

From: [Debbie Ubnoske](#)
To: [Roxanne Johnston](#)
Subject: Re: Shore Pines
Date: Monday, September 27, 2021 11:58:17 AM

Thanks Roxanne. I did take more time and read the justifications for the variances and they seem to lean heavily on the fact that these are affordable units and the City needs affordable units. Clearly, there seems to be no mention of the need for a variance based on the fact that this site has constraints that other similar sites where affordable units have been built don't have. That is typically the justification for approving a variance. It appears as if funding is at risk if the developer doesn't meet a certain threshold of units but I cannot see how this could be a reason to approve a variance. You mention they are providing more open space and amenities than required by code. Perhaps it would be more appropriate for the developer to provide what Code requires for open space which would then make it possible for more parking on site. That would deal with that issue. I find no legal justification for a variance to the height requirement. They are not in a High Density Residential zone. They are in a Highway District zone and trying to justify the height based on the fact that they are "similar" to a High Density Residential zone isn't an appropriate reason to support a variance. As I am sure you can tell I am just now seeing all the reports and supporting information so am just putting forth my thoughts based on what I have read so far. Is there a way for me to get a copy of the City's General Plan and Land Use Map for future reference? In my opinion, and conceding I am not yet that familiar with Florence, it seems to me that affordable and multi-family housing should be located near the central core of the city as it makes it easier for people to walk/bike to work and services.

On Sep 27, 2021, at 11:30 AM, Roxanne Johnston
<Roxanne.Johnston@ci.florence.or.us> wrote:

Hello again,

I will add your email as testimony. If you want to speak at the virtual meeting, please sign up at this link – it allows participation and isn't the same as a speakers card:

<https://attendee.gotowebinar.com/register/8175729188482698253>

I am wondering if you read only the AIS (Agenda Item Summaries). The findings (labeled Exhibit A) for both the variance requests (13 pages) and design reviews (66 pages) are pretty comprehensive. The proposed Resolutions for both proposed Findings show the conditions that staff recommends.

IF something is not required in code, such as the requirement for balconies, patios and a noise study, then we do not condition these – it would not be fair to require one group to do something that is not required in the same zoning district. Applicants are

supposed to provide their rationale for all variances and the narrative for those are found in Exhibit B of the Variance Findings (PC 21 23 VAR 02). The amount they are wanting to vary are included in the AIS (Agenda Item Summary) The Planning Commission will decide the requirements have been met – otherwise, without the variance requests and exceptions, the entire review would have been done administratively (in-house).

Here is what applicants are asking: Height: 3'11 inches taller than the allowed 35' in the Highway District (that is slightly over a 10% request). The argument is that High Density Residential zoning allows a height of 40'. That district is focused on multi-family housing and Highway District is a more intense use in terms of noise, for example, and allows a higher percentage of lot coverage(85%) than High Density Residential(75%). Since commercial-type zoning districts are typically higher impact uses, staff has already been working on code amendments that will make more sense – for example, in our Pacific View Business Park, we are currently requiring a lot of design features that we require along Hwy 101 when those in the PVBP are more industrial and contain metal buildings. Doesn't make a lot of sense for them to use Old Town standards and extra material when these are intense land uses farther away from Old Town, or highway visibility for example. It adds unnecessary costs to the developer.

Density – You didn't ask about density, but again, the applicant uses the fact that they provide much more than the minimum requirement for amenities – both outdoor and indoor. And their building footprint is a lot less. I pulled in state code, which is reflected in our Comprehensive Plan, too – both advocated increased density per acre. In this instance, the request is for 7 additional units. There are slightly over half of the 3 bedroom units being proposed than the 1 bedroom units.

The Planning Commission may allow a parking reduction since the applicant provided a parking study. The applicant is providing more open space/pervious surfaces than they need to and are saving many trees. They appeared 2 times in front of the Planning Commission earlier this year asking guidance from the Commission and have demonstrated that they have done their due diligence. As for the lighting, that, too, is considered a reduction instead of a variance request. I don't know why, but that is how the code reads. I would encourage you to read the results of the applicant's parking study in Exhibit D of the Design Review.

I did not write the original findings for the Design Review. We are short-staffed and so we contracted an outside Planner to draft the findings. I did help with edits and yes, the applicants didn't outwardly provide a lot of noticeable detail in their plans and we have proposed a condition (Condition 5.3) in the attached resolution that they need to provide more detail. . The description of what materials they are using, and colors, are in the notes of those plans. It is up to the Planning Commission if they want to review the entire proposal together, or even parts of the development, or if they want staff to review them. That is why staff writes 'proposed' on the Findings and Resolutions. They could change.

Well, again, thank you for the email. I hope I provided some explanation.

Best,
R

Roxanne M. Johnston, CFM

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From: Debbie Ubnoske <dsubnoske@gmail.com>

Sent: Monday, September 27, 2021 10:30 AM

To: Roxanne Johnston <Roxanne.Johnston@ci.florence.or.us>

Subject: Re: Shore Pines

Thank you Roxanne. What is the basis for the variances being considered for building height, parking and lighting? The staff report doesn't identify what criteria is being used to grant the variances. In my opinion, the reduction in parking is fairly significant and could have an impact on the adjoining church property given that there are no off site parking spaces. It seems to me that too many units are being proposed which is the reason for the requested variances. I didn't see any mention in the staff report of site difficulties, lot shape, etc. that would provide staff with the rationale to approve these variances. I have looked at the criteria for the granting of variances and don't feel the Commission can find the variances to be appropriate given the criteria. I am also concerned about the lack of lighting which could certainly pose a security issue for residents. Lastly, the elevations provide for no visual interest. The buildings are square boxes with minimal windows and no outside decks or patios. Did the developer provide renderings? Was a noise study done given the proximity to Highway 101?

On Sep 27, 2021, at 8:22 AM, Roxanne Johnston

<Roxanne.Johnston@ci.florence.or.us> wrote:

Good morning,

Thank you for filling out a speake'rs card and your inquiry. The link to the materials, including proposed site plan and elevations (tab down towards the bottom of the page) is here: <https://www.ci.florence.or.us/bc-pc/planning-commission-hearing-30> Please let me know if you have further questions,

Best,
R

Roxanne M. Johnston, CFM

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