

To: Planning Commission
From: Peter Wright
Date: 7/22/25
Subject: Comments on Unit Lot Subdivision Ordinance

Dear Planning Commission,

Thank you again for your thoughtful work on the Unit Lot Subdivision (ULS) ordinance. I support the updated draft and want to offer one focused refinement to help finalize the structure: separate staff's recommended approval criteria into two coordinated review tracks—site plan review and plat review. This adjustment reinforces the ordinance's core logic that development standards apply to the parent lot and gives applicants clearer direction about what must be shown on the required site plan versus what belongs in the plat documentation—and how each will be reviewed.

Zooming out, this structure makes each stage of a new ULS development project more legible:

- **Site plan review** confirms that development on the parent lot meets zoning and infrastructure standards.
- **Plat review** addresses ownership, access, shared elements, easements, and recording steps.
- **Building permit review** (not part of ULS) evaluates individual structures for detailed code compliance and life safety at the point of construction.

Staff's suggested approval criteria already align conceptually with these layers. My proposal simply makes site plan review—a process that currently occurs implicitly as part of the building permit pathway for non-ULS projects—a clear and standalone step within the ULS framework. This clarifies roles and timing, creates parity with non-ULS projects, and helps avoid misapplying neighborhood-scale design expectations (e.g., Chapter 16.45) to existing infill lots. It also supports the legal requirement that ULS be “logically integrated” with review of the underlying development.

For already-built projects, this separation resolves a recurring question: how to process ULS proposals after development has occurred. In those cases, the site plan serves as a record of existing conditions to support future zoning conformance, while the plat ensures legal access, easements, and unit lot lines align with what was constructed. It's the difference between asking, “is this safe and functional?” and “can this safe and functional configuration now be formalized through the ULS framework?”

I've attached a markup showing how this structure could be implemented using staff's proposed language, along with a few supporting edits and comments. These suggestions are secondary to the broader conceptual shift, which I believe is all that is needed to complete the ordinance.

Thank you again for your attention to this level of detail and for advancing a tool that can meaningfully expand homeownership opportunities in White Salmon.

Respectfully,
Peter Wright

Proposed Modifications to Draft ULS Ordinance

Legend

1. **Bold text** = Staff recommendations
2. Underlined text = Proposed additions or deletions

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 *under 16.66.060* as part of the land division application.

16.66.060 Site Plan Review and Approval ~~Approval Criteria~~

- A. Purpose. This section establishes a streamlined site plan review process to verify development compliance for unit lot subdivisions.
- B. Applicability. Site plan review under this section applies to:
1. Proposed development that will be subdivided through ULS
 2. Existing legally constructed development where verification is requested as part of ULS C.

Review

C. Standards. Site plan review shall verify:

1. **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**
2. **Utilities and other public services necessary to serve the needs of the proposed development unit lot subdivision shall be made available**
3. **Access is provided to each unit lot by public right-of-way and/or access easements that meet applicable fire and building code requirements**
4. **The proposed development complies with the White Salmon environment code (Title 18)**

D. Required Materials. Applications shall include:

1. Site plan showing proposed buildable envelopes with dimensioned setbacks
2. Envelope area calculations demonstrating lot coverage compliance

3. Utility connection points and access routes to envelopes
4. Parking area locations meeting code requirements
5. Property boundaries and existing easements
6. Topographic information where slopes exceed 15%
7. Existing structures and improvements

E. Review Process. Site plan review shall be:

1. Reviewed for compliance by city staff in accordance with the process established for building permits
2. Integrated with ULS application review timing

16.66.070 Plat Review and Approval ~~Review Process~~

A. 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:

1. Development of the parent lot complies with applicable standards as verified through site plan review under Section 16.66.060 or previously completed building permit review.
2. Unit lot boundaries and easements are consistent with the approved site plan and do not conflict with applicable building or fire code requirements. Shared improvements shall be protected consistent with this section.
3. **Easements for utilities, access, and common areas are properly identified on the face of the plat and shall be recorded with the county auditor.**
4. **Agreements for the use and maintenance of common areas, structures, and utilities have been prepared and shall be recorded with the county auditor.**

B. 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,~~ local utility providers, 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 this Section 16.66.070.

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.