



CITY OF MANZANITA

655 Manzanita Avenue – Manzanita Oregon 97130

P.O. Box 129, Manzanita, OR, 97130-0129

Phone: (503) 812-2514 | TTY Dial 711

devservices@ci.manzanita.or.us

Planning Commission

Live in Person

Or via Zoom Video Webinar

<https://ci.manzanita.or.us/planning-commission/>

AGENDA

September 14th, 2026

04:00 PM Pacific Time

Live in Person at Manzanita City Hall

Video Meeting: The Planning Commission will hold this meeting through video conference.

The public may watch live on the City's Website: ci.manzanita.or.us/broadcast

or by joining the Zoom Meeting:

<https://us02web.zoom.us/j/86395122183?pwd=nwyMTUPXsksZHaXpqAB8P55uB7pMSO.1>

Meeting ID: 863 9512 2183

Passcode: 462145

Dial in number: (253) 215 8782

Please note that a passcode is not required to enter the webinar.

Note: Agenda item times are estimates and are subject to change

1. CALL TO ORDER (4:00 p.m.)

2. AUDIENCE PARTICIPATION

Comments must be limited to city topics that are not on the agenda. A topic may not be discussed if the topic record has been closed. **Comments may also be submitted in writing before the meeting, by mail, e-mail (to devservices@ci.manzanita.or.us), or in person to city staff.**

3. APPROVAL OF MINUTES

A. Meeting date - August 10th, 2026

4. Public Hearing

A. Planning File # 26071 - Resilience Hub at City Hall

B. Comprehensive Plan Adoption

5. UPDATES

A. Scott Fregonese, City Planner

5. ADJOURN (5:30 p.m.)



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CITY OF MANZANITA PLANNING COMMISSION MEETING MINUTES

August 10, 2026

I. CALL TO ORDER: Chair Squillo called the meeting to order at 4:00 PM in the council chambers.

II. ROLL: Commissioners present: Chair Frank Squillo, Vice Chair Bert Gregory, Brad Berman, Erica Althans-Schmidt, Mark Kuestner, and Carl Vandervoort. City Planner Scott Fregonese and Permit Technician Jeremy VonSeggern.

III. AUDIENCE: Members of the public attended online and in person. No comments were offered during the general audience-participation period on matters not otherwise listed on the agenda.

IV. APPROVAL OF MINUTES: The July 13, 2026, Planning Commission Meeting Minutes were reviewed. A motion was made and seconded to approve the minutes. Motion passed unanimously.

V. PUBLIC HEARING - STEEPLEJACK VARIANCE, PLANNING FILE 26040: Chair Squillo opened the first public hearing. No commissioner reported a conflict of interest, bias, or ex parte contact. City Planner Fregonese presented the staff report on Steeplejack's request to reduce the required off-street parking from four spaces to two by removing the two front parking spaces. Staff found that the request did not satisfy the variance criteria, including the requirements for exceptional or extraordinary circumstances and a demonstrated hardship, and recommended denial. Staff also noted possible alternatives, including verification of the parcel area and use of qualifying off-site parking under the City's parking provisions. Brady Day, representing Steeplejack, described conflicts between customers waiting near the entrance and vehicles using the front spaces, and discussed constraints on creating additional parking at the rear of the property.

Public Testimony: Testimony included support for removing the front spaces because of perceived safety and maneuvering concerns; concerns from an adjoining property owner regarding the shared driveway/easement, access to the neighboring property, the accuracy of the site plan, and possible added congestion; and questions regarding access to the rear parking area. The Commission and staff discussed the shared driveway, the rear parking configuration, and the need to keep the easement clear.

Commission Deliberation and Action: Commissioners expressed support for small businesses and acknowledged potential pedestrian-safety benefits, but concluded that the variance criteria had not been met. Commissioners discussed possible future alternatives, including relocating a parking space, securing off-site parking. A motion was made and seconded to deny the Steeplejack variance request. Motion passed unanimously.

VI. PUBLIC HEARING - PROPOSED COMPREHENSIVE PLAN: Chair Squillo opened the first Planning Commission hearing on the proposed Comprehensive Plan. One commissioner disclosed prior individual comments to the City and prior comments to the State concerning dune management made before appointment to the Commission, stated that no ex parte communications had occurred since appointment, and stated an ability to participate fairly and impartially. No other disclosures were reported.

Staff Report: City Planner Fregonese reviewed the four-year planning process, Oregon's statewide planning framework, the role of the Comprehensive Plan as a long-range policy guide, the organization of the proposed plan, and the extensive public-engagement process. He reviewed the anticipated adoption schedule, including a continued Planning Commission hearing on September 14, 2026, followed by City Council hearings if the Commission is prepared to make a recommendation.

Commission Discussion and Direction: The Commission provided direction for staff to return with proposed edits and clarifications. Topics included narrowly tailored right-of-way language for emergency-

preparedness facilities and accessibility features; a policy addressing maintenance of public streets and rights-of-way, including unpaved streets; restoration of public-involvement and transparency language; clarification of the dune-management process and related policies; stronger guidance for the commercial core, mixed-use development, and local business vitality; consideration of gateway character and landscaping; improved document navigation and policy numbering; clearer separation of bundled transportation, right-of-way, and parking policies; possible study of a comprehensive parking strategy for the commercial core; street-network and block-connectivity language; and updates or source dates for maps and data. Commissioners were asked to provide additional written comments to staff so a consolidated list of recommended edits could be prepared for the September meeting.

Action: A motion was made and seconded to continue the Comprehensive Plan public hearing to the September Planning Commission meeting. Motion passed unanimously. The continued hearing is scheduled for September 14, 2026.

VII. GENERAL UPDATES: City Planner Fregonese reported that staff is working to arrange Planning Commission training. He also noted upcoming resiliency-related work at City Hall involving a storage facility.

VIII. ADJOURNMENT: The meeting concluded at approximately 6:29 PM.

MINUTES APPROVED THIS ____ DAY OF _____ 2026

X

Frank Squillo
Chair

ATTEST:

X

Nancy Jones
Clerk of the Council, Pro Tem



CITY OF MANZANITA

Development Services

655 Manzanita Avenue – Manzanita Oregon 97130

P.O. Box 129, Manzanita, OR, 97130-0129

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NOTICE OF VARIANCE APPLICATION

File No. 26071

The City of Manzanita Planning Commission will hold its regular meeting on Monday, September 14, 2026, at 4:00 PM at City Hall and via Zoom. Go to www.ci.manzanita.or.us for log in information. This meeting will include a public hearing to consider the following application:

Request: Application for approval of an accessory structure at City Hall to construct a Resilience Hub
Applicant: City of Manzanita (James M Fanjoy, Viridian Architecture LLC.)
Location: 655 Manzanita Avenue
Assessor's Map: Township 3 North; Range 10 West; Section 29AD; Tax Lot 2500
Area: Approximately 2.71 acres, or 118,100 square feet
Plan Designation: Commercial 1 (C-1).
Criteria: This application will be evaluated against provisions listed in Ordinance 95-4: Section 3.040 (C-1 Zone) and Section 6.030 (General Provisions Regarding Accessory Use).

Persons interested in the proposal should become involved in the land use decision-making process. Anyone desiring to speak for or against the proposal may do so in person or by representative at the hearing. Written comments may also be filed with the City of Manzanita prior to the public hearing. All documents, evidence, and staff reports relied upon by the applicant, including a list of Manzanita Zoning Ordinance approval criteria applicable to the request, are available for inspection at Manzanita City Hall at no cost, or copies can be obtained for \$0.25/page.

The Planning Commission's review is for the purpose of deciding on the proposal. A decision by the Planning Commission to approve or deny the application will be based upon the above-mentioned criteria and these criteria only. At the hearing it is important that comments relating to the request pertain specifically to the applicable criteria. Failure of an issue to be raised in the hearing, in person or by letter, or failure to provide sufficient specificity to afford the decision-maker an opportunity to respond to the issue precludes appeal to the Land Use Board of Appeals based on that issue.

A copy of the staff report will be available at least seven days prior to the hearing for inspection at no cost, or a copy can be obtained for \$0.25/page. If you need any special accommodation to participate in the hearing, please notify City Hall 24-hours before the meeting. For further information please contact Scott Gebhart, Development Services Manager [503-812-2514 Ext. 7] P.O. Box 129, Manzanita, Oregon 97130.



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Type 1 LAND USE APPLICATION

Zoning Ordinance 95-04 | Development Services

Site address:

Tax Map & Lot:

Zoning district:

Overlay zone(s) if any:

Applicant name:

Owner name:

Mailing address:

Phone:

Email:

Project narrative / description:

Required attachments (check all included):

Site plan (scaled)

Written criteria response / narrative

Elevations (if applicable)

Landscape plan (if applicable)

Parking / access plan (if applicable)

Overlay documentation (if applicable)

Other supporting documents

Applicant signature:

Date:



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Application Type & Fee Worksheet

Select ONE application type. Fees auto-populate and Total Due auto-calculates (Adobe Acrobat recommended).

Select application type:

Address Request

Administrative / Minor Pre-Application Meeting (30 minutes)

Tree Removal Permit

Temporary Permit

Property Boundary Adjustment

Final Plat – Partition

Final Plat – Subdivision

Performance Bond Review

Pre-Application Conference (1 hour)

Zoning Interpretation (Written Request)

Extension of Land Division Approval

Replat / Plat Amendment (Minor)

Dune Grading – Remedial/Construction

Fees (auto-filled):

Base fee (\$):

Deposit (\$):

Total due now (\$):

Deposits apply when consultant/legal/engineering review is required (Exhibit A).



City of Manzanita/ Planning Department
PO Box 129
Manzanita, OR 97130

July 30, 2027

RE: Manzanita Resilience hub, planning narrative

To the reviewer:

The city of Manzanita intends to install a permanent resilience hub on the northeast corner of their property located at 635 Manzanita Ave in Manzanita, Oregon. This hub is designed to contain supplies and equipment for use by emergency services for the benefit of the citizenry in the event of an emergency such tsunami, earthquake, or other large scale disaster. It will be accessed infrequently, perhaps a few times per year, for routine maintenance and inventory. The hub itself consists of two 40' shipping containers and an awning between them, as well as accessory services such as an electrical connection and a propane tank.

Manzanita Zoning Ordinance section 6.030(2)(b) specifically prohibits the use of cargo containers as accessory structures within the city limits. However, exception (iii) states:

placement of cargo containers and/or portable site storage containers for storage of disaster relief supplies meant for the general public such as food, medical supplies, and blankets, provided that visibility of the cargo containers and portable site storage containers from the street or adjacent properties shall be minimal as determined by the Planning Commission.

To minimize the visual impact of the hub, it will be painted in a neutral green color, and surrounded by landscape plantings as shown in the attached renderings.

Respectfully Submitted,

James M Fanjoy
Principal Architect

Tillamook County Fire Agencies

ONSITE Fire Apparatus Access and water Supply Driveway Inspection Form 2025 OFC REV 05.2026

Reference: 2025 Oregon Fire Code (OFC) Chapter 5 and Appendix B, C and D

Address/Location of Proposed Development:	3N10W29AD02500 655 Manzanita Ave, Manzanita, OR 97130		
Name:	James Fanjoy	Contact Phone #:	503-272-1701
		Email:	jim@ViridianArch.com
Proposed Work: 500 gallon Propane tank, 2 40' emergency supply connex's			
Total Square Footage of proposed structure:	640	Building Height:	9'-0"
		Building Type:	II-B
		Building Occ. Use:	7
Reliable Water Source:	YES NO	Existing Water Source Gallons or hydrant flow @20 PSI:	500
		Water source type:	M-27
Approved Fire Department connection from water source: YES NO (For draft hydrant specifications, contact local FD)			

Step 1: Driveways shall meet the Oregon Revised Statutes (ORS) 476 and the 2025 Oregon Fire Code (OFC), and/or County Road Standards.

Step 2: Provide the fire department/district with a detailed site plan including the information as noted below on the plan.

- If an approved NFPA Fire Sprinkler, Fire Alarm and Monitoring is planned for the proposed construction, note on site plan.
- If the area is rural, there is no hydrant service or reliable water supply, provide water supply plan per current NFPA 1142 standard.

Step 3: Contact the local Fire authority having jurisdiction (AHJ) for the construction site to arrange a driveway inspection/approval, then deliver this signed form to the building official. There may be local ordinances with more stringent requirements, check with local Building and Fire AHJ prior to construction.

Property Owner shall maintain property/business according to the Oregon Fire Code and NFPA Standards.

- ☒ **Load Width:** Fire access roads shall have an unobstructed driving surface width of not less than 20 feet for commercial property use and on driveways serving over 5 homes (Diagram 1-A). (OFC 503.2.1) (OFC D101.2)
- Surface width with fire hydrant shall be minimum of 26 feet at hydrant area (Diagram 3-A) (OFC 503.2.1, D103.1w/ exception)
 - Wildland-Urban Interface areas 12 feet wide minimum for residential 1-2 family serving 5 homes or less (OFC D101.2).
 - Additional width would be necessary for approved parking on roadway or per local ordinances.
- ☒ **Vertical Clearance:** An unobstructed vertical clearance of not less than 13 feet 6 inches, including tree and brush obstructions shall be maintained. (Diagram 1-A) (OFC 503.2.1)
- ☒ **Surface and Load Capacities:** Fire access roads shall be of an all-weather surface with asphalt, concrete, gravel or other approved driving surface capable of supporting the imposed load of a fire apparatus weighing at least 75,000 pounds. (OFC D102.1) Proper drainage shall be provided and maintained to prevent runoff damage. (OFC D103.7)
- ☒ **Grade:** Fire access road grade shall not exceed 10%. (OFC D103.2) **NOTE:** If the structure site is located on sloped property greater than 10%, contact your local fire official for input prior to driveway construction. (Diagram 2-A)
- ☒ **Distance from Structure(s):** Fire access roads shall be within 150 feet of all portions of the exterior walls of the structure as measured from the approved fire access road. (OFC 503.1.1)
- ☒ **Dead End Roads and Turnarounds:** An approved turnaround is required if the dead-end fire access road is greater than 150 feet. (Diagram 3-A) (OFC D103.4 and Table D103.4) Rural: Turnouts or other approved alternative access methods may be proposed for approval by the fire code official. (Diagram 4-A) (OFC 503.1, D103.1 Ex. 3, D101.2, 2024 IWUIC section 403.2.2)
- ☒ **Bridges:** The bridge shall be constructed and maintained in accordance with AASHTO LRFD. The bridge shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. Vehicle load limits shall be posted at both entrances to bridges. (OFC 503.2.6)
- ☒ **Gates:** Gates securing fire access roads shall comply with all the following: Minimum unobstructed width shall be 20 feet without a center post or island. Gates shall be of the swinging or sliding type operated by one person. Knox Box Rapid Access System or other unlocking method shall be submitted for approval by the fire code official on all locking or coded gates. Electric gates (listed per UL 325) and automatically operated gates (listed per ASTM F2200) shall be equipped with a means of opening the gate by fire department personnel with approved emergency opening devices. (OFC 503.5, D103.5)
- ☒ **Address Sign:** A permanent address sign must be installed plainly visible and legible from the street or road fronting the property. Numbers shall be at least 4" (recommended minimum 6") in height and contrast with the background. (OFC 505)
- ☒ **Water Supply:** An approved water supply for supply of the required fire flow for fire protection shall be provided to premises upon which facilities, buildings or portions of buildings are hereafter constructed or moved into the jurisdiction. Water Supply must be designed and maintained according to the OFC or NFPA 1142 depending on location and type of water availability. (OFC Section 507) – an approved NFPA designed fire sprinkler system, fire alarm and monitoring may be an approved alternative for reduced fire water flow- OFC App. B

This Section to Be Completed by Fire Official of Nehalem Bay Fire & Rescue Fire Department/District as enforced under ORS and OFC.

- ☐ **Water and Fire Access at the development site is required prior to combustible load in and construction** 2025 OFC 501.4, 507.1.
- ☐ **Condition Pending for Construction:** Fire access plan to the proposed development site is temporarily suitable for access by fire service equipment/construction if approved for construction by the building department, however deficiencies exist and are required to be corrected prior to fire service approval. **RE-INSPECTION REQUIRED -SITE NOT YET APPROVED.**
- ☐ **Pending:** ☐ Width ☐ Vertical clearance ☐ Imposed weight load support ☐ Grade ☐ Turnaround ☐ Turnouts ☐ Gate ☐ Address Posted ☐ Water Supply ☐ Recommend Alternative Method/UACS (1-2 Family OAR 918-480-0125) /NFPA approved Fire Sprinkler with Building Official
- ☐ Other

Fire Official: Dan Weitzel Title: Captain Date: 07/22/2026

Final Approval: Water Supply and Fire Access to the proposed development site are satisfactory for access by fire department equipment.

Fire Official: _____ Title: _____ Date: _____

Diagram 1-A Road Width and Vertical Clearance

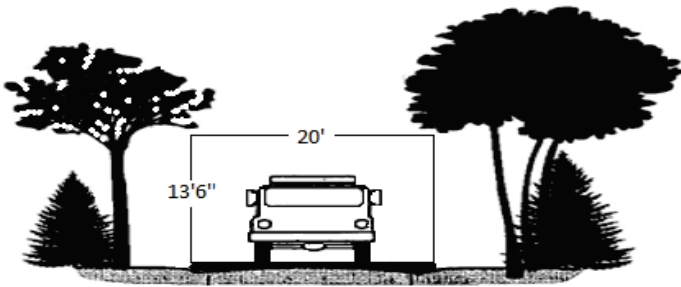


Diagram 2-A Grade Alternate

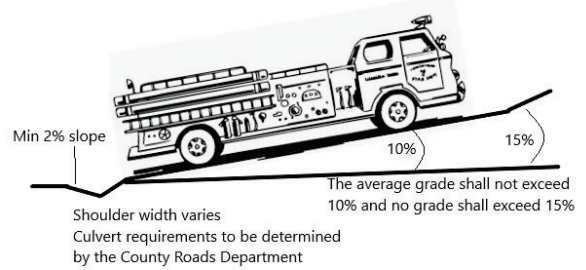


Diagram 3-A Turnarounds and Hydrant Clearance Parking

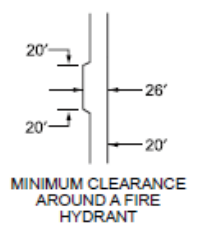
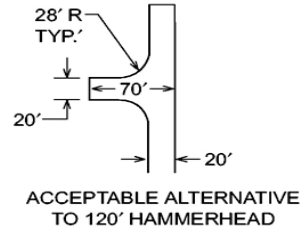
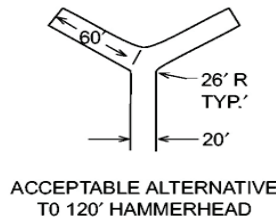
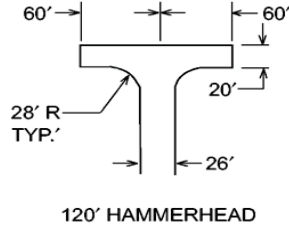
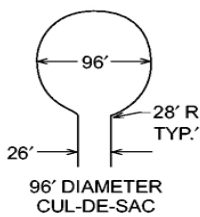


Diagram 4-Residential Turnouts

Every 400 Feet (Overhead View Looking Down)

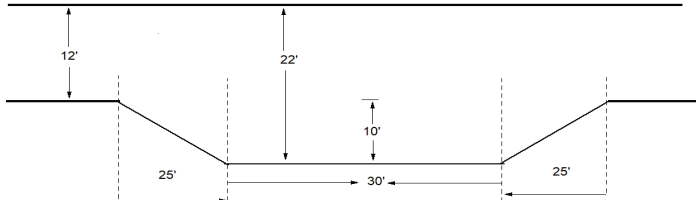
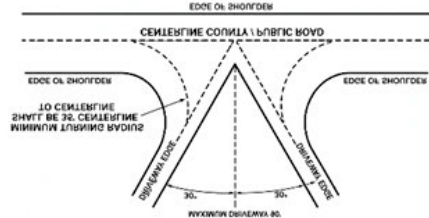


Diagram 5-



Urban Firefighting water supplies: For all structures in a competent water supply area, a water supply for fire suppression with an approved hydrant system/location shall be in place, with appropriate flow measured at 20 PSI test witnessed by fire authority, flushed and operational prior to bringing combustible construction on site in accordance with current Oregon Fire Code Chapter 5, appendix B, C and D.

Rural Firefighting water supplies: For residential structures in rural district without a competent fire water system over 3,600 SQ FT, including garage and porches, and for all commercial properties, a water supply for fire suppression shall be provided in accordance with current NFPA 1142 standard on water supplies for suburban and rural firefighting prior to bringing combustible construction on site. **Note:** An approved NFPA 13 Automatic Fire Sprinkler System (or NFPA 13R/ 13D) may be an acceptable alternative to the required water supply.

Other Information:

Many existing driveways do not provide the needed emergency access, where delays or emergency response may be hindered because of improper or non-maintained emergency access. New or exterior dimension altered structures will be expected to fully meet and maintain current fire access and water supply code requirements. If the home site is located on sloped property, we recommend you determine site grade and contact your local fire official for input prior to driveway construction.

With the increase of structures in the rural area, the need for adequate fire department access is ever more critical. The risk of wildfire and other emergency incidents increases with structure density.

Consult with the fire code authority for any alternative methods or further options/exceptions within the Oregon Fire Code. Here is the link to the OFC <https://codes.iccsafe.org/content/ORFC2025P1>

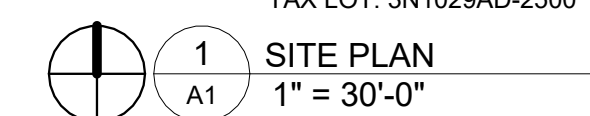
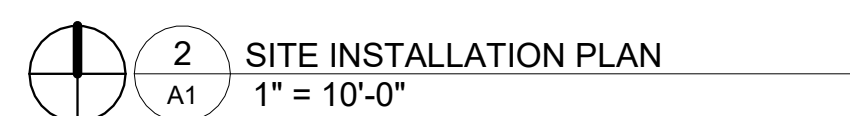
Tillamook County Fire Districts & Fire Departments

Bay City Fire	503.377.0233
Garibaldi Fire	503.322.3635
Nehalem Bay Fire	503.368.7590
Netarts/Oceanside Fire	503.842.1153
Nestucca Fire & Rescue	503.392.3313
Rockaway Beach Fire	503.355.2978
Tillamook Fire District	503.842.7587
Deputy State Fire Marshal	971.368.9229
Tillamook Building Division	503.842.3408

Duston.Yacapin@OSFM.Oregon.gov
Buildingpermits@tillamookcounty.gov



35820 US101 Nehalem, Oregon 97131
503.272.1701 www.ViridianArch.com



Resilience Hub
City of Manzanita
655 Manzanita Ave
Manzanita, OR 97130

[illegible]

PRELIMINARY
NOT FOR CONSTRUCTION

Project number 2606

A1

ENLARGED PLANS

7/22/2026 12:55:11 PM



VIRIDIAN
ARCHITECTURE

35820 US101 Nehalem, Oregon 97131
503.272.1701 www.ViridianArch.com

Resilience Hub
City of Manzanita
635 Manzanita Ave
Manzanita, OR 97130

No.	PC Review	Description	Date
			08/03/2026

PRELIMINARY
NOT FOR CONSTRUCTION

Project number 2606

A0

**SITE PLAN +
RENDERINGS**



PERSPECTIVE - AERIAL WEST

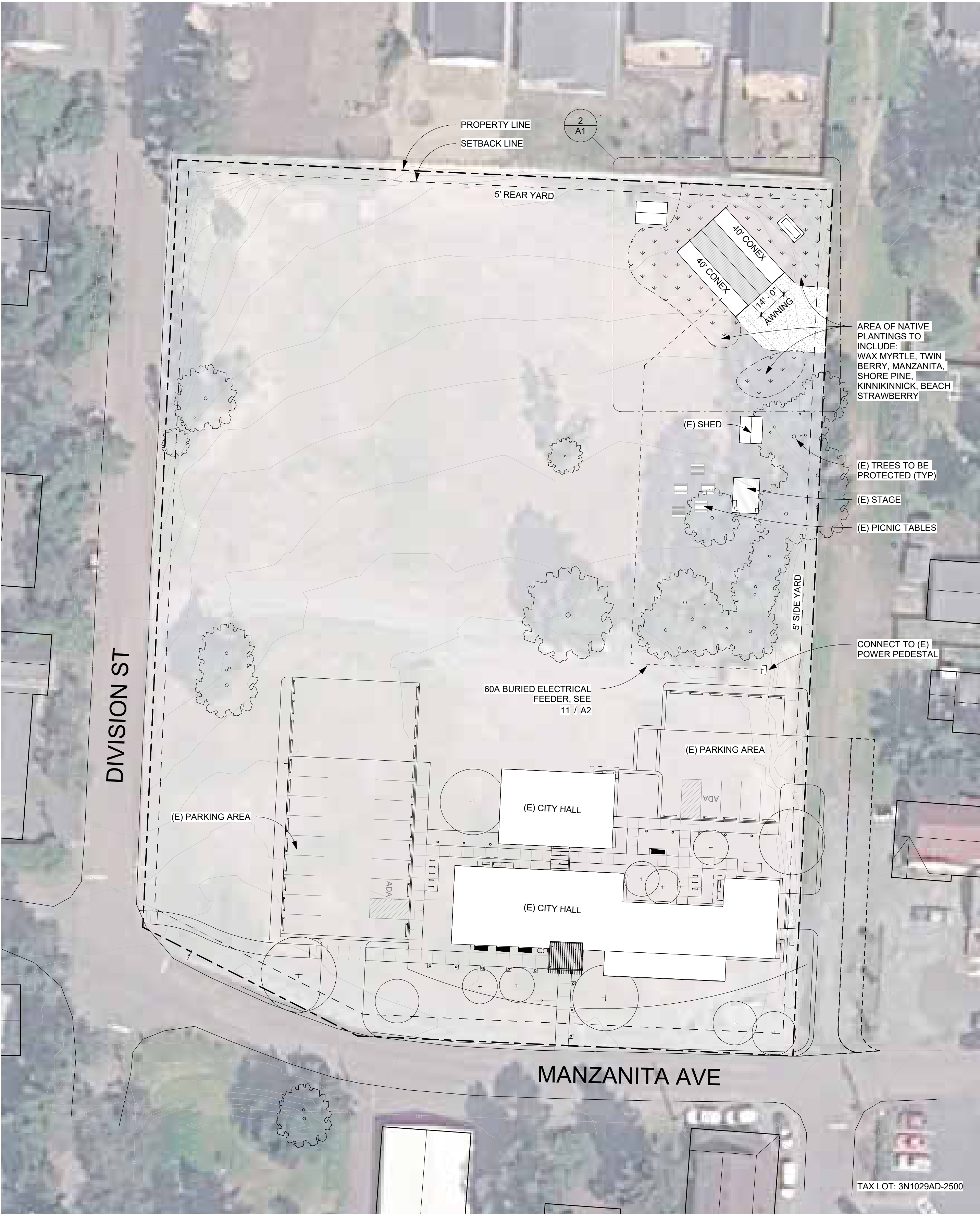


PERSPECTIVE - AERIAL SOUTH

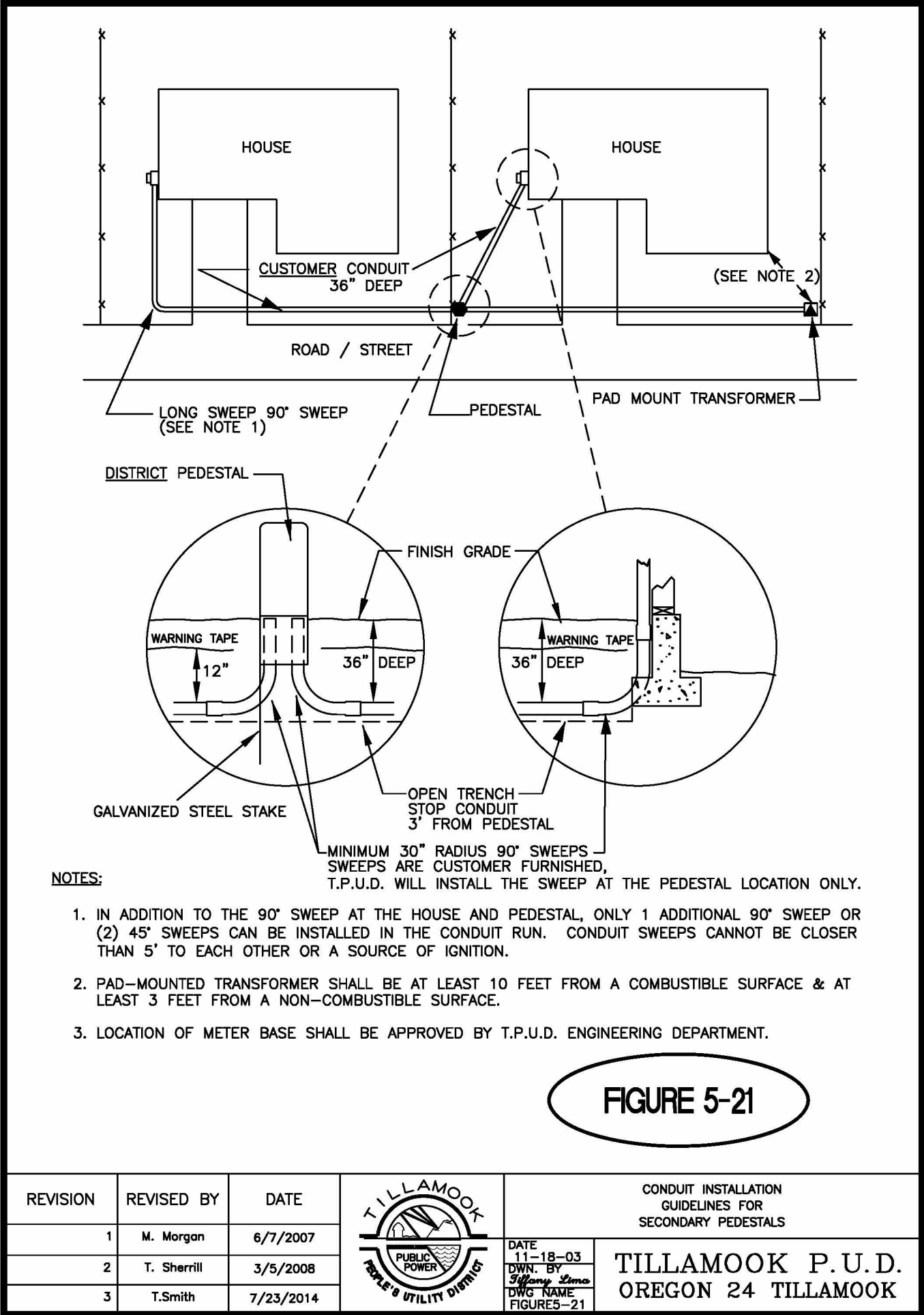


PERSPECTIVE - APPROACH

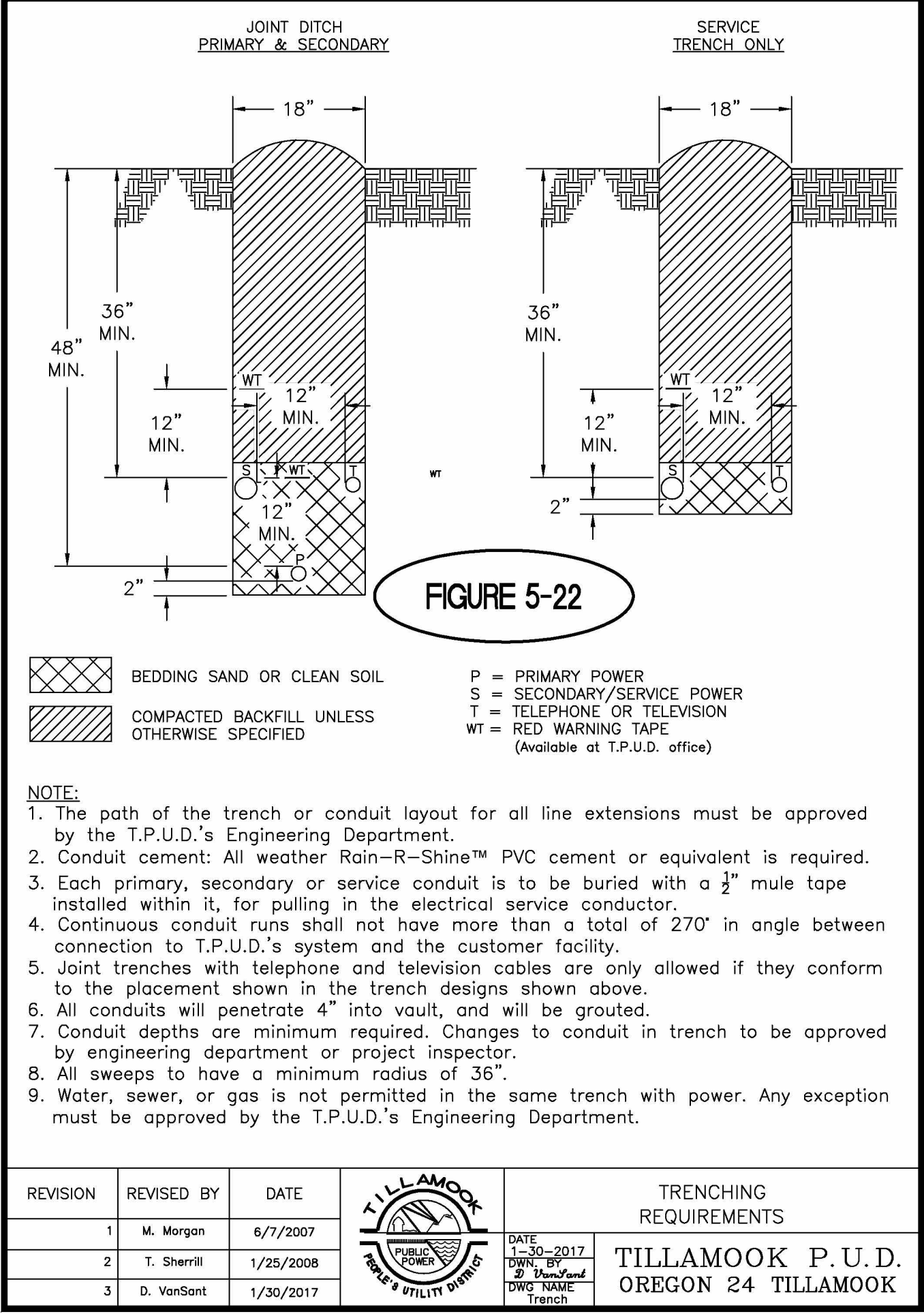
* RENDERINGS ARE INTENDED TO ILLUSTRATE THE OVERALL PLANTING CHARACTER AND DENSITY ONLY. FINAL PLANTING DESIGN, INCLUDING PLANT LOCATIONS, ARRANGEMENT, AND SPECIES SELECTION, WILL BE DEVELOPED IN COORDINATION WITH THE LANDSCAPE DESIGNER AND INCORPORATED INTO THE PERMIT DOCUMENTS DURING A FUTURE PHASE OF THE PROJECT.



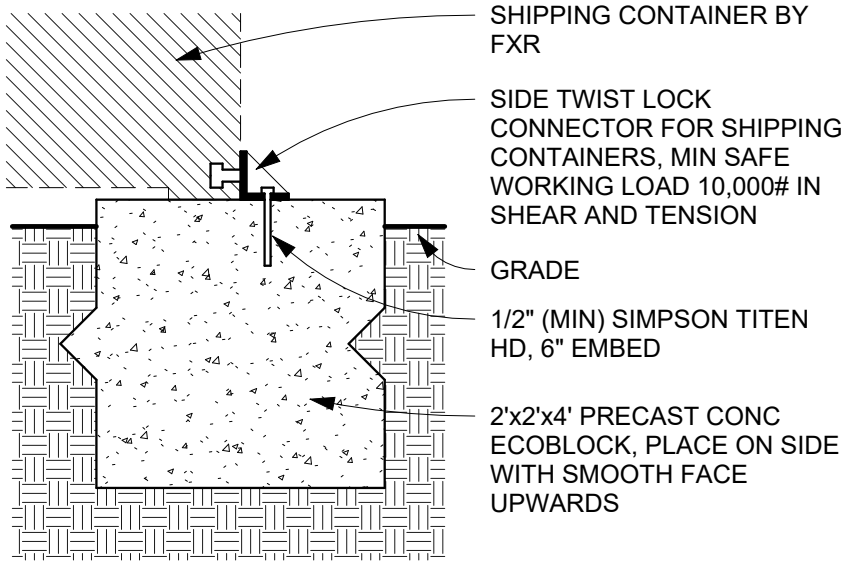
1 SITE PLAN
A0 1" = 30'-0"



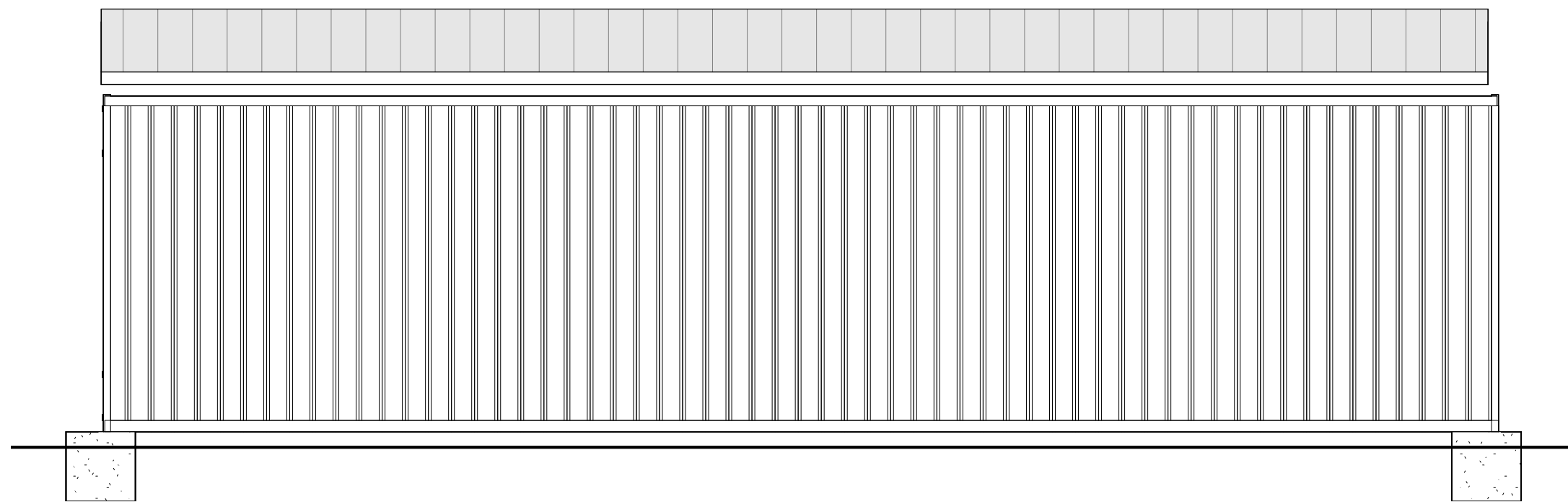
12 PEDESTAL GUIDELINES
1" = 1'-0"



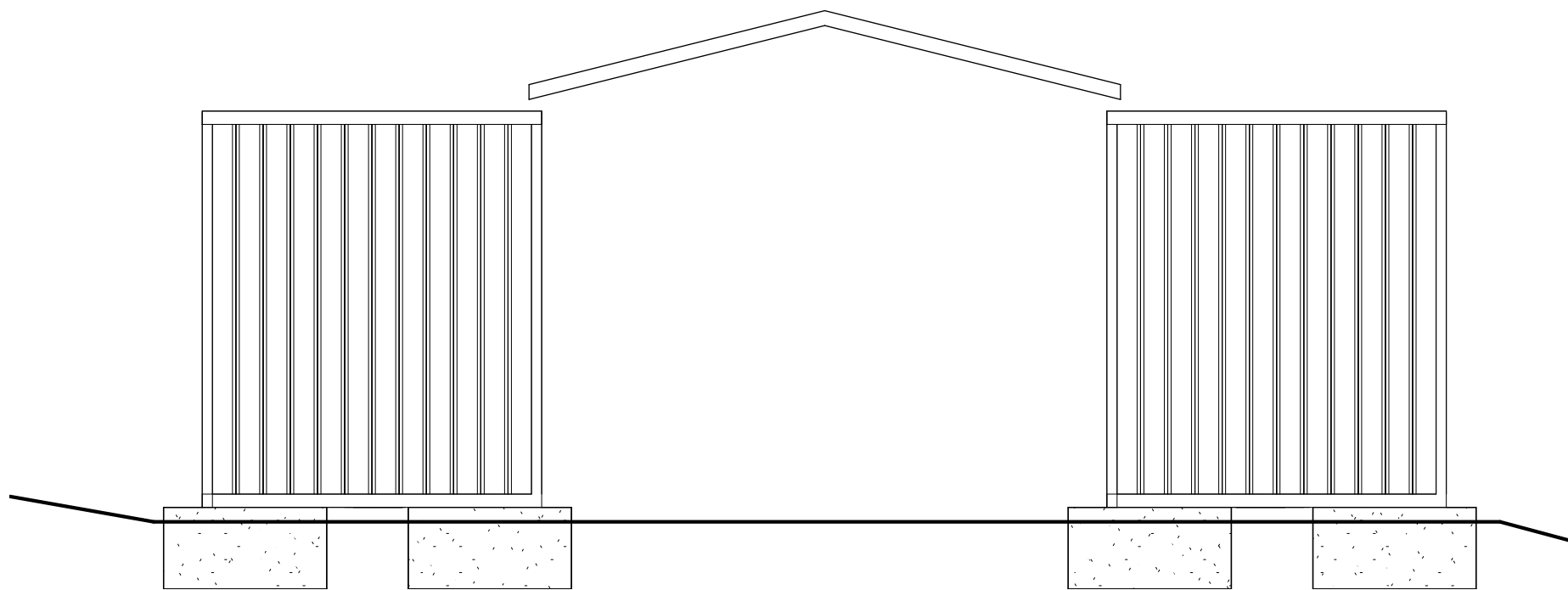
11 TRENCHING REQUIREMENTS
1" = 1'-0"



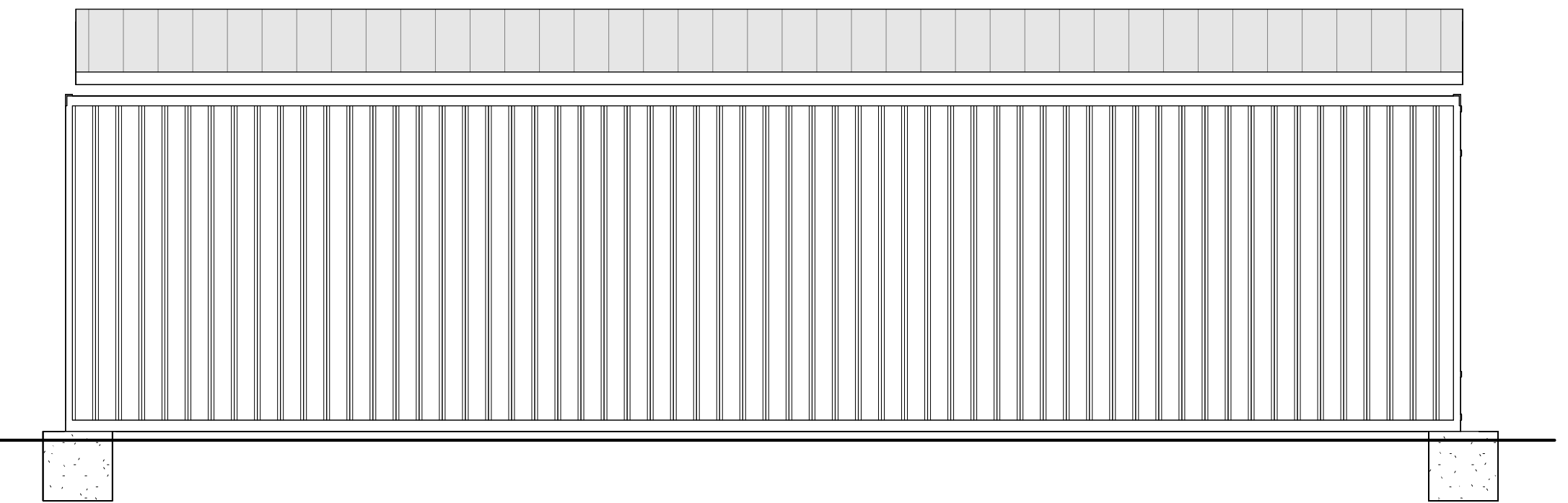
5 BEARING PLINTH & SEISMIC HOLDDOWN DETAIL
3/4" = 1'-0"



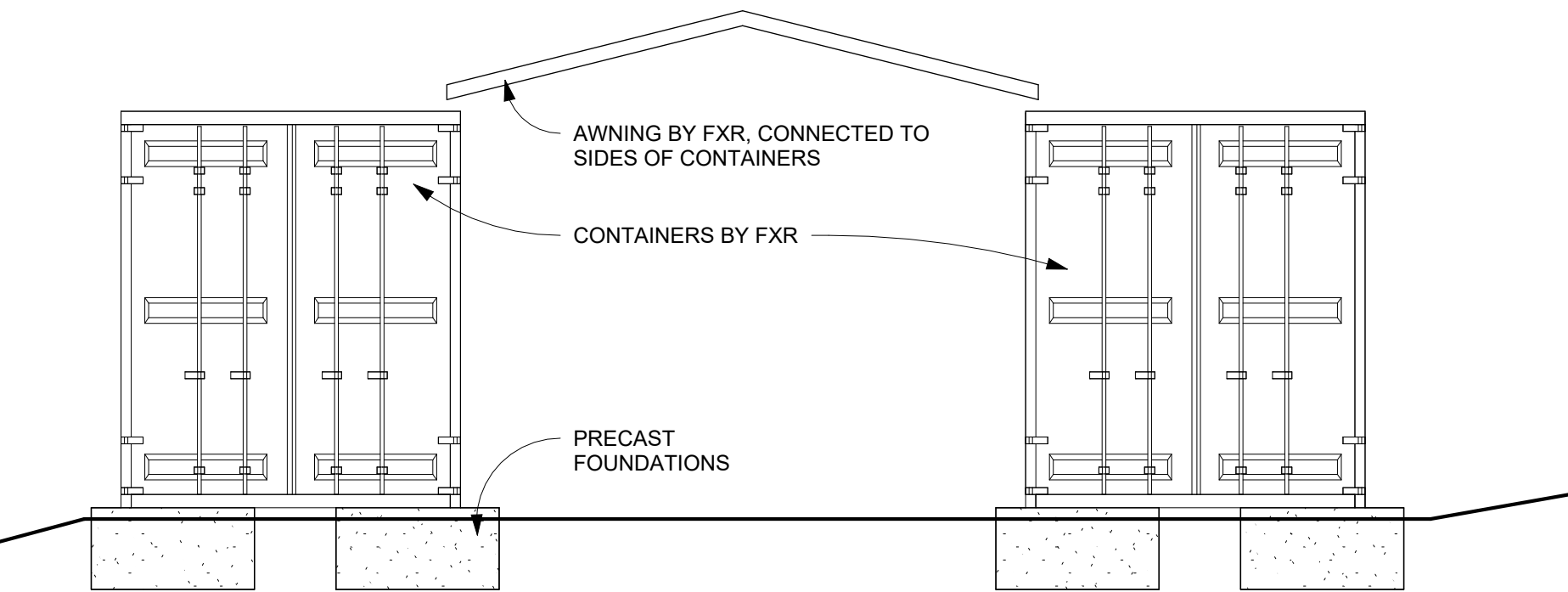
4 NORTHEAST ELEVATION
1/4" = 1'-0"



3 NORTHWEST ELEVATION
1/4" = 1'-0"



2 SOUTHWEST ELEVATION
1/4" = 1'-0"



1 SOUTHEAST ELEVATION
1/4" = 1'-0"

No.	Review	Description	Date
			07/30/2026

PRELIMINARY
NOT FOR CONSTRUCTION

Project number 2606



Questions? Contact us at OREMGrants@odhs.oregon.gov

ITEM	Type 1 Quantity	Type 2 Quantity	Type3 Quantity	Type 4 Quantity	Type 5 Quantity
40' Conex Box	3	2	2	1	0
20' Conex Box	0	0	0	0	1
Shipping Container Canopy Shelter 12' x 40'	1	1	1	0	0
Lockbox Key Container	1	1	1	1	1
Flammable Storage Cabinet that meets NFPA, IFC, and OSHA Standards	1	1	1	1	1
Insulation	3	2	2	1	1
Wall Heater	3	2	2	1	1
Dehumidifier	3	2	2	1	1
Utility Wall	3	2	2	1	1
Floor Seal	3	2	2	1	1
Metal Shelving	15	10	10	5	5
Electrical Panel (int.) Conduit, lines, Weatherheads	3	2	2	1	1
Interior LED light system on a switch within container	3	2	2	1	1
Outdoor portable LED lights on a stand	1	1	1	1	1
Solar powered, motion sensor, LED lights affixed to the exterior	1	1	1	1	1
Dual Fuel 9500W portable generators	3	3	2	2	2
25ft generator cord (heavy duty) and hook-up	3	3	2	2	2
5 gal. metal, self-closing lid w/ spout fuel cans	2	2	2	2	2
5 gal propane tank	2	2	2	2	2
Propane tank hose	2	2	2	2	2
Portable solar panels	2	2	2	1	1

ITEM	Type 1	Type 2	Type3	Type 4	Type 5
	Quantity	Quantity	Quantity	Quantity	Quantity
10x10 Pop-up canopy w/walls	1	1	1	1	1
10x15 Pop-up Canopy	1	1	1	1	1
Pallets of water	4	3	3	3	3
WIFI PTZ Transmitting Quad Cameras	1	1	1	1	1
High security padlocks (keyed)	8	6	6	2	2
Pallets of MREs or comparable shelf-stable food	2	2	2	1	1
Radio Communications Package	1	1	1	1	1
communication, networking switch and box (Starlink, 6U, Switch, UPS Battery Backup, Installation, Testing, and Warranty)	1	1	1	1	1
500 gallon propane tank (empty)	1	1	1	1	1
Large Propane Tank Hose	1	1	1	1	1
Propane tank anchor securing	1	1	1	1	1
Field toilet	2	2	2	0	0
Toilet tank	2	2	2	0	0
Handwashing stations	1	1	1	0	0
Rainwater storage systems	1	1	1	0	0
Outdoor Extension Cord	4	4	4	4	4
Trauma Kits (First Aid)	1	1	1	1	1
Weather telemetry	1	1	1	1	1
Raised Stub-Wall Foundation of RR Ties (4x6x8) pressure treated lumber	3	2	2	1	1



CITY OF MANZANITA

Development Services
655 Manzanita Avenue – Manzanita Oregon 97130
P.O. Box 129, Manzanita, OR, 97130-0129
Phone: (503) 812-2514 | TTY Dial 711
devservices@ci.manzanita.or.us

STAFF REPORT

TO: Manzanita Planning Commission
FROM: Scott Fregonese, Contract City Planner
SUBJECT: Planning File #260730 – Manzanita Resilience Hub
DATE: August 20, 2026

I. BACKGROUND

- A. **APPLICANT:** James M Fanjoy, Viridian Architecture LLC.
- B. **PROPERTY LOCATION:** The property is located on the north side of Manzanita Avenue, and east of Division Street. The site address is 655 Manzanita Avenue, and is the site of the Manzanita City Hall. The County Assessor places the property within Township 3 North; Range 10 West; Section 29AD; Tax Lot 2500.
- C. **PARCEL SIZE:** The property contains approximately 2.71 acres, or 118,100 square feet.
- D. **EXISTING DEVELOPMENT:** The subject property contains the Manzanita City Hall with associated vehicle parking and landscaping. The subject property also hosts the Manzanita Farmer's Market from May to September on the grass field to the north of the existing buildings.
- E. **ZONING:** Commercial (C-1).
- F. **ADJACENT ZONING AND LAND USE:** Land to the north, east, and south is also located within the C-1 zone and contains a mix of commercial and residential uses. Middle Housing 1 (MH-1) zoned property containing residences is located to the east.
- G. **REQUEST:** The applicant is requesting approval of an accessory structure on the subject property to construct a Resilience Hub.
- H. **DECISION CRITERIA:** Review of this application shall be based on the following provisions in Ordinance 95-4: Section 3.040 (C-1 Zone) and Section 6.030 (General Provisions Regarding Accessory Use).

II. APPLICATION SUMMARY

- A. The subject property contains existing buildings that house the Manzanita City Hall operations.
- B. The applicant intends to construct a permanent Resilience Hub on the northeast corner of the subject property. The Applicant states in their written narrative that the proposed Resilience Hub is designed to contain supplies and equipment for use by emergency services for the benefit of the citizenry in the event of an emergency such tsunami, earthquake, or other large scale disaster. The Applicant states that the Resilience Hub will be accessed infrequently, perhaps a few times per year, for routine maintenance and inventory. The hub is described as two (2) 40 foot long shipping containers with an awning between them, with an electrical utility connection and an adjacent propane tank.
- C. The Manzanita Zoning Ordinance (MZO) in subsection 6.030.2(b) prohibits the use of cargo containers as accessory structures within the city limits, however, the provisions of 6.030.2(b)(iii) gives an exception for cargo containers for the expressed purpose of the storage of disaster relief supplies meant for the general public such as food, medical supplies, and blankets, provided that visibility of the cargo containers and portable site storage containers from the street or adjacent properties shall be minimal as determined by the Planning Commission.
- D. The application will be decided by the Planning Commission following the procedures of Article 10 of the Manzanita Zoning Ordinance.

III. CRITERIA AND FINDINGS – ACCESSORY STRUCTURE – PORTABLE STORAGE CONTAINER PLANNING COMMISSION REVIEW

- A. Manzanita Zoning Ordinance (MZO) defines “structure” as:

Structure. Structure means anything constructed or built which requires location on the ground or is attached to something having a location on the ground, including covered patios, fences and walls; but not including normal plants and landscaping materials, paved outdoor areas, walks, driveways, and similar improvements.

FINDING: Staff finds that the proposed shipping containers are constructed objects that will be located on the subject property and used for the storage of emergency supplies and equipment. Accordingly, the shipping containers meet the MZO definition of a structure. The proposed awning and associated improvements are likewise constructed improvements that will be located on the subject property and are components of the proposed Resilience Hub.

- B. MZO Article 3 Section 3.040 provides the required dimensional standards for the Commercial (C-1) zone.

(3) Standards. In the C-1 zone the following standards shall apply:

(a) The minimum lot size, setbacks and height for residential uses, except in mixed use development, shall be the same as in the MH-1 zone.

FINDING: Staff finds that the proposed Resilience Hub is not a residential use and is therefore not subject to the residential lot size, setback, and height standards. The proposed Resilience Hub is an accessory structure associated with the existing use of the subject property. Therefore, this standard does not apply.

(b) For commercial, nonresidential, or mixed use development uses, the minimum front yard shall be 10 feet, the minimum side yard shall be 5 feet, and the minimum rear yard shall be 5 feet. For corner lots adjacent to Laneda Avenue, the yard facing Laneda Avenue shall be considered the front yard.

FINDING: Staff finds that the proposed Resilience Hub is a nonresidential accessory structure. The proposed structure is required to maintain a minimum 5 foot side yard and 5 foot rear yard setbacks, consistent with the dimensional standards for nonresidential development in the C-1 zone. The Applicant's submitted site plan demonstrates compliance with these yard setback standards for both the proposed structure and propane tank. Therefore, the standard is met.

(c) 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.

FINDING: Staff finds that the submitted elevations identify the maximum height of the proposed Resilience Hub as approximately 12 feet, 7 1/4 inches. Therefore, the proposed structure complies with the maximum building or structure height standard of 28 feet, 6 inches. Therefore, the standard is met.

(d) Minimum landscaped area: At least 10% of the total lot area of commercial, mixed use, or non-residential uses shall be devoted to landscaping or usable open space such as playgrounds, sitting areas or picnic areas. For developments exempt from on-site parking requirements under Section 4.090(2) and for commercial and mixed use developments providing less than the required number of parking spaces on-site, an additional 10% of the total lot area shall be devoted to landscaping. The minimum lot area required for landscaping in residential and other uses shall be 20%. Placement of landscaping is subject to standards specified in Section 4.156.

FINDING: Staff finds that the proposed Resilience Hub is a nonresidential use subject to

the minimum 10 percent landscaped area requirement. The Applicant proposes to retain existing trees and landscaping on the subject property and to provide additional native plantings, including wax myrtle, twin berry, manzanita, shore pine, kinnikinnick, and beach strawberry, as shown on the submitted site plan. Based on the submitted site plan, the proposed development complies with the minimum landscaped area requirement. A condition of approval has been issued to ensure the required landscaping is planted and maintained. As conditioned, this standard is met.

(e) Parking shall be in accordance with Article 4, Section 4.080.

FINDING: Staff finds that the proposed Resilience Hub will be accessed infrequently for routine maintenance and inventory and is not expected to generate regular vehicle traffic. Based on the proposed use and limited anticipated vehicle activity, the Resilience Hub will not generate a parking demand requiring additional parking spaces. No changes to the existing parking areas on the subject property are proposed or required. Therefore, the existing parking supply is sufficient to serve the proposed use, and this standard is met. Any future parking proposed on the subject property shall comply with the applicable requirements of MZO Article 4, Section 4.080. As conditioned, this standard is met.

(f) Signs shall be in accordance with Article 4, 4.070.

FINDING: Staff finds that no new signs are proposed as part of the Resilience Hub. Therefore, no additional sign review is required with this application, and this standard is met. Any future signs proposed on the subject property shall comply with the applicable requirements of MZO Article 4, Section 4.070. As conditioned, this standard is met.

(g) In the C-1 zone, signs, awnings, marquees and sidewalk coverings shall extend not more than 10 feet from a building or more than 5 feet over a sidewalk, whichever is less.

FINDING: Staff finds that the proposed Resilience Hub includes an awning between the two shipping containers. The proposed awning does not extend more than 10 feet from the structure or more than 5 feet over a sidewalk. Therefore, this standard is met. Any future signs, awnings, marquees, or sidewalk coverings proposed on the subject property shall comply with the applicable requirements of MZO Article 4, Section 4.070. As conditioned, this standard is met.

(h) Adequate storm drainage shall be provided as specified by the City.

FINDING: Staff finds that the proposed Resilience Hub will add approximately 1,200 square feet of impervious surface to the subject property.

Section 4.156 requires that adequate storm drainage shall be provided to accommodate the additional impervious surface.

The grading and contouring of the site, and on site drainage facilities, shall

be designed so there is no adverse affect on neighboring properties or public rights-of-way.

No stormwater system is shown on the provided plans. Therefore, this standard is not met. **Prior to issuance of permits**, the Owner/Applicant shall demonstrate compliance with the applicable City storm drainage requirements for the proposed development, using properly constructed drywells or other approved methods. As conditioned, compliance with the standard is feasible.

(i) Design review subject to Section 4.152.

FINDING: Section 4.152 requires review plan approval prior to any issuance of a building permit for new construction or alteration, or alteration of site improvements, unless the proposal is considered a minor alteration as defined in Section 4.151. Minor alterations and Major revisions are defined as:

Minor alteration: Modification of a building or improvement which is (a) not a Major Revision to an approved design review plan, (b) does not significantly alter or move an exterior wall or roof or change the height of a portion of a building, (c) does not relocate an existing building on its lot, (d) creates no new driveways, and adds no additional uses to the building.

Major revision: Modifications to an approved design review plan which result in a significant change to the plan; including but not limited to changes to the siting of a building or improvements, the modification of the areas to be landscaped, the placement of mechanical or electrical equipment not shown on the approved design review plan, or modifications to a plan element that was the subject of a Design Review Board condition.

Staff finds that the proposed Resilience Hub constitutes a minor alteration to the approved City Hall development. The proposed improvements do not result in a significant change to the approved design review plan. The Resilience Hub will be located at the northeast corner of the subject property and will function as an accessory facility to the existing City Hall use. The proposed improvements do not relocate the existing City Hall building or establish a new use on the subject property. The proposed landscaping will retain existing vegetation and provide additional native plantings to minimize the visual impact of the Resilience Hub to neighboring properties.

The proposed development will utilize the existing dedicated right of way at the northeast corner of the subject property for fire access. The fire access has been reviewed and preliminarily approved by Nehalem Bay Fire & Rescue, and does not create a new driveway connection to the subject property. Therefore, the proposal does not create a new driveway as contemplated by the definition of a minor alteration.

The proposed electrical service will connect to an existing power pedestal, with electrical service to the Resilience Hub provided through buried electrical conduit. The proposal

therefore does not include the placement of new mechanical or electrical equipment of the type contemplated by the Major Revision definition. The proposal also does not modify a plan element that was the subject of a Design Review Board condition.

Therefore, the proposal does not constitute a Major Revision to the approved design review plan and qualifies as a Minor Alteration, and is exempt from Design Review. This standard is met.

(j) Building(s) on a lot shall have a floor area ratio of no more than 0.65. The combined floor area of all buildings on a lot shall be used in calculating the floor area ratio. If a development is proposed on a lot divided between the R-4 and C-1 zones, the area in the R-4 zone shall be assumed to be no greater than the area in the C-1 zone for purposes of calculating the floor area ratio.

FINDING: Staff finds that the approved City Hall development has a Floor Area Ratio (FAR) of approximately 0.065. The proposed Resilience Hub will add approximately 640 square feet of floor area to the subject property, resulting in a combined FAR of approximately 0.070. The resulting FAR is substantially below the maximum FAR of 0.65 permitted in the C-1 zone. Therefore, this standard is met.

(k) If a development is proposed on a parcel consisting of two or more contiguous lots, the lots must be legally combined into one lot.

FINDING: Staff finds that the proposed development is located on a single legal lot. Therefore, the requirement to legally combine two or more contiguous lots does not apply, and this standard is not applicable.

C. Article 6 contains the provisions to address accessory structures.

An accessory use shall comply with all requirements for a principal use, except as this Ordinance specifically allows to the contrary, and shall comply with the following limitations:

[...]

2.

(b) Cargo containers, railroad cars, truck vans, converted mobile homes, trailers, recreational vehicles, bus bodies, vehicles and similar prefabricated items and structures originally built for purposes other than the storage of goods and materials are not permitted to be used as accessory structures or for accessory storage purposes on any property within the city.

Notwithstanding the provisions of this section, the placement of cargo containers and/or portable site storage containers shall be allowed for the following purposes:

[...]

iii) placement of cargo containers and/or portable site storage containers for storage of disaster relief supplies meant for the general public such as food, medical supplies, and blankets, provided that visibility of the cargo

containers and portable site storage containers from the street or adjacent properties shall be minimal as determined by the Planning Commission.

FINDING: Staff finds that the proposed Resilience Hub includes two cargo containers that will be used for the storage of disaster relief supplies and equipment for the benefit of the general public in the event of a tsunami, earthquake, or other large scale disaster. Article 6 generally prohibits the use of cargo containers as accessory structures or for accessory storage purposes; however, subsection 6.030.2.(b)(iii) specifically allows the placement of cargo containers for the storage of disaster relief supplies intended for the general public, subject to a determination by the Planning Commission that visibility of the containers from the street or adjacent properties will be minimal.

The proposed use is consistent with the exception because the cargo containers will be used to store emergency supplies and equipment for use by emergency services and for the benefit of the general public during a disaster. The proposed Resilience Hub is therefore eligible for the exception to the general prohibition on cargo containers.

The Applicant proposes to minimize the visibility of the cargo containers through a neutral green exterior color and landscaping, including retained vegetation and additional native plantings surrounding the Resilience Hub.

Staff recommends that the Planning Commission determine that visibility of the cargo containers from the street and adjacent properties will be minimal based on the proposed site design, landscaping, and location of the Resilience Hub. **Prior to issuance of permits**, the Owner/Applicant must demonstrate on construction documents the sight obscuring vegetation surrounding the proposed Resilience Hub that substantially conform to the submitted site plan. Subject to the Planning Commission's determination regarding visibility, and as conditioned, compliance with the standard is feasible.

- D. The Manzanita Zoning Ordinance does not specifically establish the specific review criteria or procedures, except as provided above. Staff has concluded that the above criteria is the applicable review criteria for the proposed Resilience Hub will follow the typical Public Hearing Procedures for a decision before the Planning Commission, as outlined in Article 10.

IV. RECOMMENDATION AND CONDITIONS OF APPROVAL

City staff finds the proposal can comply with the applicable criteria and **recommends the Planning Commission approve subject to the following conditions:**

- A. PTP – Stormwater Management: **Prior to issuance of permits**, the Owner/Applicant shall demonstrate compliance with the applicable City storm drainage requirements for the proposed development, using properly constructed drywells or other approved methods.

- B. PTP – Sight Obscuring Vegetation: **Prior to issuance of permits**, the Owner/Applicant must demonstrate on construction documents the sight obscuring vegetation surrounding the proposed Resilience Hub that substantially conform to the submitted site plan.
- C. The Property Owner/Applicant shall retain existing trees and landscaping on the subject property and provide and maintain additional native plantings, including wax myrtle, twin berry, manzanita, shore pine, kinnikinnick, and beach strawberry, as shown on the submitted site plan.
- D. The developer shall submit a building permit for construction of the building, conforming to the applicable building code requirements. The submitted site plan shall substantially conform to the approved layout. While building plans may be simultaneously submitted with engineering plans, building permits shall not be issued until all engineering plans are reviewed and approved.
- E. The structure shall comply with the building permit requirements and substantially conform to the submitted site plan. The Owner/Applicant is advised that substantial modifications to the approved plan may require a new application review and decision.
- F. Compliance with these conditions and the applicable requirements of the Manzanita Zoning Ordinance, Nehalem Bay Fire & Rescue, Tillamook County Environmental Health, and applicable building code provisions shall be the sole responsibility of the Owner/Developer.
- G. Any future parking proposed on the subject property shall comply with the applicable requirements of MZO Article 4, Section 4.080.
- H. Any future signs, awnings, marquees, or sidewalk coverings proposed on the subject property shall comply with the applicable requirements of MZO Article 4, Section 4.070.

V. PLANNING COMMISSION ACTION

- A. The Planning Commission has the following options:
 - 1. Approve the application, adopting the findings and conditions of approval contained in the staff report;
 - 2. Approve the application, adopting modified findings and/or modified conditions of approval; or,
 - 3. Deny the application and establish findings as to why the application does not comply with the decision criteria.
- B. Staff will prepare the appropriate Order for the Chair's signature.

Randy Kugler <rkinor@gmail.com>

This testimony to be included in the record for the above Variance request submitted for the Manzanita Planning Commission Public Hearing on September 14, 2026.

Section 8.020 of Ordinance 95-04 states: A Variance may be granted only in the event that all of the following circumstances exist:

1. Exceptional or extraordinary circumstances apply to the property and result from lot size or shape, topography, or other circumstances over which the owners of the property have no control.
2. The variance is necessary for the preservation of a property right of applicant substantially the same as owners of other property in the same zone or vicinity possess.
3. The variance would not be materially detrimental to the purposes of the Ordinance, the Comprehensive Plan, or to property in the same zone or vicinity in which the property is located, or otherwise conflict with the objectives of any City policy.
4. Variance request is the minimum variance which would alleviate the hardship.

Oregon land use law allows for the consideration of a Variance to seek relief from the bulk standards of a particular zone where the strict application of those standards impose a hardship that is beyond the control of the applicant. Variances are not intended to approve uses no matter how well intended that use may viewed by some.

Holding a Public Hearing for a Variance request where no Variance exists for the Planning Commission to consider and apply the required review standards precludes any possibility of adopting Findings to approve the application request.

I am in support of the construction of an accessory structure at City Hall to construct a Resilience Hub.

I do not support the staff submission of an application that jeopardizes the integrity of our Planning Commission by expecting members to overlook a factual procedural problem to approve a City supported project.

Thank You



Envision Manzanita Comprehensive Plan Update

Suggested Comprehensive Plan Recommendations

September 3, 2026

Overview

Envision Manzanita is a multi-year planning project to update the city's Comprehensive Plan and Housing-Related Ordinances. Manzanita's current Comprehensive Plan was last updated in 1996. The Comprehensive Plan will guide development through goals and policies for land use, housing, transportation, and more, as set out in the Oregon Statewide Planning Goals over a 20-year planning horizon.

On August 10, 2026, a Planning Commission Meeting was held to discuss the Envision Manzanita Comprehensive Plan Update and make recommendations for adoption. Approximately 26 comments were received from the Planning Commission and the Public. Comments were given between June 22 and August 12, 2026.

Planning Commission and DLCD Comments, and Staff Recommendations

A compilation of comments from Planning Commission members and the Public are provided below. Please note that one particular comment was received multiple times regarding structures in public right-of-way. To reduce the size of this document, names of participants have been documented following the overall change recommended. Comments have been organized by Chapter below. Chapters without any comments have been removed from the table. Each comment is addressed in the right-hand column by Staff. Please note that following the Planning Commission Comments Table is a table with recommendations from the Department of Land Conservation and Development (DLCD). This table is formatted in the same order as outlined above.



Chapter	Planning Commission / Public Comment	Recommended Revision
About Manzanita	P.9 Paragraph 2, instead of saying that "we honor", we should say we "strive to honor." There are no locations in the city that has any mention of our relationship to our native people. No street names, no monuments or plaques or any businesses that capture any native heritage exist in our city.	Remove "We honor" and replace with "we strive to honor".
	P.9 Final paragraph, please strike the Warm Springs from the paragraph.	Remove "Warm Springs"
	P.10, Early- Mid 1800's, there were no forced removal of native Nehalem people.	Remove section on forced removal
	P.11, 1910's-1930's, I think that you should also mention that farming (specifically dairy farming) and commercial fishing were economic drivers for the region.	Include mention of farming and commercial finishing industries under 1910's-1930s in timeline.
1. Citizen Involvement	Goal Three: PAGE 31 – Make sure all property owners are informed. Add water bill list as using only voter list excludes significant stakeholders. Add POLICY 3.3 "Foster transparent communication to residents and property owners about public process engagement opportunities using web pages, water bill addresses, email, and voter mailing lists. "	Add policy 3.3: Foster transparent communication with residents and property owners about public process engagement opportunities using web pages and both physical and virtual mailing lists.
	P.30. I would suggest an additional Goal 1.5 to have the City foster collaborative partnerships with non-profit organizations	Include as Policy 1.8: Foster collaborative partnerships between the City and non-profit organizations that

	that create opportunities for the arts and culture.	create opportunities for the arts and culture.
2. Land Use Planning	Introduction: PAGE 34 & 35 – Inconsistencies with Comp Plan Map & Passed Ordinance Current in Draft: Residential Zoning Districts in Manzanita allow a variety of housing types and densities. The City currently has four residential zones: Middle Housing 1 Zone (MH-1), Middle Housing 2 Zone (MH-2), Middle Housing 3 Zone (MH-3), and Residential Manufactured Dwellings (RMD) Map Proposed Revision: Manzanita's three residential zones—Middle Housing 1 (MH-1), Middle Housing 2 (MH-2), and Middle Housing 3 (MH-3)—accommodate a range of housing types and development forms consistent with state housing requirements and Manzanita's community character.	Update text to: “Manzanita's three residential zones: Middle Housing 1 (MH-1), Middle Housing 2 (MH-2), and Middle Housing 3 (MH-3). These zones accommodate a range of housing types and development forms consistent with state housing requirements and Manzanita's community character.”
	Goal One: PAGE 36 – Add a Cycle of Comp Plans for City Council to consider. Revise POLICY 1.1 Refine Comprehensive Plan policies in future updates, with a cycle of no more than 10 years, based on well documented existing conditions related to economic development, housing, and natural resources.	Revise Policy 1.1: Refine Comprehensive Plan policies, with a goal of complete revisions every 10 years, in future updates based on well-documented existing conditions related to economic development, housing, and natural resources. We cannot typically require an update every 10 years, but we can recommend it.
	Goal Two: PAGE 36 – Add a Policy about the important Gateways to Manzanita.	Add Policy 2.5: Preserve and enhance design that reinforces Manzanita’s unique coastal village identity through focus on the Manzanita Avenue and Laneda Avenue gateways, through generous, landscaped

	Add POLICY 2.5: “Preserve and enhance the natural landscape character of the Highway 101 corridor, with particular attention to the Manzanita Avenue and Laneda Avenue gateways, through generous, landscaped setbacks, preservation of mature trees and native vegetation, and context-sensitive site design that reinforces Manzanita’s unique coastal village identity.”	setbacks, preservation of mature trees and native vegetation, and context-sensitive site design.
	Goal Three: Page 37 – Revise the policy to reinforce the block size connectivity goals as passed in the Transportation Plan Ordinance. Existing Draft POLICY 3.3 “Encourage Street patterns which are responsive to the natural terrain of the City.” Revise POLICY 3.3 “Encourage street networks that respond to Manzanita’s natural terrain while providing interconnected, small-block street patterns to support safe walking, bicycling, neighborhood connectivity, and emergency access.”	Revise Policy 3.3 to include: Encourage street networks that respond to Manzanita’s natural terrain while providing interconnected, small-block street patterns to support safe walking, bicycling, neighborhood connectivity, and emergency access.
5. Natural Resources, Scenic and Historic Areas, & Open Spaces	Goal One: Page 44 – Add a policy about invasive species coordination Add New POLICY 1.8: “Coordinate with Oregon Parks and Recreation Department, Tillamook County, and other partners to prevent and manage invasive species in surrounding natural areas, including Nehalem Bay State Park”	Include new Policy 1.8: Coordinate with Oregon Parks and Recreation Department, Tillamook County, and other partners to prevent and manage invasive species in natural areas.
	Goal Two: Page 44 – Add a policy about character of city signage (New LA Style Street Signs) Add New POLICY 2.5: “Design public signage—including street, wayfinding, park, and civic signage—to reinforce	Add Policy 2.5: Design public signage including street, wayfinding, park, and civic signage to reinforce Manzanita’s distinctive coastal village identity, while meeting applicable safety, visibility, and accessibility standards.

	Manzanita's established historic cedar signpost character and distinctive coastal village identity, while meeting applicable safety, visibility, and accessibility standards."	
	P.42. paragraph 1, please remove the name of Laneda Lodge and rename it the Lane Hotel, as well as on the caption. I suggest the following language because the Oregon Historic Sites Database information was collected in 1973 and is inaccurate.	Recommend updating names from 'Laneda Lodge' to 'the Lane Hotel'.
	Many historic structures in Manzanita are present in the commercial and residential areas. Most notable among them are the buildings currently occupied by Left Coast Siesta (former Lane Hotel), the San Dune Pub (first post office) and the Pine Grove Community House. Nationally recognized architect, Tom Bender, designed the building currently occupied by First Security Bank of Washington and the Manzanita Branch of the Tillamook County Library. [include updated photos]	Recommend to include photos provided and short descriptions.
6. Air, Water, & Land Quality	Goal One: Page 50 – Add compost Adjust POLICY 1.7: "Coordinate with Tillamook County in providing adequate solid waste facilities, including recycling, compost, and transfer facilities, for the Manzanita area"	Update Policy 1.7: Coordinate with Tillamook County in providing adequate solid waste facilities, including recycling, compost, and transfer facilities, for the Manzanita area.
7. Areas Subject to Natural Hazards	Page 56 – Clarify abbreviations MAP 4: LOCAL HAZARDS MAPS, TSUNAMI AND EARTHQUAKE I suggest the consultants spell out scenario abbreviations such as "Local Tsunami Inundation Area." Many readers will not know what the abbreviations mean, and comprehensive plans should be understandable to the public."	Revise maps to spell out 'small, medium, large, extra-large, and extra-extra-large to identify Tsunami inundation scenarios.

	EVCNB: We are reaching out to ask that as you consider the Manzanita Comprehensive Plan that you include provisions for City owned Right-of-Ways (ROW) to allow for structures that could be used for emergency preparedness. Our organization’s mission is to create a culture of preparedness for the Nehalem Bay region. Our programs focus on individual and community preparedness. One of our more successful programs, the Prepare Your Neighborhood (PYN) program, encourages neighborhood groups in the area to work together to help create resilience in neighborhoods by helping neighbors get to know each other, share emergency resources and equipping neighborhood groups with critical emergency supplies and tools to use during a major disaster. Many neighborhoods have developed neighborhood caches with emergency supplies and tools which is a very positive development for this area. It means that these neighbors will be able to help each other during emergencies, without needing to access first responders as much, thus allowing scarce governmental resources to be used for those who are the least prepared and most in need after a major disaster. Some of these neighborhood groups would benefit from being allowed to use ROW’s owned by the city to put their emergency caches. This is especially true in the Manzanita area. Using ROWs would be very helpful to many neighborhoods’ groups. Several of the PYN groups are using garages or spaces in homes, which is not ideal, should the property sell. These caches are not large – typically the size of a small shed (8x10) so not a great deal of space is required, and the structures could be easily moved if necessary. We see these neighborhood caches as a part of the larger resilience effort for this area; a way to augment the Resilience	Recommendation to remediate issue with structures in the public ROW within chapter 11: Public Facilities and Services. Recommend including a policy focused on promoting neighborhood resilience mentioned. Add Policy 2.4: Coordinate with the Emergency Volunteer Corps of Nehalem Bay to support caches with emergency supplies and tools in Manzanita neighborhoods to support community preparedness.
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	Hubs recently acquired from the state for Manzanita and Wheeler. The better prepared everyone is, the better off we will all be when a major disaster strikes.	
	To the City of Manzanita: Please find a written version of my verbal testimony during the August 10 Comprehensive Plan Public Hearing: Given the history of the Tillamook Fire and this year's historic and devastating Oregon wildfires, our city must accept that we are not exempt from the increasing risk of wildfire. Therefore, to support community efforts to become resilient and take preventative action I propose that our Comprehensive Plan include supportive language such as, "The Comprehensive Plan aims to reduce wildfire risk by promoting resilient building codes, defensible space maintenance and community education." Thank you for your consideration	Modify Policy 1.7: Support community wildfire protection by implementing strategies identified in the Tillamook County Community Wildfire Protection Plan (CWPP) and encouraging fire-resistant landscaping and building materials, prioritizing defensible space, and providing community education opportunities.
8. Parks & Recreation	Since you are including programs available at NCRD, you should mention that the Hoffman Center for the Arts provides programming that includes classes for writers and painters and has a clay studio. The Nehalem Valley Historical Society presents historical programs and assists local historical research through its museum and archive.	Recommend to outline these amenities in the introduction section.
	P.65. I would add a Policy 1.7 that would "Encourage and support private non-profit organizations that provide historical and cultural activities." This would be consistent with P.74, Policy 3.3.	Recommend adding Policy 1.7: Encourage and support private non-profit organizations that provide historical and cultural activities.
9. Economic Development	Goal 2: Enhance the vitality, appearance, and functionality of the downtown commercial area near Laneda Avenue. Page 56 – Add Policy about commercial uses in C-1	Add Policy 2.5: Preserve commercially zoned land in downtown Manzanita by prioritizing commercial, small business, and mixed-use, and preventing exclusively residential development supporting a diverse local economy and maintaining a vibrant, active village

	Add POLICY 2.5: "Preserve commercially zoned land in downtown Manzanita by prioritizing commercial, small business, and mixed-use multifamily development above the ground floor, and preventing exclusively residential development supporting a diverse local economy and maintaining a vibrant, active village center."	center.
10. Housing	Goal 1: Page 80 – Add mixed use to prevent single family consuming the rare commercial land Revise POLICY 1.6: "Encourage the development of mixed-use multifamily housing units above the ground floor in conjunction with the commercial core in the City to provide diversity and security in commercial areas and a range of housing options."	Revise Policy 1.6: Encourage the development of mixed-use housing in conjunction with the commercial core in the City to provide diversity and security in commercial areas and a range of housing options.
11. Public Facilities & Services	Dear Planning committee and Manzanita city council members, I think we all agree how critical it is that we have a well-prepared community in the event of disasters, and that our EVCNB has done an outstanding job helping neighborhoods to achieve readiness. We've done great work compiling materials in our cluster. Our Classic Ridge EVCNB {Emergency Volunteer Corps of Nehalem Bay) disaster meeting place is at the intersection of High and Elm Street, at the top of a public easement that continues down to Greenridge. We, like other neighborhood clusters, hope to raise funds to be able to install a small structure, large enough to hold our neighborhood emergency supplies on this easement. However, upon review of the Comprehensive Plan Goal 5, Policy 5.7 {page 90 of the downloaded Draft Comprehensive	Revise Policy 5.7: Retain public ownership of all rights of way and ensure the use remains public, shared and non-structural with the exception of public emergency cache structures.

	Plan "Retain public ownership of all rights of way and ensure the use remains public, shared and non structural." As you may know, our neighborhood is very hilly and we need all the help we can get to make access or our supplies a little easier to quickly access. Our supplies need to be stored at our disaster meeting location, which is on a city easement, in order to be easily accessed; similar to what other EVCNB neighborhood clusters enjoy. Therefore, we ask that the "non-structural" language in Goal 5, Policy 5.7 on page 90 of the draft Comprehensive Plan either be removed, or modified to provide an exception for EVCNB emergency planning supplies <i>Same Comments from:</i> Kerry B Milligan, Becky Pirkel Hurd, Chris Fox, Christine Fox, Craig W LeCroy, Georgianna Marie, Jenna Barnett, Judy Allen, Julie Johnson, Karl Nusch, Kelly Kurtzman, Kyle Wood, Laura Jertberg, Lawrence and Sandra Matasar, Tim Belden, Trish Johnson, Will & Joean Sonnenfeld, Donna and Frank Shrier	
	Dear Committee Members, I respectfully urge, as a private citizen, the PASC to include a policy in the new Comprehensive Plan requiring the City to safely maintain all City-owned rights-of-way. Our home on Spindrift Lane was built in 1972, when many village streets were unpaved. For more than 50 years, residents have paid the same City taxes and utility fees as other neighborhoods, yet the public right-of-way on our street-and on many other unpaved streets throughout Manzanita-has received no City maintenance. Since construction of a new home nearby, the City-owned right-of-way has experienced repeated flooding that restricts	Include new Policy 5.15: Maintain all publicly owned rights-of-way, including unpaved streets, drainage, and associated infrastructure, in a safe, functional, and equitable manner to support public safety, neighborhood resilience, and reliable public access.

	beach access and creates a safety hazard, particularly for young children. I am not asking that the street be paved. I am simply asking that the City accept responsibility for basic maintenance and stormwater management within its own rights-of-way, just as it does elsewhere in Manzanita. I respectfully request that the PASC include a Comprehensive Plan Policy directing the City to maintain all City-owned rights-of-way in a safe and equitable manner for the benefit of all citizens and neighborhoods. Suggested Comp Plan Policies: Public Facilities & Services - Policy 5.15: "Maintain all publicly owned rights-of-way, including unpaved streets, drainage, and associated infrastructure, in a safe, functional, and equitable manner to support public safety, neighborhood resilience, and reliable public access."	
	Goal 5 Page 90 – Add to goal to emphasize health & safety Goal 5: Promote sustainability, resilience, public health, safety, and efficiency in public facilities and services. Page 91 – Emphasize Maintenance of streets as a PUBLIC FACILITIES & SERVICES responsibility (in addition to make it clear and reinforced in TRANSPORTATION.)	Update Goal 5: Promote sustainability, resilience, public health, safety, and efficiency in public facilities and services. *pg 91- referenced in new Policy 5.15 above
	Add POLICY 5.15: "Maintain all publicly owned rights-of-way, including unpaved streets, drainage, and associated infrastructure, in a safe, functional, and equitable manner to support public safety, neighborhood resilience, and reliable public access."	Updated, please see Policy 5.15 above.

	I looked forward to reading the City Comprehensive Plan. Went over it line by line. Was encouraged by Oregon Statewide Planning Goal 7, Policy 3.1 and 3.4. Further encouraged by Oregon Statewide Planning Goal 11 - Goal 4, Policy 4.5 and Policy 4.7. AND THEN Goal 5, Policy 5.7 hit me! It says "Retain public ownership of all rights of way and ensure the use remains public, shared and non structural." This is the opposite of what neighborhoods need to be resilient after a disaster. We need our supplies to be stored on public land where it can be easily accessed. I thought the comprehensive plan was going to support the neighborhoods on this. What can be done to remove this language from the comprehensive plan?	Updated, please see Policy 5.15 above.
12. Transportation	Dear Committee Members, I respectfully urge, as a private citizen, the PASC to include a policy in the new Comprehensive Plan requiring the City to safely maintain all City-owned rights-of-way. Our home on Spindrift Lane was built in 1972, when many village streets were unpaved. For more than 50 years, residents have paid the same City taxes and utility fees as other neighborhoods, yet the public right-of-way on our street-and on many other unpaved streets throughout Manzanita-has received no City maintenance. Since construction of a new home nearby, the City-owned right-of-way has experienced repeated flooding that restricts beach access and creates a safety hazard, particularly for young children.	Recommend no adoption of any new Transportation policies. Policies must comply with the recently adopted 2023 Nehalem Bay Transportation System Plan. Policies for newly adopted planning documents must be represented in Comprehensive Plan updates per guidance from DLCD.

	I am not asking that the street be paved. I am simply asking that the City accept responsibility for basic maintenance and stormwater management within its own rights-of-way, just as it does elsewhere in Manzanita. I respectfully request that the PASC include a Comprehensive Plan Policy directing the City to maintain all City-owned rights-of-way in a safe and equitable manner for the benefit of all citizens and neighborhoods. Suggested Comp Plan Policies: Transportation - Policy 3.9: Prioritize maintenance of public streets and rights-of-way to provide safe access for pedestrians, cyclists, motorists, emergency vehicles, and beach access in all neighborhoods, including those served by unpaved streets."	
	Goal 1: Page 96 – Add village character Clarify POLICY 1.6: "Support streetscape improvements to downtown areas, including, but not limited to, improved landscaping pedestrian scale lighting, benches, bicycle racks, and street trees consistent with the village character of Manzanita."	See comment above.
	Goal 3: Page 98 – Clarify who is responsible for street improvements to city standards, (paved) as distinct from maintenance of all existing ROW. Revise POLICY 3.5: "Mandate that constructing streets in new subdivisions, planned developments, or in rights-of-way improvements to city standards where no improved street exists shall be the responsibility of the developer or the	Update Policy 3.5: by adding 'city standards' piece. Allowed change as it does not significantly change the TSP policy.

	adjacent property owners. The City shall share costs in the following way: On existing dedicated, but unimproved streets, which are arterials or feeders, the City will pay the difference in pavement width between the existing width and arterial or feeder width. On existing dedicated unimproved or underimproved residential streets, the abutting property owners shall pay all costs of the improvement. Substantial improvement of existing street intersections shall be the responsibility of the City. There shall be no city participation in bearing the cost of streets in subdivisions or planned developments. Owners wishing to build access to their property on unimproved rights-of-way must adhere to City Street Standards	
	Page 98 – Add a clear maintenance Policy as part of PUBLIC FACILITIES & SERVICES (in addition to make it clear and reinforced in TRANSPORTATION) Add POLICY 3.9: “Prioritize maintenance of public streets and rights-of-way to provide safe access for pedestrians, cyclists, motorists, emergency vehicles, and beach access in all neighborhoods, including those served by unpaved streets.”	See comment above about adding any new policies to this chapter.
13. Energy Conservation	Goal 3: Page 104 – Add transit signage Add signage to POLICY 3.1 Coordinate with transit providers, like the NW Connector, to expand shared and accessible transportation options for residents and visitors. Promote clear, visible, and accessible transit stop signage for residents and visitors.	Revise Policy 3.1: Coordinate with transit providers, like the NW Connector, to expand shared and accessible transportation options for residents and visitors, such as promoting clear, visible, and accessible transit stop signage.

	Goal 4: Page 104 – Reinforce policy to add extended periods, a major earthquake could cut fuel delivery access to Manzanita by up to 6 months. Add to POLICY 4.3: “Plan for energy resilience and essential operations for extended periods following major disasters by incorporating backup power and renewable systems into critical infrastructure and emergency facilities.”	Revise Policy 4.3: Plan for energy resilience and essential operations for extended periods following major disasters by incorporating backup power and renewable systems into critical infrastructure and emergency facilities.
	P.102. Is there a reason that internet service providers are not a part of the discussion of Utilities?	Internet providers are mentioned in the Public Facilities and Services section. Update text to include: Current utilities that serve Manzanita consist of the Tillamook People’s Utility District (PUD) and various internet providers.
17. Coastal Shorelands	Goal 2: Provide safe, equitable, and sustainable public access to Manzanita’s coastal shorelands, beaches, and waterways while preserving natural and cultural resources. Policy 2.1: Develop and maintain a comprehensive Public Access Plan identifying all beach access points, emergency routes, and opportunities for improved signage, safety, and maintenance. (Define to include Parking, Paths, Path identification), and Who is accountable for the maintenance.	Update Policy 2.1: Develop and maintain a comprehensive Public Access Plan identifying all beach access points, parking, path identification, emergency routes, and opportunities for improved signage, safety, and maintenance.
	P.118, Policy 4.1. Thanks for including Clatsop-Nehalem but this should also include the Confederated Tribes of the Siletz.	Include reference to the Confederated Tribes of the Siletz.
18. Beaches and Dunes	Goal 1 Page 124 – The current language is confusing. Does proposed Policy 1.4 intend that every future foredune grading proposal require a Comprehensive Plan amendment,	Recommend to not update policy. The Foredune Management Plan will need to be updated and policies amended in the Comprehensive Plan after adoption.

	or only that grading occur pursuant to an area-wide Foredune Management Plan that has been adopted as part of the Comprehensive Plan? It is not clear. Hierarchy should be clear: Comprehensive Plan → Foredune Management Plan → individual grading proposal/permit. Suggest staff come back with a coordinated recommendation for policies 1.3, 1.4 and 2.5 together for clarification and legal test before adoption, rather than trying to interpret Policy 1.4 in isolation. Given that, below is one draft suggestion for Policy 1.4: Existing Draft Policy 1.4: “Uphold that foredune grading for view enhancement or to prevent on-going sand inundation may be allowed in foredune areas where an overall plan for managing the foredune grading is prepared. Before grading can begin, the foredune grading plan must be adopted as an amendment to the Comprehensive Plan.” Suggested Revised Policy 1.4: “Allow foredune grading for view enhancement or prevention of ongoing sand inundation only where authorized by an area-wide Foredune Management Plan adopted as part of the Comprehensive Plan and consistent with Statewide Planning Goal 18. Require individual grading activities to comply with the adopted Foredune Management Plan and all applicable local, state, and federal requirements.”	
	I have some concerns I'd like to voice for the Comprehensive Plan you are working to approve. Can you please forward this note onto the team that is responsible for working that. I'm hoping they will contact me to get my questions answered and allow me to voice my concerns in any upcoming public hearings or ways to provide	Policy 1.4 addresses the need for a Dune Management Plan and a complete process with it's own adoption and community feedback opportunities.

	my input into the process. I am VERY concerned about the sand dunes that are just south of Laneda being reduced by homeowners that are trying to improve their view. These SAND DUNES are IMPERATIVE to the natural barrier from rising tides, king tides and other phenomenon that could destroy / threaten the entire town of Manzanita. I truly hope the city will keep the current moratorium indefinitely on view improvement efforts to reduce the size of our sand dunes!! Please let me know how I (and many of my neighbors) can provide our input into the process of finalizing the comprehensive plan.	
	Goal 1: Protect the natural functions, scenic beauty, and ecological integrity of Manzanita's beaches and dunes. Policy 1.3: Update the Dune Management Plan to establish clear and current standards for dune preservation, restoration, and maintenance that reflect current conditions and meet the needs of the community (and property owners)) and the health of the dune system. Incorporate guidance on vegetation management, erosion control, and compatible recreation uses. Policy 1.4: Uphold that foredune grading for view enhancement or to prevent ongoing sand inundation may (Shall) be allowed in foredune areas where an overall plan for managing the foredune grading is prepared. Before grading can begin, the foredune grading plan must be adopted as an amendment to the Comprehensive Plan (What is involved in amending the CP?)	Recommend to not update with the suggested changes. • Property owners and the community are synonymous • 'may' is more representative than 'shall' in this situation • The amendment process is outlined in other city documents
	Goal 2: Ensure responsible public access and use of beaches	Recommend to update Policy 2.1: Maintain and

	and dunes while protecting natural and cultural resources. Policy 2.1: Maintain and improve public access (Define to include: Parking, Paths, Path identification) to and along the beach. All shoreline stabilization measures shall be reviewed to ensure that public access is preserved. Projects shall not restrict existing primary or secondary access sites. Policy 2.6: When reviewing proposals for permanent structures near beach access locations, prioritize the protection and enhancement of public access. Private beach access should be discouraged if adequate public access exists nearby. (Clarify who's responsible/accountable for maintaining and who pays public & emergency access)	improve public access to and along the beach, by defining parking and identifying paths. All shoreline stabilization measures shall be reviewed to ensure that public access is preserved. Projects shall not restrict existing primary or secondary access sites. Recommend to not update Policy 2.6. Identifying responsibility and management of areas will be coordinated through the City, County, Oregon Parks and Recreation Department, and others.
	Goal 3: Foster a culture of shared responsibility and environmental stewardship of Manzanita's beaches and dunes. Policy 3.1: Foster a culture of shared responsibility and environmental stewardship of Manzanita's beaches and dunes. Promote community education and volunteer programs focused on dune ecology, habitat restoration, and beach cleanups in partnership with local schools, nonprofits, and Oregon Parks and Recreation Department. (include "local business friendly") Policy 3.2: Recognize and manage the beach and dune system as a shared public resource and key component of Manzanita's environmental identity, economy, and resilience through outreach and educational opportunities, such as working with local partners to host and educate at beach cleanup events. (include "local business friendly")	Update Policy 3.1: Foster a culture of shared responsibility and environmental stewardship of Manzanita's beaches and dunes. Promote community education and volunteer programs focused on dune ecology, habitat restoration, and beach cleanups in partnership with local schools, nonprofits, local businesses, and Oregon Parks and Recreation Department. Update Policy 3.2: Recognize and manage the beach and dune system as a shared public resource and key component of Manzanita's environmental identity, economy, and resilience through outreach and educational opportunities, such as working with partners like local schools, nonprofits, local businesses, and Oregon Parks and Recreation Department to host and educate at beach cleanup events.



Chapter	DLCD Recommendation	Recommended Revision
Introduction	Pg 1. General comment - appreciate the inclusion of maps and data in each section!	Review and cite all referenced data and plans in bibliography.
	Make sure to document/cite all data referenced or used throughout each chapter of the comp plan and in maps to be very clear where the information came from. See comment in Goal 17 section related to this point. A bibliography or works cited page of some sort would be my recommendation.	
	Pg. 5 Change "Division" to "Department"	Rename "Division" to "Department"
3. Land Use Planning	Pg 34. Change "Division" to "Department." The agency name change happened after the original comp plan was developed.	Rename "Division" to "Department"
6. Natural Resources, Scenic and Historic Areas, & Open Spaces	Pg 41. Change "Division" to "Department"	Rename "Division" to "Department"
	Policy 1.3: Delete this policy. There is an existing estuary management plan for Nehalem. Manzanita does not have authority within the estuary. See my comments in the Chapter 17 section for more detail. A policy could be added to acknowledge the jurisdictional relationship.	Delete policy
14. Areas Subject to Natural Hazards	Pg 55. Could add state agencies to this list, namely OEM and DOGAMI (recommendation, not required)	Add state agencies to information list
	Pg 55. Theses are great maps! Make sure the underlying data is cited somewhere (meaning report title, date published,	Cite all data and plans in an end bibliography.

	web-link, author, etc.) within the comprehensive plan or any appendices, especially if the maps or data are used for regulatory purposes. DOGAMI does sometimes update their online viewers and its important that the city adopts a static publication(s) and map(s). We created a bibliography for the City of Newport during one of their updates. A similar approach could be used here for all the inventories referenced and used throughout the comprehensive plan so you know where the data has come from to create the factual basis of the plan.	
	Pg 57. Could add a policy related to limiting future placement of critical facilities in high hazard areas, or it could possibly fit in either policy 1.4 or 1.5. We see it's in Policy 4.6 in the Public Facilities chapter, but might be good to include in the hazards section too since it's directly hazards related. (recommendation, not required)	Update Policy 1.4: Utilize the development code to provide incentives and regulations to manage development in areas prone to natural hazards and limit future placement of critical facilities in high hazard areas.
	Policy 1.6: Could add, "and enhance" (recommendation, not required)	Update Policy 1.6: Maintain and enhance wetlands, riparian buffers, and natural drainage systems as multi-benefit areas for flood storage, water quality protection, and habitat preservation.
	Pg 58: Could add a policy related to hazard preparedness outreach and education for tourists too, i.e. partnering with tourism bureau and/or hotels/short term vacation rental properties, etc. (recommendation, not required)	Add Policy 2.4: Provide readily-available hazard preparedness information and education to visitors, partnering with the tourism bureau, vacation rental companies, and local hotels.
15. Parks & Recreation	Policy 2.6: Could add tribal coordination here. (recommendation, not required)	Update Policy 2.6: Coordinate with state and federal agencies and Tribal Governments to ensure recreational planning and shoreline protection measures on public lands are consistent with local needs, environmental protection goals, and

		community character, including limitations on motorized vehicle use on beaches consistent with state regulations.
16. Public Facilities & Services	Policy 5.10: Could add "beach access" to this list of alternative uses of right-of-ways. (recommendation, not required)	Update policy 5.10: Utilize street right-of-way which cannot be improved due to steep topography, or other valid reason, for other purposes, such as parks or open space, walking trails, greenbelts, or beach access.
17. Transportation	Policy 3.8: Same comment here as above - could add "beach access" to the list. (recommendation, not required)	Update Policy 3.8: Utilize street rights-of-way which cannot be improved due to steep topography, or other valid reason, for other purposes, such as parks or open space, walking trails, greenbelts, or beach access.
18. Urbanization	Policy 4.1: Add to this list "beaches and dunes", add "natural" between "sensitive" and "resource"	Update Policy 4.1: Limit development on lands identified as environmentally constrained or unbuildable, including floodplains, wetlands, beaches and dunes, and other sensitive natural resource areas.
19. Coastal Shorelands	Pg 113: Goal 17 does require inventory information. This chapter does not reference an inventory, only a list of the lands to be included in the shorelands boundary. However, the appropriate inventory information is described elsewhere in the comp plan - under Goal 5, Goal 7, Goal 8, and Goal 18. Please make a clear reference or statement(s) within this chapter to describe the inventory information used to develop the coastal shorelands boundary, which could just be referencing those other chapters. A clear description of the coastal shorelands boundary map needs to be included here as well. How was the boundary drawn? DLCD did produce metadata along with the map so that information should be available.	Reference inventories described under Goals 5, 7, 8, and 18. Note that this inventory information was used to develop the coastal shorelands boundary. Include a clear description of the coastal shorelands boundary map (used DLCD metadata)
	Pg 114. Since this is a short list without much additional context, it should reflect the actual areas within the city's	In list include description of areas in the city that are affected by each topic area. If they are not relevant to

	coastal shoreland boundary and not just what the goal says. For example, the city does not have any areas necessary for water-dependent and water-related uses or coastal headlands within their jurisdiction.	the city, state it.
	Pg. 114. Add additional narrative text to address key goal requirements that are not applicable to the city but to show that they were acknowledged in the planning process. Here are my suggestions: "The Nehalem Estuary is classified as a Shallow-Draft Development Estuary. While Manzanita does border this estuary, Tillamook County and the cities of Wheeler and Nehalem have jurisdictional authority over the estuary, in coordination with state and federal agencies." "The majority of Manzanita's coastal shorelands are along the ocean with a small amount of shorelands along the Nehalem River Estuary within the city's Urban Growth Boundary. The vast majority of the city's coastal shoreland areas are residential with a very small portion in Commercial. The city has determined that it does not have or need water-dependent zones because of the unique characteristics of its shoreland areas. The city also does not have any or a need for designated sites for estuary mitigation, restoration, or dredged material disposal as those sites are identified and protected by the cities of Wheeler and Nehalem and Tillamook County for the purposes of managing the Nehalem River Estuary."	Update text to include recommended information: "The Nehalem Estuary is classified as a Shallow-Draft Development Estuary. While Manzanita does border this estuary, Tillamook County and the cities of Wheeler and Nehalem have jurisdictional authority over the estuary, in coordination with state and federal agencies." "The majority of Manzanita's coastal shorelands are along the ocean with a small amount of shorelands along the Nehalem River Estuary within the city's Urban Growth Boundary. The vast majority of the city's coastal shoreland areas are residential with a very small portion in Commercial. The city has determined that it does not have or need water-dependent zones because of the unique characteristics of its shoreland areas. The city also does not have any or a need for designated sites for estuary mitigation, restoration, or dredged material disposal as those sites are identified and protected by the cities of Wheeler and Nehalem and Tillamook County for the purposes of managing the Nehalem River Estuary."
	Pg 114. Recommend adding definitions of public access and primary vs. secondary access in this list.	Add definitions of 'public access, primary access, and secondary access' to the callout box.

	Policy 1.4: Add the Department of State Lands to Policy 1.4 since they have authority within wetland areas. Delete "estuary management" from the policy as it is not applicable.	Update Policy 1.4: Coordinate with the Oregon Parks and Recreation Department, the Department of Land Conservation and Development, the Department of State Lands, Tillamook County and other state and federal agencies to align wetland and shoreline management actions with applicable state and federal standards.
	Policy 2.3: Do these terms get defined somewhere? (primary vs. secondary). See comment above for suggested placement of the defined terms.	Addressed in comment above.
20. Beaches and Dunes	Pg 121: Change second sentence in #3 to “ This requires an approved foredune management plan that covers an entire management unit, ensures flood protection, maintains sand supplies, and stabilizes sand post-grading through planting and maintaining vegetation.”	Update text to: Dune Grading: Foredune grading for views is allowed in limited cases for existing developments. This requires an approved foredune management plan that covers an entire management unit, ensures flood protection, maintains sand supplies, and stabilizes sand post-grading through planting and maintaining vegetation.
	Pg 121: Could add “for any non-recreational activities or improvements, including but not limited to...”	Update text to: Ocean Shore Regulation: Oregon’s ocean beaches are regulated by the Oregon Parks and Recreation Department (OPRD) under the "Beach Bill." OPRD oversees permits for activities affecting shorelands west of the statutory vegetation line for any non-recreational activities or improvements, including but not limited to beachfront protective structures, stairways, and walkways that encroach on public beaches.
	Pg 121: add beachfront. As in beachfront protective structures.	Added above, see text.

	Pg 121: Add the word "beachfront" before "protective structures" as that is the term used in Goal 18. Alternatively, you could use the term "structural shoreline stabilization solutions" as that will be defined in DLCD's current rulemaking for Senate Bill 504.	Update text to: Shoreline Armoring: Beachfront protective structures like riprap and seawalls are only.
	Policy 1.6: Add the inventory of eligible vs. ineligible lots here as the OCMP inventory could get updated over time, so the city must have a static copy/inventory.	Add map or list to inventory eligible vs. ineligible lots for protective structures only where development existed on or before January 1, 1977.
	Policy 1.7: Appreciate the least impacts alternative hierarchy. Suggest adding "nature-based" to #2 (Nonstructural nature-based erosion control) as this is the term that will be used under the Senate Bill 504 rulemaking currently underway.	Update Policy 1.7: Permit beachfront protective structures only if: a. Visual impacts are minimized; and b. Long-term public access to and along the beach is maintained; and c. Negative impacts on adjacent property and the public beach are minimized; and d. Long-term or recurring costs to the public, including but not limited to adverse impacts to the public beach, are avoided; and e. The owner is responsible for long-term maintenance of the structure and for the removal of failed erosion control materials. f. It is demonstrated that land-use management practices and nonstructural solutions cannot feasibly alleviate the hazard; and g. The action is designed to minimize adverse impacts on water currents, erosion, and accretion patterns; and h. State resource agency recommendations are followed; and i. Lower impact solutions are incorporated into the project; and j. Lower impact solutions alone are not feasible.

		k. The order of solutions, from lowest impact to highest impact are: Avoiding the hazard, moving the building Non-structural nature-based erosion control Hybrid erosion control (Non-Structural, supported by Structural) Beachfront Protective Structure with persistent vegetation Beachfront Protective Structure with no persistent vegetation.
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Oregon

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September 10, 2026

City of Manzanita
Attention Planning Commission
PO Box 129
Manzanita OR 97130
SENT BY EMAIL



RE: Manzanita PAPA 003-26 (Local case file ORD 26-04)

City of Manzanita Planning Commission and City Staff,

I am writing to provide testimony for the September 14, 2026 Planning Commission meeting which the Department of Land Conservation and Development (DLCD) wishes to be entered into the record. This testimony is regarding the proposed Manzanita Comprehensive Plan update PAPA 003-26 (Local Casefile ORD 26-04). These comments (included below) address compliance with the Oregon Land Use Planning Goals, as well as policies, and may also include recommendations for items to be included in the Plan.

DLCD would note that there are comments below which indicate where there is a need for revision needed to be consistent with Oregon Land Use Planning Goals. There are also recommendations for the City to take into consideration. The Department of Land Conservation and Development appreciates the time and hard work it takes in updating a comprehensive plan which addresses the needs and desires for a community while addressing Statewide Planning Rules. We also appreciate working with the City of Manzanita and the 3J consulting team on this update.

Regards,

Brett Estes
North Coast Regional Representative

DLCD Comments related to Oregon Land Use Goals 5 and 6

Amanda Punton, Natural Resource Specialist

For comments in this section DLCD comments in CAPITALIZED LETTERS are necessary for goal or rule compliance. Recommendations are provided in regular text as noted below:

NECESSARY FOR GOAL OR RULE COMPLIANCE

Recommendations

From matrix		DLCD Comment
Natural and Cultural Resources Policies		
1. The City of Manzanita recognizes the need to conserve open space and protect natural and scenic resources. Planning policies shall be designed to preserve the low intensity character of the community, to promote uses which preserve natural values, such as the presently abundant plant and animal habitat, and to preserve the scenic character of the town.	Revise	THIS IS A GOAL 5 POLICY AND SHOULD NOT BE MOVED TO GOAL 4 POLICIES. DLCD supports a revision to this policy to describe measures for complying with Goal 5 for natural resources that do not rely on preserving the low intensity character of the community. Consider adding a policy to pursue adoption of a riparian resource inventory and protection measures for locally significant riparian areas, consistent with Goal 5 and OAR 660-23-0090. Consider adding a policy to pursue adoption of a local wetlands inventory and protection measures for locally significant wetlands consistent with Goal 5 and OAR 660-23-0100. Consider adding a policy to pursue adoption of a local wildlife habitat resource inventory and protection measures for locally significant wildlife habitat, consistent with Goal 5 and OAR 660-23-0110.

3. If archeological sites are identified in the City, the City will coordinate with the State Historic Preservation Office in establishing a review procedure that meets the requirements of Oregon Administrative Rule 600-16-000 through 660-16-025.		Consider recognizing the city's need to comply with the new Goal 5 cultural areas rule, OAR 660-023-0210, which will be effective In January 2027.
Parks and Open Space Policies		
12. Conserve natural wildlife habitats by concentrating future development in areas designated for urbanization and by preserving unique wildlife areas.	Revise	THIS IS A GOAL 5 POLICY AND SHOULD NOT BE MOVED TO GOAL 3 POLICIES. Consider adding a policy to pursue adoption of a local wildlife habitat resource inventory and protection measures for locally significant wildlife habitat, consistent with Goal 5 and OAR 660-23-0110.
Air, Water, and Land Resources Quality		
6. Manzanita will review all Department of Environmental Quality permits, notices of construction, air contaminant discharge permits, and indirect source construction permits, to ensure that the proposed activity is consistent with the Comprehensive Plan. The City will formally respond only in those instances where there may be conflict between the Comprehensive Plan and the activity for which the permit is being sought.	New	THIS POLICY MUST BE CONSISTENT WITH THE CITY'S OBLIGATION TO PROVIDE A LAND USE COMPATABILITY STATEMENT (LUCS) WHEN A LUCS IS REQUESTED BY DEPARTMENT OF ENVIRONMENTAL QUALITY (DEQ), OR AN APPLIANT FOR A DEQ PERMIT.

Comprehensive plan maps

Sections 3.090 and 3.091 speak to required city actions based on a Comprehensive Plan Map entitled "Wetland Areas of Manzanita".

Section 3.090 Wetlands Notification Overlay Zone.

The purpose of the Wetland Notification Overlay Zone is to establish a procedure that ensures that the permitting requirements of the Division of State Lands and the U.S. Army Corps of Engineers are met in the wetlands area of the City and its Urban Growth Area.

Section 3.091 Zone Boundaries. *The boundaries of the Wetland Notification Overlay Zone shall conform to areas so designated in the Comprehensive Plan Map entitled "Wetland Areas of Manzanita".*

This provision is likely intended to comply with wetland Land Use Notification to the Department of State Lands, required by ORS 227.350. **DLCD recommends that the Wetland Areas of Manzanita be revised to show data from the current Statewide Wetlands Inventory (SWI) or replace the map with a reference to the SWI.** See [DSL's Projects in Wetlands and Waters web page](#) for more information. The [SWI web map is available here](#).

THE WETLAND AREAS OF MANZANITA MAP HOULD NOT BE REMOVED FROM THE COMPREHENSIVE PLAN IF IT IS NOT REPLACED WITH A CURRENT MAP OR REFERENCE TO THE STATEWIDE WETLAND INVENTORY.

DLCD Comments related to Oregon Land Use Goal 7

Marian Lahav, Natural Hazards Mitigation Planning Program Coordinator

Deanna Wright, National Flood Insurance Program Coordinator

From search in Comprehensive Plan draft for "flood" there are policies generated under Goal 7 Policy 1.3, 1.6 3.3 and should retain those for flood risk reduction. The city has updated flood maps as of 2018 effective flood map products with VE or Velocity zones and from review of the FEMA National Flood Hazard Layer the V zones are along the coastline of the city. Much of the existing development appears outside of the mapped V zones. Revise pg. 54 - ODEM does not map the floodplain. Revise to state: The effective flood maps identifies that most of Manzanita and its Urban Growth area lie outside of the mapped special flood hazard area, although some oceanfront properties are located within the mapped flood-prone areas.

The background information is very nicely done. In addition to the hazards mentioned and described (Earthquakes, tsunamis, coastal erosion, landslides, and wildfires) I encourage the City to also acknowledge and similarly briefly describe the hazards grouped under "Severe Weather" addressed in the NHMP: Drought, Windstorms, Winter Storms, and Extreme Temperatures.

Goal 1, Policy 1.1: Edit: *Coordinate with Tillamook County and the Department of Land Conservation and Development's Natural Hazards ~~Division~~ Program on regularly updating and maintaining the Natural*

Hazard Mitigation Plan (NHMP) and update related plans as new information becomes available or after major hazard events.

Goal 1, Policy 1.2: For consistency between the background at the beginning of the chapter, the goals and policies, and the hazards addressed in the NHMP, I suggest the background section include mention and description of sea level rise and its relationship to coastal erosion. (This can be taken from the NHMP.)

Goal 1, Policy 1.3: Edit: ...integrate these maps into City GIS systems for ongoing analysis, and into the NHMP and Comprehensive Plan.

Goal 3, Policy 3.3: If a windstorm disaster occurred (as it has), as written, this policy would require expediting land use review for development in the windstorm-affected area while balancing code requirements related to floodplains(!). Given Policy 1.4, Policy 3.3 could be rewritten to read, *Expedite the land use review processes for development in areas affected by natural hazard events, while balancing related code requirements, including those to be developed under Goal 1, Policy 1.4.*

Natural Hazards Goal 3, Policy 3.3 seems to have an editing error: Expedite the land use review processes for development in areas affected by natural disaster, while balancing code requirements related to floodplains. Balancing should be done for all code requirements, not only the floodplain code.

I agree with Meg Reed's comment (see Goal 16,17,18 comments) on Page 61 "Could add a policy related to limiting future placement of critical facilities in high hazard areas, or it could possibly fit in either policy 1.4 or 1.5. We see it's in Policy 4.6 in the Public Facilities chapter, but might be good to include in the hazards section too since it's directly hazards related. (recommendation, not required)". While she said it's recommended, I'd say it's *strongly* recommended and I'd like to see it in the hazards chapter. It would be a great addition to that policy or add it standing on its own.

Concur with Meg Reed's comment (see Goal 16,17,18 comments) on Policy 2.1. in the NH chapter. (include tribal coordination)

Also agree with Meg Reed's (see Goal 16,17,18 comments) comments about citations for the underlying data.

I recommend adding, either in *Natural Resources, Scenic and Historic Areas, and Open Spaces* Goal 2 or *Areas Subject to Natural Hazards* Goal 1 or Goal 3, a policy that supports working with the Oregon Parks and Recreation's Oregon Heritage Program to develop a Disaster Resilience Plan for Heritage Resources in Manzanita. That would help address potential impacts to historic buildings, archaeological artifacts, museum exhibits, etc. Both these links go to the same website where there are a wealth of information and resources:

- [Oregon Parks and Recreation : Disaster Preparedness, Recovery & Resilience : Oregon Heritage : State of Oregon](https://www.oregon.gov/oprd/OH/Pages/DisasterPrep.aspx)
- <https://www.oregon.gov/oprd/OH/Pages/DisasterPrep.aspx>

DLCD Comments related to Oregon Land Use Goal 10

Jena Hughes, Housing and Growth Management Analyst

On Goal 1 Blue Box referencing “population growth forecasted”: Per changes to Goal 10, cities no longer use the population forecast to estimate needed housing. Instead, they should use the state-allocated housing need (Oregon Housing Needs Analysis). It is recommend replacing “population growth forecasted”: with "housing need."

Goal 1: Policy 1.3: It is recommend striking “in response to growth and”. In compliance with statute and rules, Manzanita must update their HCA every 8 years regardless of whether the forecast shows increased population growth.

Goal 2: Policy 2.2: Per ORS 197A.400, local governments must apply clear and objective standards, conditions and procedures regulating housing development, so this policy appears to be inconsistent with this requirement. Additionally, Goal 1 does not specifically require review of development applications, but rather, "Citizens shall have the opportunity to be involved in the phases of the planning process as set forth and defined in the goals and guidelines for Land Use Planning, including Preparation of Plans and Implementation Measures, Plan Content, Plan Adoption, Minor Changes and Major Revisions in the Plan, and Implementation Measures." It is recommend to strike this policy.

DLCD Comments related to Oregon Land Use Goals 16, 17, 18

Meg Reed, Senior Coastal Policy Specialist

Rhiannon Bezore, Coastal Shores Specialist

Comments are listed by page number and section or policy. Most comments should be considered required to be consistent with the land use goals. Some comments are recommendations and are indicated as such.

General comments:

- Appreciate the inclusion of maps and data in each section! Make sure to document/cite all data referenced or used throughout each chapter of the comp plan and in maps to be very clear where the information came from (e.g., report title, date published, web-link, author, etc.). See comment in Goal 17 section related to this point. A bibliography or works cited page of some sort would be my recommendation.
- For all places where DSL is mentioned, please revise to say Department of State Lands, not Division of State Lands. The agency changed its name after the original comp plan was developed.

Page 44, Goal 1, Policy 1.3

Delete this policy as it is not relevant anymore. There is an existing estuary management plan for the Nehalem estuary. Manzanita does not have authority within the estuary. See comments in the Chapter 17 section for more detail. A policy should be added to acknowledge the jurisdictional relationship.

Page 55, Map 3

These are great maps! Make sure the underlying data is cited somewhere within the comprehensive plan or any appendices (e.g., report title, date published, web-link, author, etc.), especially if the maps or data are used for regulatory purposes. DOGAMI does sometimes update their online viewers and it's important that the city adopts a static publication(s) and map(s). We created a bibliography for the City of Newport during one of their updates. A similar approach could be used here for all the inventories referenced and used throughout the comprehensive plan, so you know where the data has come from to create the factual basis of the comp plan as required by Goal 2.

Page 57, Goal 1

Could add a policy related to limiting future placement of critical facilities in high hazard areas, or it could possibly fit within either policy 1.4 or 1.5. We see it's in Policy 4.6 in the Public Facilities chapter, but might be good to include in the hazards section too since it's directly hazards related.
(recommendation, not required)

Page 57, Goal 1, Policy 1.6

Could add, "and enhance" to "Maintain **and enhance** wetlands..." (recommendation, not required)

Page 58, Goal 2

Could add a policy related to hazard preparedness outreach and education for tourists too, i.e. partnering with tourism bureau and/or hotels/short term vacation rental properties, etc.
(recommendation, not required)

Page 66. Goal 2, Policy 2.6

Could add tribal coordination here in addition to state and federal agencies. (recommendation, not required)

Page 67, Goal 3, Policy 3.2

If this refers to culturally significant areas for tribes, it is important to include tribal voices in this policy development. Many tribes do not want culturally significant areas to be publicly known because of vandalism.

Page 91, Goal 5, Policy 5.10

Could add "beach access" to this list of alternative uses of rights-of-way. (recommendation, not required)

Page 98, Goal 3, Policy 3.8

Same comment here as above - could add "beach access" to the list. (recommendation, not required)

Page 109, Goal 4, Policy 4.1

Add to this list "beaches and dunes" as environmentally constrained lands.

Page 113, Coastal Shorelands

Goal 17 does require inventory information. This chapter does not reference an inventory, only a list of the lands to be included in the shorelands boundary from the goal. However, the appropriate inventory information is described elsewhere in the comp plan - under Goal 5, Goal 7, Goal 8, and Goal 18. Please make a clear reference or statement(s) within this chapter to describe the inventory information used to develop the coastal shorelands boundary, which could reference those other chapters.

A clear description of the coastal shorelands boundary map needs to be included in this chapter as well. How was the boundary drawn? DLCD did produce metadata along with the map so that information should be available.

Page 114, Coastal Shorelands (blue callout box)

Since this shorelands list is a short list without much additional context, it should reflect the actual areas within the city's coastal shoreland boundary and not just what the goal says. For example, the city does not have any areas necessary for water-dependent and water-related uses or coastal headlands within its jurisdiction, so those should be taken out.

Add additional narrative text to address key goal requirements that are not applicable to the city but to show that they were acknowledged in the planning process. Here are my suggestions:

"The Nehalem Estuary is classified as a Shallow-Draft Development Estuary. While Manzanita does border this estuary, Tillamook County and the cities of Wheeler and Nehalem have jurisdictional authority over the estuary, in coordination with state and federal agencies."

"The majority of Manzanita's coastal shorelands are along the ocean with a small amount of shorelands along the Nehalem River Estuary within the city's Urban Growth Boundary. The vast majority of the city's coastal shoreland areas are residential with a very small portion in Commercial. The city has determined that it does not have or need water-dependent zones because of the unique characteristics of its shoreland areas. The city also does not have any or a need for designated sites for estuary mitigation, restoration, or dredged material disposal as those sites are identified and protected by the cities of Wheeler and Nehalem and Tillamook County for the purposes of managing the Nehalem River Estuary."

Recommend adding definitions for public access and primary vs. secondary access in the list of key terms.

Page 116, Goal 1, Policy 1.4

Add the Department of State Lands to Policy 1.4 since they have authority within wetland areas. Delete "estuary management" from the policy as it is not applicable.

Page 121, Beaches & Dunes

Change second sentence in #3 (Dune Grading) to “This requires an approved foredune management plan that covers the applicable planning area, ensures flood protection, maintains sand supplies, and stabilizes sand post-grading through planting and maintaining vegetation.”

Revise 2nd sentence in #4 (Ocean Shore Regulation) to “OPRD oversees permits for any non-recreational activities or improvements affecting shorelands west of the statutory vegetation line, including but not limited to beachfront protective structures, stairways, and walkways that encroach on the public beach.”

Page 124, Goal 1, Policy 1.6

Add the inventory of eligible vs. ineligible lots here as referencing the OCMP inventory is not static. That inventory could get updated over time, so the city must have a static copy/inventory.

Page 125, Goal 1, Policy 1.10

Appreciate the least impacts alternative hierarchy. Suggest adding “nature-based” to #2 (Nonstructural nature-based solutions) as this is the term that will be used under the Senate Bill 504 rulemaking currently underway.

DLCD Comments related to Oregon Land Use Goal 14

Kevin Young, Senior Urban Planner

Add, at a minimum, a reference page to all their adopted documents (adopted) that support the comprehensive plan. This includes the development code, but other things would be (as applicable):

- Acknowledged Documents (for which PAPAs have been filed)
- Housing capacity analyses
- Economic opportunities analysis
- Water, sewer, and stormwater master plans
- Transportation system plan
- Any Goal 5 implementation documents
- Coastal Goal implementation documents (for example, there is some reference to a Foredune Management Study or similar)
- Parks plan
- Hazard mitigation plan
- Historic district or historic resource adoption studies and documentation
- Urban Growth Management Agreement with Tillamook County
- School district facility needs analysis

- Etc.

Including these documents as supporting documents to the comprehensive plan provides the city with a factual and policy basis for decision-making.