



February 10, 2025

City of Manzanita Planning Commission
PO BOX 129
Manzanita, OR 97130

Dear City of Manzanita Planning Commission,

This letter is on behalf of Kathleen Niskanen.

Please enter this letter into the public record regarding Planning File #25001, Manzanita Pines, a 60-unit, affordable housing development.

From discussions with the adjacent property owners a public notice error occurred which allows for an additional 20 days of comments. Based on this, a decision cannot be made at this hearing because the notice period occurs outside of the hearing deadline. This hearing should be continued to a date certain.

It appears from the application that a variance (Zoning Ordinance Article 8) to reduce the required number of parking spaces is requested. The notice fails to note this variance request and the applicable criteria. Additionally, the staff report and the applicant's findings of fact fail to address the criteria for variance from Article 8.020, Circumstance for Granting a Variance. Though SB1537 allows for a reduction in parking minimums, there are no criteria or processes within the Manzanita Zoning Ordinance as to how the local government will implement the reductions allowed in SB1537.

The same can be said about the reduction in the setbacks and the increase in height. A 30 percent increase in height when only ten feet from adjacent properties if processed as a variance would take considerable findings as to what is unique or unusual about the property and how the variance is not self-imposed to allow for a substantial height increase over the allowed maximum height in the zone. SB 1537 does not only apply to affordable housing developments and the concerned parties question if precedent is being set that would allow all new housing developments a 30 percent increase in height.

The adjacent property owners have expressed concerns regarding the removal of significant number of trees in order to accommodate the development. The adjacent property owners are concerned the compaction of the dunes necessary to create a suitable base for development. The concern is how the impacts of dune compaction creates substantial vibration on adjacent properties which could cause structural damage.



The adjacent property owners are concerned that stormwater drainage from the development and the parking areas will have negative impacts upon their structures and property.

The property owners would like additional information on the affordable criteria. What is the area median income standard and who will verify compliance with the standards of affordability? What is the term of affordable housing? For example, is it deed restricted to be affordable for 30 years, 60 years or another period of time.

The adjacent property owners request that the city of Manzanita Planning Commission leave the public record open and continue the public hearing consistent with Oregon Revised Statutes (ORS 197.797 (6.a))

ORS 197.797

6.a. Prior to the conclusion of the initial evidentiary hearing, any participant may request an opportunity to present additional evidence, arguments or testimony regarding the application. The local hearings authority shall grant such request by continuing the public hearing pursuant to paragraph (b) of this subsection or leaving the record open for additional written evidence, arguments or testimony pursuant to paragraph (c) of this subsection.

Thank you for your consideration.

Sincerely,

Amy Gunter

Amy Gunter
Rogue Planning & Development Services, LLC