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City of Manzanita Planning Commission
VIA EMAIL: planning@ci.manzanita.or.us

RE: Planned Unit Development – Vito Cerelli

Dear City of Manzanita Planning Commission:

I am writing with several concerns about the proposed Planned Unit Development (PUD) at Dorcas Lane and Classic Street. As a neighbor whose family owns and lives full time in a home directly across the street from the proposed development, I am concerned that both the three page application from the developer and the Staff Report do not adequately address the requirements in City code for a PUD.

As you know, it is the Planning Commission's duty to make sure the PUD meets the standards in the code. The review must not be put off to technical review after the PUD has already been approved. There must be actual designs detailing the infrastructure plans, including water, sewer, roads/traffic, electricity, stormwater, and electricity for the Planning Commission to review and to base their decisions on. Instead, we have a three page application, and a Staff Report that consistently shifts the decision making to design review or technical review. Development standards must be reviewed by the Planning Commission now rather than kicking the can down the road when this development is already on its way to construction.

At the Planning Commission meeting on March 21, 2022, it was my understanding that the approved 2017 wetland delineation would be provided to the Planning Commission and public prior to the meeting on April 18, 2022. It does not appear that the delineation has been made available yet. Based on the National Wetlands Inventory (<https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>), the property has one of the larger freshwater emergent wetlands in the City. The wetland is one that is recognized by the City as it is shown on maps in the 2019 Buildable Lands Inventory. Department of State Lands approved wetland delineations are public documents, and the report and corresponding survey/map must be provided for review.

At the March 21 meeting, the City Planner stated that only the layout and concept is required at this time because of the PUD procedure and that the technical details would be reviewed later. I respectfully disagree with this premise, and the City code is quite clear that the Planning Commission shall review and discuss the PUD requirements now, not later in the process. This Planning Commission decision must be based on City code and the developer must provide

detailed plans that the Planning Commission can fully review before making its decision, given the code language includes the words shall and must.

*Section 4.136.2., establishes the following standards and requirements: (a) A planned development may include any uses and conditional uses permitted in any underlying zone. **Standards governing area, density, yards, off-street parking, or other requirements shall be guided by the standards that most nearly portray the character of the zone in which the greatest percentage of the planned development is proposed.***

The character of the zone has not been defined to my knowledge. That must occur before review of the other issues listed above.

Why does the Staff Report indicate that density standards do not apply when the buildings meet the definition of a dwelling?

Parking is already a big issue and has been a point of conflict in this neighborhood for several years. The Staff Report indicates that parking will be reviewed and approved at a later date. The parking plan must be reviewed and approved now, all parking for this development must occur onsite, there is no available street parking in the area.

*Section 4.136.3, addresses the Planned Unit Development Procedure. The following procedures shall be observed in applying for and acting on a planned development:
The Planning Commission shall consider the preliminary development plan at a meeting, at which time the comments of persons receiving the plan for study shall be reviewed. In considering the plan, the Planning Commission shall seek to determine that:*

(2) Resulting development will not be inconsistent with the Comprehensive Plan provisions or zoning objectives of the area, particularly with regard to dune stabilization, geologic hazards and storm drainage.

This area of town already has identified issues with stormwater management as runoff from Classic Street Cottages consistently runs down Dorcas. Stormwater from Dorcas was supposed to go onto the golf course, but that plan was discontinued. The City is now working to correct the issues in another way. Given stormwater management is already a concern in this neighborhood, Planning Commission must review how this proposed development plans to manage run off, especially given the freshwater emergent wetland that is either on the property or nearby as well as the impacts drainage can have on the golf course. As we saw in January, increasing storm events combined with non-permeable surfaces increases stormwater runoff and flooding. A detailed plan of how stormwater will be managed must be provided at this stage of review per the code above.

(3) The area around the development can be planned to be in substantial harmony with the proposed plan.

It is my opinion that a 34 unit hotel is not in substantial harmony with the residential neighborhood surrounding the proposed development.

(5) The streets are adequate to support the anticipated traffic and the development will not overload the streets outside the planned area.

My greatest concern, as I mentioned at the March 21 meeting is the traffic at the four way stop and on Dorcas Lane and Classic Street. I appreciate that the Planning Commission heard this concern from the community and is requiring a traffic study.

The City must address the fact that Classic Street is going to accumulate more and more traffic. Upgrading Classic Street to the design standards in the City of Manzanita Downtown Transportation Plan must be a priority, creating a safe path for pedestrians and bicycles, as well as ensuring the engineering and stormwater drainage is appropriate.

(6) Proposed utility and drainage facilities are adequate for the population densities and type of development proposed.

The plans for all the infrastructure that will be needed to fully develop this site must be provided in enough detail that the Planning Commission can fulfill its duty to review utility and drainage facilities. This shall include electricity, water, sewer, gas tanks, and stormwater. Review of these plans are REQUIRED at this review, based on language in Section 4.136.3. Engineering plans must be reviewed by the Planning Commission now, not later.

D. Development standards in the SR-R zone are found in Section 3.030(4). Each item is reviewed below:

1. (4)(a) - Overall density for the SR-R zone is 6.5 dwelling units per gross acre. Dwellings may be clustered on one portion of a site within the SRR zone and achieve a maximum density of 13 dwellings per acre where at least 40% of the total lot or parcel area is reserved or dedicated as permanent open space as a public or private park area or golf course. The open space shall be so indicated on the Plan and zoning map, and deed restrictions to that effect shall be filed with the City.

The findings for this section in the Staff Report states that density standards do not apply because it is a commercial project, even though the project is made up of dwellings. The cabins and lodges may not be long-term dwellings, but they appear to meet the definition of a dwelling in City ordinances (p. 3).

Dwelling Unit. Means one or more rooms occupied, designed or intended for occupancy as separate living quarters, and containing four (4) or more of the following: refrigeration; cooking facility (including cooking stove, hot plate, range hood, microwave, or similar facility) or wiring or venting to support same; dishwashing machine; sink intended for meal preparation (not including a wet bar); garbage disposal; toilet; shower or bathtub [Amended by Ord 03-08, passed October 15, 2003]

Due to the lack of specificity in the application and layout, I am unsure as to how many units will have a kitchen, but it seems that most of them will. If you look at the definition of a dwelling in the code, it means that every unit with a shower/tub, toilet, kitchen sink, and one other kitchen appliance qualifies as a dwelling. Why does just calling it a commercial project mean the density standards do not apply?

This proposed project will build 34 units in the middle of a residential area, the largest hotel development of its kind in 40 years in the City. The Planning Commission needs to look at this issue. If it follows the required density guidelines, the development shall only have 25 units (3.83 acres X 6.5 dwelling units/gross area). In an effort to reduce the impact of this development on our residential neighborhood, I request the Planning Commission apply the lower density standards to this project.

4. (4)(d) - The maximum lot coverage in the SR-R zone shall not exceed 40%. Less lot coverage may be required in steeply sloping areas or areas with drainage problems. In all cases the property owner must provide the City with a storm drainage plan which conducts storm runoff into adequately sized storm drains or approved natural drainage as approved by the Public Works Director.

5. (4)(e) - In areas without a high-water table, a dry well capable of absorbing the storm runoff shall be provided in accordance with City standards.

I am bringing these requirements to your attention in order to make it clear that stormwater must be addressed during this review. It is repeated in the ordinance multiple times. It cannot be addressed later in the development process.

(3)(f) - The maximum building or structure height shall be 28 feet, 6 inches. However, if more than one-half of the roof area has a roof pitch of less than 3 in 12, the building or structure height shall not exceed 24 feet. The height of a stepped or terraced building shall be the maximum height of any segment of the building or structure.

The height restrictions for this proposed development shall follow this code. The Planning Commission must not allow for an increase in height of the proposed structures.

The Staff Report Summary states that this approval is just for a basic layout and that the engineering and other details will be reviewed at later stages. I strongly disagree. The PUD code language is clear and directive, using shall in multiple instances, thereby requiring a deeper review, with greater specificity in plans for infrastructure and engineering, as well as grappling with the density requirements. The application and proposal need more work, as these issues must be reviewed and discussed by the Planning Commission now, as part of the decision-making process for the PUD, not in design and technical review in the future. Infrastructure and engineering plans need to provide enough specificity so the Planning Commission can do its duty and review this project in detail before making a decision. Approving this PUD as a simple

exercise of only approving the layout and then pushing the deeper review out to a later date is unfair to the neighbors who have real concerns about this project.

Thank you for the opportunity to provide comment and for your consideration of the issues I have raised.

Sincerely,
Denise Lofman