margins to see if the leaves are smooth, if they are smooth, then the tree is likely Tree of Heaven. If the leaves are serrated or "toothed" margins, then the tree is likely Black Walnut or another type of Sumac). If you do have Tree of Heaven, it is very important NOT to cut the tree unless it is a hazard tree. If you cut Tree of Heaven before it is dead, it will root sucker wildly and create more of a problem. If a tree must be cut because it is a hazard, the outer rim and cambium layer of the trunk will need to be treated immediately afterward with herbicide. Tree of Heaven treatment is different depending on what size the trees are. On smaller trees, less than 3-4 feet, a foliar spray can be used. Using a 1% Triclopyr solution or 2% Glyphosate solution can be used. Triclopyr concentrate (60%) can be used undiluted for the hack and squirt technique or can be diluted down (1 part chemical to 60 parts water for foliar spray). When using a hack-and-squirt method to control Tree of Heaven, you can use a concentrated herbicide solution undiluted or diluted with water at a 1:1 ratio. Herbicide applications are done from July to mid-October when the trees are sending energy down to the roots of the tree. There is more we could discuss here, but that's what I can share for now.

Tova

Tova B. Tillinghast

District Director

Underwood Conservation District

www.ucdwa.org

From: Alex Capron <ACapron@facetnw.com>

Sent: Tuesday, September 17, 2024 3:13 PM

To: Dan Richardson <dan@ucdwa.org>

Subject: Fw: Firewise Concerns in White Salmon

Hi Dan,

I mistyped your e-mail address. Hopefully this goes through!

We understand that you cannot regulate inside City limits. However, would you be willing to have this amendment be included in City tree code as a voluntary measure for residents concerned about defensible space and seeking Firewise guidance from you and UCD?

Applicability.

18.40.025. For properties seeking Firewise assistance, written recommendations provided by Underwood Conservation District or West Klickitat Fire District are accepted for establishing defensible space limits for a given site. Properties located within the wildland-urban interface (WUI), the International Wildland-Urban Interface Code, 2021 Edition, published by the International Code Council and as adopted by the State Building Code Council in Chapter [51-55](#) WAC is adopted by reference thereto as though fully set forth herein and shall be applicable within the city.

Appreciate your feedback!

Thanks!

Alex Capron, AICP (he/him/his)

Senior Planner

O: 425-822-5242

D: 425-650-1319

E: acapron@facetnw.com

[\[facetnw.com\]](http://facetnw.com)facetnw.com

Formerly DCG/Watershed

From: Alex Capron <ACapron@facetnw.com>

Sent: Tuesday, September 17, 2024 3:01 PM

White Salmon Tree Code Update (WSMC 18.40 - 18.41 & Chapter 17.72 Off Street Parking and Chapter 13.01.050 Stormwater Runoff Control Standards)

Public Comments Matrix – Comment Period July 10th – August 9th, 2024. Public Hearing – August 28th, September 11th

The City of White Salmon is undergoing an update of its existing Heritage Tree Ordinance (WSMC 18.40) to improve implementation of this code as it relates to tree canopy preservation and in light of the City’s Housing Action Plan adoption. These responses cover the public comment period 7/10 – 8/9, as well as public hearings on 8/28 and 9/11.

#	Email Address	Name/Organization	Date	General Topic of Concern	Memo Topic & Reference Location
1	nathene@klickitatcounty.org	Nathan Erickson, Klickitat County Public Works	7/22/24	Attachment: Comments on WS-SEPA-2024.002 Tree Protection Ordinance: <ul style="list-style-type: none"> Concerns with off-street parking loading requirements. Permit process for County road connection 	Parking & Public right-of-way access – Response #1
2	william.weiler8@gmail.com	William Weiler	7/22/24	Disappointed that white oaks and other Heritage Trees measuring 18” DBH was deleted from draft code.	White Oak protection – Response #2
3	nanettestevenson@hotmail.com	John and Nanette Stevenson	8/7/24	Strongly opposed due to overreach. Should only apply to public land.	Removing Trees on Private Property – Response #3
4	grantc165@gmail.com	Grant Cheney	8/8/24	Strict, onerous, concerned about fire risk, affordable housing.	Removing Trees on Private Property – Response #3, Firewise – Response #4, Housing – Response #5
5	laura@gorge.net	Laura Cheney	8/8/24	Fire risk.	Firewise – Response #4
6	lori@pathfinder-re.com	Lori Clark	8/9/24	Objects due to overreach, fire risk, affordable housing, cost of arborist services, view protection. Feels current tree ordinance and critical area code are adequate.	Removing Trees on Private Property – Response #3, Firewise – Response #4, Housing – Response #5
7	chinman@hoodriverinn.com	Chuck Hinman	8/9/24	Objects due to questionable effectiveness to protect trees, does not support other city goals (housing density/affordability), fire risk, cost of arborist services.	Removing Trees on Private Property – Response #3, Firewise – Response #4, Housing – Response #5
8	tstevenson@gorge.net	Tom Stevenson	8/9/24	Attachment: Concerns with fire risk, affordable housing, science behind tree	Removing Trees on Private Property – Response #3,

White Salmon Tree Code Update (WSMC 18.40 - 18.41 & Chapter 17.72 Off Street Parking and Chapter 13.01.050 Stormwater Runoff Control Standards)

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				age/size. Notes views of trees in surrounding scenic area. Suggests tree replacement for removals, tree growth/planting in the right of way/public land, that tree planting on private land be encouraged to respect development and fire danger.	Firewise – Response #4, Housing – Response #5
9	Amber Johnson			Request to consider larger tree replacement ratios for White Oaks to capture both temporal and physical loss. Retain dead trees for wildlife snags.	White Oak replacement & Snag retention – Response #7
Public Hearing – August 28, 2024 – verbal comments					
	Name	Resident Status	Comment		
10	Bill Weiler	Outside City Resident	Worked with the Fish and Wildlife Department in White Salmon for 20 years, addressed the meeting to express his support for tree protection efforts, highlighting his passion for preserving the area's natural resources. He mentioned his long tenure in the region and his current involvement in advocating for tree protection on behalf of White Oaks. He emphasized the importance of protecting legacy trees, citing their ecological value and their role in supporting local wildlife, particularly birds and mammals. He also raised concerns about the current proposal, which he believes does not adequately address the protection of legacy trees. Weiler suggested that, based on his extensive research of tree protection systems nationwide, the proposal should include specific provisions for legacy tree conservation. He highlighted that other jurisdictions have robust definitions and protections for such trees, which should be considered to improve the current proposal. Weiler concluded by submitting his written testimony and requested that the city incorporate these considerations into their tree protection policies.		Legacy Trees – Response #6

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11	Lori Clark	Outside City Resident	A county resident and local business owner, criticized the city's tree ordinance. She highlighted her personal experience with a fire that destroyed her son's home, emphasizing the need for defensible space around properties. Clark argued that the ordinance's restrictions could hinder homeowners' ability to manage vegetation for fire safety. She also shared how insurance costs increased due to the need to clear trees around her property. Clark urged the City to reconsider the ordinance, balancing tree protection with practical safety measures.	Firewise – Response #4
12	Laura Cheney	Inside City Resident	A long-time resident, expressed concerns about the proposed tree ordinance. Noted a lack of emphasis on fire prevention, reduced diameter of protected trees could increase fire risk by adding fuel to the forest floor. Highlights the need for fire management, especially on bluffs, and criticized the ordinance for not addressing these risks adequately. She also disputes the claim that mature white oak trees are fire resistant, stating that oaks burn just like other species. Cheney urged the city to hold a town hall for open dialogue and to reconsider the ordinance, especially regarding its impact on affordable housing and increased landowner costs.	Firewise – Response #4
12	Tom Stevenson	Inside City Resident	Tom Stevenson voiced concerns about the proposed tree ordinance, noting that despite modifications, the revised version still contains issues. He criticized the provision allowing only two tree removals every two years, arguing that it doesn't accommodate land management needs, particularly on different lot sizes. Stevenson also expressed skepticism about allowing neighbors to nominate trees on others' properties, suggesting it might complicate neighborhood development. He emphasized the importance of promoting tree growth and thoughtful planting on both public and private lands while addressing development	Tree removal increase by property size addressed in latest code edit

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			<p>and fire safety.</p> <p>Chair Greg Hohensee clarified that, according to page 17 of the packet, tree nominations on private property require the landowner's approval and cannot proceed without it, correcting the potential misconception.</p>	
13	Karen Jenkins	Inside City Resident	<p>Member of the city's tree board, emphasized the complexities surrounding the proposed updates to the tree ordinance. With over a decade of experience as a certified arborist, Jenkins highlighted concerns about enforcement and the practical challenges of implementing the ordinance. She noted that enforcement often incurs costs, which could be used for tree planting on public property, though such spaces are limited in the community. Jenkins also acknowledged the serious fire risks associated with tree planting and the difficulty of replacing mature trees. She advocated for incentives to retain large, old trees, as it takes a century to grow a tree of that age. Jenkins urged the city to take time to thoroughly consider the ordinance changes, balancing tree preservation with community development needs.</p>	Response #2 – White Oak protection, Response #3 – Removing Trees on Private Property
14	Juan Chaves	Outside City Resident	<p>In the process of moving into the city limits, expressed his commitment to the community and his love for trees. He highlighted the challenges posed by an old white oak on his property and stressed the importance of finding flexible solutions for tree management. Chaves suggested exploring options for tree replacement that consider the long-term benefits of mature trees, such as water and soil absorption, while also accommodating development needs and affordable housing. He urged the city to work with arborists and the community to develop practical, adaptable guidelines that balance green space preservation with</p>	Response #3 – Removing Trees on Private Property, Response #5 - Housing

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			property development.	
15	John Stevenson	Inside City Resident	A forester with 30 years of experience, spoke about the definition and significance of heritage trees. Emphasized that a six-inch oak is not typically considered a heritage tree, citing such trees can take decades to mature and are not always indicative of historical significance. Several large heritage trees exist in White Salmon with large natural cavities. Warned that misidentifying trees as heritage when they are not can inadvertently contribute to fire hazards by creating ladder fuels. Urges city to carefully consider what qualifies as a heritage tree to prevent potential fire risks, referencing recent fire events as cautionary example.	Firewise – Response #4
16	Amy Stevenson	Inside City Resident	A longtime resident of White Salmon, expressed concerns about the proposed tree ordinance. She mentioned that she had previously submitted a letter but was unsure if it was received or properly included in the meeting materials. Stevenson criticized the ordinance for its complexity, noting that it seems to require advanced knowledge of biology and tree growth, which could pose challenges for property developers. She shared her experience with her own property, where the presence of potentially white oaks could complicate future development. Stevenson highlighted that the ordinance might make it difficult to develop small, treed lots and urged the council to consider property rights and practical implications for property owners. She concluded by emphasizing the need for a more flexible approach to tree management and development.	In response to Planning Commission and this public comment, the code has been update to reduce technical jargon. Further, Firewise – Response #4
September 11 PC Public Hearing – Verbal Comments				
	Laura Cheney	Inside City	Laura Cheney, an Inside City resident, reiterated her previous remarks about the increased fire risk due to	Firewise – Response #4

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			the decreased Diameter at Breast Height (DBH) of trees, which has led to greater density. Laura provided data indicating that nearly 85% of wildfires in the U.S. are caused by human activities such as unattended campfires, discarded cigarettes, and arson. She offered to leave the data for the group’s review.	
	Tom Stevenson	Inside City	another Inside City resident, followed up on a document he previously shared in early August, discussing the danger of wildfires in White Salmon, where he had firsthand experience assisting with two major fires. While recognizing the importance of clearing vegetation for fire safety, Tom emphasized his love for trees and the value of tree enhancement. He advocated for tree planting initiatives both on public lands and private property, urging the city to prioritize trees while balancing fire safety. He concluded by recommending that any tree ordinance should be more educational than restrictive, encouraging thoughtful planting rather than focusing on prohibitions.	Firewise – Response #4

Topic

Parking & Public right-of-way access

1. Response: Change not recommended. The amendments proposed the Chapter 17.72, off-street parking and loading only pertain to a waiver from ADU off-street parking requirements (one per ADU otherwise required) and is narrowly tailored to that amendment alone as an incentive to retain mature trees on-site.

White Oak protection

2. Response: Change not recommended. The removal of white oaks from the heritage tree ordinance is in-fact a replacement and improvement of protection of these tree species. A white oak or Quercus garryana is protected as a special tree in the draft ordinance (WSMC with a tree size of 6”

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or greater in Diameter Breast Height (DBH), as deemed a slow growing tree by Columbia Land Trust and the East Cascades Oak Partnership in correspondence with them for technical guidance. Their guidance mentions examples of 2-3” white oaks that approach 100 years old. So, a 6” from the original 14” is deemed appropriate, consistent with growth patterns in the area.

Removing Trees on Private Property

3. Response: Change recommended. At a high-level, this revised ordinance carries the intent of the City’s existing 2019 Community Forest Management Plan forward to retain mature trees City-wide due to their multiple benefits providing for climate resiliency, habitat and aesthetics. Trees such as the white oak carry special importance, as these mature trees are fire adapted, with oaks carrying thick bark and waxy leaves that resist burning (East Cascades Oak Partnership, 2024). Even so, the proposed code (WSMC 18.40.030) allows for up to two trees to be removed within a 24-month period without an arborist report without development. Further, larger lots may remove additional tree(s) without development where, “...One additional significant or special tree may be removed for every additional 7,200 square foot lot area.” (WSMC 18.40.030(C)). This allowance addresses concerns brought up by Planning Commission early on in this project with the current code, addressing affordability with single family property owners wanting trees removed, yet still meets the purpose statement under WSMC 18.40.010 to prevent indiscriminate removal or destruction of trees. For trees impacting existing views, homeowners do have the ability to trim trees up to 25% of a tree crown without a permit. For concerns regarding diameter standards, see response #2 above. With regard to imminent hazards related to life and property, the code does authorize removal without permit in notifications to either Public Works, police chief or fire chief under WSMC 18.40.030(E). Otherwise, hazard and nuisance trees can be removed with an arborist report, thereby ensuring safe arboricultural practices are observed during removal.

Firewise

4. Response: Change recommended: Currently, the Department of Natural Resources (DNR) is updating their Firewise maps which will be required to be followed on a local level. Implementation of the Wildland Urban Interface Code (WUI) by the State Building Code Council (SBCC) is expected to occur in late 2025 at the earliest. When complete, local jurisdictions will have six months to adopt a variation of those maps at a local level with the ability to modify maps in coordination with jurisdictions throughout the state. In response to the DNR Firewise program in coordination with the Washington State Building Council, the City is considering the following language that defers to the West Klickitat Fire Authority and Underwood Conservation District in wildfire planning:

18.40.025 - Applicability.

For properties seeking Firewise assistance, written recommendations provided by the Underwood Conservation District and West Klickitat Regional Fire Authority are accepted for establishing defensible space limits for a given site. Properties located within the wildland-urban interface (WUI), the International Wildland-Urban Interface Code, 2021 Edition, published by the International Code Council and as adopted by

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the State Building Code Council in Chapter 51-55 WAC is adopted by reference thereto as though fully set forth herein and shall be applicable within the city.

Both entities were consulted with, including e-mail exchanges that are appended to this comment response matrix.

Housing

5. For fire risk, see response #3. Housing. Change not recommended. This code focuses on development incentives for new and re-development of single-family lots. The code allows for the maximum of two ADU's allowed in R1, R2 and R3 zones for ADU's 700 square feet in-size, and does the same for townhomes 900 square feet in-size, thereby avoiding the variance process currently allowed for single family lots that wish to exceed the 50% lot area for residential units. Tree replacement would instead be required for development proposal removing trees per WSMC 18.40.050 and the maximum trees feasible would be retained through an arborist study.

Legacy Trees

6. Response: Change not recommended: The idea that legacy trees be protected to a greater extent than significant and special trees is already established in the code in the form of heritage trees, should the property owner choose to nominate this tree for long-term protection.

White Oak replacement & Snag retention

7. Response: Change not recommended: Acknowledge that removal of Oregon White Oaks and the temporal loss with removal of larger trees should be observed for these priority habitats, along with dead and dying tree (snag) retention where it doesn't increase fire risk of nearby structures. The City will consider including these higher mitigation measures and snag retention as Best Available Science recommendations under mapped Priority Habitat Species and habitat conservation areas under the City's next critical areas ordinance periodic update, as regulated under (WSMC 18.10). Snag retention would also be an item that is not appropriate in urbanized areas as a possible fire risk. Even so, this item would be better addressed