

Subject: Council Workshop Aug 12, 2025 - Middle housing

PLEASE INCLUDE THIS IN THE COUNCIL PACKET FOR THIS MEETING. THANKS.

Dear Mayor and Council Members,

Since the Planning Commission submitted their vision of a future Manzanita, I have been looking for some plain language explanations for the changes proposed. Clearly the Planning Commission's vision is not sitting well with residents and even the Planning Commission did not approve the vision unanimously. There seem to be many unanswered questions. While code can be tedious and dry, it is important to find ways to explain the changes proposed.

So I have some simple questions and I hope simple answers can be provided which will help us all understand the changes and WHY the Planning Commission and its consultants want to go beyond what is required by State Law.

1. The first question is: WHY? Could a member of the Planning Commission explain why they chose to go beyond the State Law on Middle Housing for Manzanita? What were their goals and thinking?
2. What is the downside of simply adopting the State Law? Be specific in the response.
3. If the reason is more housing availability for a specific economic strata, please share the home prices they hope to see given the high cost of land in Manzanita? (the cheapest home in Manzanita today is \$450-\$500,000, with most +/- \$1.0 million.) Who is the target home buyer?
4. The handout in the recent town hall was a good start but it seemed to only cover some of the changes and left you with some questions. As an example, if it is true that the new setback is 10 feet instead of 20 feet, that fact was not highlighted. It leaves one to wonder what else has not been highlighted.
5. Question: If I have a 5,000 sq ft lot, could I create four 1,250 sq ft lots on it and place a 450 sq ft manufactured home on each lot with no provision for Onsite parking? And sell each lot separately? Yes or No? And is the answer different if we only adopted the State Law versus the Planning Commission Manzanita vision law?
- 5 (a). Under the Manzanita PC vision, Is it true that a future duplex, triplex or fourplex can be built without required onsite parking or much less than what the State law requires? Yes or No? If yes, why?
6. A setback of 10 feet might be appropriate in downtown areas of a city with sidewalks. In Manzanita, with no sidewalks and more street parking under the new vision, will this not create a safety issue for families and children walking the street? Driving up towards the Farmers Market on Manzanita with cars parked on both sides and pedestrians being forced to walk the road is a good example. Is that really our vision for Manzanita?
7. Parking: I know the City of Portland in its wisdom allowed the construction of neighborhood multifamily housing without any onsite parking requirements (with a hope that more people will use mass transit) and developers maximised the living space (for

more profits). As a result, today these neighborhoods are filled with cars parked on both sides of the streets and the road effectively becomes a single lane. If you drive down a street in SE Portland or the Alphabet district, you know what I mean. Is this our vision for Manzanita?

8. Finally, I respectfully request that a member of the Planning Commission be at this workshop to answer these and other questions rather than the outside consultant.

We all love our city and its atmosphere and its livability. And we want to protect the character and charm of Manzanita. We also recognize the housing shortage in our area for workers. I am asking these questions to understand the Planning Commission's vision and the City Council's future vision of Manzanita.

Let us find a way to do our bit to help increase housing without damaging the livability and charm of Manzanita. I also hope that the Council defers the adoption of the Planning Commission's vision and just operates under the State Law for now which became effective July 1. What is the rush to adopt a "Manzanita" vision?

And please try to respond to the specific questions posed by residents in the work session rather than another powerpoint lecture.

Thank you,
Anupam

Anupam Narayan
Manzanita and Portland, OR

August 10, 2025

Manzanita City Council

Re: Proposed Amendments to Zoning Ordinance

Dear Mayor Stock and Councilors:

Watching your recent work sessions on the proposed changes to the zoning ordinance leads me to offer these comments, which reflect my views and not necessarily those of my colleagues on the Planning Commission. I'm speaking for myself. I hope you find them helpful.

It's not just about workforce housing

The goal of the changes is to allow smaller dwellings than we now do. Allowing them doesn't guarantee they'll get built, of course. What gets built depends mostly on market forces beyond our control. But *not* allowing them guarantees they *won't* get built.

Manzanita needs smaller dwellings because smaller is – not always, but usually – more affordable than larger. And our town badly needs more affordable housing. It won't thrive if local employers, both private and public, can't recruit good workers because it costs too much to live here.

But it's not just employers and job seekers who would benefit from smaller dwellings; some residents would, too. This is, in large part, a retirement community. The median age is 68 (as I recall). And many people, as they get older, look to downsize. They no longer want to climb stairs or maintain a big yard, especially if their health declines or they lose a spouse or partner. At the same time, they don't want to leave the community that's been their home. Smaller dwellings – especially cluster cottages and courtyard apartments, which offer close-at-hand neighbors to help out and lookout – would be a great alternative for many. We shouldn't make people leave town to find that housing option.

Don't assume the neighbors don't want it

In my conversations around town, I haven't heard opposition to the kinds of multi-family dwellings included in these proposed changes – duplexes, triplexes, quadplexes, townhomes, cluster cottages, and the like – not even in the mostly built-out parts of town (admittedly a non-scientific poll). To be sure, everyone cares about what gets built next door to them. And when it comes to the physical structure – to the size, the footprint, the setback, the height, maybe even the design – they have a right to care. But they don't have a right to care about who lives there - one family, two, or three. Given that the average household size is just over two people, and getting smaller all the time, they really *shouldn't* care; a multi-family

home might have no more occupants than a single-family home. I think most people in town understand that and don't insist that multi-family housing not be allowed in areas that now have mostly or only single-family housing.

Big city challenges aren't limited to big cities

As you know, a state law requires every city in Tillamook County, including ours, to follow another state law that required cities with over 25,000 people, so-called "big" cities, to allow housing other than a single-family dwelling in residential zones. See ORS 197A.420(a) and (2)(a). But, even without that law, we should still make corresponding changes in our zoning ordinance.

Just because we're not a big city doesn't mean we don't have some big-city challenges when it comes to housing. We do – no doubt because our housing prices are just as high as those in many bigger cities. We, too, have a dire shortage of middle housing – best thought of as housing affordable to people on a middle-class income, which often means smaller and attached housing options. And the problem is worsening as housing prices continue their sharp rise, followed closely by rising rents.

It follows that we should welcome, not resist, as if we could, the requirement to comply with a law to boost our stock of middle housing. The initial reaction of some to the changes – we're not a big city, so we shouldn't do it – misses the point. We *should* do it if it's right for us no matter our size, and I believe it is.

This mostly expands, not constricts, property rights

Whenever you enact a new zoning rule, affected property owners wonder whether it will diminish their property rights and thereby reduce their property's value. For the most part, the Planning Commission's proposed changes *enlarge* property rights. They allow more types of housing in more places than under the current ordinance. And they end the ordinance's restrictions on use, both outright and conditional. At the same time, the proposals don't change the ordinance's current height restrictions, and they relax some set-back requirements (those in front).

The one notable exception is a limit on the size of dwellings (3,000 square feet, not counting the garage). Some might think that lowers a property's value – telling the owners they can't build something as big as they might want. But it could also be viewed as *raising* its value, too. That's because the restriction applies, of course, to the adjoining properties. What your property is worth depends not only what you can do with it, but also on what your neighbors can do with *their* properties. If you can't build something oversized, crowding them, impeding their view, and blocking their sunlight, they can't build something that would do that to you. Most people will recognize the trade-off and thus conclude that this size restriction will be a wash in terms of property values.

Parking and housing are intertwined

Every lot has only so much land to build on. The more that's required for off-street parking, the less there is for a dwelling or dwellings, so reducing those requirements can help to boost housing.

Manzanita has room for a reduction. Many of our homes are second homes, not always occupied. Some, in fact, are rarely occupied, even in season or on holidays, and thus put no demand on the supply of on-street parking spaces. We don't have the same need for off-street parking that you might find in cities where houses are occupied full-time.

Parking requirements are minimum requirements, not maximum. It's not that you can't create more off-street parking, if you want it – only that you don't have to. For those who don't want it, we shouldn't force it on them, leaving them instead to devote more of their land to housing, if that's their choice. (Here, again, the proposed changes to the housing ordinance enlarge property rights rather than restrict them.)

It's also about segregation

Single-family zoning has its roots in discrimination by race, and regardless of current intentions, it still has an exclusionary effect.¹ It's important, then, that cities not segregate by housing type. Otherwise they can end up unwittingly segregating by race. Putting all the single-family homes here and all the multi-family dwellings there, on the other side of the tracks, literally or figuratively, can create racial disparities, because different places have different amenities. In our town, for instance, the proposed MH1 zone is closer to the beach and has more ocean views. It's also easier to walk to the park, stores, restaurants, farmers market, and city hall. The MH2 zone is not so blessed (although it has other attractions). And that's a good reason not to confine all the non-single-family housing there.

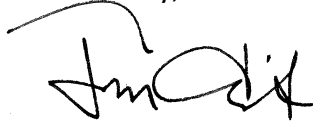
In my view, we shouldn't restrict certain types of housing to certain locations. If a housing type is permitted anywhere, it should be permitted everywhere, thus helping to integrate our community by race and other demographics. To be sure, market forces, land supply, and terrain, especially slope, will largely determine what gets built where. But

¹ Back in the day, developers often sold lots with deed restrictions that prohibited re-conveyance to non-whites. When the courts outlawed that practice, cities turned to zoning as an indirect means to the same end. At the time, most people of color couldn't afford anything but an apartment or a small house on a small lot, so "single-family zoning," joined with minimum lot- and house-size restrictions, kept them out of desirable neighborhoods. "Red-lining" by realtors and lenders played a role, too. But those pernicious practices ended eventually with federal and state fair-housing laws. Single-family zoning remains in many places and is the main reason why some of them are so very white. A neighborhood's housing stock is mostly what determines who lives there – who wants to *and* can afford to. And after generations of discrimination, in housing, employment, education, and other fields, people of color, by and large, lack the income and wealth needed to buy an expensive single-family home in a place where that's the only housing option.

notwithstanding those hurdles, if someone wants to build a particular type of dwelling in a particular part of town, we shouldn't be telling them, no, you have to build it someplace else. Whatever might happen in practice, we should, at least in theory, be non-exclusionary.

Thanks for listening, and thanks also for your service to our community.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Christ", with a stylized, flowing script.

Tom Christ

What the ordinary Manzanita voter might want to know....

Two general questions come to mind about the draft housing code: Why is Manzanita doing something different from what the state requires? How will this affect current residents?

I understand that the general purpose of the state law (SB 406 passed in 2023) is to encourage housing stock growth by allowing builders to build multi-family units where they were limited to single-family before. State law also addresses required parking. Most Oregonians are aware that the housing stock is low, which is not healthy for the state. The state talks about “middle housing” as distinguished from low-income, work-force, or other types of housing. The focus is clearly housing stock.

State law only applied to big cities, but Tillamook County representatives, Javadi and Weber, chose to have the law apply to all towns in Tillamook, regardless of size. Other small towns in Tillamook simply adopted state requirements. The Manzanita planning commission decided to do something different with some of the requirements. **Why** is Manzanita doing something different?

As I understand it so far...

Types of housing:

A. Single-family: Manzanita reduces the required onsite parking to 1 per home. The state doesn't require a change. **Why** the change? How does this apply to current homeowners when they remodel? Many streets are narrow, and we have no sidewalks – is this dangerous as well as crowded?

Why is there a cap on the size of the home? Where did 3000 sf come from? Yes, 3000 sf is out of character with most neighborhoods, and can be ugly (so can other things), but this is a whole different topic and consideration.

Why does the setback change from 20 to 10 feet in the front (and from 5 to 3 feet on the side)? The state doesn't require this. And, if this goes through, will it be available to existing homeowners? How does this affect livability?

B. ADUs: State requires them and requires no parking. Manzanita follows state requirements.

C. Tiny homes (under 500 sf). The state requires only one parking space (not two, as is currently the case in Manzanita). The draft proposal goes to zero – no onsite parking required. **Why?** (These would appear to be prime candidates for second homes. Why is there no onsite parking, given our general lack of public transport? There will be cars!)

D. Duplex/triplex/quad/townhome/cottage: State has lot size requirements. Manzanita is following state requirements. **Is this true? Not sure. The state requirement is 5000, and we are saying that size (probably?) won't apply to quads or triplexes.** The planning commission draft proposes 1250 sf minimum size (instead of the 1500 sf size for state requirements). Why would

we want to go to 1250 lots if the state requires 1500? This seems like a way to squeeze in one more unit – with less parking. Currently, Manzanita requires two parking spaces per unit in these types of buildings. State reduces this requirement to one or less than 1 per unit. The draft proposal follows the state law, but allows on-street parking. The state does not require this. Given the lack of sidewalks and already crowded streets during the summer, **why** is this proposal being made? This proposal is scary to some of us due to safety and noise pollution concerns.

Other....

- The commission has said, "don't worry," that all of these changes will invite more STRs because the rule is two parking spaces for STRs. However, rules change – which is why this question keeps coming up. Is there anything else, other than the 2-parking space rule, that would prevent more STRs? If so, write it in. I don't have a bias against STRs, most are quite well managed, and they help fund the city. However, if the intention is not to grow STRs, using a rule around parking that can be changed seems convoluted and evasive.
- What else is changing that the draft proposes, but state law doesn't require? (Still not clear to me.) For example, HOAs must meet state requirements – but does the draft address more than what the state requires for HOA?
- What are the other changes in the draft that are NOT addressed by state law? I understand there are design requirements – is this appropriate here, though? Wouldn't it be better to do this separately with more input?
- If housing stock goes up considerably, what is the predicted effect on **(1) liveability and (2) housing prices?** Manzanita has no sidewalks. Greenspace is a consideration for some residents. It doesn't seem enough to say we don't know how it will affect the town for the changes the city is proposing (over the minimum state requirements). If trees are covered in other plans, that's great, but how will the parking proposals in this plan affect trees now?
- I know that FAR is the sq footage of the building/lot size. What impact does applying it to residential areas have? Why was that included? What was the planning commission hoping to have happen?
- Note: The term "permissive" is confusing. Permissive to whom or for whom?

I know there has been a lot of work and discussion on these code changes. Yet questions and confusion still exist amount residents and homeowners. It is both a benefit and curse that so many of us care deeply about the effect of change, environment, and balancing the needs of new housing with why people want to be here.

Thank you,
Judith Sugg