



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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