



White Salmon Planning Commission Meeting

A G E N D A

July 23, 2025 – 5:30 PM

119 NE Church Ave and Zoom Teleconference

Meeting ID: [871 9417 5570](#)

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

Call to Order/Roll Call

Approval of Minutes

- [1.](#) Meeting Minutes - June 25, 2025
2. Meeting Minutes - July 9, 2025

Presentations

Parliamentary Guide

Public Hearing

- [3.](#) Unit Lot Subdivision Ordinance (continued)
 - a. Discussion
 - b. Action

Adjournment



File Attachments for Item:

1. Meeting Minutes - June 25, 2025

Placeholder document ----

Meeting minutes will be added to the packet as soon as they are ready, and no later than Friday 7/18/2025.

File Attachments for Item:

3. Unit Lot Subdivision Ordinance (continued)

a. Discussion

b. Action

**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 Purpose.

This chapter is established to provide an alternative to the traditional method of land division for creating sellable lots for detached and attached dwellings, such as single-family homes, townhomes, and cottage housing developments. A unit lot subdivision (ULS) provides opportunities for fee-simple ownership of land and may include common areas or structures. Unit lot subdivisions apply zoning development standards to the parent lot as a whole, allowing greater flexibility for individual unit lots.

16.66.020 Definitions.

The following definitions apply to this chapter:

- A. "Lot, parent" means a lot which is subdivided into unit lots through the unit lot subdivision process. A parent lot is also called a "zoning lot", consistent with WSMC 17.08.700.
- B. "Lot, unit" means a lot created from a parent lot and approved through the unit lot subdivision process. A unit lot is also called a "record lot", consistent with WSMC 17.08.700.
- 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.

16.66.030 Applicability.

- A. Unit Lot Subdivisions are permitted in any zone that allows for the development of single-family detached dwellings.
- B. In the event of a conflict between this chapter and any other provisions of Titles 16 or 17, the requirements of this chapter shall control.

16.66.040 Development Standards.

- A. A lot developed or to be developed with two or more attached or detached dwellings may be subdivided into individual unit lots as provided herein.
- B. Development as a whole on the parent lot, rather than individual unit lots, shall comply with applicable design and development standards.

- C. 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.
- D. 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 spaces or structures, such as garages, parking and vehicle access areas; underground utilities; common yards; shared interior walls; exterior building facades and roofs; and other similar features shall be recorded with the county auditor.
- E. 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.
- F. Subsequent platting actions, additions, or modifications to the structure(s) may not create or increase any nonconformity of the parent lot.

16.66.050 Application Requirements.

- A. 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 unit lots.
- B. 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.

16.66.060 Approval Criteria.

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:

- A. 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:
 - 1. White Salmon comprehensive plan;
 - 2. White Salmon zoning code (Title 17) and land division code (Title 16), unless superseded by provisions in this chapter.
 - 3. Engineering design standards;
 - 4. Critical areas ordinance (Chapter 18.10 WSMC);
 - 5. City trees ordinance (Chapter 18.35 WSMC) and heritage trees ordinance (Chapter 18.40 WSMC)

- B. 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.
- C. 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;
- D. Approving the proposed unit lot subdivision will serve the public use and interest and adequate provision has been made for public health, safety, and the general welfare.

16.66.070 Review Process.

- A. An application for a unit lot subdivision with four (4) or fewer unit lots shall be processed according to the procedures for Type I-B land use decisions established in Chapter 19.10 WSMC, Land Development Administrative Procedures. An application for a unit lot subdivision with more than four (4) unit lots shall be processed according to the procedures for a Type III land use decision.
- B. The city planner 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 deemed necessary by the city.
- 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, and the criteria in Section 16.66.060.
- 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 modifications of standards in Chapter 16.65.075 WSMC.

16.66.080 Decision.

- A. The city 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. Effect of Preliminary Approval.
 - 1. 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.

2. 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 city, the city shall then authorize the recording of the unit lot subdivision.
 - E. Recording.
 1. Notes shall be placed on the face of the plat as recorded with the county auditor to state the following:
 - a. The title of the plat shall include the phrase "Unit Lot Subdivision."
 - b. Approval of the design and layout of the unit lot's housing development project was granted based on detailed review of that specified project, as a whole, on the parent lot, including specific reference to the applicable permit or file number for that specified project;
 - c. Subsequent subdivision actions, additions, or modifications to the unit lot housing development project's structures may not create or increase any nonconformity of the parent lot as a whole, and shall conform to the approved unit lot housing development project or to the land use and development standards in effect at the time of the proposed actions, additions, or modifications;
 - d. If a structure or portion of a structure within the unit lot housing development project has been damaged or destroyed, any repair, reconstruction, or replacement of any structure shall conform to the approved unit lot housing development project or to the land use and development standards in effect at the time the proposed repair, reconstruction, or replacement project's permit application becomes vested; and,
 - e. Additional development or redevelopment of the individual unit lots may be limited as a result of the application of development standards to the parent lot.
 2. 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.

3. Upon recording the unit lot subdivision, the applicant shall provide to the city one copy of the unit lot subdivision for city records.
- F. 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.
- G. Revision and Expiration. Unit lot subdivisions with four (4) or fewer unit lots shall follow the revision and expiration procedures for a short subdivision, and those with more than four (4) unit lots follow the revision and expiration procedures for a long subdivision.

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

Comments and Questions from Commissioners

- Received from Commissioner Mournalt on July 15, 2025.

Review of WRIGHT'S COMMENTS

(with ***staff responses in italics)

REFERENCE	COMMENTS, CORRECTIONS, SUGGESTIONS, AND /OR QUESTIONS
060.B.2	Change "Access is to each unit" to "Access to each has been provided for...". Reason: This will change the tense of the sentence to match that of C.
	Change "or" to "and/or". Reason: I think this will the city and the applicant greater flexibility in design and approval
	<i>***Staff response: included in staff suggestions.</i>
060.B.3	What is meant by "access". Access for the owners is provided under 2. If maintenance and repair access is required and/or needed, I think "access" needs to be better defined.
	<i>***Staff response: clarified, because easements won't be recorded until after review and approval.</i>
060.B.4.	Question: What is the criteria for establishing "feasible"?
	<i>***Staff response: agreed that this criterion is difficult to evaluate, recommend that we do not include it. Excluded from staff suggestions.</i>
070.B.	Erase "planner"
	Like Peter, I feel that listing all the possible commentors is not necessary.
	<i>***Staff response: included these 2 in my staff suggestions</i>
	The end of the sentence change "any" to "and"
	Add this sentence at the end: This applicant will be informed, in a timely manner, of other officials from whom comments are needed, the reason(s) why they are needed and any time extensions required. Reason: This keeps the communications open and minimizes surprises.
	<i>***Staff response: to be determined by planning commission.</i>
080. C.	Question: Would the submission for preliminary approval include layout of road, utilities, etc. rather than construction? If the intend is only the layout than I think that needs to e addressed.
	<i>***Staff response: the preliminary plat approval would include the layout of the utilities, roads, etc. Civil engineering plans for construction are approved by PW/Eng after the preliminary plat is approved, but before the final plat is approved.</i>

2. Comments from Commissioner Brown at 7/9 meeting:

16.66.060 C and D, and the related 16.66.070 C do not seem pertinent.

****Staff response: Staff agrees. Suggestions to modify 16.66.060 C and D are included in the chart of suggestions.*

For .070 C, I think we should keep. The two sections it cross-references are Chapter 16.45 and 16.60. Chapter 16.45 - DESIGN STANDARDS deals with access, utilities, drainage, construction standards. Some of those standards are or could be applicable to a ULS.

Chapter 16.45 - DESIGN STANDARDS

16.45.010 - General standards.

16.45.020 - Protective improvements.

16.45.030 - Access.

16.45.045 - Lot size and dimensions.

16.45.100 - Water, sewer, utilities and drainage.

Chapter 16.60 contains the standards for plat maps and are certainly applicable.

Chapter 16.60 - PLAT STANDARDS AND SPECIFICATIONS

16.60.010 - Preliminary plat.

16.60.020 - Final plat.

Suggestions for the Proposed Ordinance for Unit Lot Subdivisions

Recap: At the 7/9 meeting, we received a long comment from Mr. Peter Wright with suggested revisions, and the Commission decided to consider more carefully. Staff requested that Commissioners submit their own suggestions via email, after reviewing the comment letter. Commissioners Price and Loker had no further comments, and Commission Chair Trabant was generally supportive of the comment's suggestions.

Commissioner Morneault returned specific comments and questions; staff incorporated these into the chart below, and included responses as an attachment in today's packet. Commissioner Brown voiced concerns during the 7/9 meeting, which staff has also incorporated into this chart and responded to in the same attachment.

16.66.060 Approval Criteria.

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:

7/9 draft	Wright suggestion/Morneault improvement	Staff suggestion
<p>A. 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:</p> <ol style="list-style-type: none">1. White Salmon comprehensive plan;2. White Salmon zoning code (Title 17) and land division code (Title 16), unless superseded by provisions in this chapter.	<p>A. Development of the parent lot complies with applicable zoning and development standards as verified through concurrent or previously completed site plan review under WSMC Chapter 17.81.</p>	<p>A. Development of the parent lot complies with applicable zoning and development standards in the White Salmon zoning code (Title 17), land division code (Title 16), unless superseded by provisions in this chapter.</p> <p><i>(***staff comment: after reading WSMC Chapter 17.81 "Site and Building Plan Review", it does not seem to apply to the typical residential</i></p>

7/9 draft	Wright suggestion/Morneault improvement	Staff suggestion
<p>3. Engineering design standards;</p> <p>4. Critical areas ordinance (Chapter 18.10 WSMC);</p> <p>5. City trees ordinance (Chapter 18.35 WSMC) and heritage trees ordinance (Chapter 18.40 WSMC)</p>		<p><i>uses in this proposed chapter, that is, single-family dwellings and ADUs.)</i></p>
<p>B. 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.</p>	<p>B. The proposed unit lot subdivision establishes a legal and functional fee-simple ownership structure based on the following criteria:</p> <ol style="list-style-type: none"> 1. Lot configuration allows for clear definition of individual unit lot boundaries; 2. Access is provided to each unit lot by public right-of-way and/or recorded easement, meeting applicable fire and building code requirements; 3. Required easements for utilities, access, and common areas are properly identified and will be recorded; 4. The proposed ownership structure is legally feasible and does not create conflicts with existing property rights. 	<p>B. Utilities and other public services necessary to serve the needs of the proposed unit lot subdivision shall be made available.</p> <p>C. Access is provided to each unit lot by public right-of-way and/or access easements that meet applicable fire and building code requirements.</p> <p>D. Easements for utilities, access, and common areas are properly identified on the face of the plat and shall be recorded with the county auditor.</p> <p>E. Agreements for the use and maintenance of common areas, structures, and utilities have been prepared and shall be recorded with the county auditor.</p>

7/9 draft	Wright suggestion/Morneault improvement	Staff suggestion
	C. Required agreements for use and maintenance of common spaces, structures, and utilities have been prepared and will be recorded with the county auditor as specified in Section 16.66.040(D).	
C. 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;		F. The proposed development complies with the White Salmon environment code (Title 18).
D. Approving the proposed unit lot subdivision will serve the public use and interest and adequate provision has been made for public health, safety, and the general welfare.	D. The unit lot subdivision does not create or increase any nonconformity of the parent lot as required by Section 16.66.040(F).	(n/a. this is effectively covered by criteria A and F)

16.66.070 Review Process.

7/9 draft	Wright suggestion/Morneault improvement	Staff suggestion
B. The city planner shall solicit comments from the public works	B. The city shall solicit comments from the public works director, fire chief or	B. The city shall solicit comments from the public works director, fire chief or

<p>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 deemed necessary by the city.</p>	<p>designee, local utility providers, and any other officials as deemed necessary by the city to address ownership and access issues specific to the unit lot subdivision.</p> <p>This applicant will be informed, in a timely manner, of other officials from whom comments are needed, the reason(s) why they are needed and any time extensions required.</p>	<p>designee, local utility providers, and any other officials as deemed necessary by the city.</p> <p>← ← ← <i>(***Staff comment: Flag for discussion by the Planning Commission. I do not think this sentence is necessary, as we give a limited time window for agency comments already, and because this would be more appropriate in Title 19, which deals with administrative procedure and should apply universally to other applications.)</i></p>
<p>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, and the criteria in Section 16.66.060.</p>		<p>(no change)</p>