

## Growing pains

It has been painful to watch White Salmon work its way through the growing pains it has experienced over the past decade. Once White Salmon resolved its water supply issues in the 2010s, the moratorium that had held the city's land use development in check was lifted. It was as if a casino had opened in town. Suddenly, all bets on the future of White Salmon were on. The City of White Salmon, for its part, welcomed new housing construction under comprehensive land use development and zoning rules that came into play in the first few years of the last decade. The enactment of those regulations were hailed as a landmark achievement by the White Salmon City Council and the many individuals who played parts in the process of reforming and reformulating the City's approach to land use within its ever-expanding boundaries as a result of citizen-initiated annexations.

Now, the community of White Salmon is in the midst of another major rewrite of its comprehensive land use plan and zoning code. Exactly how this rewrite is going to be different from the last one is unclear because it is still too early in the collaborative process that is being led by the White Salmon Planning Commission. All along, the City's Planning Department continued to process all manner of land use applications and issue building permits for new construction in residential and commercial zoning districts. The business of being an actively growing community did not stop just because the City Council decided last year the community needed to undertake a review of its vision statement and land use guidance and controls for possible amendments. Business as usual, however, has now been identified as a threat to the safety, health, and welfare of White Salmon residents by the City Council, which has enacted a six-month moratorium on non-single-family residential development within the City as a way of hitting the pause button while the Planning Commission completes its work on the comprehensive plan.

A moratorium is perhaps the most extraordinary land use control authorized by the Washington Planning Enabling Act. It is an emergency power given to county and local legislative authorities for dealing with imminent threats to public safety, health, and welfare, and foreseeable consequences in the absence of government action. In other words, the legislative authority has to justify its action by defining the threat and the foreseeable consequences and how the adopted interim land use control will mitigate the threat.

That's why the City Council now must conduct a public hearing to take testimony on the continuation of the moratorium that allows single-family housing construction in five residential zoning districts to take place unabated. The law requires the council to build a public record as a demonstration that it is using the emergency power granted to it for its intended public benefit purpose. The moratorium, if it remains in place after the public hearing, "may be effective for not longer than six months, but may be effective for up to one year if a work plan is developed for related studies providing for such a longer period," the law states. The related studies, in this instance, will be the rewriting of the City's comprehensive plan, development guidelines, and permanent land use controls, which will provide the framework under which White Salmon can reasonably manage the growth that isn't going to go away just because the City Council has called a timeout on certain non-single-family residential applications.

That said, we believe the moratorium is the correct (and overdue) step for the City Council to take at this inflection point in White Salmon's history. The hope is that it is indeed a decisive moment that marks the start of a significant positive change from the kind of community White Salmon is right now, the one it wants to be, and the one it becomes. As was the case with the State-mandated water-related moratorium of the previous decade, all bets on the future of White Salmon are off once again. **SB**



## Jan Brending

---

**From:** Jeff Dellis <jeffmdellis@gmail.com> on behalf of Jeff Dellis  
**Sent:** Wednesday, February 5, 2020 12:37 PM  
**To:** janb@ci.white-salmon.wa.us  
**Cc:** Erika Castro-Guzman  
**Subject:** Letter to City regarding moratorium  
**Attachments:** 200205 - Letter to City\_Moratorium.pdf

Hi Jan,

I got my act together and have drafted a letter for the Council's consideration. I hope it's not too lengthy (I have a tendency to get on my soapbox) - I wrote some considerations about affordable housing and short term rentals generally, and then finished with a request for the Council to amend the moratorium verbiage to not inadvertently capture scenarios outside of its true purpose (trees in my case, but there are likely others), should the moratorium remain in effect. I don't claim to know all there is to know about these issues, but having lived in the area for some time now (and other special places people seem to flock to) I wanted to share some of my comments as broad as they may be.

Would you mind including this along with the other comments you've received?

Thanks!  
Jeff Dellis



---

February 5, 2020

City of White Salmon  
100 N. Main Street  
White Salmon, WA 98672

Dear Mayor and Councilmembers,

My family and I currently reside in Hood River, and have owned land within the White Salmon City limits for several years. We intend to build a house for ourselves and are anxiously awaiting becoming full-time White Salmon residents in the near future. I am a licensed architect in both Washington and Oregon.

Thank you for the opportunity to comment on issues raised by the recent moratorium. Below is a discussion on several topics: 1) Affordable Housing, 2) Short Term Rentals, and 3) Additional Considerations. My point is to provide considerations on these matters as you deliberate, some of which you may know or has already been codified.

On the subject of affordable housing:

We live in a place where others want to be, which is not an economically discriminant desire. With year-round outdoor recreation opportunities, the beautiful surrounding landscapes, proximity to an international airport, and 'work from home' being on the rise, it's hard to imagine the desire of others from elsewhere to be here (either relocated or vacationing) declining. This, in combination with limited available housing stock, creates a 'high demand, low supply' scenario which in turn puts pressure on housing costs as the average resident cannot financially compete with many from afar.

Construction costs have risen dramatically – materials prices have escalated, local contractors are in short supply relative to demand which naturally creates a 'what can you pay' situation, and city infrastructure may be defunct, undersized, or non-existent which may cause significant off-site improvement costs for something as benign as a single-family residence or short plat. Additionally, layered jurisdictional review processes, a natural result of growth pressure, can cost time and money beyond that which is essential to the construction project itself. I don't have access to a thorough construction costs database in our area, but it seems like construction costs range between \$170-200 per square foot for anything beyond even the most basic residence. If we projected that to a reasonable, yet comparatively small, 1800sf 3bed/2bath house that would yield a \$306,000 - \$360,000 construction project. That doesn't include soft costs like land acquisition (likely over \$100,000 at this point), professional services fees, permitting/SDC's fees, and other fees associated with mortgage engagement. I imagine that if one were to take an average household income (perhaps even in a more affluent area) and apply a normal debt service, they would find it virtually impossible for this household to afford this house or anything close to it. Beyond the single-family scenario, the developer requires a project to be financially feasible as well – the costs incurred to create a project and associated risk are directly tied to sale/lease price.

The City of White Salmon comprises a relatively small, hemmed-in area that only has so much room for growth. Given the formidable economically-advantaged competition for housing, significant costs of

construction, and relative lack of space (not immediately apparent now, but certainly will be in the future), it seems that increased density, along with thoughtful regulations, may be one of the most important tools we have to facilitate a hope of ever having affordable housing. This would require zoning changes to allow a tighter horizontal density (minimum lot sizes, setbacks, accessory dwellings, etc), taller height restrictions (at some point 'up' is the only place to go), and incentives to encourage infill projects that yield a mix of housing options in a walkable city. This would ultimately mean a sacrifice to some degree of the open space we now have, but such is the case in any city.

Even if regulations were enacted now, significant change wouldn't happen overnight. However, if this future isn't meditated and acted upon in a conscious manner now, the likelihood of this housing mix being achieved will be pushed further into the future. Consider a point where it becomes blatantly apparent that zoning changes are required to increase density for the sake of housing needs, and presuming that existing buildings often don't support significant changes – unless housing prices are grossly inflated (which is counter to affordable housing), it may not make financial sense to tear down something built in 2020 for many, many years, thus pushing off the goals of the zoning changes. One could speculate about some impending doom that causes our societal regression, but it seems more likely that pressure on housing (and the need for density) will only increase over time, the long-term rate at which is anybody's guess.

#### On the subject of short-term rentals:

As discussed above, our area is, and is continuing to become ever more, a really great place to be. The decline of visitors to our area is an even less likely outcome than the decline of 2<sup>nd</sup>-home or relocated homeowners from other areas. These visitors of course will need a place to stay. Benefits of accommodating these visitors include outside money spent on locally-owned lodging, fees collected by the city for lodging taxes and registration permits, and the byproduct outside money spent by visitors here during their stay. Care must be taken that this accommodation does not disrupt the city's social fabric.

A phenomenon that occurs in many areas is non-residents purchasing homes and establishing them as vacation rentals, which essentially tears away at neighborhood continuity by creating a 'transient-only' situation. We currently live near downtown Hood River with a number of 2<sup>nd</sup>/3<sup>rd</sup>/etc homes around us and have noticed the deteriorating effects of this phenomena. Allowing non-residents to own and operate STRs, whether the house itself or an accessory dwelling, would likely have deleterious outcomes for the City. I don't think it would be fair, though, to restrict primary residents from operating short term rentals with certain limitations.

Hotels and bed-and-breakfasts (group living generally) are a longstanding and rightful form of short-term rental accommodations within appropriately-zoned areas. However, realistically there is not a large amount of available space in the City to fully support this, considering a healthy commercial/multifamily district would include uses other than STRs. In the downtown core, lot sizes would preclude adequate parking provisions (not only for STRs, but multifamily in general) without relegating at-grade floors to parking. This of course would pose a significant risk to the long-term goal of a pedestrian-oriented environment. I do support STRs in commercial zones, and multifamily projects (which could be a key component to affordable housing), but I don't know if we could rely exclusively on

commercial/multifamily zones to provide all STR needs without sacrificing the diversity required for a healthy city.

In the face of high housing costs, with little chance for its substantial reverse, an ADU in conjunction with a homeowner's primary residence is a logical partial solution to making housing accessible to a wider range of people by allowing homeowners added income and offering smaller, less costly rentals. Should ADU's be rented on a short or long-term basis? On one hand the owner/resident has added income to offset housing costs, the City gains some added tax revenue, and visitors that will be here one way or another have a place to stay. One could say allowing this in an ADU could deteriorate neighborhood continuity, but is that statement really justifiable if the transient occupancy represents only a portion of a resident's primary dwelling? On the other hand, the owner/resident has similar added income and there is a long-term rental available, though the ADU's size may not cater to a family. This would relegate STRs to commercial/multifamily zones, or simply to another nearby municipality. Not having substantial data at my disposal, I suppose I have no definitive answer to this as I can see both sides.

Additional considerations regarding the recent moratorium:

I am planning to build a house for my family on land that we've owned for several years in White Salmon. Our land is located in a forested area, and due to the presence of certain trees our proposal will trigger review by City Council which as I understand it, by a technicality would fall under the moratorium restrictions even though we are located within a residential zone. If the moratorium should remain in place for any duration, I ask that you consider and amend its verbiage in a manner that isolates its purpose and does not capture outlying circumstances, not only those regarding the critical areas ordinance but perhaps others as well.

Thank you again for the opportunity to expound my thoughts.

Sincerely,



Jeff Dellis

1219 Columbia Street

Hood River, OR 97031

Owner of land in WS-SP-89-03 and soon-to-be full-time resident.





## Jan Brending

---

**From:** mike rockwell <outstandinginhisfield@gmail.com> on behalf of mike rockwell  
**Sent:** Wednesday, February 5, 2020 1:37 PM  
**To:** janb@ci.white-salmon.wa.us  
**Subject:** Residential development moratorium

To City Council of White Salmon

While I applaud the progression of a comprehensive plan for the City of White Salmon, I believe this spontaneous moratorium to be ill thought out and an unfortunate and non-productive stipulation to the process of providing more homes to the community. By halting progress with development for the next 6 months, it basically kills these projects for the whole year as the prime construction season is upon us now. By enacting this moratorium the City is in effect decreasing the number of available properties to build on in 2020, and perhaps well into 2021. This not only has the negative impact of raising financial costs to any developer, which thereby gets passed on to the consumer, but decreases the number of lots available for the potential homeowner to buy and build upon. Since prices are controlled by supply and demand, this then has the reverse desired effect that the City claims they are looking for, ie: less expensive real estate. With the pent-up demand caused by the moratorium, there is likely to be an additional bump in pricing once the moratorium is lifted. Nor do I see how the moratorium will actually effect the outcome of a well thought out comprehensive plan. Is the City thinking of denying, or severely limiting, or by contrast open to smaller lots for the developments currently in the works?

Additionally, the City will lose considerable tax income in the coming year or two that this moratorium will set back the clock of development.

I also find it an unusual and non-productive form of legislating for any elected government to bring forth such drastic and highly consequential changes to our code without FIRST putting it on the agenda so at least the discussion is known and open to the public up-front, rather than to haphazardly toss it into a City council meeting for a quick and dirty vote without public input! It is the proverbial cart before the horse and makes it less likely to be subject to a fair discussion process that such a momentous decision deserves. It is akin to breaking the rules and then asking for forgiveness later. The City requires 21 days notice for a citizen initiative such as annexation, but then this shows up un-announced? BTW, the annexation process that was done last year, was claimed by the City to be a benefit to the City, and now this moratorium is a major set back and financial slap in the face to anyone who wants to progress with their plan as intended.

I strongly support the City reversing this ill conceived reaction to a process that will obviously take more than 6 months time anyway to develop a comprehensive plan. This is not a valid method for productive governing or growth!

Thank you for your time.

Mike Rockwell



## Jan Brending

---

**From:** Mat Loikkanen <matloik@gmail.com> on behalf of Mat Loikkanen  
**Sent:** Wednesday, February 5, 2020 1:50 PM  
**To:** Jan Brending  
**Subject:** White Salmon Dev. Moratorium

Hi Jan. Please accept my comments regarding this moratorium below. Thanks, -mat

*I am a relatively small-time local builder. I build on spec, buying land or a lot, building a house, and then selling it. My comments regarding the moratorium are as follows: As a builder, I would very much like to build "affordable houses", including multi-family. However, in this current market, that is difficult if not impossible to do, in certain respects, with costs out of my control. Lots and construction costs, including what materials cost and what trades / sub-contractors charge, have steadily risen over the past few years. What buildable lots cost, and what plumbers and electricians, for example, charge are out of my control. If a lot costs me \$250K, I can't build an affordable house. I'm certain there are details that I'm not aware of, but on the surface this moratorium to me seems to unfairly impact someone as myself -- I can't purchase a R2 lot and build a duplex -- while others in the construction trades have other work -- e.g., remodel jobs. Again, it seems inequitable that builders and developers bear the burden of this moratorium, and it may well have the opposite effect of further driving up costs of existing platted lots.*

MAT LOIKKANEN / LOIK HOME LLC  
PO Box 2525, White Salmon WA 98672  
[matloik@gmail.com](mailto:matloik@gmail.com) / 503.789.0426



## Jan Brending

---

**From:** Mayor Of White Salmon <mayor@ci.white-salmon.wa.us> on behalf of Mayor Of White Salmon  
**Sent:** Tuesday, February 4, 2020 11:55 AM  
**To:** Jan Brending  
**Subject:** Fwd:

Marla Keethler, Mayor  
City of White Salmon  
509-774-7491

----- Forwarded message -----

**From:** Chris Moore <cmo.pnw@gmail.com>  
**Date:** Mon, Feb 3, 2020 at 1:05 PM  
**Subject:**  
**To:** <Mayor@ci.white-salmon.wa.us>, <JoeT@ci.white-salmon.wa.us>, <AmyM@ci.white-salmon.wa.us>, <JasonH@ci.white-salmon.wa.us>, <DavidL@ci.white-salmon.wa.us>, <AshleyP@ci.white-salmon.wa.us>

Mayor Keethler and council members,

The moratorium on new construction should not apply to single family houses that include an ADU intended for long term rental.

ADUs add affordable housing stock to our city without requiring new land or new projects dedicated to multi-family housing.

The city could encourage and promote construction of single family homes with ADUs by discounting or waiving permit fees for property owners who include an ADU on the property if it is intended to be a long term rental.

I am a landowner who intended to build a new home with an ADU for long term rental within the city limits this year, 2020. If the moratorium prevents me from starting construction until July or August I will wait another year to start the project because I don't want exterior work to be underway during the wet months. This means that my ADU would not be available until 2022, a full year later than originally intended.

I agree that White Salmon needs more affordable housing, which is one reason why I am committed to including an ADU in my project. I am not interested in short term rentals and I want more people in our community to be able to afford to live in the place we love!

Thank you,  
Chris Moore Resident of White Salmon



## Jan Brending

---

**From:** Mayor Of White Salmon <mayor@ci.white-salmon.wa.us> on behalf of Mayor Of White Salmon  
**Sent:** Tuesday, February 4, 2020 11:51 AM  
**To:** Jan Brending  
**Subject:** Fwd: ADU moratorium

for tomorrow's public hearing record

Marla Keethler, Mayor  
City of White Salmon  
509-774-7491

----- Forwarded message -----

**From:** Crissy <crissy@protonmail.com>  
**Date:** Mon, Feb 3, 2020 at 11:53 AM  
**Subject:** ADU moratorium  
**To:** [Mayor@ci.white-salmon.wa.us](mailto:Mayor@ci.white-salmon.wa.us) <[Mayor@ci.white-salmon.wa.us](mailto:Mayor@ci.white-salmon.wa.us)>

Dear Mayor Keethler,

I'm sending this letter to urge you to allow permitting for ADUs to continue under the moratorium issued 1/15/2020—generally if possible, but particularly for ADUs planned as permanent rental housing within R2 districts. My personal situation is that my husband and I are--or were--only a few weeks away from applying for a single family home and conditional use building permit when news of the moratorium on ADUs reached us. Since ADUs and single family homes go together, it is both surprising and distressing news. I know you have many things to read, but please, give my following comments your earnest consideration.

1. (b) It is well documented by other cities that have advocated for ADUs, and thereby increased their inventory, that they can be an important part of the solution to creating density and affordable housing. ADUs intended for permanent dwelling units:

- are compatible in use, design and character with the single family home it is located adjacent to or within.
- do not require additional land or short plats to create space for them.
- could increase affordable housing stocks up to the rate of single family homes with proper advocacy efforts.
- have a distinct advantage in creating truly affordable housing due to the minimum 300 square foot size. By code, no other residential dwelling can be that minimum size--and since square footage costs money, ADUs can be among the most affordable housing options for renters.

If the moratorium on ADUs is not lifted immediately, however, every single family home planned and permitted during the moratorium is a lost opportunity....Here's why:

(2) Single family homes and ADUs are planned as a system in new construction (particularly those attached or within the primary home), and therefore need to be permitted together and built together. It's the only practical, workable scenario.

The parts that make up a house are nothing less than a system. It's not just the huge matter of shared walls and roof. A house and ADU are designed in harmony to provide soundproofing, privacy, utilities, comfort, storage, parking and outdoor space for all residents. From a practical and financial standpoint, the two cannot be separated, and therefore ADUs cannot realistically be permitted separately at a time in the future.

3. (3) If private homeowners are willing to help create more permanent rental housing on their own property, please not only let us, help us. Why should all the assistance go to developers? The city could use some of the money they have access to, as a result of Bill 1406, to encourage more ADUs. (e.g. waive the permitting fee if applicants sign a waiver stating the ADU will be used as permanent housing for a minimum number of years).

4. (4) And finally, although ADUs can be an important part of White Salmon's solution to affordable housing, some people want or need them for an aging parent or an adult child, for example, so please understand that your moratorium focused on housing issues could create unintended consequences or hardships.

Please seriously consider lifting the moratorium on ADUs during your next city council meeting on February 5<sup>th</sup>.

Sincerely,

Crissy Trask

Sent from [ProtonMail](#), encrypted email based in Switzerland.



## Jan Brending

---

**From:** john Edwards <jedwardsonsite@hotmail.com> on behalf of john Edwards  
**Sent:** Monday, February 3, 2020 10:13 AM  
**To:** Mayor@ci.white-salmon.wa.us; janb@ci.white-salmon.wa.us  
**Subject:** re: 6-Month Moratorium on Residential Development

Dear Mayor Keethler,

I will try to attend the city council meeting on Wednesday to raise these concerns in person but that is dependent on if I can get child care for that evening so I wanted to write you a note as well.

I have a number of comments about the Ordinance and the reasoning behind it...

- The Ordinance claims to want to allow for affordable housing development but then prohibits the issuance of permits for affordable housing types (multifamily, townhomes, duplexes etc...) while allowing single family homes on vacant lots. I understand that you needed to do this because the ordinance is an infringement on property rights but this achieves the exact opposite goal to the one stated. Now you will ONLY have more single family homes built in the next year.

- Placing a 6 month moratorium on building permits would essentially stop construction for 9-12 months; because of the city's approval process. Have you considered the impact this would have on local construction firms?

- Is it possible to get a copy of the results of the vision survey (I cant recall if it was vision 2030 or 2040); preferably posted on the website in full so people can see the evidence being cited? My memory of that survey is that it could only possibly give you the answers you wanted as the responses were pre-defined. Also, I know the survey was hurriedly filled out by patrons of the towns brewpub (because that's where I filled one out). So I wonder about the percentage and cross-section of the community actually reached by it.

- The long standing effect of city policy has been that it is not easy to develop multifamily housing (permit fees, utility charges, offsite improvements etc...). If we've had a comp plan since 2012 but haven't been following it, how does preventing all residential development for 6 months (Except single family homes) help? Why couldn't the city just quietly do the work to bring its practice in line with its policy? Or, if the issue was in the mobile-home zone, why not impose the moratorium narrowly there?

Please know that I do actually support the stated objective of having a variety of housing types available in the city, and I personally have no plans to develop anything within the next 6 months but I strongly disagree with imposing measures like this especially when it seems that the power to make the changes to the system are inside of the city government anyway. It looks erratic and signals that the city council may just change it's mind at anytime; that's not good for long term investment.

Thanks, Hopefully I'll see you on Wednesday,

John Edwards  
503-333-4114



## Jan Brending

---

**From:** Steve See <steves@pelletlab.com> on behalf of Steve See  
**Sent:** Tuesday, January 28, 2020 2:24 PM  
**To:** janb@ci.white-salmon.wa.us  
**Subject:** Moratorium Comment  
**Attachments:** Building Permit Moratorium.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Red Category

Jan Brending,

My permit moratorium comments attached, thank you!

Sincerely,  
Steve See



Steve See  
White Salmon Washington

1/28/20

Anyone resident of White Salmon can see the effects of growth, increased traffic, parking problems and general crowding. A person looking for a rental or buying a home will find prices are pretty steep. My hunch is many established residents would welcome a moratorium on building permits in the hopes of a little relief. I understand because I also wait in traffic that wasn't there a few years ago.

Perhaps the most urgent issue in the short term would be a stoplight at the Estes / Jewett intersection. This intersection is clearly backing up as never before during the morning and evening hours.

Clearly, parking in the downtown area was never intended for the volume of traffic now visiting. Perhaps the huge success of the local brewery is a factor and they should be asked to take part in the solution. Visitor parking should be encouraged in the vast unused parking areas around the banks and across from Thriftway.

In the long term, a walking trail from the Park-and-Ride up the hill to White Salmon would be a draw for more athletic visitors to leave their cars out of town entirely, and enjoy a brisk climb up to town.

These steps would help to solve some of the symptoms of the huge increase in visitors to the town.

Affordable housing is a problem, and will continue to be, so long as this area is attractive to many people of upper income brackets. As an example, the home across the street from me was a simple 2 bedroom house on a large lot, occupied for years by a retired SDS worker and Korean War veteran. On his passing away the house was sold. In a different town – say Basset Nebraska, this house would have a value of \$26,000, and probably not even sold. In White Salmon this old house sold for 10 times that amount after which it was promptly bulldozed over and a large new house built, complete with an oversized garage to house the enormous Mercedes van.

With that said, I do not believe that this is necessarily a bad thing. Real-estate values are what they are; can an ordinance, code or moratorium change that? In some parts of the country the old house across the street from me would be boarded up, vacant and unsold. As it is, White Salmon gains a fair amount of property tax, permit fees, and another resident. Local jobs were created in the building of the house. Affordable? No, not likely that an SDS worker will ever live there again.

Regarding the moratorium, I do feel that that restricting R-2 and R-3 development, while exempting single family homes is wrong. It is no coincidence that extremely unaffordable housing is most prevalent in areas that are militantly against multi-family housing.

As a builder of a duplex in White Salmon I can tell you there is a fairly strong anti-renter sentiment on the street. R-2 zoning seems to be viewed as something negative and renters as an unwanted addition to the neighborhood. The reality is, if the goal is integrating housing units into town priced at the lower end of the price range a duplex is a good tool. A well designed duplex can look great, blend well into the neighborhood, and the building cost is less than building 2 separate houses of the same size. A

townhouse can also provide an entry level to home ownership. In my view R-2 zoning should actually be increased, not restricted with a moratorium, if the goal is more affordable housing.

## Jan Brending

---

**From:** Adam Stolz <adam.stolz@zepherinc.com> on behalf of Adam Stolz  
**Sent:** Thursday, January 16, 2020 10:03 AM  
**To:** janb@ci.white-salmon.wa.us  
**Subject:** Adam Stolz - Conditional Use Application  
**Attachments:** Adam Stolz Application Date.JPG

Jan,

Thank you for talking with me just now about my Conditional Use application. As discussed, I have been trying to schedule a pre-application conference with the city for a few weeks, which we were able to finally hold yesterday, 15 January. At that meeting, I had a complete application and payment ready, minus the mailing addresses of my neighbors - there is not a spot on the application to fill in this information. At the meeting, I asked if I could submit the application and payment electronically, but I was told I needed to drop off hard copies, in person, during working hours.

Therefore, I went back to the office and made a quick attachment with mailing addresses. I came by city hall that evening (the 15th), but it was just after 5pm, and I missed being able to hand my application to the city employees inside. There was no dropbox, so I came by this morning to hand over my application. At that time, I was told of the 6-month moratorium on development passed last night by council. I also learned that this moratorium was in effect immediately even though a public hearing wouldn't take place until 05 February, and no in-process applications could be considered. It is this fact that I take issue with.

I understand the intent of the moratorium, even if I don't agree with the methods. If this is meant to address affordable housing, development should not be hindered, just (potentially) the nature of development - i.e. short-term rentals versus long-term. Prohibiting the development of long-term rentals for 6 months will only compound the issues of affordable housing, especially when those 6 months are the prime contracting seasons of spring and summer. But that is not what this email is meant to address.

It is my belief that applications which were effectively complete, just not physically handed to a city employee before the 16th of January, should still be acceptable within a reasonable window of opportunity. My application was complete, with payment, and was expected on the 15th by the city. The lack of ability to submit electronically, through a drop box, or even by sliding it under a door at just after 5pm on the 15th should be taken into account. Ideally, the window of opportunity for in-process applications should extend from the vote to enact such an ordinance through a public hearing, or the hearing should be scheduled much closer to the ordinance vote.

My application is to convert an existing structure into a long-term rental ADU. This is not a new build, and it is not meant for short-term rental. I had a pre-application meeting with the city on the 15th, and my application was deemed ready to submit as soon as I added neighboring mailing addresses. I attempted to hand-deliver my application the late afternoon of the 15th, but I just missed doors closing. I was told there was absolutely no other way to "officially" submit my application. A few hours later, a new ordinance passed which made my application no longer acceptable. I petition that my application was so significantly in-process, and reviewed, and deemed appropriate for submission, that it be accepted by the city if for no other reason than simply not having a drop box for after-hour citizens. As the photo attached can attest, even my application folder and check are dated the 15th. I scanned my complete application (including the check) yesterday as well, if that evidence is helpful. The "created on" date of these scans is the 15th, which cannot be altered by me.

Thank you for offering to meet with Marla on this next week when she is back. I am encouraged to hear that she has authority to review such cases and potentially make a determination that my application can be received. Please let me know if you need any additional information from me on any of this.

Thank you again, Jan.

R/  
Adam

**Adam Stolz**  
**Director of Business Development**  
**812.664.3021**

**ZEPHER INC**

[adam.stolz@zepherinc.com](mailto:adam.stolz@zepherinc.com)

[www.zepherinc.com](http://www.zepherinc.com)

Connect at [www.linkedin.com/in/adamstolz](http://www.linkedin.com/in/adamstolz)

*\*\*Information contained within this message is the property of Zepher Inc. and should be considered proprietary information. Contents of email may be subject to the International Traffic in Arms Regulation (ITAR) or the Export Administration Regulation (EAR) of 1979. Regulated data may not be exported, released, or disclosed to foreign nationals inside or outside the United States without obtaining the prior written approval of Zepher Inc and licenses as required by the U.S. Department of State.*



## Jan Brending

---

**From:** Joel Madsen <joelm@columbiacascadehousingcorp.org> on behalf of Joel Madsen  
**Sent:** Wednesday, February 5, 2020 3:35 PM  
**To:** 'Marla Keethler'  
**Cc:** 'Jan Brending'  
**Subject:** Comment on Ordinance 2020-01-1060 and Affordable Housing Threshold

Mayor Keethler (and City Councilors),

Please consider the following comments as they relate to the City of White Salmon's development moratorium and affordable housing threshold.

As organizations that work to promote and administer affordable housing solutions throughout the mid-columbia region please be informed that we support the City of White Salmon's Residential Development Moratorium. The current Comprehensive Plan for the City of White Salmon sets goals that we supported when the 2012 comp plan was approved and we still support these same goals today. We appreciate the City aspiring to provide locations for a variety of residential uses and dwelling. We appreciate the City aspiring to protect existing uses from conversion to incompatible and irreversible land uses. We certainly appreciate the City aspiring to promote diversified residential opportunities for all economic levels.

Through this moratorium you're acknowledging that we can do better as a City (and in partnership) to advance these goals set out in our Comp Plan. We couldn't agree more and are here to help you in doing so. Our organizations are committed to working with you and the residents of White Salmon to achieve the goals laid out in the comprehensive plan. By hitting the pause button through this moratorium we can have the appropriate and intentional discussions to best position our community for achieving the goals we've established.

With specific regard to affordability targets, we support your recommendation to target city incentives and resources for affordable housing up to 80% of the annually published area median income and would like to remind you that any commitment of a product targeting this income level should also have a commitment for how long that product would be affordable to the target income level (i.e. 50 year affordability period). Also, we generally agree with the thoughts on moratorium planning you've presented in the 2/5/2020 City Council Meeting packet regarding other areas of focus during moratorium and look forward to, when relevant, bringing our resources and expertise to the table to further refine your proposed strategies.

Most of all, I'd like to thank you for taking action toward a more inclusive and diverse community.

Joel

Joel Madsen  
Executive Director  
Mid-Columbia Housing Authority *and*  
Columbia Cascade Housing Corporation  
500 E Second  
The Dalles, OR 97058  
P: 541.296.5462 Ext 116  
C: 509.637.5345

