

Date 11 June 2025  
Subject Manzanita Middle Housing Code Amendments  
To Leila Aman, City Manager  
From Marcy McInelly, Urbsworks, Inc.

## Occasionally Asked Questions

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**Question: Parking restrictions in the proposal have shifted over the four Commission meetings. Why?**

**Answer**

To comply with HB 2001 and SB 406, parking requirements must be reduced from two spaces to one per dwelling and this amendment was included in the first version. Since that time there were two new versions, as requested by the Planning Commission and, most recently, by a DLCD staff reviewer:

- Planning Commission request: Add an allowance for ADUs and dwellings under 500 square feet to be exempt from the parking requirement.
- DLCD staff reviewer direction: Include the OAR language regarding Triplex and Quadplex parking requirements which are slightly different than parking requirements for single dwellings and duplexes.

**Question: What happened to the proposal for on-street parking?**

**Answer**

In the Code Concepts work session, Planning Commission looked at Urbsworks' proposals for on-street parking. The options would allow an applicant to meet the parking requirements with spaces on the street rather than on the dwelling site. There are clear advantages but there were concerns and questions about the proposal. Allowing on-street parking is not required to comply with state requirements. Staff agreed that there was not enough time to resolve community concerns before the grant deadline.

**Question: Where does the 1,250 square foot minimum lot size come from?**

**Answer**

Municipalities must comply with requirements for Townhouses and allow them to be built on any lot that currently allows single dwellings. Townhouses are defined as "a row of two or more attached units, where each dwelling unit is located on an individual lot or parcel and shares at least one common wall with an adjacent unit." This means that each lot must be allowed to be subdivided into new lots. How many new lots is a result of the Townhouse maximum density requirement.

If (or when) Manzanita adopts the Model Code the Maximum Townhouse Density is set in stone, and it is a rigid formula based on the base zone definition of “minimum lot size,” and a multiplication factor:

- Base zones with minimum lot size of 2,500 sf—2 x;
- Base zones with minimum lot size of 2,500-5,000 sf—3 x, and
- Base zones with minimum lot size of 5,000 or greater sf—4 x.

As detailed in the next two Q&As, establishing a maximum density for townhouses has the effect of creating a minimum lot size for townhouses. Municipalities that have adopted the Model Code are not required to state the resulting minimum lot size in their zoning code (and many do not) but it exists, nonetheless.

Note: A municipality may adopt the Model Code, OAR provisions, or a combination of the two. On the topic of Minimum Townhouse Density, the Model Code requires a municipality to adopt the density formula (see bullet points above), but the OAR allows a more subtle calculation which has a different result—providing yet another choice for Townhouse Minimum Density (see Table 1 – Figuring Townhouse Maximum Density).

Furthermore, the OAR provides municipalities a choice not to adopt a Townhouse Maximum Density at all, in other words to be silent on the topic and let applicants decide what the Townhouse Maximum Density and the resulting minimum lot size should be for their project. The consultant does not recommend this approach.

### **Question: Is the 1,250 square foot minimum lot size a state mandate?**

#### **Answer**

No, not strictly speaking; the 1,250 square foot minimum lot size is not explicitly named as a requirement in either the OAR or the Model Code. However, in a desire to increase transparency and understandability for the Planning Commission and community, the consultant included the number in the first draft of code amendments dated 03/14/25. Planning Commissioners supported the proposal at that time and with each subsequent draft.

As stated above, requiring Townhouses on all lots that allow a single dwelling is a requirement. Therefore, in the 06/02 Planning Commission Cover Memo the consultant listed the minimum lot size resulting from the Townhouse Maximum Density requirement as a “mandatory” requirement.

The consultant believes it is important to control the maximum density of Townhouses, and, while it is optional, cities are allowed by the OAR and the Model Code to do so. The maximum density for Townhouses is based on the density of the base zone.

Establishing a townhouse maximum density naturally defines a minimum lot size for townhouses.

**Question: Why is the consultant recommending that Manzanita adopt a Townhouse Maximum Density provision (and a resulting minimum lot size), if cities do not have to do so?**

**Answer**

The consultant recommends that Manzanita adopts a maximum density for Townhouses for several reasons: Townhouses must be allowed on every lot that is zoned for single detached dwelling. Townhouses have many positive attributes but when there are no controls on certain features the effect can be surprising. Some recommended controls are:

- Limit the number of townhouse that can be attached.
- Require a minimum distance between driveways.
- Minimize the presence of front-facing garages.

These controls are built in to Section 4.160 Supplemental Standards and can be found in subsection 4.161 (design standards applicable to all middle housing) or in the townhouse-specific standards in subsection 4.164.

Maximum density is also an important control. As described above, establishing a maximum density for townhouses has the effect of creating a minimum lot size for townhouses.

The consultant feels that establishing a maximum density for townhouses is especially important because no overall maximum lot size has been established. In earlier PC work sessions, the Planning Commission discussed a maximum lot size but chose not to establish one. (The consultant proposed 7,000 square feet maximum for lots in MH-1 and 10,000 square feet in MH-2 and MH3, see "Draft new zones tables" dated 25\_0413.)

*Table 1 – Figuring Townhouse Maximum Density* shows the math for each of the two options provided by HB 2001:

Table 1 – Figuring Townhouse Maximum Density

Model Code method	OAR method
<p>LCMC, Chapter 4 (B)(2):</p> <p><i>In zones in which the minimum lot size for detached single family dwellings is 2,500 square feet or less, townhouse projects are allowed two (2) times the allowed density for detached single family dwellings.</i></p> <p><i>In zones in which the minimum lot size for detached single family dwellings is more than 2,500 square feet but less than 5,000 square feet, townhouse projects are allowed three (3) times the allowed density for detached single family dwellings.</i></p> <p><i>In zones in which the minimum lot size for detached single family dwellings is 5,000 square feet or more, townhouse projects are allowed four (4) times the allowed density for detached single family dwellings.</i></p> <p><u>Calculation</u></p> <p>Base zone: 1 unit / 5,000 sf</p> <p>Base zone density: 8.7 dwelling units / acre</p> <p>Townhouse allowance: 4 x</p> <p>Maximum Townhouse density: 34.8 dwelling units / acre</p> <p>Townhouse maximum density converted to lot size:  <math>43,560 / 34.848 = 1,250</math> square feet</p>	<p>660-046-0220 Middle Housing Siting Standards in Large Cities, (3) Townhouses</p> <p><i>If a Large City applies density maximums in a zone, it must allow four times the maximum density allowed for detached single-family dwellings in the same zone for the development of Townhouses or 25 dwelling units per acre, whichever is less.</i></p> <p><u>Calculation</u></p> <p>Base zone: 1 unit / 5,000 sf</p> <p>Base zone density: 8.7 dwelling units / acre</p> <p>Townhouse allowance: 4 x</p> <p>Townhouse maximum density: 34.8 dwelling units / acre</p> <p>Base the max density on 25 dwelling units per acre which is less than 34.848 dwelling units per acre:</p> <p>Maximum Townhouse density: 25 dwelling units / acre</p> <p>25 dwelling units per acre, converted to lot size:  <math>43,560 / 25 = 1,742.4</math> square feet.</p>

Question: Regarding minimum lot size, what are the city's options?

### Answer

Manzanita can:

- Elect not to establish a maximum density for Townhouses, thereby avoiding the minimum lot size issue. This may result in unintended negative consequences with townhouse development.

- Choose to establish a maximum density for Townhouses using the Model Code method, see *Table 1 – Figuring Townhouse Maximum Density*: 34.8 dwelling units / acre, leading to a minimum lot size for Townhouses of 1,250 sf.
- Choose to establish a maximum density for Townhouses using the OAR method, see *Table 1 – Figuring Townhouse Maximum Density*: 25 dwelling units / acre, leading to a minimum lot size for Townhouses of 1,742.4 square feet.
- Elect to apply either of the two options, 1,250 sf or 1,742.4 sf, to other housing types (in addition to Townhouses), such as Cottages Clusters.

## Question

In the Planning Commission packet there are instances of “TBD.” Does this indicate that the code amendments are not complete?

## Answer

“TBD” refers to the final page number which can only be determined once the strike through text is removed, and new underlined text is incorporated. At that point the page numbers will be entered. This is an example of a minor script or administrative amendment and is not a policy-related amendment.

During the final stages of the adoption process the consultant will conduct a “search-and-replace” step on Ordinance 95-4 to correct cross references and other minor edits, for example, replacing all incidents of terms that have changed, such as “single family dwelling.”