

Alain & Lisa Briand  
1945 Spyglass Ct  
Netarts, Oregon 97143

June 5, 2023

Tillamook County Commission  
201 Laurel Ave  
Tillamook, Oregon 97141

Subject: Proposed Changes to Short Term Rental Regulations

Dear Members of the Tillamook County Commission,

We, have been proud owners of a short-term rental property located at 1945 Spyglass Ct in Netarts, Oregon, for the past four years. This property was purchased as our vacation home after years of saving and planning and we offer it for rent as an STR through Vacasa in order to offset our cost of ownership. We are writing this letter to express our deep concerns and opposition to the proposed changes to the Short Term Rental Regulations in Tillamook County.

While we understand the need for regulations to ensure the responsible operation of short-term rentals, we believe that certain aspects of the proposed changes are impractical and impose unnecessary burdens on property owners. We participated in the advisory meetings, which showed the possibility for fair & reasonable updates to the STR policies. We would, however, like to highlight the following points of contention:

1. Requiring renters to park off-street: We recognize the importance of addressing parking concerns; however, the proposed regulation would place an unfair burden on property owners. As owners, we cannot restrict the use of public streets for parking. Our home has 4 parking spaces that we ask each renter to use.
2. Requiring immediate response to complaint calls: While we are committed to addressing any legitimate concerns from our guests, demanding an immediate response to complaint calls is unreasonable. Property owners or our designated management company, we may not always be available or within close proximity to the rental property. A reasonable response time should be considered, taking into account the nature of the complaint.
3. Requiring expiration date on exterior signage: Mandating an expiration date on exterior signage would necessitate annual expenditures from property owners. This requirement places an undue financial burden on us without significant justification. If the signage is well-maintained and not causing any inconvenience or harm, it should not be subject to an arbitrary expiration date.
4. Changing from permits to business licenses: We strongly object to changing the requirement from permits (for an allowed use) to business licenses (with no land use rights). This change would effectively eliminate the land use rights that all permit holders currently enjoy, which are

guaranteed under state law. It is essential to protect the rights of property owners and ensure fair treatment under the law. Understand that this is our second home, not a business for us.

5. Permit Transferability is also a great concern. A new law that tries to limit or prohibit transfers of an existing nonconforming use is not allowed by state law. The county is offering current permit holders just one single transfer which is absolutely insufficient. Many homes have historical use as STRs (including ours), and if permits are limited, then not having the ability to be an STR will undoubtedly negatively impact our future sale value. Please consider exceptions for legal transfers between family members, LLCs, trusts, etc..

We respectfully request that the Tillamook County Commission reconsider these proposed changes and engage in a dialogue with short-term rental property owners to develop regulations that are fair, practical, and uphold our rights as property owners. We are more than willing to work collaboratively towards finding balanced solutions that address community concerns without unduly burdening property owners. We fear that some of the currently proposed changes would be too restrictive and would eventually jeopardize our ability to support and maintain our family's vacation home.

Thank you for your attention to this matter. We trust that you will carefully consider our concerns and take them into account during the decision-making process. We look forward to a fair resolution that maintains the vitality of the short-term rental industry while respecting the rights of property owners.

Sincerely,

Alain & Lisa Briand

## Lynn Tone

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**From:** Donald Truxillo <dona1d.truxillo@gmail.com>  
**Sent:** Tuesday, June 6, 2023 3:21 PM  
**To:** Lynn Tone  
**Subject:** EXTERNAL: In support of the draft ordinance to restrict STRs in Neahkahnie

[**NOTICE:** This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe.]

Hello,

I am writing in support of the ordinance that would put the limits and restrictions on STRs in Neahkahnie.

This is important to the sustainability and quality of life in Neahkahnie,

Best regards,

Donald Truxillo

Joseph Long

8250 Hillcrest Rd.,

Neahkahnie 97131

## Lynn Tone

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**From:** Dave Benz <dave.r.benz@icloud.com>  
**Sent:** Wednesday, June 7, 2023 10:24 AM  
**To:** Lynn Tone; Sarah Absher  
**Subject:** EXTERNAL: Proposed Ordinance STR Tillamook County Public Comment from Owner

[**NOTICE:** This message originated outside of Tillamook County – **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

June 7, 2023

Dear Sarah, Lynn and Commissioners,

8194 Nehalem Road  
Tillamook County  
Nehalem ( Neahkanie), Oregon

My name is David Benz and with my wife Jean we own and have a STR renewed Permit.

We are appreciative of all the time, planning and public forum the Tillamook STR committee has performed!

As homeowners we value the Neahkanie Neighborhood our home is located and we sincerely without any reservation respect all our neighbors!

We have followed every rule to use our home for our family, friends and renters, including weekly garbage pickup in a large rubbish can which has a lid that closes with a bungee. We have a local landscaper, replaced our roof last August by hiring a local contractor, and employ VACASA in Manzanita, a Professional Management Company who has local residents clean and performs maintenance on our home. We have specific marked parking for everyone who uses our home, a sign with local contact and phone number beside the front door, a Tsunami Map and our STR permit framed and mounted in our entry.

We can honestly state that as a result of Covid in 2020 the desire to “get-away” outdoors, of not just county residents, rather citizens from Portland and other interior towns, and cities far surpassed anyones expectations, and much of the beach and ocean use, was by people coming just for the day.

This anomaly of increased extremely high demand use, caused greater use of cars parking on along the beach, and traffic!

The carrot over effect continued into 2021 and since then the nights rented has slowed.

We object to any change from a STR Permit to a License, as we purchased our home considering the use of it, specifically as a place to relax ourselves, and the ability to offset operational costs, but having a Permit to rent, which we have done both for long term and short term renters.

With a local Manzanita Attorney Sarah Smyth-Mcintosh, we registered our Neahkanie house as an LLC, ONLY for insurance purposes, in the event someone was injured on our property, including workers we hire. Some local residents are mistaken in

Thinking that our home is a corporation, and we had/have no intention of being an LLC for any other reason than insurance purposes.

We are with this note stating that we with Cost Hosts and other owners will be a **Plaintiff**, in changes which affect our ability to use our home as was intended by us, and approved by Tillamook County.

Thanks again for all the work you have done, and we appreciate the opportunity its to voice our thoughts!

Sincere Personal Regards,

David & Jean Benz

4516 77th Ave Ct NW

Gig Harbor, WA 98335

C-253 514 5244

[Dave.r.benz@gmail.com](mailto:Dave.r.benz@gmail.com) [Jeanbenz@gmail.com](mailto:Jeanbenz@gmail.com)

## Lynn Tone

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**From:** Dave Benz <dave.r.benz@icloud.com>  
**Sent:** Wednesday, June 7, 2023 10:24 AM  
**To:** Lynn Tone; Sarah Absher  
**Subject:** EXTERNAL: Proposed Ordinance STR Tillamook County Public Comment from Owner

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Thanks again for all the work you have done, and we appreciate the opportunity its to voice our thoughts!

Sincere Personal Regards,

David & Jean Benz

4516 77th Ave Ct NW

Gig Harbor, WA 98335

C-253 514 5244

[Dave.r.benz@gmail.com](mailto:Dave.r.benz@gmail.com) [Jeanbenz@gmail.com](mailto:Jeanbenz@gmail.com)

## Lynn Tone

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**From:** Public Comments  
**Sent:** Wednesday, June 7, 2023 3:43 PM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: Comments Opposed to revisions to the Short Term Rentals Draft Ordinance in Tillamook county

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**From:** Pam Statz <pamstatz@gmail.com>  
**Sent:** Wednesday, June 7, 2023 11:38 AM  
**To:** Public Comments <publiccomments@co.tillamook.or.us>  
**Cc:** jcasegraham@gmail.com  
**Subject:** EXTERNAL: Comments Opposed to revisions to the Short Term Rentals Draft Ordinance in Tillamook county

[NOTICE: This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Tillamook County Board of Commissioners & STR Advisory Committee,

I'm writing in support of Short Term Rentals in Tillamook county. I am opposed to the revisions to the STR Draft Ordinance.

My husband and I own an STR on Neahkahnie Mountain at 8180 Nehalem Rd, Nehalem, OR 97131. Our neighborhood has several STRs and is historically an area dominated by seasonal homes.

I'd like to address several issues of the STR Draft Ordinance:

Changing the regulation of short term rentals from a permit to a license and restricting transferability  
- It is unclear how this will directly impact our property rights in regards to land use laws and our property value. Will Tillamook County take this into consideration when reassessing property tax bills?

Requiring renters to park off-street

- How will this be enforced? Will Tillamook county be recording the license plates, makes and models of every car owned by every renter and have police officers monitoring street parking?

Requiring immediate response to phone call

- What exactly does immediate mean? Will a call back within minutes still mean a violation against the STR owner? This is excessive since three violations equal revocation of a license and a potentially massive financial impact on homeowners.

Requiring exterior lighting to direct downwards

- Replacing exterior lighting is an excessive cost. Why aren't non STRs being held to the same standard?



Requiring expiration date on exterior signage

- This is an excessive cost and it is very questionable on how it could be enforced. Why not simply make this information publicly available at <https://www.co.tillamook.or.us/>?

Requiring in-person response within 20? or is it 30 minutes?

- This places homeowners and STR managers in potentially dangerous situations. This is particularly troubling since Tillamook county seeks to cut six TCSO Deputy positions in the recent proposed budget for 2023. This also places a greater burden on STR owners than even for ambulance emergency response the county which permits 10% of call response to exceed 20 minutes – setting a higher expectation for short term rental owners to respond to noise complaints than they do response to life-threatening injuries.

Fee no less than \$100 to change Contact Person

- This is an excessive cost. STR management companies often have turnover in staff. Our main contact has changed three times in the last two years.

We take our duties as homeowners very seriously. The safety of the community and our guests is our number one priority. We allow only two cars to park on the property and are diligent about keeping the landscaping neat, and the house well maintained. We are active members of the Neahkahnie community. We employ local residents including Vacasa staff (formerly Sunset Vacation Rentals) who manage the property, Mark McCorkle Construction, and Hood Landscapes. When we are visiting we support the local economy by frequenting stores and restaurants in Manzanita, Nehalem and Wheeler. We sign petitions and work to affect slower traffic speeds on our street, we pick up garbage on the beaches, and we make an effort to know and engage with our neighbors. My family couldn't afford the joys of living in a place like Neahkahnie Mountain without being able to offer our home as an STR. Our home is meant to be enjoyed and I would hate to have it sit empty between our visits. Having renters, many of whom are repeat guests, helps us keep track of maintenance issues and needed repairs that we might miss if our home were only occupied occasionally.

Please consider families like mine when addressing the final version of the STR ordinance.

Pam Statz & Justin Graham  
8180 Nehalem Rd, Nehalem, OR 97131

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Pamela Statz  
[pamstatz@gmail.com](mailto:pamstatz@gmail.com)  
[pamelastatz.com](http://pamelastatz.com)  
415.577.9149

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## Lynn Tone

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**From:** Public Comments  
**Sent:** Wednesday, June 7, 2023 3:43 PM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: STR Public Comment

-----Original Message-----

From: Tara <riverhousehome@gmail.com>  
Sent: Wednesday, June 7, 2023 12:57 PM  
To: Public Comments <publiccomments@co.tillamook.or.us>  
Subject: EXTERNAL: STR Public Comment

[NOTICE: This message originated outside of Tillamook County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Our primary residence for the last 10 years is Falcon Cove in North Tillamook County. We have at least 6 STRs immediately around us and can honestly say that we have never felt the need to complain to the county. We have periodically been annoyed by day tourists that park their cars in areas not designated for parking but we think that goes with living close to beach paths.

Our home is an approved STR. We are not currently renting it but may someday need to move closer to medical facilities, so our goal is to rent it then to help cover expenses while keeping it in the family.

We question the assertion that STRs use more water than permanent full time residents as justification for reducing STRs. We object to signage on our property if we aren't currently renting. It seems a privacy issue. We object to the ordinance being revised to license rather than permit because it appears to reduce property owner rights. We feel that if we chose to sell our property the STR permit should transfer with ownership.

We hope that our comments will be considered when the commissioners evaluate the ordinance.

Thank you,  
Tara & John Erben  
44925 Tide Ave  
Arch Cape, OR. (Mailing address)  
509 440-1778  
Sent from my iPhone

## Lynn Tone

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**From:** Elaine <ejhanby@nehalem.tel.net>  
**Sent:** Thursday, June 8, 2023 8:02 AM  
**To:** Lynn Tone  
**Cc:** Sarah Absher  
**Subject:** EXTERNAL: Draft STR Ordinance Public Hearing June 13

[NOTICE: This message originated outside of Tillamook County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

To County Commissioners, Erin Skaar, Mary Faith Bell, David Yamamoto, Director Sarah Absher,

RE: Draft STR Ordinance Public Hearing

As a full time residents/taxpayers, we are fully aware of the upcoming public hearing on the draft STR ordinance. We are also aware of the strong opposition to the measure by STR owners and operators. It surprises no one that owners and operators wish to continue their "business as usual" and have mounted a vigorous, clamorous opposition to regulations that they heretofore have not been required to meet.

The opposition comes in spite of recognized needs for controlling the STR business in unincorporated parts of Tillamook County. It is blind to the damage already inflicted to the current and future livability of Tillamook County. It is blind to foreseeing an environment that is sensitive to preserving the beauty and attractiveness of Tillamook for permanent residents and, as well, for visitors seeking a recreational destination.

We encourage Tillamook County administration to transcend the clamor of those opposing regulation of STR's. We support you to look to the long-range future of County residents - the folks who have lived here a long time and will continue to enhance the economy, culture and well-being of the County.

We are grateful to the administrators and the STR Committee for their notable effort on this subject. Thank you for your time and attention to this vitally important matter.

Respectfully submitted,

Elaine & John Hanby  
7785 Twana Trace  
Nehalem, OR 97131

Chair Skaar, Vice-Chair Bell, Commissioner Yamamoto, Director Absher

I am a full-time resident of Neahkahnie. Please consider the following comments regarding the STR Ordinance draft dated June 6, 2023. While I do not agree with several of the proposals in the present draft, it is a great improvement over the current Ordinance 84. Director Absher and Mr. Kearns deserve a great deal of credit for the progress that has been made.

Before addressing specific provisions, I would like to emphasize the importance of easy public access to STR licensing information as well as transparency in enforcement of possible Ordinance violations. A publicly accessible database containing licensing information like that currently used by Manzanita could be a model.

Manzanita's database provides:

- STR address
- Contact Name
- Contact Phone
- Maximum Occupancy

Adding complaint information with resolution action for each SRT would enable a community to monitor the County's effectiveness in dealing with STR issues.

**.030 Z: Definition of "Short-Term Rental":** The current language seems internally inconsistent. In the first sentence, it states "...consecutive period less than 30 days per month...". In the penultimate sentence the term is "...a rental period of 30 or few nights." One includes 30 while the other does not. Also, why include "per month" since the 30 day/night period could bridge two months.

**.070 D. 1. b:** On street parking is a significant issue in Neahkahnie and many other communities. There should be an opportunity for the community to provide in-put before any on-street parking is approved. Will these spaces be specifically identified in connection with a specific STR? How will community members know if there is a violation?

**.080 C.** The cap on occupancy should be 10 people, not 13 (children should be considered people even in the context of STRs) and certainly not 17. Indemnity aside, the County should consider the safety of transient visitors in setting occupancy limits. It is unrealistic to think that 14 "people" plus 3 children can safely evacuate a smoke filled, unfamiliar, single-family residence on a dark night.

**.100 B 1-3:** For full public transparency, complaints should be set forth in an updated data base easily accessible by the public. This database should include the record of response required under paragraph 3 of this section.

**.110:** All licensed STRs should have to comply with certain new regulations such as daytime noise. While there may be some updated regulations that would require extensive modifications to the existing STR structure (hopefully not relating to safety) that would be excluded, updated regulations that relate to the transient guests, such as daytime noise, should not be excluded.

**.140:** To assure transparency, notice regarding County action for a particular STR should be provided to the affected community in addition to what might be basically hidden in the public notice section of the Tillamook Headlight Herald. Notice should at least be provided in the database referenced above. Preferably, the STR owner should be required to provide notice of a hearing concerning violations to those residents within a certain distance from the STR. A prospective STR owner is required to provide notice to neighbors under provision .050 A 7 so notice regarding a violation hearing should be similarly required. This would permit the attendance of interest people at hearings concerning violations in their neighborhood.

Finally, it is disappointing that:

1. There is no limitation on the number STRs that an entity can operate in a neighborhood. This is important to limit the investment community in overwhelming a neighborhood.
2. There is no specific requirement concerning nighttime lights. Having a "dark sky" requirement is important for enjoying the full impact of a coast sky. Many STRs keep lights on all night.

Respectfully submitted,  
David Boone  
Daveboone01@gmail.com

## Lynn Tone

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**From:** Public Comments  
**Sent:** Thursday, June 8, 2023 7:49 AM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: STR Ordinance Review

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**From:** John Pierce <johnp@xsspecialty.com>  
**Sent:** Wednesday, June 7, 2023 6:16 PM  
**To:** Public Comments <publiccomments@co.tillamook.or.us>  
**Subject:** EXTERNAL: STR Ordinance Review

[NOTICE: This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe.]

As a current STR permit holder at 37770 18th St in the Manzanita UGB, I'd like to express my concerns regarding the possible changes to the way in which we have historically been authorized to operate by virtue of the county's approval.

Regardless of the many issues related to Covid we managed to complete our house in 2022 with the intent of using the proceeds to aid in our children's college tuition and eventually move into the house full time. The proposed overhaul to the current system will have a profoundly detrimental effect on our ability to recognize either of these goals.

1. It baffles me why the county, with its vast resources and mission of promoting health and safety and economic stability would bring in outside counsel who's infamously recognized as being anti-STR. My assumption is the county has very diligent and professional inside counsel but for some reason chose to take a divisive path.
2. I hope the council pays particular attention to addendum M of the packet supplied by Sarah. Addendum M recognizes the inability of the county to police noise and offers a seemingly balanced solution. The vagueness of the noise definitions in the draft are specifically addressed. What's unreasonable to one person may not be to another and that becomes a very subjective issue. Allowing a neighbor to file generic noise complaints without some kind of counterbalance in place to protect the permit holder from undue penalties creates an unfair burden on both current and future operators. One member of the STR Committee offered a solution which mirrors Clatsop County wording but that was left out of the final draft. I suggest that be added as a stop gap and communicated to people who use noise as a way to potentially suspend a permit simply because they don't like STRs.
3. Addendum M also revises some specific square footage requirements for bedrooms allowing two individuals. The county building department reversed their earlier recommendation regarding this issue yet those reconsiderations were not included in the final draft. The county agrees that a room sleeping two individuals does not need 50 sq ft per person. Please amend this.

What the county is proposing is a vast overhaul of an imperfect system that quantitatively works for the vast majority of county residents. I'm certainly not saying there isn't room to improve but how are we, as STR operators, supposed to stop people from parking in the public right of way. I'm sure we all recognize we're obliged to the grace of public works regardless of where we may be spending the night.

Life and safety - yes! Common sense - yes!

Limiting my ability to transfer more than one time - no. Removing and/or impacting our current property rights in any form - no.

We all strive to be good neighbors and we encourage the fine folks who spend their money in our shops and restaurants to act as such, but we shouldn't be held to higher standards than our non STR neighbors. If a home can legally sell on the market in its current condition why tell them they have the burden of being held to revised building codes simply because they wish to rent to a family for less than 30 days. If that same home were to become a long term rental would you have them adhere to the new building code as well?

Fairness - yes. Clarity - yes.

I believe there are compromises to be had and life and safety are public duties. Changing from permits, limiting transfers, imposing new codes, imposing penalties for vaguely defined infractions, caps and distance limitations, requiring owners to defend and hold harmless the county are all excessive and place an undue burden on our rights as they currently exist as approved and recognized by the county.

Perhaps the county should have concentrated on improving what currently works, start with the good, and then addressing what needs to be tweaked instead of reinventing the wheel. Do what's equitable for all without feeling the need to justify the draft ordinance for the sake of having to justify something.

This may well be an expensive lesson in civic mismanagement for the county and residents.

John Pierce

## Lynn Tone

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**From:** Public Comments  
**Sent:** Thursday, June 8, 2023 7:49 AM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: Fw: Please Support STRs & Tourism in our Coastal Communities with Balanced Regulations - Do Not Repeal Ordinance #84

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**From:** Steve <[swoods.home@aol.com](mailto:swoods.home@aol.com)>  
**Sent:** Wednesday, June 7, 2023 5:35 PM  
**To:** Public Comments <[publiccomments@co.tillamook.or.us](mailto:publiccomments@co.tillamook.or.us)>  
**Subject:** EXTERNAL: Fw: Please Support STRs & Tourism in our Coastal Communities with Balanced Regulations - Do Not Repeal Ordinance #84

[NOTICE: This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

----- Forwarded Message -----

**From:** Steve <[swoods.home@aol.com](mailto:swoods.home@aol.com)>  
**To:** [publiccomments@co.tillamook.or.us](mailto:publiccomments@co.tillamook.or.us) <[publiccomments@co.tillamook.or.us](mailto:publiccomments@co.tillamook.or.us)>  
**Sent:** Sunday, February 12, 2023 at 09:58:30 PM PST  
**Subject:** Please Support STRs & Tourism in our Coastal Communities with Balanced Regulations - Do Not Repeal Ordinance #84

Tillamook Board of County Commissioners & STR Advisory Committee,

To our Leaders,

I encourage you to reconsider your new regulations concerning Short Term Rentals.

I recently enjoyed my 70th birthday at an STR in Neskowin. We had brothers, nephews, high school friends and a friend from my first job. In all there were 16 of us. Under your new rules this wouldn't be possible (limit of 10 plus 2) for total occupancy. Some of our people are single so we used all 9 bedrooms to sleep everyone. We were all together in one place and enjoyed each others company and told a lot of old stories. Where else could we do such a gathering? The local Motel wouldn't work for us. Could we find two houses side by side and rent both? Maybe but the chances are not great. I believe we are not the only groups who like to gather every few years and catch up on life.

I question who came up with the 250' limit for STR's, and is it 250' in all directions which means it's really 500' from one to the other? Did they consider the village portion of Neskowin which has much higher density and much smaller lots? If lot's are 50' does this mean no other STR for 5 lot's to the north, south, east, and west would be approved? That's an awful lot of homes that would be eliminated from just one approved STR.



How does one make plans when the rules change every 5 years? Even at my advanced age I tend to think beyond 5 years when making major financial decisions such as a home purchase. I know there are already people who are rethinking what they are going to build or if they will build at all based on your new proposals.

How is this going to impact your communities when the contractor, builder, cabinet maker, and all the rest find there is no longer any employment to be had near their home? This will not only curtail new people from moving into the area but will force others to move out.

Are we chasing a problem that doesn't exist? Do we really have that many problems with STR's? In the last year I would like to know how many complaints the county actually received. Did some of those come from the same people again and again just because they don't like STR's? The discussions I have listened to indicate there are actually very few complaints that reach the county. Correct me if I am wrong. Is it 20, 200 or 2,000? I don't believe I have ever heard an actual number put on it.

I have noticed a lot of the letters to the county seem to mention the same issues as though a group was directing the responses to the county. I find it very strange that many of those concerns are the same ones mentioned to Lincoln county in their request for community input. I also believe that much of this is coming from the small group of people who live here full time. Do they have different property rights than I do? Does their opinion count more somehow than the STR and vacation/second home people? I wasn't aware of any difference in either the US or State Constitution.

As I understand it Tillamook County receives far more revenue from the STR's than from hotels and motels at this time. In addition the revenue from STR's is growing while the hotel and motel revenue is declining. Is this due to the internet and the ease today in finding a full home to rent at a price which isn't much higher than a single room in a motel? Today when I travel I tend to stay in STR's by choice and for many reasons. Do you really believe VRBO, VACASA, AIRB&B and others are going to go away or that the desire to visit the coast is going to decline? I think that ultimately the internet and the demand will win this battle.

If the county should adopt these new restrictive regulations on STR's they might as well quit spending dollars to promote tourism. Why would you advertise to create demand for something that you don't have the supply to fulfill? Under these new regulations the supply will dwindle quickly once the first 5 years is up.

I have lived in Oregon all of my life and I hate to see so many infringements being placed upon us with such little understanding of the long term impact. As an example do we really need a rule telling us how we have to shield our outside lighting? Can't we just go talk with our neighbors and work it out? Will you be regulating the size of the light bulbs next?

Thank you for taking the time to consider my thoughts. I apologize for taking so much of your valuable time but I hope you will give strong consideration to my comments.

Sincerely,

Stephen R. Woods

**Lynn Tone**

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**From:** Public Comments  
**Sent:** Thursday, June 8, 2023 7:49 AM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: Public Comments for STR BOCC Meeting June 13th 2023

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**From:** Pete Stone <psphoto@comcast.net>  
**Sent:** Wednesday, June 7, 2023 4:15 PM  
**To:** Public Comments <publiccomments@co.tillamook.or.us>  
**Subject:** EXTERNAL: Public Comments for STR BOCC Meeting June 13th 2023

[NOTICE: This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe.]

## To the BOCC:

My name is Pete Stone, I am an STR owner in Nedonna Beach ( have been for over 10 years with no complaints ), and these are my views, and don't represent any other group or organization.

**SUBJECT: The new proposed Draft Ordinance #84**

**TITLE: The Good, The Bad, and The Ugly....**

**#1: "A Horse by another Name"**

**Calling the new DO ( Draft Ordinance ) a "License" rather than a Permit doesn't change it into something it's not.**

And....saying it's not Land Use ( "No Nonconforming Status Conferred" ) won't mean that...in the eyes of the law....LUBA will see it the County's way.

If there's a legal challenge, the Courts, and or LUBA, will look at what this Draft Ordinance really IS....not what it **says** it is.

Looks like a Duck, Quacks like a Duck.....

So....for **existing Permit holders**, the new DO should **continue** to be described as a **Permit**.

That means that **full transferability of permits** should remain upon property transfer or sale ( **Do restaurants or bars or hotels lose their ability to operate simply due to such a transfer of ownership, even if they are in full compliance with OLCC and health and safety laws?** ).

It's not the responsibility of the County to **disallow a previously permitted nonconforming use**, despite they're being others who want to compete as STR owners.

This is nothing more than **interference in the property rental market** that should be outside the purview of the County.

A **reasonable Cap** system for **FUTURE STR** permits, if flexible enough to handle Tourism growth and demand for overnight accommodation seems a **more reasoned approach**....possibly a **2% cap on top of current STR levels** in the County or identified Communities, with **review after 3 years** to see if Tourist demand is being accommodated.

**Tourism** spending has historically been **growing at 3%** in the County, so **much less** than that simply won't keep up with demand and be a **drag on job growth and economic development**.

## #2: "Sorry you built that... cuz we're not letting you use it"

There are a handful of STR homes ( **Estate Homes with 5+ bedrooms** ) that should be allowed to be reviewed separately in terms of allowable occupancy, parking, etc.

These homes are few in number, but are **unique enough in character and size** that the Department of Community Development should be able to assess them separately to see if allowable Ordinance limits regarding **occupancy and parking can be exceeded** safely to provide multifamily accommodation in the County.

If so....a "**variance**" should be provided, as many cities and counties do for special situations.

## #3: "To Have and to Hold Harmless"

The "Executed and Hold Harmless Agreement" is **overly broad**, and despite claims by Sarah Absher, appears on only one other type of permit application seen on the Tillamook County Department of Community Development forms ( I know....I looked! ).....the one for a **Temporary Use Permit**, which makes sense, **since such use may involve County property**. Why do STR owners need to indemnify the County....don't you have your own liability insurance?

In addition to what I've said here.....I believe this Hold Harmless agreement is **preempted** by the State Tort Claims Act ORS 30.260.

## #4: " Help!....I Really Need Somebody..."

The plan to have a **Hotline** serviced by Granicus is a good idea.....and they should **collect data** about every call.

Response times should be measured **based on the time that Granicus contacts an owner** or listed responsible party for a particular STR.

**30 mins seems reasonable for a call to respond** to a complaint ( Tier 1 or 2... see below ).....except in rare situations where no cell service is available ( e.g. Tillamook to Portland Hwy 6 ) temporarily.

A **time of 30-45 mins** also seems reasonable for an **in person** response if a call doesn't solve the issue ( Tier 1 only, Tier 2 should allow 2 hours max for an in person response, since they aren't urgent ), so that would be a **total of 1-1.25 hours to correct a complaint ( if a call doesn't solve the problem )**. The County should consider **possible allowances** for road closures, weather, electrical failure ( common event here! ), and **give some flexibility here**.

Emergency services in the county often can't respond within a guaranteed 30 minute window of time....so STRs should not have to be held to a higher standard.

There are quite a few issues concerning complaints here that have **not been well thought out**, however.....

Will Granicus call the complaining party back?

How will a **complaint be verified**?

Should the County include language that would require some form of **documentation** of a complaint? ( cellphone recording with time stamp? )

What if the guest is **off property** ( i.e. a loud beach party ) when a complaint ensues?

Should all complaints require the same "rapid response?" Obviously an over occupancy frat party at 2:00am should require a rapid response, but should a small bag of trash left next to a garbage can require it? **Should minor violations be treated the same?**

**I believe there should be Tier 1 and Tier 2 level complaints. Different complaints require different response times.**

**Tier 1 would be disturbances from 10:00pm to 7:00am: Sustained noise, over occupancy, wild parties, significant overflow parking, etc.**

**Tier 2 would be daytime minor issues: dog barking, excess garbage next to can, 1 car or less parked incorrectly, etc.**

Also.....there should be language allowing for **more than one contact person** for response. An owner might want to be the phone contact, but have **someone else locally be the in-person respondent.**

Property Management companies may have different people on call at different times.....especially since **no single "respondent" actually works 24/7.** There needs to be flexibility for this.....perhaps a **primary and secondary contact**, as well as an allowance for a Property Management company to assign internally a particular contact person depending on their timetable.

Additionally, the fee ( \$100 ) for **simply changing the name** of the "Contact Person" seems arbitrary and excessive.

## **#5: "You could hear a pin drop..."**

Noise is a tricky one, especially since the County doesn't currently have a noise Ordinance. Any regulation in this regard has to **allow for "reasonable" noise.....**such as a few people having a BBQ on the deck, children playing in the sand and laughing, a family having a few drinks watching the sunset. All things that EVERYONE should be able to enjoy during **daytime hours.**

Between 10:00pm and 7:00am, more stringent rules are needed.

Unfortunately, the DO has gone overboard here, saying **"there shall be no amplified music or other noise during quiet hours that can be heard beyond the property lines"**.

The problem with this is that people often arrive late to check in, or return after an evening dinner out after 10:00pm. The very fact that a car drives on to my property on my gravel driveway, and the opening and closing of car doors **creates some noise, means they would be in violation of this Ordinance!**

My neighbor lives right next to me, and would certainly hear these activities if they were standing on their deck! The words that need to be added are **SUSTAINED NOISE..... not a few brief unavoidable sounds.** Many STR properties are right next to other properties, so the standard should be fair and reasonable.

Frankly, the County should look at the regulations adopted by Marion County for ALL residents in Unincorporated areas.....See:

<https://www.co.marion.or.us/SO/Operations/CodeEnforcement/Documents/noise1.pdf>

Here's their standards: **" Generally speaking, maximum sound levels are 55 dBA during the day and 45dBA at night for residential noise"**.

There's a reliable and **free App** for both iPhones, and Android Phones to **measure sound levels** from the National Institute of Occupational Safety and Health ( NIOSH ) called the NIOSH Sound Level Meter that's available for those who need to document unreasonable sound levels....and **it saves and produces documentation** of time and place of a particular recording.

There's also WiFi connected devices to monitor on-property sound levels if needed....such as Minut or NoiseAware.....which could be good for previously "problem" properties.

See:

## #6: “Hey! You can’t park there!”

The County really should have done a survey on **available parking** at STR properties to see just how **diverse** each parking situation really is! Some properties barely have enough parking for a couple of cars on property, **some could park a whole assortment of cars**, boats, trailers...whatever!

Having maximum limits on vehicles seems unfair without an actual parking availability review.

**Reasonable minimums** for on-property parking based on accommodation levels seems good, but asking STR owners to enforce on-street parking limits seems absurd.....**how can we enforce ANYTHING people do once they are off property?**

We can REQUEST they park according to what the County wants, but until we get deputized by the Sheriff, really can’t make any enforceable demands on guests staying with us. It would certainly seem **unfair for daytrippers and locals to be allowed to park on street, but not STR guests.**

The better way to address this is with **good signage with time limits** for parking ( 2 hour, no overnight, etc ), that way everyone is treated fairly with this limited “resource”.

## #7 “You can’t flush your problems away”

Quite simply, unless the County can show that STRs have more issues with their septic systems than other residential dwellings, **the rules should be the same for all** in terms of inspections, permitting, etc. If a property was built and approved with an allowable occupancy level, and their STR permit doesn’t exceed that level, then the effective septic system permit and inspection standard should still apply. There **shouldn’t be an arbitrary new higher standard based on zero data**, and no identifiable level of failure here. This is a classic case of a **solution in search of a problem**. If the County decides to enforce higher septic system standards, they should apply to ALL residential dwellings, not just STRs.

## #8: “Sign? What Sign?”

Here’s the standard for readability of signage from a distance:

“ A good rule of thumb is that **for every 10’ between your reader and your signage, add 1” to the height of your letters** . A 1” tall character can easily be read by most people from a distance of 10’, but **from 40’ away, you will need your type to be at least 4” tall for optimal readability.**”

My house sits approximately 100 feet back from the road. According to this readability standard, the 5 or so lines of information required would **need a sign at least 4.5 FEET in height to be readable from the road right of way** if attached to my house! Do we really need signage...with all this info, including the property address, since the house number is already required separately to be “prominently displayed” on the outside of the property and visible from the road right of way?

Either STR owners are going to have to attach signs **4x5 FEET** in size to their properties, or go with smaller free standing signs on their front lawns, that may very well get knocked or blown over.

**A better compromise would be to only require the following:**

**Contact Name: John Smith ( Optional ph# )**

**Permit XXX-XXXX**

**County STR Hotline: 800-555-1212**

I guarantee any neighbor who is calling in a complaint KNOWS the general address the property has, and **only needs the house number** to fully identify the property in question.

And... **why is the permit expiration date needed?** What purpose does it serve for a complaint? The County, having issued the Permit, certainly knows if a permit is current. Would Granicus, or whoever else handles the hotline, need that information? I can think of **no situation** where it could be a determining factor, except if someone who no longer rented left the sign up with an out of date permit listed.

That would seem counterproductive to all involved! If someone was trying to rent "under the radar"....I would think they wouldn't have a "fake" or incorrect sign out at all! The sign compliance officer already know the addresses ( and presumably permit numbers and exp. dates ) of STRs they are going to check...t **hey don't need a sign** to find them.

There are a few other issues with the current Draft Ordinance, but these are the one's that have stood out for me.

I do hope the BOCC looks at the issues mentioned here carefully, and **considers all aspects of possible "UNINTENDED CONSEQUENCES" going forward.**

Thanks,

Pete Stone  
11354 NW Placido Ct  
Portland, Or. 97229

tel: 503-740-6170  
[email: psphoto@comcast.net](mailto:psphoto@comcast.net)

## Lynn Tone

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**From:** Public Comments  
**Sent:** Friday, June 9, 2023 9:57 AM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: STR permits.

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**From:** Robyn STURGIS <rybyns@hotmail.com>  
**Sent:** Thursday, June 8, 2023 4:50 PM  
**To:** Public Comments <publiccomments@co.tillamook.or.us>  
**Subject:** EXTERNAL: STR permits.

[**NOTICE:** This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Hello,

My family built a house in the Kiwanda Shores neighborhood at the beginning of covid. We intentionally picked this neighborhood due to the number of short-term rentals. We knew we would need to rent our home as well. My husband and I have invested time and money into an area of the coast that we love. When building we did everything we were supposed to do to comply with the rules and regulations. Now those rules and regulations are being changed. My main area of concern is removing our short-term rental permit and reissuing us a license. I believe that because we have held a permit that we should be able to keep our permit. It is unfair to retroactively change our status and take away our rights as homeowners. I also believe that the houses currently under construction or the homes that have had their permits put on "paus," should be able to receive permits also. I understand that change happens and am not against fair and just regulations but removing permits should not be part of that process.

Thank you,  
Robyn Sturgis

## Lynn Tone

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**From:** Public Comments  
**Sent:** Friday, June 9, 2023 9:57 AM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: Attn: County Commissioners - STR ordinance revision comments

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**From:** Scott Hohensee <hohenseescott@gmail.com>  
**Sent:** Thursday, June 8, 2023 5:15 PM  
**To:** Public Comments <publiccomments@co.tillamook.or.us>  
**Subject:** EXTERNAL: Attn: County Commissioners - STR ordinance revision comments

[**NOTICE:** This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Tillamook County Commission  
STR Comments  
6/8/23

Erin Skaar  
Mary Faith Bell  
David Yamamoto

Please find copied below my comments to the STR advisory committee which are also pertinent to your discussion regarding adoption of the proposed replacement STR Ordinance.

Regards,

Scott Hohensee

Tillamook County STVR Comments1  
11/6/2022

In January of 2020 my wife and I (Robyn Sturgis and Scott Hohensee) purchased an undeveloped lot in Kiwanda Shores. Over the course of the following year we built a vacation home for friends and family. To afford such a home depends on funds generated from short term vacation rentals. I will address motivations and goals in the next round of comments but I would first like to present a look at our initial and ongoing financial involvement in Tillamook County.

Initial Investment - \$413832

First Year Property Expenses (taxes, fees, ins, etc.) - \$8165

First Year Kiwanda Coastal Properties Management Costs - \$14225



First Year non property related expenditures (food, gas, recreation, etc.) - \$2562

That is a total first year investment of \$438784 in Tillamook County. Assuming no future cost fluctuations, we will have a continued yearly input of approximately \$25000 into the local economy from my family alone. That yearly input does not include the additional spending from our STVR guests. As stated above our ability to afford the home and our contributions to the local economy depend on STVR income. Please don't create additional STVR rules and fees that jeopardize our ability to keep the home and its contribution to the local economy.

Regards,  
Scott Hohensee

Tillamook County STR Comments2  
1/9/2023

Tillamook County STR Advisory Committee,

I understand that one of the complaints regarding STRs is that faceless, out of town corporations own and operate them with only profit in mind. I do not know the statistics regarding corporate ownership of STRs in Tillamook County. However, I do know that my family's STR is a vacation home built by us for friends and family to enjoy. It is made viable by the STR income.

Appended are an image of my daughter and I building the home as well as an image of the first vacation with her grandparents at the home. Please don't enact additional rules/regulations/fees that jeopardize our ability to keep and maintain the home.

Regards,  
Scott Hohensee

Tillamook County STR Comments3  
2/14/23  
Tillamook County STR Advisory Committee,

I would like to make 3 comments regarding the proposed replacement STR ordinance from 1/9/23. The first and most important is that the proposed ordinance, by limiting renewals to a five year period, is penalizing people like myself who have invested time, effort, money and love in Tillamook County. Secondly and thirdly, the proposed ordinance is conflating STR regulation with long term housing solutions and building codes.

Please do not include in any modification to Ordinance 84 or replacement STR ordinance a limit on how long current STR permit holders may renew their permits. Everyone who currently holds a permit has made

decisions based on the current rules and changing the rules for the current permit holders will unfairly undermine our long term plans.

As to the conflation of STR regulation with long term housing, my home is located in Kiwanda Shores where at last count there were only 2 permanent residents. All other homes are vacation homes some of which double as STRs. Removing the STRs from Kiwanda Shores will not likely result in the affected properties becoming long term housing for local residents as this would preclude their use as vacation homes for the owners. This situation would most likely occur throughout high demand areas everywhere in the county.

As to the conflation of STR regulation and building codes, the building codes already provide for allowable room sizes, parking, fire access, etc. Violations are not unique to STRs and should be addressed through code compliance for all residences throughout the county.

Regards,

Scott Hohensee

Tillamook County STR Comments5  
5/8/23

Tillamook County STR Advisory Committee,

I have two comments and one observation on the latest proposed STR ordinance. My first comment concerns the inordinate amount of subjective decision making power that will be vested in the STR Administrator. The following sections in the ordinance allow for unchecked, discretionary administrative rule making: .020.G, .050.A.10, .100.C.2, .110.C.2, .130.C.4, .130.C.5. Please remove from the proposed ordinance such concentrated, uncodified power.

My second comment regards .080.F which precludes STR guests from making any noise outside the domicile. Music and conversations occurring at respectful levels should not be prohibited. Please remove or modify this requirement in the proposed ordinance such that guests may enjoy themselves.

My observation regarding the proposed STR ordinance is that it is top heavy and cumbersome with pitfalls intentionally placed to catch STR owners in positions of non compliance. Several new administrators and multiple new procedures will be required to fully implement the proposed ordinance. Could not this expenditure in time and money be better spent by enforcing the current ordinance?

Regards,

Scott Hohensee

## Lynn Tone

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**From:** Public Comments  
**Sent:** Friday, June 9, 2023 1:59 PM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: Comments for STR Advisory Meeting | June 13, 2023

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**From:** GREGORY MILLER <ggmphoto@charter.net>  
**Sent:** Friday, June 9, 2023 11:55 AM  
**To:** Lynn Tone <ltone@co.tillamook.or.us>; Public Comments <publiccomments@co.tillamook.or.us>  
**Subject:** EXTERNAL: Comments for STR Advisory Meeting | June 13, 2023

[**NOTICE:** This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Dear Tillamook County STR Advisory Committee,

My wife and I are full-time residents and registered voters living in Neskowin.

We want to thank the committee for providing possible amendments to manage the saturation of STRs and adding necessary regulations to the existing Ordinance. We feel it is imperative that the County support a livability mandate that is acceptable to all who reside next to or are in close proximity to multiple STR properties.

I cannot stress how critical it is for the county to approve a cap of 20% on licenses. If you exclude multi-family properties, such as condominiums, then that number should drop to 15%. As it is, Neskowin is saturated with too many STRs. It is ridiculous and unnecessary to increase that number.

It is surprising that so many STR owners are supporting higher cap limits. Rental dollars will only stretch so far. The more rentals... the more competition for that revenue stream. Even the proposed 1% increase of new licenses would place added stress to County resources that can't effectively enforce current regulations, let alone new ones.

Please consider my concerns in your decisions.

Sincerely,

Gregory Miller

June 8, 2023

To: Tillamook County Board of Commissioners

Subject: Proposed Amendments to Ordinance 84 for the Regulation of STRs

**WE SUPPORT: STR License Caps; Occupancy Limits; Elimination of License Transferability; Enforcement Funding; Parking Limits; Contact Requirements**

We want to thank the Tillamook County Board of Commissioners for the pause in permitting more short term rentals (STRs) in recognition of community concerns, livability impacts and inadequate ordinances and regulations, as stated in the findings of your Order #22-033.

We are especially grateful as we in Neahkahnie have been a target for expanding STR development that has spiraled out of control. What's happening now is much different than the part time rentals and tourism that have long been vital to our community. The recent increase in STRs is fracturing the balance between residences and rentals. Our neighbors are disappearing from our neighborhood.

We regret that your sole direction that the STR Advisory Committee

“...shall study livability issues to address community concerns related to STRs in unincorporated areas and make recommendations to the Board of Commissioners for ordinance amendments to address community concerns and mitigate livability issues.”

was ignored by the majority of the committee members who instead decided to organize into an STR owner group. They hired legal counsel, public relations consultants and lobbyists and mounted a well funded campaign against doing the very thing with which you tasked them. Unfortunately very few members stayed committed to working per your direction. We hope you take the committee recommendations with a large grain of salt.

Neahkahnie is a small residential area without commercial zones, at the end of a road that branches into a web of narrow, dead end streets with minimal parking. The residences are mostly older and small to medium-sized, designed for single families of 2, 4, 6, possibly 8. Water is supplied by a spring fed community system. Our homes, streets and water supply were not designed to support the numbers of STRs and the STR occupancy limits that already have been approved, such as 10, 12, 14, 17, 18 and 20 occupants.

For years a number of these homes were periodically rented, causing little concern or impact on livability and public safety. We had some long-term renters as neighbors. Now that has radically changed. What was once a private residence for rent has evolved into a commercial motel like space, regularly occupied and frequently turned over. On Treasure Rocks Road alone, a short street with a few dead end off shoots, at least 20 STRs are approved for a total of 180 occupants, simply too much for any neighborhood.

To protect public safety and livability in Neahkahnie, the county needs to:

1. Establish a **CAP ON # OF STR LICENSES** in Neahkahnie and a means to manage STR concentration. We have too many STRs for a neighborhood designed solely for single family residential living. Our livability is plummeting and our infrastructure is overwhelmed. The total needs to be lowered from today's numbers.
2. Establish common sense **MAXIMUM OCCUPANCY LIMITS** to be compatible with a single family residential community. Single family homes are rarely designed for as many as 8. The committee turned this section into tortured language aimed at cramming as many people into a house as possible, which is one of the biggest problems in our community.
  - adopt a simple commonly used definition of **bedroom** and do not allow other rooms to become bedrooms;
  - allow only **2 extra children** occupants up to **5 years old**. 12 year olds take up as much space as adults and are independent enough to walk to the beach on their own.
3. Eliminate the **TRANSFERABILITY OF LICENSES** and **SET ONE LICENSE PER OWNER LIMIT** to help gradually lower the density

within some areas, give all homeowners the opportunity to get a STR license, level the playing field for property values, and discourage corporations and investors with no concern for the community.

4. Provide **ADEQUATE FUNDING AND ENFORCEMENT TOOLS** enabling the county to do its job. STR fees need to be set at a level that fully funds county staff enforcement personnel and tools.
5. Establish **PARKING LIMITS, NOISE AND GARBAGE STANDARDS** for STRs. We support requiring **all parking to be onsite**. Our partially paved streets are barely wide enough for 2 vehicles to pass and already very narrow for emergency vehicles. We support the draft garbage and noise standards.
6. Establish **CONTACT AND POSTING REQUIREMENTS**. We support having clearly posted information that can be read from the street, a contact person who can be on site quickly, and a well publicized 24/7 county STR Hotline.

Residential livability can be preserved with STRs when residential and STR impacts are comparable and compatible. STR issues can be managed and have been addressed meaningfully in many jurisdictions throughout Oregon, including Cannon Beach immediately to our north and Manzanita right next door. Without comparable STR approaches, the Neahkahnie residential area will continue to be the target of STR investors.

In Neahkahnie 20% of our residences already are permitted STRs, so does it make sense to propose to cap the number of STRs at this level, let alone higher than it is now? We used to be a residential community of full-time home owners, part-time owners with occasional renters as well as long-term renters. We've evolved now into a community of absent part-time owners with outside managed income properties and no long-term rentals. We're losing our sense of community with neighbors being replaced by commercial transients. Your stated goal of addressing community concerns and mitigating livability issues cannot be met with the current concentration of STRs and the high occupancy rates in Neahkahnie.

Thank you for considering our comments.

Sincerely,

Mike Woodin

Amy Bell

37635 Beulah Reed Road

## Lynn Tone

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**From:** Public Comments  
**Sent:** Friday, June 9, 2023 9:56 AM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: Public Comment- Proposed Ordinance #84 - Bedroom square footage for historic cottages

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**From:** Susan Schomburg <susan@schomburggallery.com>  
**Sent:** Thursday, June 8, 2023 9:57 PM  
**To:** Public Comments <publiccomments@co.tillamook.or.us>  
**Subject:** EXTERNAL: Public Comment- Proposed Ordinance #84 - Bedroom square footage for historic cottages

[NOTICE: This message originated outside of Tillamook County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

June 8, 2023

To: The Tillamook Board of County Commissioners & Ms. Sarah Absher

Re: Proposed Ordinance #84 - Amendment #2

My parents built a 2 bedroom, 1 bath cottage in the Neskowin Village in the late 1960s. The cottage was modeled after a Japanese tea house and is less than 600 square feet.

From the 1970s through the early 2000s, when my parents were not using their cottage, they rented it short-term to others by advertising in The Sunday Oregonian. In 2018, I was fortunate to inherit the cottage, and I received an STR permit in 2021.

In viewing Page 3 of the proposed Ordinance 84 draft, I am concerned about the following clause in the definition of a "bedroom."

**"A minimum of 70 square feet of floor space and not less than 7 feet in any horizontal dimension"**

I got out my measuring tape ... and learned that my bedroom floor spaces, not including the closets, pencil out to 7 feet 10 inches by 8 feet 9.5 inches. Converting the feet to inches, results in 94 inches by 105.5 inches or 9917 square inches ... which is **68.86 square feet** (9917 square inches / 144 square inches).

Based on the proposed ordinance draft, my cottage would no longer qualify as a short term rental, despite having been a historical vacation rental for decades. Both of my bedrooms have full sliding glass doors onto a deck that allow for immediate egress to the outdoors.



The staff report indicates that the purpose of the minimum square footage for bedrooms is to ensure closets are not converted to bedrooms. This scenario is clearly not the case with my cottage, and is an example of an unintended consequence of an arbitrary regulation.

I respectfully ask that you please consider removing any minimum square footage requirement from the bedroom definition, so that historic cottages that otherwise meet the safety requirements will not have their ongoing use as an STR eliminated.

Thank you for your consideration.

Susan Schomburg  
4360 Hillsboro Avenue  
Neskowin, OR 97149

## Lynn Tone

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**From:** Kathy Oullette <kathyoullette@gmail.com>  
**Sent:** Thursday, June 8, 2023 5:22 PM  
**To:** Lynn Tone  
**Subject:** EXTERNAL: STR Ordinance communications / written testimony

[**NOTICE:** This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open attachments unless you are sure the content is safe.]

Sorry I cannot attend, hopefully you can get this filed for me - thank you!

Public comments regarding STR ordinances and livability in Neskowin with high STR percentage

We retired here 9 years ago. We have been impacted by STR activity in relation to garbage control, traffic, parking issues, noise and fireworks which was fairly nonexistent when we moved here. We have multiple STR's in our concentrated neighborhood where other homes are either lived in full time or owned as full time family vacation property. Some homes appear to rent (regular traffic with different vehicles) and are unsigned. After time you know the families that own or regularly come. The STR business impact has changed the neighborhood. It's a nuisance to have new visitors day to day or week to week. You often end up providing directions, address speed violators, monitor parking and garbage within the neighborhood properties that are STR's. With these considerations we support a percentage cap as a required assessment within neighborhood communities to limit the number of STRs in each community.

Density limits with CAP - IN FAVOR!

We strongly believe that NO Transfers of permits/licenses should be grandfathered for ANY STR. This requires a process where licenses are managed until filled to a percentage cap. Why is our home determined to have a lesser value if it does not have a transferable permit? Why is Tillamook County 'creating value' to property based on a permit/license holder? This is an unfair situation for those without permits and Tillamook County should remove the condolence that creates this unfair leverage and eliminate transfers in all cases. Should I buy a permit to increase my home value when it is for sale???

No Transfers period - IN FAVOR!

We desire a community to engage in local activity that benefits all who live here and are personally invested in their homes and neighbors. When part time vacations are here, they are here to vacation and use the properties how they want. We heard many people say they want to retire here after STR activity to fund their home when the time comes. What they do not recognize is that they will be impacted by the same lack of community investment of vacationers and STR owners that do not share in community involvement. People that buy 'FOR PROFIT' business aspects should be treated like a business with increased guidelines. Businesses do not belong in our neighborhoods. We understand the single beach home owner, living the dream, having to rent to make ends meet. Single families making a beach investment is great, get a permit, rent as you can. But permits are not guaranteed. If you can't afford it, then sell it - it's that simple. Allow our neighborhoods to be collective quiet locations of nature and beauty, not party homes that take over neighbors rights and disrupt day to day life.

Family over Business - IN FAVOR!

Kathy & Russell Oullette  
Neskowin Oregon

5/18/23

**To: Tillamook County Commissioners & Tillamook STR Committee**  
**RE: Oceanside Residential Plan & STR's**

In the community of Oceanside, there's been a conversation occurring over the last 10-15 years about the changing nature of our unincorporated residential community. People are moving to Tillamook County and will continue to do so. Retirement, business and tourism are on the rise and well. Regardless if a person has purchased an Oceanside property for an investment or for part or permanent residence there's a big question here. If not addressed comprehensively and equitably, access to housing will become a more severe and problematic situation as we move forward.

**What is it we want our Oceanside residential community to grow into?**

The residents and property owners in Oceanside had a part in creating designate zoning, guided by Tillamook County for most all unincorporated communities back in the early 1990's. In Oceanside, our residential areas were zoned as Low Density R-1 and later Resort Zoning was added. Part of low density zoning included the acknowledgment that Oceanside streets were less than standard (not two lane) and lots were smaller in the 'village' area.

The 2011 Vacation Rental ordinance added a mix to the residential zone. Both Terresea and The Capes (with minor exceptions) did not allow for vacation rentals.

**What is it we want our community to grow into?**

We feel the need to preserve some residential nature and provide homes to people who will live full and part time here. As Tillamook County is making a final review, taking into consideration comments from all of us- community members, workers, business owners, renters and property owners on the issue of growth, we here on Sunset Avenue support the need for a cap on the number of STR's in Oceanside. Vacation rentals are well represented here, we're seeing a tipping point occurring where some of the 19% STR's now sit vacant. We do support keeping the existing STR's but we support a percentage,

20% at most is reasonable in our small village. It could be different in a larger community with wide streets, a commercial hub and available parking. We see so many day visitors from the Portland area that, that alone fills up our downtown area in summer. Oceanside is not Pacific City is not Cloverdale. We look forward to further discussions in individual communities.

Along with that, on street parking allowances will work only if particular notice is made, given the width and safety many of our Oceanside village streets allow for, exemplified on Portland Avenue. The overflow onto Sunset Avenue is subject to on street parking that is already being used. By walking the neighborhood, one understands this.

**Thank you for your work on the issue,**

**From properties on of Sunset Avenue in Oceanside-**

**Signed,**

**Gil Wiggin, 1280 Sunset Ave., resident, business operator**

**Paul Peterson, 1340 Sunset Ave., owner, resident**

**Deborah Sposito 5475 AsterSt., owner, vacation rental  
and adjoining Sunset Ave. property**

**Clark Holloway 5475 Portland Ave., owner, resident**

**Kris Woolpert, 1535 Sunset Ave., long term renter, business owner**

**Stephen Smith 1560 Sunset Ave., owner, vacation rental**

**Kathie Norris 1655 Sunset Ave. owner, resident  
and adjoining streets-**

**Carol Kearns, owner Bed & Breakfast, resident**



## Lynn Tone

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**From:** Public Comments  
**Sent:** Thursday, June 8, 2023 2:12 PM  
**To:** Lynn Tone; Sarah Absher; County Counsel  
**Subject:** FW: EXTERNAL: STR proposal

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**From:** Marcia LaPierre <marciatlaw@gmail.com>  
**Sent:** Thursday, June 8, 2023 1:45 PM  
**To:** Public Comments <publiccomments@co.tillamook.or.us>  
**Subject:** EXTERNAL: STR proposal

[**NOTICE:** This message originated outside of Tillamook County -- **DO NOT CLICK** on links or open **attachments** unless you are sure the content is safe.]

Dear Tillamook County Commission,

I just reviewed the proposed "update" to the short term rental rules applicable to homeowners in the county. After the shock settled, I started to wonder why such extreme changes are being considered and how these actions are permissible?

My house is on the beach in the Kiwanda Shores community. In 2015, when we took the risk on this property, it was an undeveloped hill of sand. But my husband and I desperately wanted that location to be our retirement home and an incentive for our three children to move to the area from California. We knew that the only way we could afford it was to rent it just enough to balance the costs.

We threw EVERYTHING into building our dream home. Since achieving our building goal, we have been ideal citizens. We have complied with every single county and home owner association requirement. We have obtained a rental permit. We, not every resident, just the beachfront owners, pay for maintaining the sand. We pay to plant hillside grass and plants (that have blown away for decades and continue to do so.) We pay for utility costs that have quadrupled. We respond to any and all neighborhood complaints (which total one in seven years, and it wasn't about renters.) We also rent as few days as possible to enable us to pay a portion of the mortgage. Taking away our freedom to rent our house and renew our permit essentially takes away our land use rights.

Not only were we successful in building our dream retirement home, but also in convincing our children to move. Currently, my husband and I live within 20 minutes of each of our children and his parents- all of whom left California at our bequest. We need the rental income from our beach house to be able to remain near our family. Without it, we are left with a major dilemma: give up the beach house and lose our retirement dream; or give up our Ridgefield home and lose contact with our family who moved to be near us? (Assuming that we could actually move to Pacific City given that my husband is still working in California and has to fly down there twice a month.)

The changes you are attempting to adopt will financially destroy us and hurt my family situation. The proposed changes threaten the life we built around our beach home, invade our property rights and seem unjust and unconstitutional.

Another question that I cannot answer is how our permits can be reclassified as "licenses"? Is it an excuse to act so aggressively? As I understand it, permits affecting land ownership are extremely different from a license. That makes perfect sense. A driver's license does not give the State the right to dictate what type of car we own, what upgrades it must have or to whom we can rent it. Licenses apply to controlling an owner's actions. Permits relate to land use, and the Constitution limits how far a permit can go before it becomes a taking. This proposed amendment is clearly threatening to take away our property.

My final point is personal. I was diagnosed with a very rare cancer in 2006. I was told that I had two to five years, no more. I fought with everything I had and beat it into remission, at severe costs. Five years ago, it came back and I am currently in the midst of a new battle. My beach front home is my inspiration, my sanctuary, a true life saver. If you do as planned, you are not only threatening my family, but also my sanctuary as I battle for life. Therefore, I beg you to give great thought to what you're doing, why you're doing it, who will gain from it and what you are forcing innocent people to lose.

Thank you for your consideration,

Marcia LaPierre  
34130 Ocean Drive  
Pacific City, Oregon

Sent from my iPhone



David J. Petersen  
david.petersen@tonkon.com  
Admitted in Oregon and California

Danny Newman  
danny.newman@tonkon.com  
Admitted in Oregon and Texas

503.802.2054 direct  
503.221.1440 main

503.802.2089 direct  
503.221.1440 main

June 8, 2023

**VIA E-MAIL**

Tillamook County Board of Commissioners  
201 Laurel Avenue  
Tillamook, OR 97141

Email: [ltone@co.tillamook.or.us](mailto:ltone@co.tillamook.or.us); [publiccomments@co.tillamook.or.us](mailto:publiccomments@co.tillamook.or.us)

Re: Tillamook County Ordinance 84 Revisions

Dear Commissioners:

The undersigned represent Oregon Coast Hosts ("OCH"), a community grass roots organization that advocates for fair short term rental ("STR") regulation in unincorporated Tillamook County. On behalf of our client, we have reviewed the Short Term Rental Advisory Committee Report dated May 23, 2023 ("STRAC Report") which includes a proposed rewrite of County Ordinance No. 84 (Exhibit A to the STRAC Report). Both the analysis in the STRAC Report and the text of the proposed ordinance itself suffer from at least *nine* legal deficiencies:<sup>1</sup>

1. The proposed ordinance would violate property rights under ORS 215.130(5) by eliminating permits and restricting transfers, and would constitute an unlawful taking of private property without compensation.

2. The County has failed to provide proper notice of the pending proceedings.

3. The proposed ordinance improperly subjects STRs to different building code standards than the state building code.

4. Language in the proposed ordinance requiring STR owners to indemnify the County is overbroad and is preempted by the Oregon Tort Claims Act.

5. The factual findings in the draft ordinance are not supported by substantial evidence in the record.

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<sup>1</sup> We actually raise more than fifteen legal problems when you include sub-issues discussed in this letter. While we have raised each of these issues at least once and sometimes repeatedly to the County's chosen counsel, none have been addressed in the STRAC Report or the draft ordinance. So we are forced one last time to raise all of the issues to show the Board and the public how far afield the draft ordinance is from a legal standpoint and to hopefully avoid subsequent legal proceedings, while at the same time preserving these issues for a potential appeal.



6. The proposal to adopt community-specific STR caps by Board order at a later time is unlawful.

7. The proposed ordinance improperly singles out STRs for livability regulations that should apply to the community as a whole.

8. The proposed ordinance would illegally discriminate against renters and owners of STRs.

9. Other miscellaneous issues including various undefined terms or other vagaries in the ordinance rendering certain items confusing, conflicting, misleading and unconstitutionally vague.

This letter discusses each of those deficiencies in turn, and we urge the Board to rectify these issues before adopting any revised ordinance.

**1. The proposed ordinance would violate property rights and would constitute an unlawful taking of private property without compensation.**

*a. The proposed ordinance would violate ORS 215.130(5) regarding legal nonconforming uses.*

A nonconforming use is a lawful use of land that is later rendered nonconforming by limitations imposed after the use came into existence. Tillamook County Land Use Ordinance ("LUO") 7.0120(1)(a); *Rogue Advocates v. Board of Comm. of Jackson County*, 277 Or App 651, 654 (2016). Under state law, counties are required to allow nonconforming uses of land to continue. ORS 215.130(5). The statute exists to prevent unconstitutional taking of property. *Bergford v. Clack. Co/Trans. Serv.*, 15 Or App 362, 367 (1973). It is also just common sense fairness, as for many families a modest investment in a single family dwelling reflects the majority of their life savings and may be critical to that family's retirement plan.<sup>2</sup> It does not matter whether the mechanism to violate the state statute is a land use ordinance, a licensing ordinance, a board order or resolution; such action by a county is an unlawful land use decision.

Historically, Tillamook County has always allowed vacation rentals and short-term stays in residential structures as a use of land permitted outright, without regard to the length of stay or the characteristics of the users (i.e. owners, guests or renters).<sup>3</sup> While the County has not historically given express permission to short-term stays

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<sup>2</sup> According to a 2022 study by the Tillamook Coast Visitors Association, the median annual **gross** rental income from a STR in Tillamook County averaged only \$28,884 between 2019 and 2021, and that average is likely inflated by atypical higher gross income in 2021 due to the pandemic.

<sup>3</sup> See e.g. Tillamook County Ordinance 69, the first County ordinance regulating vacation rentals, which expressly states that (as of 2009) "short term rentals [] are not presently regulated."



either, the LUO contains no language to the effect that any use not expressly allowed is prohibited. This history is consistent with Tillamook County's character as a community with a substantial number of second homes. If short-term use of a home were unlawful, 40% of homeowners could be cited for a zoning code violation,<sup>4</sup> but to our knowledge no short-term use of a Tillamook County residence has ever been cited for violating zoning code.

In *Briggs v. Lincoln County* and *Cammann v. Lincoln County*, LUBA 2021-118/2022-030, a ballot measure seeking to invalidate legal nonconforming STR permits in Lincoln County was determined to be a land use decision and was invalidated for violating ORS 215.130(5). Like the Lincoln County ballot measure, proposed revised Ordinance 84 would substantively violate ORS 215.130(5) in at least five separate ways.

1. It unlawfully attempts to convert property rights to something other than property rights, an attempt that was ruled unlawful by LUBA in *Briggs* and *Cammann* and which would violate the takings clauses of the U.S. and Oregon Constitutions.

2. It attempts to illegally restrict transfers of existing STR permits to one transfer, but ORS 215.130(5) requires counties to allow legal nonconforming uses to transfer to new owners indefinitely.

3. It illegally purports to require structural updates to residential buildings beyond that which is legally permitted for nonconforming structures. See LUO 7.020(3).

4. It improperly attempts to restrict vacation rental use by purporting to curtail the scope of operations that existing STR permit holders are entitled to continue, such as occupancy limits.

5. While growth limitation tools like caps and buffers have been deferred, and "phase out" provisions are currently not under consideration, if those concepts were applied to existing nonconforming uses they would similarly be unlawful.

Drafting tricks like changing "permits" to "licenses," or claiming that land use decisions are not land use decisions, are just window dressing. What matters is the substance of a new ordinance rather than labels or disclaimers, and substantively the proposed ordinance has the same flaws as the unlawful Lincoln County ballot measure. If appealed to LUBA, this proposed ordinance will suffer the same fate.

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<sup>4</sup> See <https://www.census.gov/quickfacts/fact/table/tillamookcountyoregon/PST045222> comparing 19,058 housing units with 11,381 households, 40% of housing units in Tillamook County are not occupied by full-time residents.



Accordingly, each of these flaws should be substantively rectified before any revised ordinance is adopted.

- b. *State law prohibits the County from replacing use permits with business licenses.*

The proposed ordinance purports to end land use rights and replace the existing land use permitting scheme with a business licensing system for which no land use rights would be recognized. As discussed above, this approach is futile when applied retroactively to existing permit holders and those with vested rights to a land use permit, because *ending* a land use right is the very process that triggers the protections of ORS 215.130 for nonconforming uses.

Since the inception of STR regulation in Tillamook County, issuance of STR permits and the adoption or amendment of a STR regulatory scheme have been "land use decisions" as defined in ORS 197.015(10), and no amount of drafting trickery can change that. Such actions also are land use decisions because they have a significant impact on present or future uses of land. *Billington v. Polk County*, 299 Or 471, 478-79 (1985). The County cannot now retroactively disclaim its prior land use decisions by replacing them with a business license for existing permit holders. To do so would violate state law, including as discussed in *Morgan v. Jackson County*, 290 Or App 111 (2018) (the right to continue a nonconforming use, protected by ORS 215.130(5), could not be interrupted by a business licensing lapse).

Here, the proposed ordinance creates the very fact pattern that the Court of Appeals found to be offensive and impermissible in *Morgan*. As only one of many examples, Sections .050(A)(2) and .080(J) require the property owner to hire or employ a local representative who must be available 24 hours a day, 7 days a week and respond immediately to complaints, including arrival to the property within 30 minutes, or the property owner suffers a violation. A violation can, in turn and regardless of the merit of the underlying complaint, lead to revocation of the STR license under Section .130(C). Thus a licensing lapse caused by a local contact's oversight in filing paperwork or temporary inability to answer the phone, could mean a permanent loss of property rights of the owner without following the abandonment/cessation requirements of ORS 215.130 and LUO Article VII. For an owner to lose nonconforming land use rights in such a context would be a clear violation of ORS 215.130 and the reasoning of *Morgan* that the legislature could not possibly have intended such a result. Accordingly, any language in the proposed ordinance that threatens loss of an existing STR permit for reasons outside the context of state law on legal nonconforming uses, exceeds the County's authority and would be invalid.



c. *The proposed ordinance impairs certain property owners' vested rights.*

The proposed ordinance also violates the vested rights of some County property owners who purchased land in reliance on the existing STR regulation scheme and took steps to implement that use, but were denied the opportunity to obtain a permit before the proposed changes to the regulatory scheme are complete. Those owners have vested rights and are nevertheless be entitled to a permit under the old system. *Clackamas County v. Holmes*, 265 Or 193, 198 (1973).

d. *The proposed ordinance violates state law limitations on terminating nonconforming use rights.*

As discussed above, legal nonconforming uses must be allowed to continue without conditions. However, nonconforming uses may terminate due to nonuse, and counties may establish a time frame after which an unused legal nonconforming use is abandoned. ORS 215.130(7)(a). In Tillamook County, the abandonment period is one year with more relaxed standards if the owner has a medical or family medical leave or illness. LUO 7.020(6). Nonconforming uses may be lost or limited in other specific circumstances as well, such as full destruction of the structure. LUO 7.020(8). Here, however, the proposed ordinance contains provisions that would terminate existing STR permits in circumstances beyond those allowed by the LUO and state law. See e.g. Section .130(C)(1) in which actions as minor as a simple "failure to renew" can result in immediate revocation of a STR permit. That must be changed or the ordinance will fail on appeal to LUBA.

## **2. The County has failed to provide proper notice of the pending proceedings.**

ORS 215.503, also known as Measure 56, requires that for any ordinance in which the governing body proposes to rezone property, prior notice of the hearings on the ordinance must be given to all landowners whose property is proposed for rezoning. In addition, LUO 10.090(1) expressly requires that in Tillamook County, notice of Type IV legislative land use decisions must comply with ORS 215.503. A "rezoning" occurs when, among other things, the governing body "adopts or amends an ordinance in a manner that limits or prohibits land uses previously allowed in the affected zone." ORS 215.503(9)(b). As discussed above in Part 1, the proposed revised Ordinance 84 does exactly that.

The notice required by Measure 56 is in addition to the notice required by ORS 215.223(1) and must be given at least 20 and not more than 40 days before the first hearing on the ordinance. ORS 215.503(4). The notice must meet specific informational and formatting requirements. ORS 215.503(5). In this case, the first hearing on revised Ordinance 84 took place on May 30, 2023. Accordingly, the County was obligated to give notice meeting the requirements of ORS 215.503(5) and



LUO 10.090(1) to all potentially affected landowners no later than May 10, 2023, but no such notice was given. And, since the proposal would amend existing land use regulations, advance notice to DLCD was also required, but not given. ORS 197.610(1).

The failure to give the required notices is not merely a technicality. Many property owners throughout the County either hold STR permits or own property that would be eligible for a STR permit under current law. Without adequate notice, these owners' property rights will be substantially and adversely affected by the proposed rezoning of their property without their knowledge. Measure 56 exists precisely to ensure that property owners affected by a potential rezoning have advance notice of the effort and an opportunity to participate in the process. Thus, the County's failure to give the required notices resulted in substantial prejudice to those not notified. Any adoption of a revised ordinance without first giving proper notice will be invalid.

**3. The proposed ordinance improperly subjects STRs to different building code standards than the state building code.**

The County cannot subject STR operators to different building code standards than the state building code, unless expressly authorized by the state. ORS 445.040(1). The state building code bars local government from requiring upgrades to existing structures to meet code changes just because the code has changed (see e.g. 2021 Oregon Residential Specialty Code (ORSC), Section R102.7). Language in Section .070(C) and .090(A) of the draft ordinance requiring automatic periodic upgrades of STRs to meet new building code standards, even in the absence of a proposed alteration of the structure, is unlawful and would not be enforceable.

**4. Language in the proposed ordinance requiring STR owners to indemnify the County is overbroad and is preempted by the Oregon Tort Claims Act.**

Section .060(A)(10) of the draft ordinance requires an executed indemnification and hold harmless agreement as part of an application for a STR permit. The agreement would require the STR property owner to indemnify and defend the County against claims "accrued as a result of, or arising, out of the [o]wner's actions or inaction in the operation, occupancy, use, and/or maintenance of the property."

This indemnity obligation is overbroad and preempted by the state Tort Claims Act (ORS 30.260 *et seq.*). The Tort Claims Act provides the exclusive remedy for persons aggrieved by the torts of public actors. ORS 30.265(2). As part of that exclusive remedy, the County is obligated to defend and indemnify any public actor against tort claims, groundless or otherwise, arising out of the actor's action or failure to act in the performance of their public duty. ORS 30.285(1).



Given this, the language of Section .060(A)(10) suffers from two fatal flaws. First, the language could require a STR property owner to defend and indemnify the County or its officers, employees and agents for the County parties' action or failure to act, to the extent such action or failure to act was related to that owner's STR. This would violate both the exclusive remedy and mandatory defense and indemnity obligations of the Tort Claims Act. Second, the obligation to indemnify in Section .060(A)(1) is not limited to claims arising out of violations of Ordinance 84 by the property owner. Instead, it would also extend to acts or inaction that fully comply with the ordinance, but nonetheless trigger a claim against the County. Under ORS 30.285(1), the County cannot shift even groundless claims to third parties.

**5. The factual findings in the draft ordinance are not supported by substantial evidence in the record.**

Legislative land use decisions must be supported by an adequate factual base, which means that the decision must be supported by substantial evidence upon which a reasonable decision maker would rely to support its conclusions. *1000 Friends of Oregon v. City of North Plains*, 27 Or LUBA 372, 378, *aff'd* 130 Or App 406 (1994). The decision must also explain why it complies with applicable statewide land use planning goals. *Von Lubken v. Hood River County*, 22 Or LUBA 307, 314 (1991).

The proposed ordinance complies with neither of these requirements. Specifically with respect to the adequate factual base requirement, Section .020(B) states:

With the adoption of these regulations, the County finds that the transient rental of dwelling units has the potential to be incompatible with the residential neighborhoods in which they are situated and to have a damaging impact on the livability of those neighborhoods. Therefore, special regulation of dwelling units used for short-term rental, transient or vacation occupancy, is necessary to ensure these uses will be compatible with surrounding residential neighborhoods and will not materially alter the livability of the neighborhoods in which they are located.

The record lacks substantial evidence in the record to support these findings. To the contrary, the vast majority of evidence in the record only supports the opposite conclusion. Here are just a few examples of the abundant evidence in the record that the benefits of STRs to the community are great, and the impacts negligible:

- Data on complaints made to the County regarding STRs from 2019 to 2023 shows that other than signage violations, only 32 complaints were made (and



only 9 violations confirmed) County-wide over four-plus years.<sup>5</sup> It is not reasonable to conclude that STRs are incompatible with residential neighborhoods based on a five-year average of two violations per year across 1,209 permitted units.<sup>6</sup>

- The evidence shows that STRs also do not negatively affect housing availability. STRs actually *alleviate* housing demand for seasonal populations by allowing different families to use one home during different, successive time periods. Curtailing such “infill of time” will increase demand and will require building an increased number of mostly empty second homes. Also, Clatsop County's May 18, 2022 Short-Term Rental Data Report concluded that there is "not a correlation" between STR permits and housing prices in Clatsop County. There is no evidence upon which to conclude that the effect is different in Tillamook County, and to the extent that second-home ownership creates housing scarcity, it is a consequence of all second-home ownership, not just STRs.<sup>7</sup>
- STRs provide significant economic benefits in the form of local wages and revenue to local businesses. Data compiled by the County shows that STRs in the County supported 112 employees with an average wage of \$22.41 per hour in 2022, and that STR owners spend money with local service providers including home maintenance, landscaping, security and the like.<sup>8</sup> STR renters also bring significant dollars to the County in the form of spending at local restaurants and other businesses.
- STR owners pay transient lodging tax ("TLT"), generating about \$40,000,000 in revenue for Tillamook County between 2014 and 2022, which was about 70% of total County TLT revenues for that time period.<sup>9</sup> This is crucial revenue to the County that it is able to use to benefit the community as a whole, including residential neighborhoods.

Section .020(B) also contains several internal inconsistencies that render the proposed findings inadequate to support the ordinance. It specifically states twice

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<sup>5</sup> E-mail from Joel Stevens, Tillamook County Counsel's Office, May 25, 2023.

<sup>6</sup> The record shows that there were 1,209 active STR permits in Tillamook County as of February 21, 2023. In 2009, the County estimated that about 2,400 homes in the County were used for vacation rentals, twice the amount that have STR permits today. Ord. 69, Exh A, paragraph (a)(C). So any claim that STRs have "exploded" since 2009 is demonstrably false.

<sup>7</sup> See Tillamook County Comprehensive Plan Goal 10 Housing Element, p. 25 ([https://www.co.tillamook.or.us/sites/default/files/fileattachments/community\\_development/page/8832/goal\\_10\\_housing\\_element\\_800\\_oc.pdf](https://www.co.tillamook.or.us/sites/default/files/fileattachments/community_development/page/8832/goal_10_housing_element_800_oc.pdf)); see also 2019 Housing Needs Analysis, pp. 9-10.

<sup>8</sup> 2022 Tillamook County Short Term Vacation Rental Management company data.

<sup>9</sup> Tillamook County Community Development Department data as of February 8, 2023.



that transient rental of dwelling units can be incompatible with "*residential neighborhoods*." The findings do not even attempt to justify regulation of STRs in commercial zones, yet the ordinance would apply equally in commercial zones. Also, the finding includes "transient or vacation occupancy" of dwelling units among the uses that could be incompatible with residential neighborhoods, yet the ordinance only regulates STRs. Second homes occupied by their owners for brief stays or lent to others for no compensation are also "transient and vacation occupancy," yet this ordinance makes no effort to regulate those uses.

These findings also directly contradict and are incompatible with the Goal 10 Housing Element of the County Comprehensive Plan (see footnote 7), which defines both seasonal and permanent residents and part of the community of residential neighborhoods, and requires the County to plan for and accommodate housing to meet the needs of both populations.

There is no factual basis in the record for concluding that "transient or vacation occupancy" for compensation has the potential to be incompatible with residential neighborhoods, but the same occupancy for no compensation does not. In short, the entire revised ordinance lacks a substantial evidentiary foundation. Rather, the available evidence indicates that the concerns that justify the revised ordinance are unfounded. Further regulation of STRs seems to be a solution in search of a problem, based on the available evidence.

**6. The proposal to adopt community-specific STR caps and other growth management tools by Board order outside the scope of these proceedings is unlawful.**

All legislative land use decisions must be made by ordinance, not board order, resolution or administrative decision. ORS 215.503(2). The proposed revision of Ordinance 84 is a land use decision, and since the later establishment of caps on STRs would amend or apply that ordinance, it would similarly be a land use decision. Accordingly, deferring the setting of caps to a proceeding other than via an ordinance (as proposed in the STRAC Report and Section .040(C) of the proposed ordinance) and without giving the required notices as discussed above in Part 2, would violate state law and deny affected property owners' due process.

**7. The proposed ordinance improperly singles out STRs for livability regulations that should apply to the community as a whole.**

As discussed above in Part 5, the proposed ordinance distinguishes between "transient or vacation occupancy" for compensation and not for compensation and elects to regulate only occupancy for compensation, with no adequate factual basis for the distinction. As a consequence, STRs are unfairly singled out for livability regulations that would be more effective and fair if applied equally to all dwelling





units, not just STRs. Examples in the proposed ordinance of such regulations include maximum occupancy, minimum parking requirements, restrictions on use of on-street parking, noise regulation, quiet hours, trash service regulations and periodic septic system inspections. In each of these areas, the livability of Tillamook County's communities would be improved if all dwelling units were required to meet the same standards. There is no reasonable justification for singling out only STRs and not requiring the same of their neighbors.

**8. The proposed ordinance would illegally discriminate against renters and owners of STRs.**

The proposed ordinance attempts to unlawfully discriminate against renters and owners of STRs, by subjecting them to disparate standards compared to other owners and renters who don't pay compensation. In doing so, the proposed ordinance goes against public policy and infringes upon the constitutional right of renters and STR owners to receive equal privileges and immunities, without any adequate factual basis for doing so. See *Planned Parenthood Ass'n, Inc. v. Department of Human Resources of State of Oregon*, 63 Or App 41 (1983), *aff'd* 297 Or 562 (1984)<sup>10</sup>; see also *Tirpak v. Borough of Point Pleasant Beach Board of Adjustment*, 457 N.J. Super 447 (Law Div. 2018).<sup>11</sup>

**9. Other miscellaneous issues.**

OCH has numerous other concerns with the language of the proposed ordinance, some of which make the ordinance unconstitutionally vague.

- The terms "established neighborhood" and "established owner-occupied neighborhood" are not defined, yet the ordinance concludes that STRs have a potential negative impact on such neighborhoods. Without defining these terms, this conclusion cannot be evaluated based on the evidence and instead becomes wholly subjective and speculative.
- The term "Hosted Homeshare" is undefined and confusing.
- The definitions of "Owner" and "Transfer" in Section .030 are both over- and under-inclusive. A property can have more than one owner, and those owners

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<sup>10</sup> In *Planned Parenthood Ass'n, Inc.*, the Oregon Court of Appeals held that an administrative rule limiting state assistance for medically necessary abortions violated the privileges and immunities clause of the state constitution, in part because indigent pregnant women were treated different from each other based solely on whether their medically necessary service involved abortion.

<sup>11</sup> In *Tirpak*, the court held that municipality's deed restriction limiting owner of two-family residence from renting out more than one of the two units was unenforceable, stating that it discriminated against people based on their economic status as tenants "for no other reason than stereotypes regarding those who choose to rent as opposed to own."



can transfer partial interests in the property, but neither definition accounts for that. Also, while the definition of Transfer excludes transfers upon death, divorce, marriage or inheritance, it does not (but should) also exclude similar non-transactional transfers such as distributions from a trust to its beneficiaries or from a corporate entity to its members, partners or shareholders.

- Complaints regarding STRs should not constitute violations of the ordinance unless and until the complaints are verified and not cured within the applicable cure period. The last sentence of Section .100(B)(2) suggests that complaints not resolved within 30 minutes of receipt constitute an ordinance violation, regardless of merit. This improperly assumes that all complaints have merit and denies STR owners due process.<sup>12</sup>
- Several of the violation and revocation provisions are so vague as to be unconstitutional. “Legislation that imposes a penalty or sanction for past conduct is unconstitutionally vague if it fails to provide notice of the conduct it prohibits and allows a prosecutor, jury or judge to decide what conduct is prohibited.” *Pre-Hosp. Med. Servs., Inc. v. Malheur County*, 134 Or App 481, 491 (1995) (applying constitutional vagueness analysis to a county ordinance). The proposed ordinance is similarly unconstitutional imposing penalties in the form of loss of constitutionally-protected property rights without due process based on conduct of another. *Morgan, supra*.
- Tillamook County has consistently referred neighbor disputes to community mediation programs, which can mediate neighbor dispute at no cost or at low cost.<sup>13</sup> It would be much more efficient, cost effective, and likely to give both parties a lasting peace to treat neighbor disputes with STRs in like fashion.

Thank you for your consideration of these comments. OCH is optimistic that after consideration of all of the evidence and testimony, the Board will adopt a conservative approach to STR regulation that honors both existing property rights and the expectations of those interrupted by the STR permit moratorium, while at the same time imposing regulations on future permits that reasonably address the valid concerns of the community. But if this draft ordinance is passed without significant changes to address the points in this letter, our client will appeal and the proposed ordinance will be struck down as illegal for the reasons detailed above. Pursuing it without substantial revisions is foolhardy and waste of everyone's time

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<sup>12</sup> This issue appears to have been addressed in the revised draft ordinance submitted by the STRAC on June 6, 2023. OCH nonetheless preserves this objection in the event the language is changed further before adoption of a final revised ordinance.

<sup>13</sup> See <https://www.ycmediation.org/about-ycm/> and Board Resolution #R-17-004 (participating in state program for community mediation).



Tillamook County Board of Commissioners  
June 8, 2023  
Page 12

and resources, including County taxpayers who will have to fund the County's defense that it will undoubtedly lose.

Attached to this letter please find copies of the following documents and other evidence referenced herein. The Goal 10 Housing Element is part of the County Comprehensive Plan and is available online at the link in footnote 7.

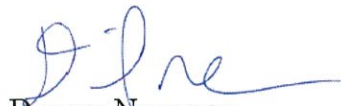
- Exhibit A 2022 Study, Tillamook Coast Visitors Association
- Exhibit B E-mail from Joel Stevens, Tillamook County Counsel's Office, May 25, 2023
- Exhibit C Tillamook County 2019 Housing Needs Analysis
- Exhibit D Tillamook County Short Term Vacation Rental Management Company Data, 2022
- Exhibit E Tillamook County Community Development Department Data, February 8, 2023
- Exhibit F Clatsop County's May 18, 2022 Short-Term Rental Data Report (excluding appendices)

Please enter this letter and its attachments into the record in this matter.

Sincerely,



David J. Petersen



Danny Newman



Heather Brann

DJP/DN/HB/djp  
Attachments

cc: OCH Board of Directors  
William Sargent  
Daniel Kearns

043463\00002\16286029v3



# EXHIBIT A

# STRs, TLT, and how \$\$ are spent



  
**Tillamook Coast**  
Visitors Association  
Visit Tillamook Coast

TLT TOTALS: 2019 to Q2, 2022

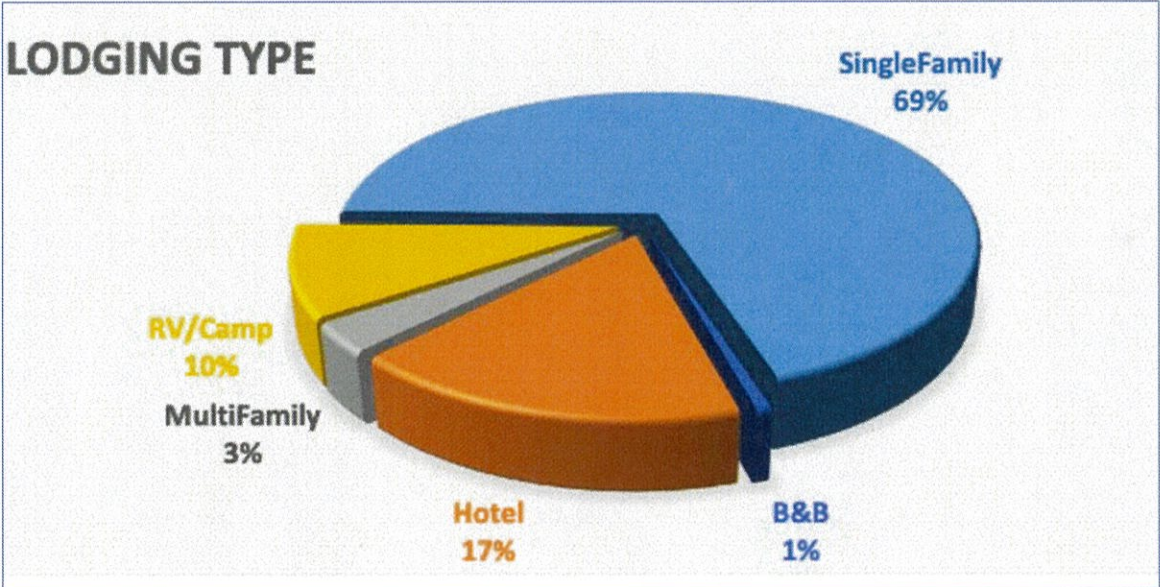
Transient Lodging Tax (TLT) collected by Tillamook County  
and Year-over-Year (YoY) Plus or Minus percentage

2019			2020		2021		2022	
	YoY			YoY		YoY		YoY
\$698,966	+17%	Q1	\$583,432	-17%	\$1,502,805	+157%	\$1,557,739	+3% + \$54,934
\$1,144,806	+13%	Q2	\$622,199	-48%	\$2,078,561	+233%	\$1,996,974	-4% -\$81,587
\$1,943,681	+11%	Q3	\$2,262,693	+16%	\$2,781,602	+20%		
\$709,038	+12%	Q4	\$1,241,553	+75%	\$1,219,407	-6%		
\$4,496,491	+13%	TOTAL	\$4,747,449	+5%	\$7,538,376	+60%	\$3,554,713	YOY down \$26,653

GROSS LODGING REVENUE TOTALS: 2019 to Q2, 2022

County-Wide Gross Lodging Receipts				
	2019	2020	2021	2022
Q1	\$12,466,788	\$13,067,909	\$33,728,792	\$34,994,940 + \$1,661,148
Q2	\$20,145,913	\$14,083,178	\$48,102,969	\$46,429,703 - \$1,673,266
Q3	\$34,587,676	\$53,149,357	\$65,205,193	
Q4	\$12,387,260	\$30,008,334	\$29,567,173	
Total	\$79,588,014	\$110,308,778	\$176,604,127	2022 Q1+Q2 total: \$81,424,643
				YOY difference: down \$12,118

Lodging inventory





**Lodging inventory**

Households in Tillamook County*	Short Term Vacation Rentals**	Hotel rooms**	B&B Rooms**	Campsites**
<b>Approx. 19,000</b>	<b>1,812 permits</b> <b>(from a total of 7,600 2<sup>nd</sup> homes in county)</b>	<b>782</b>	<b>35</b>	<b>1,232 tent sites</b> <b>1,221 RV sites</b>

\*Portland State University study, 2019

\*\*Tillamook County Community Development

## STR INCOME 2019-2021

STR Gross Rental Income Per Year			
	2019	2020	2021
Average	\$26,784	\$28,497	\$46,767
Maximum	\$23,120	\$273,349	\$389,872
Median	\$22,001	\$24,112	\$40,538
STR Income Levels per Unit			
	2019	2020	2021
>\$200,000	3	3	16
>\$150,000	5	5	28
>\$100,000	24	59	142
>\$50,000	177	222	542
>\$25,000	523	578	500
>0 - \$25,000	799	721	378
0 (not renting)	158	195	206
<b>Total STRs</b>	<b>1,707</b>	<b>1,783</b>	<b>1,812</b>



## COUNTY COLLECTIONS BY LOCATION

### By Location 2021

(Rounded to nearest dollar)

Location	Quarter				Grand Total
	2021 Q1	2021 Q2	2021 Q3	2021 Q4	
Manzanita, Nehalem, Wheeler	20,196	34,689	58,239	23,984	137,108
Rockaway Beach	17,729	32,891	59,511	20,544	130,674
Tillamook, Bay City, Garibaldi	9,457	18,466	28,897	13,865	70,685
Uninc - Cloverdale	27,036	48,747	73,670	26,660	176,113
Uninc - Garibaldi	27,337	37,690	24,358	6,124	95,508
Uninc - Manzanita	65,152	137,906	240,576	92,300	535,935
Uninc - Neskowin	57,094	109,662	208,663	72,638	448,056
Uninc - Oceanside	94,544	170,420	286,187	100,536	651,687
Uninc - Pacific City	284,722	516,682	815,540	290,394	1,907,338
Uninc - Rockaway Beach	40,370	71,366	147,970	50,702	310,408
Uninc - Tillamook	18,469	46,691	71,173	19,120	155,452
Various - Online	840,308	850,284	763,137	467,672	2,921,401
<b>Grand Total</b>	<b>1,502,414</b>	<b>2,075,493</b>	<b>2,777,921</b>	<b>1,184,538</b>	<b>7,540,366</b>

## COUNTY COLLECTIONS BY LODGING TYPE

### By Lodging Type 2021

Lodging Type	Quarter				Grand Total
	2021 Q1	2021 Q2	2021 Q3	2021 Q4	
B&B	6,889	14,288	21,302	9,614	52,092
Hotel	195,664	330,882	491,597	224,635	1,242,777
MultiFamily	35,108	63,348	99,412	35,598	233,466
RV/Camp	105,115	230,715	305,090	71,603	712,523
SingleFamily	1,159,640	1,436,259	1,860,520	843,089	5,299,507
<b>Grand Total</b>	<b>1,502,414</b>	<b>2,075,493</b>	<b>2,777,921</b>	<b>1,184,538</b>	<b>7,540,366</b>

## TLT HISTORY AND USE: ORS 320.300

Prior to 2003	After 2003	January 1, 2014
Room tax goes to general budget	Any rise in room tax subject to state law of 70/30 split	County implements 10% transient lodging tax; cities raise their tax to 9%
<p><b>4% original lodging tax*</b> All lodging tax goes to a city's general fund – most cities in Tillamook County had a room tax in place by the 1990s</p>	<p><b>4% original lodging tax*</b> Continues to go to city's general fund</p> <p><b>Cities: Any increase after 2003</b> subject to 70/30 split:  <span style="color: red;">30% goes to general budget</span>                      70% tourism facilities and/or promotions</p> <p style="color: blue;">State adds 1.0% state tax, goes to Travel Oregon</p>	<p><b>4% original lodging tax*</b> Continues to go to city's general fund</p> <p><b>Cities: Any increase after 2003</b> subject to 70/30 split:  <span style="color: red;">30% goes to general budget</span>                      70% tourism facilities and/or promotions                      1/10<sup>th</sup> of 10% total room tax to county</p> <p><b>Unincorporated: full 10% to county</b></p> <p><b>All county TLT collections: 70/30 split.</b>                      30% to roads; 70% tourism facilities and/or promotions</p> <p style="color: blue;">1.5% state increase - Travel Oregon</p>
<p>*example</p>		

## HOW TLT IS USED

Grants	Investments	Sponsorships (TCVA)
Facilities and marketing grants	Capacity Building (examples)	Community events and programs (examples)
<p><b>\$5.5 million</b> in tourism facilities grants to agencies and nonprofits</p> <p><b>\$950,000</b> in marketing grants to nonprofits and tourism businesses</p>	<p><b>\$5+ million</b></p> <ul style="list-style-type: none"> <li>• Jenson Property in Pacific City</li> <li>• Development plans for Jenson</li> <li>• Salmonberry Trail</li> <li>• Tsunami, safety and emergency access</li> <li>• Parking, trash management, bathrooms in peak season</li> <li>• Fairgrounds improvements</li> <li>• Pioneer Museum</li> </ul>	<p><b>\$100,000</b></p> <ul style="list-style-type: none"> <li>• Chamber events</li> <li>• Off-season community events</li> <li>• Scholarships for industry training</li> <li>• Auction items for fundraisers</li> </ul>

## HOW TLT IS USED

	<u>Amount</u>
Walton Family Land Donation for Right of Way	\$120,000.00
Community of Neskowin	\$100,000.00
North Coast Regional Solutions Team	\$150,000.00
Tillamook County Public Works	\$550,000.00
Nestucca, Neskowin & Sandlake Watersheds Council	\$7,700.00
ODFW Screening and Passage Program	\$102,200.00
USFS Salmon Superhwy Fish Passage Partnership Grant	\$38,400.00
U.S. Fish and Wildlife Service (USFWS)	\$3,000.00
USFWS National Fish Passage Program (NFPP)	\$40,000.00
USFWS Pacific Marine and Estuarine Fish Partnership (PMEP)	\$50,000.00
2019 House Bill 5050 Section 61	\$1,000,000.00
Tillamook County Transient Lodging Tax	\$450,000.00
Oregon Business Development Department with Oregon State Lottery Funds	\$97,500.00
<b>PROJECT COST</b>	<b>\$2,708,800.00</b>



## HOW TLT IS USED



County-wide wayfinding  
\$700,000 (so far)

Tsunami Signage  
\$40,000 (so far)





HOW TLT IS USED

Port of Garibaldi  
\$204,000



Restrooms  
and kiosk



Dock

Event tent



HOW TLT IS USED

\$138,000 on digital message signs at fire districts and ports



## HOW TLT IS USED



Oceanside Community  
Club roof repair  
\$55,000



Oceanside Beach Access  
\$75,000

HOW TLT IS USED



Kayak launchers (2): \$14,000



Beach wheelchairs (9): \$49,000

## HOW TLT IS USED



Kiawanda Community  
Center addition  
\$339,000

HOW TLT IS USED

\$153,000



Renovation and new seating in NCRD performing arts center



ADA bathroom and lobby remodel at NCRD

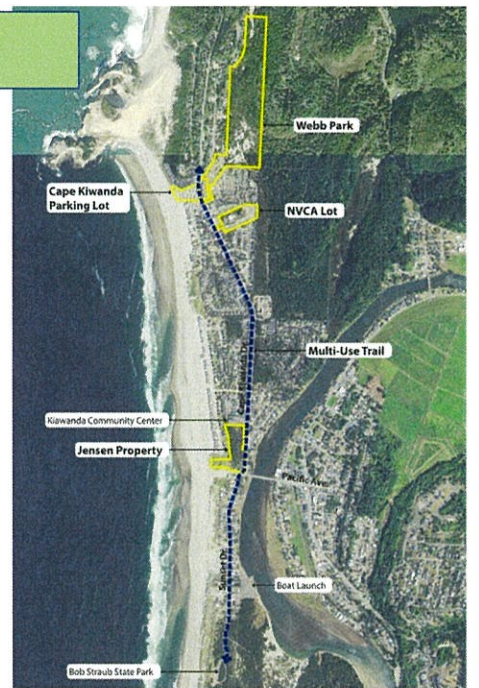


## HOW TLT IS USED

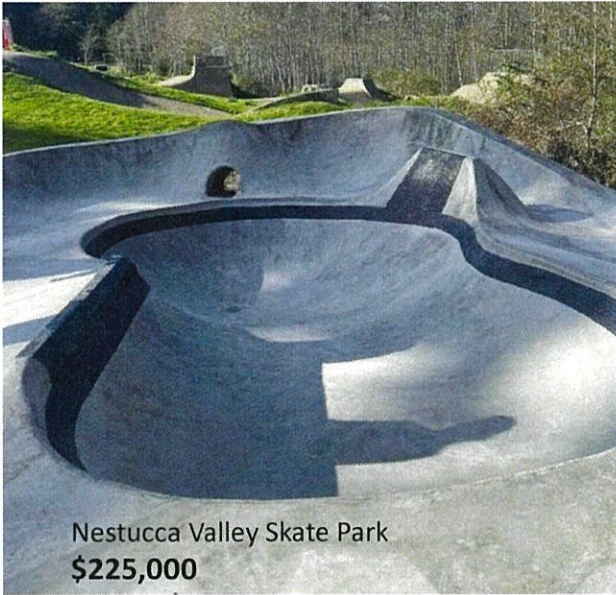


Cape Kiwanda  
beach access  
\$132,659

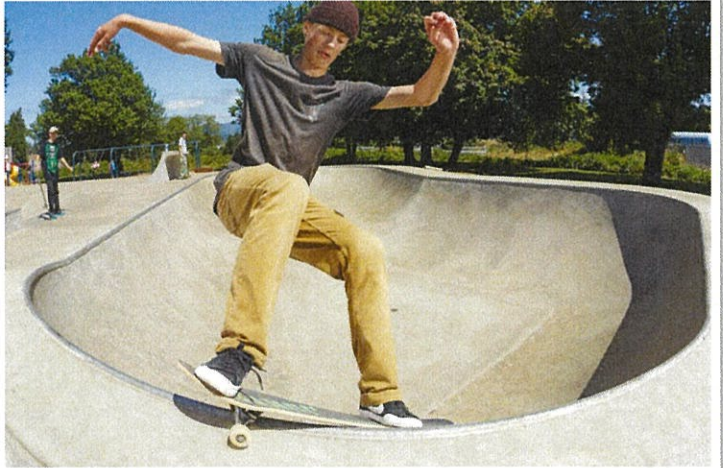
Kiwanda  
Corridor  
Project  
\$3,600,000 –  
purchase of  
Jensen  
property and  
planning



HOW TLT IS USED



Nestucca Valley Skate Park  
**\$225,000**



Tillamook Skate Park  
**\$31,450**





## Benefits of local STR agencies

Can respond quickly to issues – **85% compliance** in the 20-minute response rule

Local agencies have hundreds of employees, well paid, often with benefits

Local agencies are **part of the community**

Local agencies support local businesses, such as landscapers, painters, electricians, plumbers, etc.

Local agencies are generous with community requests – donations, auction items, sponsorships

Vast majority of “nuisance calls” are not STRs and/or not locally managed



## Future of STRs?

### **If STRs were to be shut down:**

- 69% of TLT would go away, as would grants, investments, infrastructure and community development by the county and TCVA
- Businesses supported by visitors would close and hundreds of people would lose their jobs
- Lawsuits would rise like king tides
- Real estate value would go down

### **Management of STRs is ideal:**

- City of Manzanita has a cap of 17.5% of households; mostly managed by agencies with a local presence
- Rockaway Beach is researching STR cap now
- Unincorporated areas currently have no cap, but are paused

# EXHIBIT B

# Response To Records Request

From: Joel Stevens (jstevens@co.tillamook.or.us)  
To: vwcathy1959@yahoo.com  
Cc: countycounsel@co.tillamook.or.us  
Date: Thursday, May 25, 2023 at 09:37 AM PDT

Ms. Hendrix,

Below please find some additional data compiled by the Department of Community Development. They inform me that this is what they have been able to compile at this time.

I believe this constitutes a complete response to your request.

Sincerely,

Joel



**Joel W. Stevens** | County Counsel  
**TILLAMOOK COUNTY**  
201 Laurel Avenue  
Tillamook, OR 97141  
Phone (503) 842-1805  
[jstevens@co.tillamook.or.us](mailto:jstevens@co.tillamook.or.us)

\*\*\*\*\*CONFIDENTIALITY NOTICE\*\*\*\*\*

*This e-mail contains information that is privileged, confidential, or otherwise exempt from disclosure under applicable law. If you are not the addressee or it appears from the context or otherwise that you have received this e-mail in error, please advise me immediately by reply e-mail, keep the contents confidential, and immediately delete the message and any attachments from your system.*

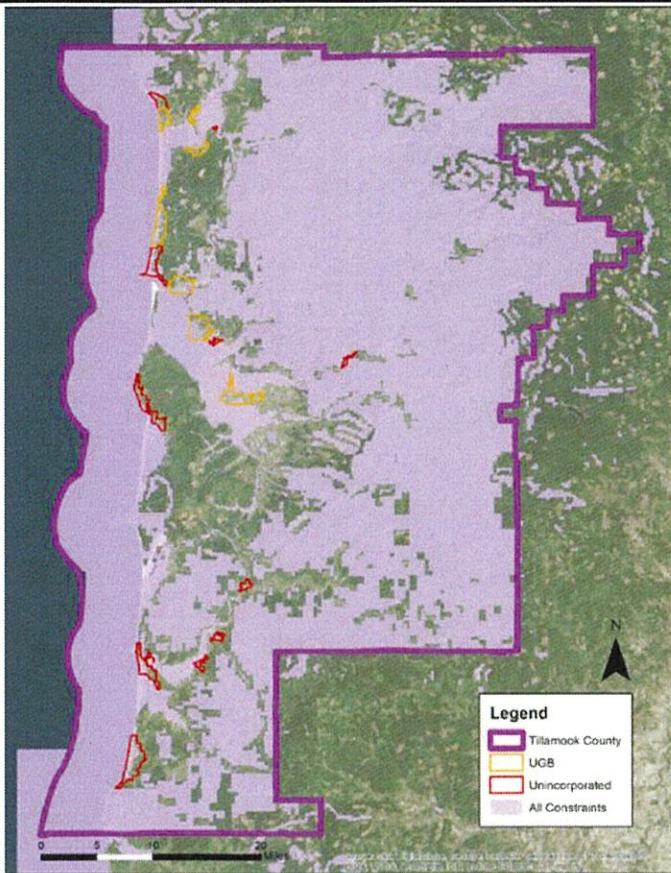
	2019	2020	2021	2022	2023	Total
Signage Violations	0	185	157	83	64	489
Violations	0	0	0	1	8	9
Complaints	1	8	13	5	5	32

# EXHIBIT C



# Tillamook County

## Housing Needs Analysis



Tillamook County



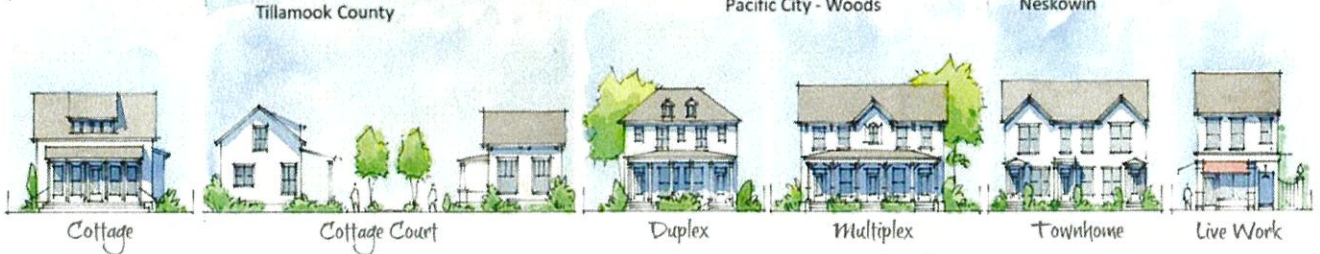
Netarts



Pacific City - Woods



Neskowin



December 27, 2019

# ACKNOWLEDGEMENTS

---

This work is made possible through input provided by County staff and the Tillamook County Housing Commission. We specifically recognize and appreciate the time and attention dedicated to this work by the following participants.

## **Tillamook County**

David Yamamoto (Tillamook County Commission Chair)

Bill Baertlein, (Tillamook County Commission Vice Chair, Liaison to County Housing Commission)

Mary Faith Bell (Tillamook County Commissioner)

Sarah Absher (Tillamook County Community Development Director)

Jake Davis (Tillamook County, Housing Coordinator)

## **Tillamook County Housing Commission**

Cami Aufdermauer (at-Large)

Sarah Beaubien (Major Employer)

Tim Borman (at-Large)

Mis Carlson-Swanson (Non-Profit)

Kari Fleisher (at-Large)

Ed Gallagher (at-Large)

Kris Lachenmeier (Major Employer)

Barbara McLaughlin (North County)

Gale Ousele (South County)

Erin Skaar (Non-Profit)

Mayor Suzanne Weber (City of Tillamook)

John Southgate, Strategic Partner, Project Coordinator

## **Interviews and Work sessions**

During the course of this assignment, FCS GROUP collected information gleaned from the following property owners, business owners, developers, and local planning commissions. We sincerely thank these individuals and collective bodies for sharing their time and attention.

- Todd Bouchard, developer/local resident
- Julie Garver, Director, Innovative Housing, Inc. (nonprofit housing developer)
- Thomas Kemper, nonprofit housing developer
- Jeff Schons and Mary Jones, Pacific City property owners/developers/business owners
- Paul Wyntergreen, City of Tillamook, City Manager
- Manzanita City Planning Commission
- Bay City Planning Commission

## **Project Consultants**

### **FCS GROUP**

Todd Chase, AICP, LEED <sup>AP</sup>, Principal/Project Manager

Timothy Wood, Project Consultant/Economist

Zech Hazel, Analyst

### **Cascadia Partners**

Alex Steinberger, Partner

Alex Joyce, Managing Partner

Victor Tran, Associate



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## Section I. INTRODUCTION

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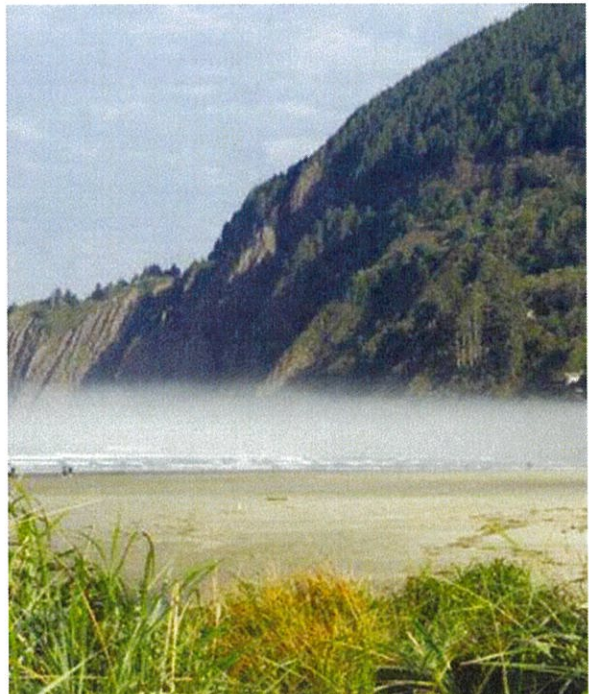
Tillamook County is widely known for its dramatic coastline, misty beaches and award winning dairy and seafood products. Tillamook County is located along the breathtaking northern Oregon Coast within 50 miles from the Portland and Salem metro regions.

Like many coastal communities, portions of Tillamook County are experiencing strong housing demand by part-time seasonal residents, especially in coastal “resort” communities. Over the past decade, new housing production has not nearly kept pace with the demand generated by permanent residents and seasonal home owners. With the majority of its housing, now controlled by part-time residents, vacancy rates have plunged to near zero and rents/prices have increased to record levels. This has led to a severe housing affordability challenge that is exacerbated by: environmental flood zone and agricultural land use constraints; limited vacant land area with adequate water, sewer and roadway infrastructure; and a growing service economy with limited family wage job opportunities.

These challenges continue to mount as employers struggle to fill job positions since workers are faced with very limited housing choices.

The Tillamook Housing Needs Analysis (HNA) is being conducted to ensure that the County can plan for coordinated housing growth in line with community preferences and market forces. The HNA includes the following:

- A determination of 20-year housing needs based upon long-term growth forecast of demand by permanent and seasonal population increases.
- An analysis of buildable vacant, part-vacant and re-developable land inventory (BLI) for land that’s planned to accommodate housing.
- Identification of new housing goals, objectives, and policy actions that address housing opportunities.



## Section II. MARKET TRENDS AND FORECASTS

---

**This section of the HNA includes a forecast of housing needed to accommodate expected year round and seasonal population growth for Tillamook County.** The housing needs forecast represents a 20-year projection from the base year (2019) through year 2039. These technical findings are also consistent with the State of Oregon requirements for determining housing needs per Oregon land use planning Goals 10 and 14, OAR Chapter 660, Division 8, and applicable provision of ORS 197.295 to 197.314 and 197.475 to 197.490, except where noted.

### II.A. METHODOLOGY

The methodology for forecasting housing needs for Tillamook County considers a mix of demographic and socio-economic trends, housing market characteristics and long-range population growth projections. Population is a primary determinate for household formations—which in-turn drives housing need. Given the significance of coastal tourism and visitation, the demand for second homes and short-term rentals is also an important determinate in understanding future housing needs.

County-wide population, households, income and housing characteristics are described in this section using available data provided by reliable sources, such as the U.S. Census Bureau (Census and American Community Survey), the U.S. Department of Housing and Urban Development (HUD), Oregon Department of Housing and Community Services, Portland State University (PSU) and Tillamook County's Planning and Community Development department. Where trends and forecasts are provided by an identified data source, FCS GROUP has included extrapolations or interpolations of the data to arrive at a base year (2019 estimate) and forecast year (2039 projection).

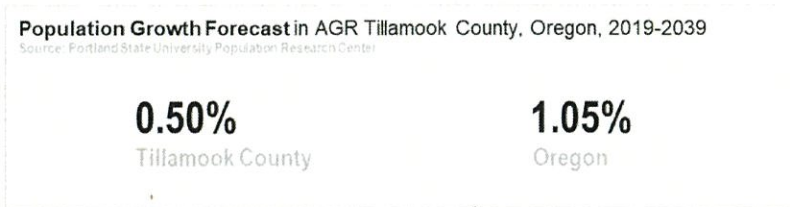
The housing need forecast translates population growth into households and households into housing need by dwelling type, tenancy (owner vs. renter) and affordability level.

### II.B. DEMOGRAPHICS AND SOCIO-ECONOMICS

#### Population

Since the year 2000, Tillamook County's permanent year-round population (including local cities) increased 8.6%, from 24,262 residents in 2000 to 26,348 in 2019. Population within Tillamook County is projected to increase to 29,284 over the next 20 years (0.5% avg. annual growth rate).

As population increases, the demand for all types of housing will increase. This HNA supports long-range planning focused on expanding the local housing inventory to accommodate baseline population growth.



The long-range population forecast prepared by PSU’s Population Research Center (PRC) expects 2,936 additional people to be added to Tillamook County by year 2039. This equates to an annual average growth rate (AGR) of 0.5%. Baseline population growth forecasts for Tillamook County and its incorporated areas is shown below in **Exhibit 2.1**.

**Exhibit 2.1 Population Growth Forecast**

	Estimate 2019	Forecast 2039	Proj. Change 20 Years	Proj. AGR (2019-2039)
Oregon	4,209,177	4,954,640	745,463	0.8%
Tillamook County	26,348	29,284	2,936	0.5%
Bay City	1,448	1,796	348	1.1%
Garibaldi	802	875	73	0.4%
Manzanita	910	1,209	299	1.4%
Nehalem	1,272	1,642	370	1.3%
Rockaway Beach	1,590	1,862	272	0.8%
Tillamook	5,643	6,439	796	0.7%
Wheeler	415	486	72	0.8%
Unincorporated	14,261	14,971	710	0.2%

**Source:** Portland State Population Research Center, 2017 estimate; 2017-2040 forecast, interpolated by FCS GROUP.  
Compiled by FCS Group. AGR = average annual growth rate.

\*Populations are based on Urban Growth Boundary

Tillamook County has a relatively older population in comparison to the Oregon average. In Tillamook County, nearly 24% of the population is 65 or older, compared to 16% for Oregon as a whole. The median age of residents in Tillamook County was 48 in 2017, compared with the State average of 39.2.



Tillamook County’s average household size is 2.41 people per occupied household, which is slightly less than the statewide average of 2.5.

### Average Number of People per Unit, Tillamook County, Oregon, 2017

Source: U.S. Census Bureau, 2013-2017 American Community Survey, compiled by FCS Group

**2.41**  
Tillamook County

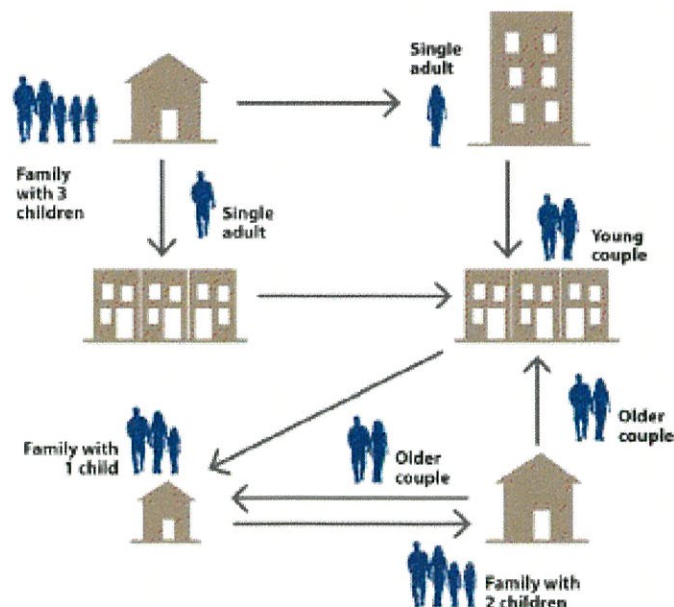
**2.5**  
Oregon

## Factors Affecting Housing Demand

There is a clear linkage between demographic characteristics and housing choice. As shown in the figure below, housing needs change over a person's lifetime. Other factors that influence housing include:

- Homeownership rates increase as income rises.
- Single family detached homes are the preferred housing choice as income rises.
- Renters usually have lower incomes than owners and are much more likely to choose multifamily housing options (such as apartments or plexes) over single-family housing.
- Very low-income households (those earning less than 50% of the median family income) are most at-risk for becoming homeless if their economic situation worsens.
- The housing available to households earning between 50% and 120% of the median family income is crucial to middle-income residents, and is often referred to "missing middle" housing stock or "workforce housing."
- Seasonal housing demand by part time residents will continue to occur primarily in coastal communities that provide access to recreational areas and services.

### Housing Life Cycle



**Key definitions:**

“**Households**” consist of all people that occupy a housing unit.

“**Family**” is a group two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together.

The relationship between demographic changes and housing needs can be used to forecast future housing needs. Three main demographic changes affecting housing in Tillamook County include:

## Generational Cohorts

As people age, their housing requirements change with time. **Exhibit 2.2** summarizes the current (2017) distribution of major generational cohorts of people living in Tillamook County.

### **Greatest/Silent Generation (those born before 1925 to 1945)**

This includes retirees better than age 74, who were raised during the Great Depression, Word War I or World War II. This cohort currently accounted for 9% of the county’s population in 2017. As they reach their 80s some move into assisted living facilities with convenient health care services and transit access. Meanwhile, others will leave the county to be closer to family or medical services.

### **Baby Boom Generation (those born 1946 to 1964)**

Baby boomers (currently age 55 to 74) accounted for 32% of Tillamook County residents in 2017. The boomer population segment has been growing more rapidly than the other cohorts over the past 10 years and many are now entering their retirement years. Boomers usually prefer to “age in place” but may downsize or move in with family members, sometimes opting to reside in accessory dwellings off the main house.

### **Generation X (born early 1965 to 1980)**

Gen X (currently includes people between age 39 to 54) accounted for 17% of Tillamook County residents in 2017. GenX households often include families with children, and many prefer to live in single family detached dwellings at various price points.

### **Millennials (born early 1980s to early 2000s)**

Millennials (currently in their twenties or thirties) accounted for 21% of Tillamook County residents in 2017. Younger millennials tend to rent as they establish their careers and/or payback student loans. Working millennials often become first-time homebuyers, opting to purchase smaller single-family detached homes or townhomes.

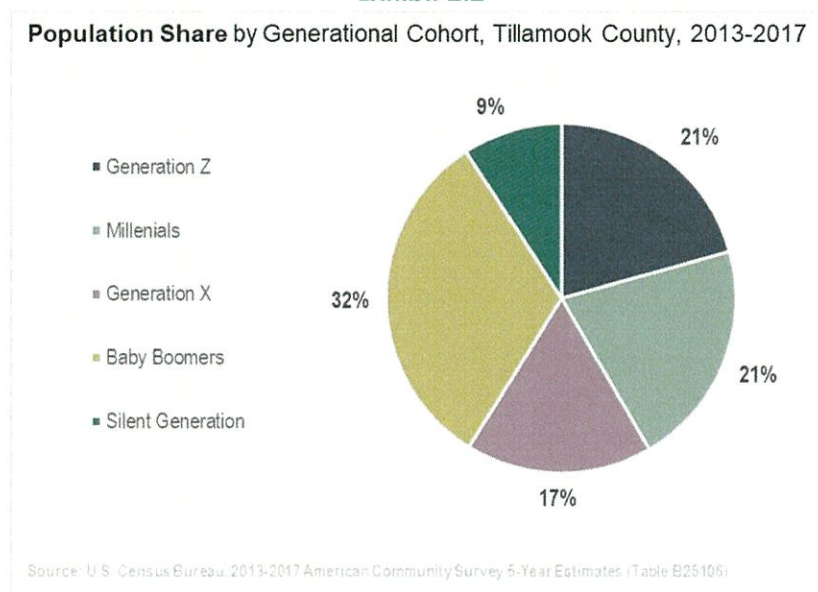
### **Generation Z (born mid-2000s or later)**

GenZ includes residents age 19 or less, which accounted for 21% of Tillamook County residents in 2017. This segment mostly includes children living with Gen Xers or Millennials.

### Families with Children living at home

This category includes a subset of Baby Boomers, Gen Xers and millennials. Taken as a whole, this category constitutes a significant proportion of Tillamook County's population; and is expected to increase moderately over the next two decades. Families prefer to live in a variety of housing types (detached homes or townhomes/plexes) at price points commensurate with their family income.

Exhibit 2.2



### Income Characteristics

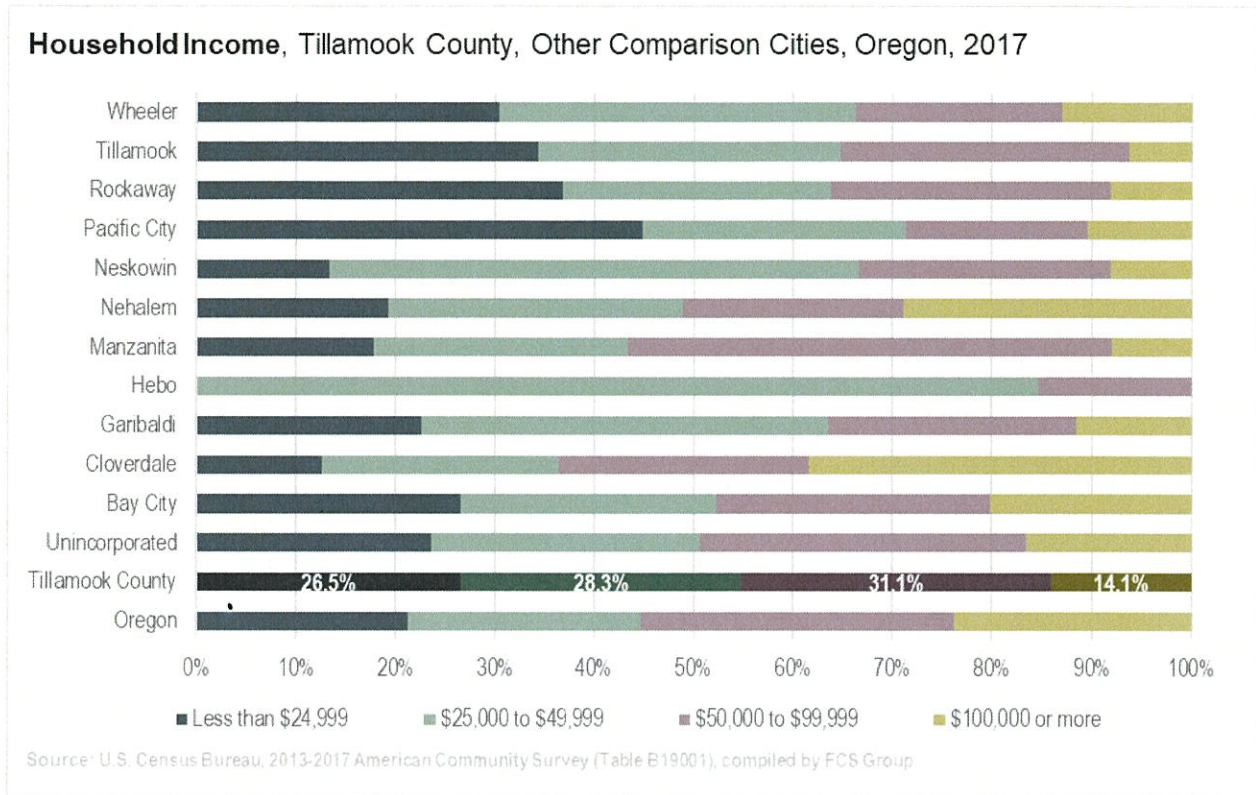
The median household income in Tillamook County (\$45,061) is well below incomes observed statewide in Oregon (\$56,119).

As shown in **Exhibit 2.3**, Tillamook County in comparison with Oregon, has a higher share of low-income residents (earning less than \$30,000), and a lower share of middle- and upper-income residents (those earning more than \$50,000). Countywide incomes vary significantly between communities, with Hebo, Pacific City, Rockaway and City of Tillamook residents having relatively lower incomes compared with Manzanita and Nehalem.

It should be noted that this analysis focuses on local cities and Census Defined Places, since those are the communities for which comparative data are available. There are additional small communities in Tillamook county, such as Oceanside, Netarts and Beaver, which do not have readily available statistics. While such small communities are vital, they are referenced here within the unincorporated county area.



Exhibit 2.3



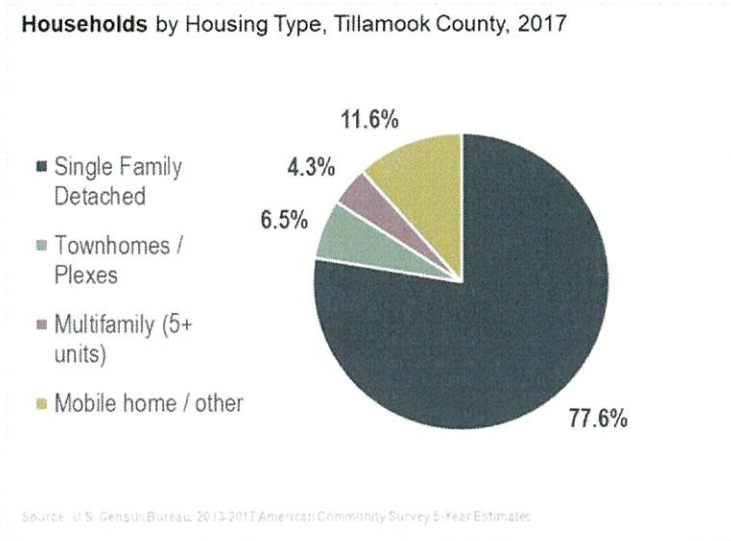
## II.C. EXISTING HOUSING CHARACTERISTICS

An analysis of historical development trends and local housing market dynamics provides insight regarding how the housing market functions. Findings indicate that changes in demographic and socio-economic patterns over the next two decades will result in a shift in housing demand from what is now predominantly single-family detached housing to wider mix of housing types.

### Housing Inventory and tenancy

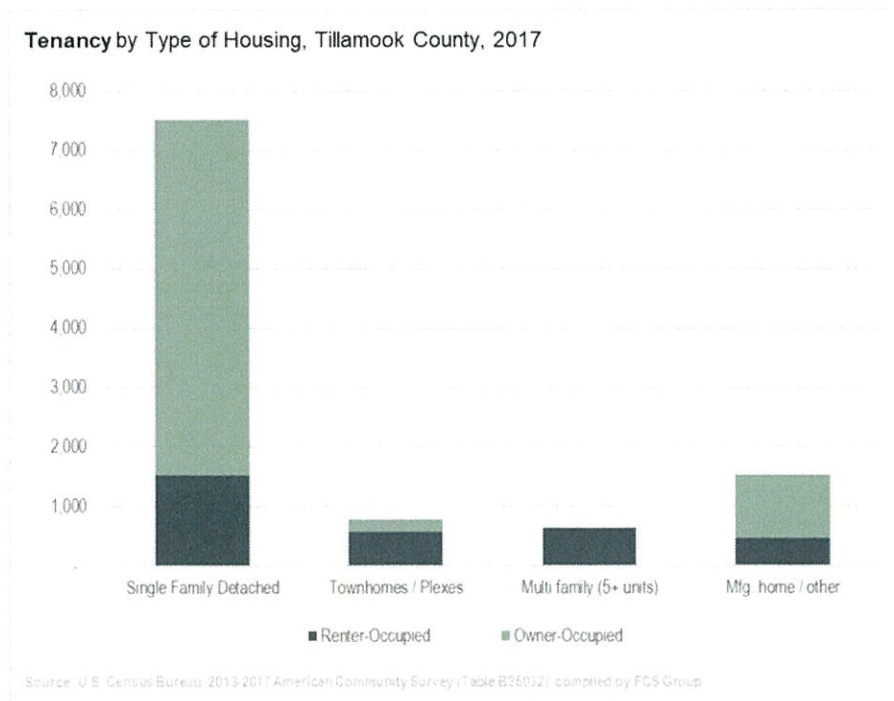
The existing housing stock in Tillamook County is dominated by single family detached (low density development) which accounts for just over three-fourths of the inventory. This is well above the state average of 63.7%. Mobile homes/other housing types comprise the remaining 11.6% of the inventory. Townhomes/plexes (medium density development) accounts for 6.5% of the inventory. Multifamily apartments and condos (with more than 5 units per structure) currently comprise only 4.3% of the inventory (see **Exhibit 2.4**).

**Exhibit 2.4**



The overall housing tenancy in Tillamook County mirrors the Oregon statewide average, with 69% of the permanent residents owning their homes, and the remaining 31% renting. As shown in **Exhibit 2.5**, most homeowners reside in single family detached homes or mobile homes (including manufactured housing). Renters occupy all types of housing, and constitute the majority of demand for townhomes/plexes and multifamily apartments.

**Exhibit 2.5**



## Seasonal Housing Inventory and Vacancy Rates

The prior housing study that was prepared for Tillamook County, *Creating a Healthy Housing Market for Tillamook County*, March 2017 (by CZB), noted that the housing market in Tillamook County has two distinct parts. There is a *coastal market* with strong demand from upper-income households, investors, second home buyers and retirees. And there is an *interior market* concentrated largely around Tillamook and other inland communities, such as Bay City. This market has a relatively older and less expensive housing inventory, which is more attainable to local residents. The demand for both seasonal housing and year-round non-seasonal demand is rising, as indicated in **Exhibit 2.6**.

Of Tillamook County's 18,789 total housing units, 44%, were classified as having "seasonal ownership" in 2017, up from 38% in 2010, according to the U.S. Census American Community Survey.

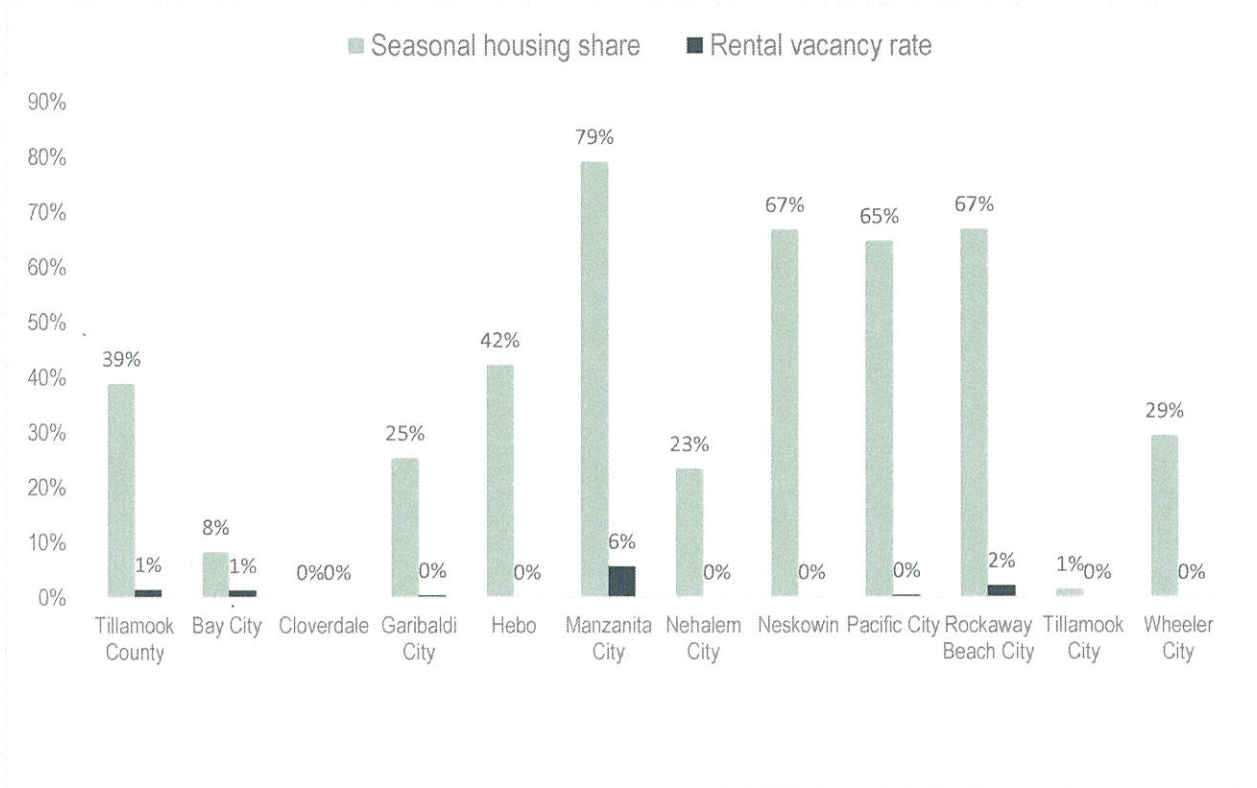
**Exhibit 2.6**



The seasonal housing inventory varies significantly by location, with the City of Tillamook, Bay City and Cloverdale having the lowest rates of seasonal homeownership and coastal resort areas such as Rockaway Beach and Manzanita having the highest levels at 74% and 87%, respectively.

As shown below in **Exhibit 2.7**, the vacancy rates for non-seasonal (year round rental housing) is well below 1% in all areas and near zero in Cloverdale, Gribaldi, Hebo, Nehalem, Neskowin and Wheeler. In comparison, the statewide average housing vacancy rate was 9.3% in 2017.

**Exhibit 2.7 Vacancy Rates by Housing Type**

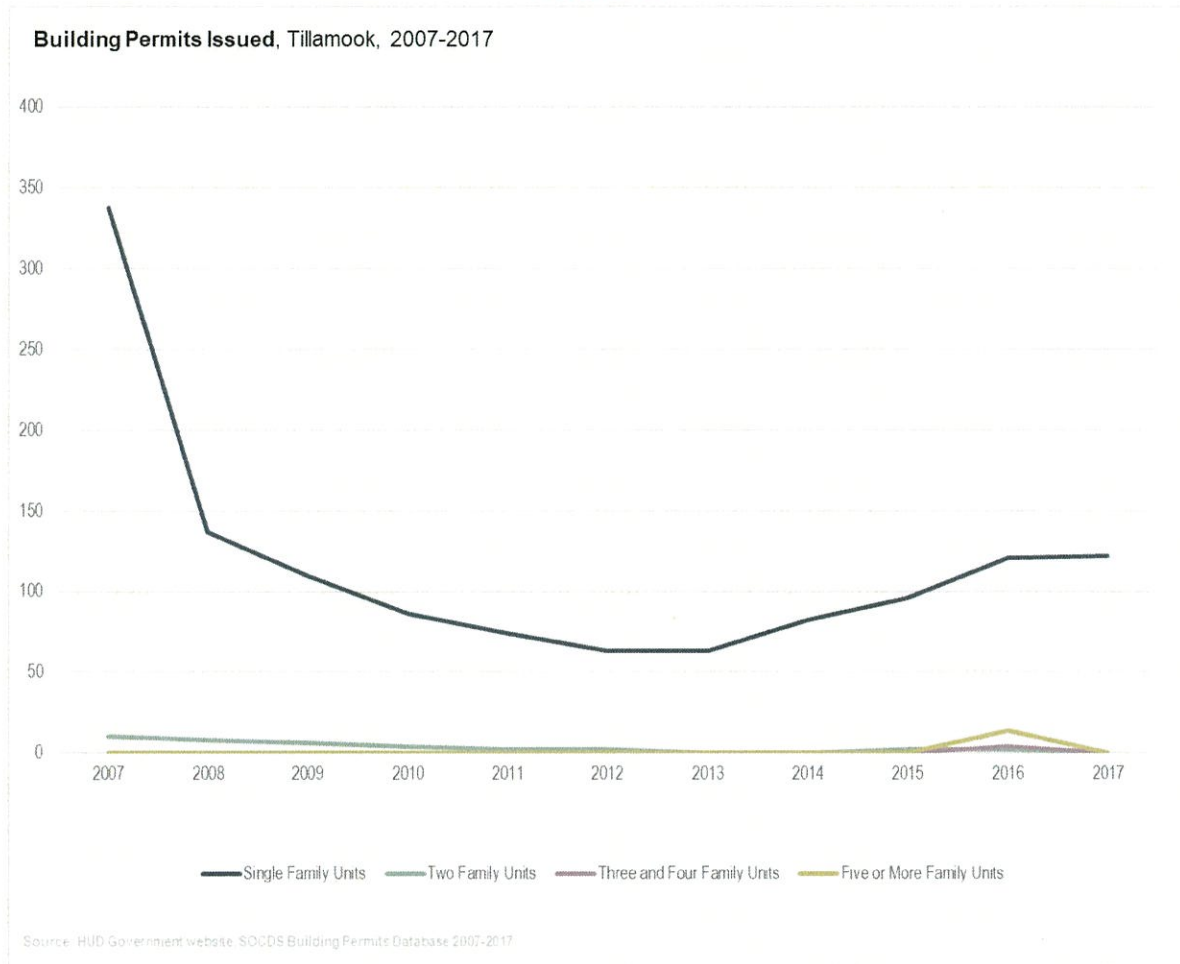


## Housing Construction Permitting Activity

During the past decade new housing construction in Tillamook County has been dominated by single family housing. Despite falling sharply following the recession, the county has issued an average of 117 single family permits annually for new construction since 2007. Issuance of new permits has picked up since its low of 2013 (**Exhibit 2.8**).

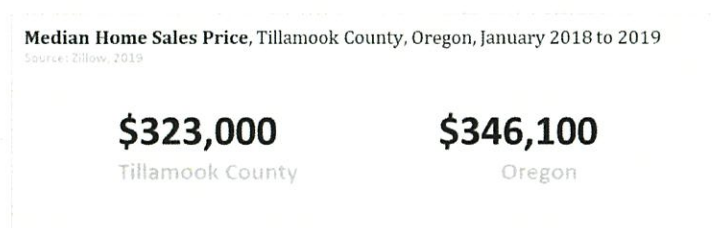
Housing production has not nearly kept up with the pace of demand. Between 2007 and 2017, about 120 new dwellings were added throughout Tillamook County annually with the vast majority as second homes. Most new housing construction has occurred in coastal “resort” towns, such as Manzanita, Neskowin, Pacific City and Rockaway Beach, where 66%-80% of the total housing stock is now owned by part-time residents. During this same time frame, it is estimated that about 80-90 existing dwelling units were converted to seasonal units or short-term vacation rentals each year. As such, the permanent year-round housing inventory in Tillamook County has been decreasing at a time when nearly 60 households were moving into the county each year.

**Exhibit 2.8**



## Housing Affordability

The median home price in Tillamook County was approximately \$323,000 (2019, 1<sup>st</sup> Q), which is slightly below the median home price in Oregon as a whole. As shown in **Exhibit 2.9**, year-over-year, home prices in Tillamook County increased by 12.2% from \$288,000 in 2018 to \$323,000 in 2019.



In general, home values declined following the Great Recession (2009 to 2014), then began a steady ascent. In Tillamook County, it is estimated that median home prices have increased by over 40%

between 2014 and 2019. During this same time frame, median household income levels in Tillamook County increased only 21%; thereby creating a major housing affordability challenge.

Based on active home listings and average sales over the past two years in Tillamook County, there is less than a three month supply of homes priced under \$300,000; and only a four to five month inventory of homes priced \$300,000 to \$500,000. For comparison, a healthy housing market is considered to have a six month housing inventory.

**Exhibit 2.9**

**Homes Sales and Inventory, Tillamook County**

Sales Price Level	Recent Sales (past 2 years)	Avg. Sales Per Month (past 2 years)	Current Listings	Remaining Inventory (months)
Sales Price Level				
Less than \$100,000	175	7.3	4	0.5
\$100,000 to \$199,999	384	16.0	27	1.7
\$200,000 to \$299,999	556	23.2	61	2.6
\$300,000 to \$399,999	421	17.5	70	4.0
\$400,000 to \$499,999	270	11.3	57	5.1
\$500,000 or more	298	12.4	124	10.0
<b>Total</b>	<b>2,104</b>	<b>88</b>		

Source: Zillow.com; analysis by FCS 9/3/19.

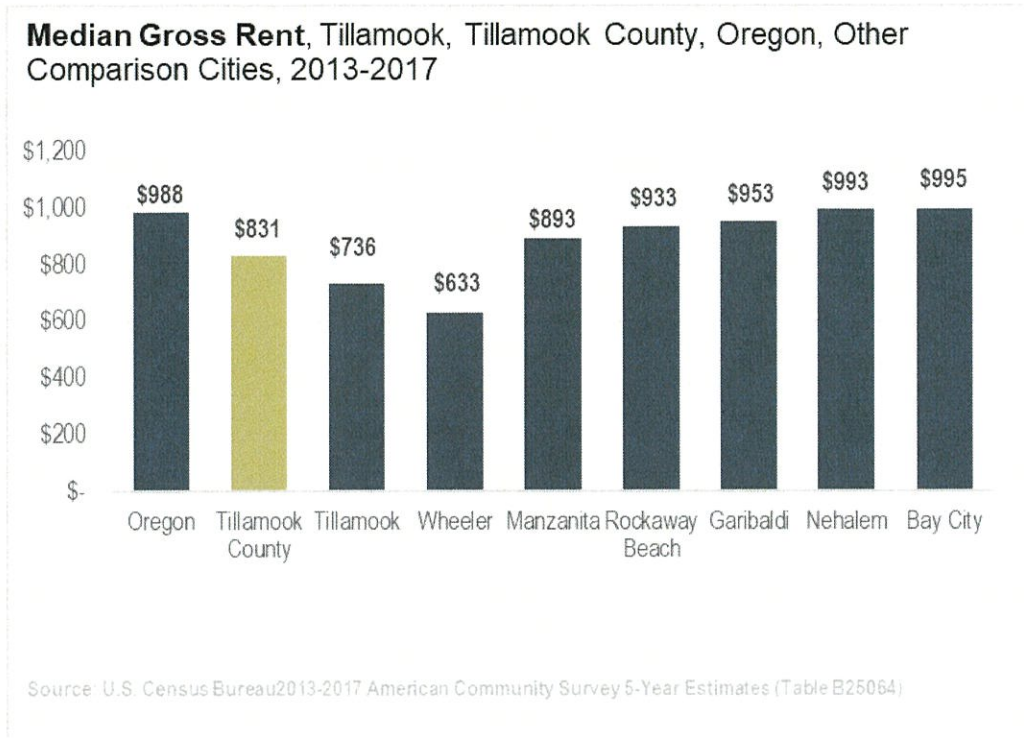
**Median Home Price Sales Trends in Select Markets**

	Aug-18	Aug-19	Change %
Tillamook County	\$288,000	\$323,000	12.2%
Bay City	\$213,000	\$244,000	14.6%
Nehalem	\$372,000	\$415,000	11.6%
Neskowin	\$425,000	\$457,000	7.5%
Pacific City	\$292,000	\$323,000	10.6%
Rockaway Beach	\$255,000	\$294,000	15.3%
Tillamook City	\$251,000	\$283,000	12.7%

Source: Zillow.com; analysis by FCS Group 1/24/18.

Median rents are also slightly lower in Tillamook County compared with the Oregon statewide average. However, in many communities within Tillamook County, rents are now on par with or have surpassed the statewide average (**Exhibit 2.10**).

Exhibit 2.10

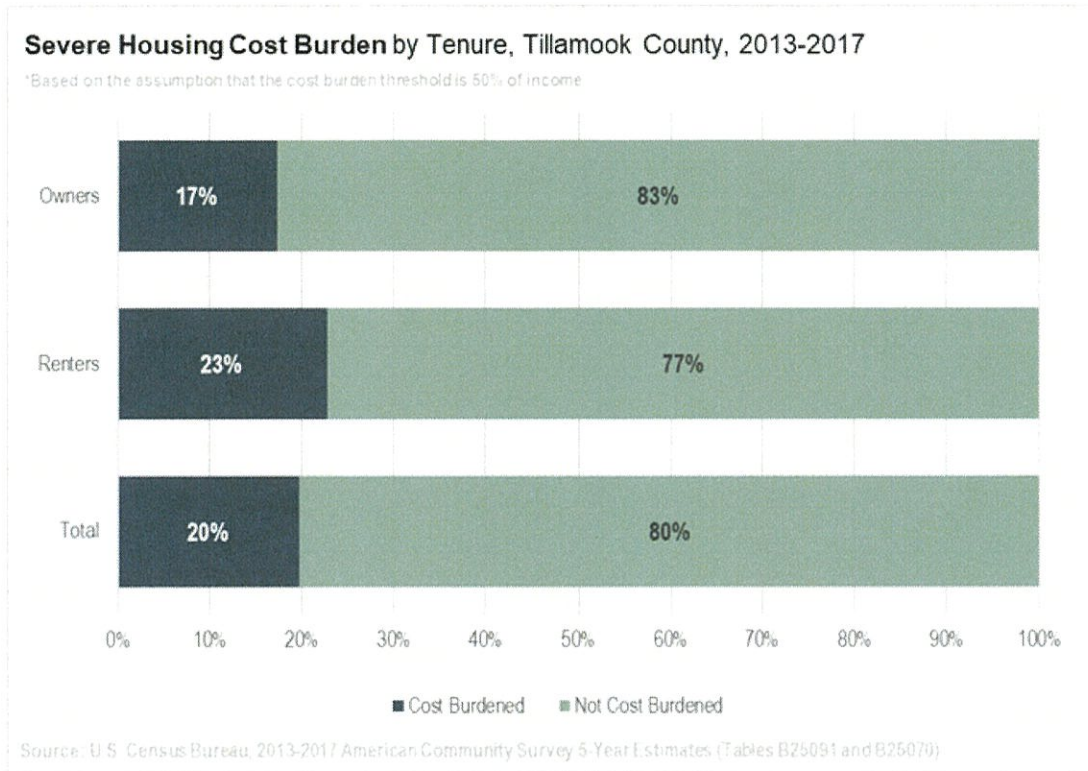


## Housing Cost Burdens

According to the U.S. Housing and Urban Development (HUD) standards, households are considered “cost burdened” if they pay over 30% of their income on housing. Households are “severely cost burdened” if they pay over 50% of their income on housing.

Despite relatively low housing costs, the fact that there limited numbers of family wage jobs makes finding attainably priced housing difficult for many residents. Approximately 23% of the renters and 17% of the owners in Tillamook County are severely cost burdened (see **Exhibit 2.11**).

Exhibit 2.11



Severe rent burdens vary widely between local areas. For example, Wheeler faces severe rent burden rates of just 10%, while 30% of Bay City renters are severely rent burdened (see **Exhibit 2.12**).

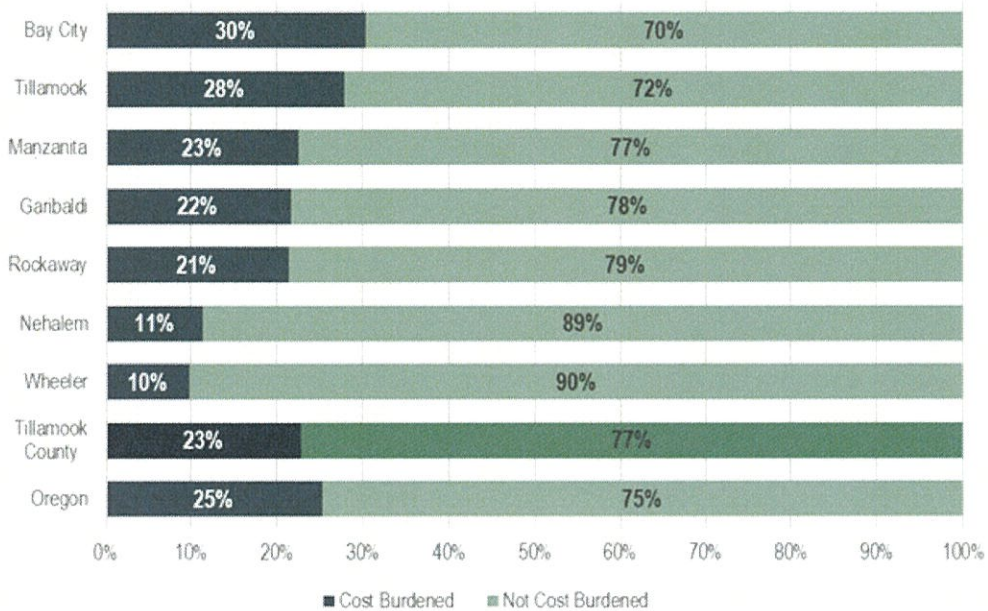
**Exhibit 2.13** further illustrates the link between lower incomes and housing cost burdens. Over 80% of households earning less than \$20,000 were cost burdened in Tillamook County. In fact, almost 60% of households earning less than \$50,000 are paying more than 30% of their income in housing costs.



**Exhibit 2.12**

**Severe Rent Cost Burden, Tillamook County, Oregon, Other Comparison Cities, 2013-2017**

*Based on the assumption that the housing cost burden threshold is 50% of income*

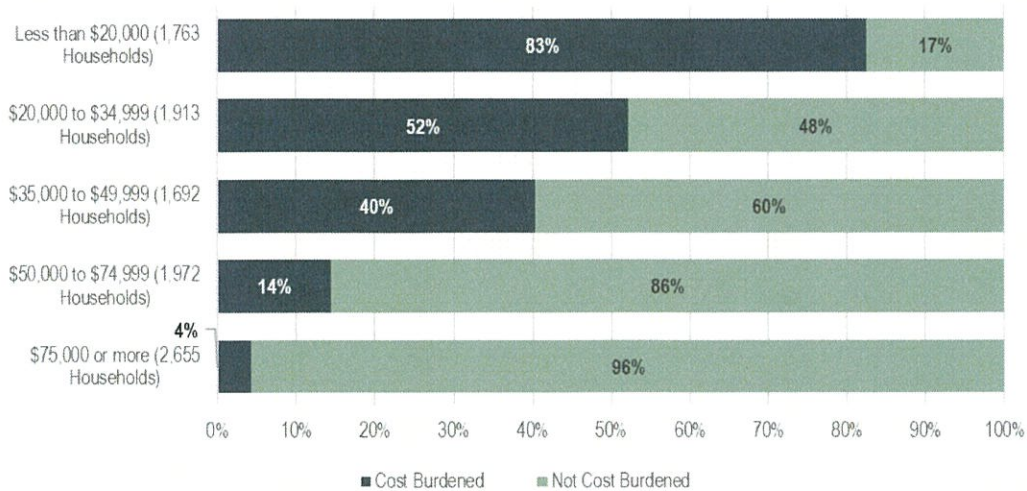


Source: 2013-2017 American Community Survey 5-Year Estimates (Tables B25091 and B25070)

**Exhibit 2.13**

**Housing Cost Burden by Income, Tillamook County, 2013-2017**

*Based on the HUD assumption that the cost burden threshold is 30% of income*



Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates (Tables S2503)

## Workforce Housing Demand

Representatives from local businesses, school districts, hospitals and emergency service sectors (e.g., police and fire districts) have voiced concern over the lack of attainable housing for their employees. Many workers now travel very long distances to jobs in Tillamook County. According to U.S. Census stats, **almost one in four workers in Tillamook County commute greater than 50 miles each way (100 miles per day); which is double the statewide average.** Nearly one in three local workers now reside outside Tillamook County.

Note: These findings are based on U.S. Census On-the-Map Longitudinal Employer-Household Dynamics (LEHD) data which are based on tabulated and modeled administrative employer survey data, which are subject to error. The Quarterly Workforce Indicators (QWI), LEHD Origin-Destination Employment Statistics (LODES), Job-to-Job Flows (J2J), and Post-Secondary Employment Outcomes (PSEO) are available online for public use.

Because the estimates are not derived from a probability-based sample, no sampling error measures are applicable. While no direct measurement of these joint effects has been obtained, precautionary steps are taken in all phases of collection and processing to minimize the impact of nonsampling errors.

As indicated in **Exhibit 2.14**, FCS GROUP has documented market gaps in Tillamook County’s available housing inventory. Conversion of homes to seasonal and vacation rentals, low vacancy rates, and inadequate housing construction levels result in market gaps that can only be corrected by supply additions. Based on relatively low market capture rates, as of year 2017, there is a housing gap of approximately 406 units for housing units needed for moderate income households at 50% to 120% of the area median family income (MFI) level.

In addition, there is also a significant market gap for government assisted housing available to households earning less than 50% of the MFI level. This analysis indicates that the market gap for rental housing at this price point equates to over 600 dwellings. In light of inadequate levels of state and federal housing grants, we have assumed a 33% market capture rate or approximately 200 units of low income housing demand is needed at this time.

**Exhibit 2.14 Existing Housing Market Gaps, Tillamook County**

### Current Housing Market Gap for Housing at 50% to 120% MFI or higher, Tillamook County

		Total Dwelling Units	Rental Units	Owner Units
Existing Workers in Tillamook County	9,476			
Long Distance commuters (over 100 miles per day)	2,030			
Market Demand Sensitivity Analysis				
Low Capture Rate	15%	305	152	152
Midpoint Capture Rate	20%	406	203	203
High Capture Rate	25%	508	254	254

Based on U.S. Census Bureau, On-The-Map data for Tillamook County, 2017.

**Current Market gap for Housing at less than 50% MFI, Tillamook County**

Affordable Monthly Rent Costs *	Current # of Renter-Occupied Households	Estimated Available Rental Units at this rent level	Housing (Gap) or Surplus	Capture Rate for Analysis	Housing Needed (units)
Less than \$500	1,139	528	(611)	33%	202

Source: U.S. Census Bureau, American Community Survey, 2017. \* Assumes 30% of income towards rent.

This analysis conservatively assumes that the level of near-term pent up market demand could support development of over 400 units of rental housing, with about half needed for households in the 50% to 120% of the MFI level for Tillamook County.

**II.D. FUTURE HOUSING NEEDS**

The methodology includes three housing forecast scenarios which were reviewed and discussed by the Housing Committee. They include:

- Scenario A Baseline Forecast
- Scenario B Baseline + Workforce Housing Forecast
- Scenario C Policy Scenario as modified version of Scenario 2
- Scenario D Midpoint of low and high growth forecasts

**Scenario A: Baseline Housing Demand Forecast**

The future (20 year) housing forecast for Tillamook County takes into account the population and socioeconomic and housing characteristics described earlier.

The baseline forecast applies the long term population forecast by Portland State University, and assumes that current household size, group quarters demand, vacancy rates and seasonal housing rates remain constant. With the baseline forecast, Tillamook County is projected to add 2,936 people which will require 2,305 new dwellings over the next 20 years. If the future housing demand is distributed within Tillamook County based on the current housing mix, the 20-year housing demand in the unincorporated areas would equate to 510 dwellings, and the various incorporated area UGBs would need to accommodate the remaining 1,795 housing unit (see **Exhibit 2.15**).

**Exhibit 2.15 Scenario A Baseline Forecast**

**Baseline Housing Demand Forecast, Tillamook County, 2019-2039**

	Net New Population <sup>1</sup>	Group Quarters Share	Group Quarters Pop. <sup>2</sup>	Avg. HH Size <sup>2</sup>	Occupied Dwellings <sup>2</sup>	Seasonal & Vacancy Rate <sup>2</sup>	Seasonal & Vacant Dwellings	Total Dwelling Need (excl. group quarters)
<b>Unincorporated areas</b>	<b>707</b>	<b>2.6%</b>	<b>18.4</b>	<b>2.41</b>	<b>286</b>	<b>44.0%</b>	<b>225</b>	<b>510</b>
Tillamook UGB	796	0.88%	7.0	2.47	319	8.5%	30	349
Nehalem UGB	370	0.00%	-	3.43	108	25.0%	36	144
Bay City UGB	348	0.00%	-	3.43	101	14.6%	17	119
Manzanita UGB	299	0.00%	-	3.43	87	86.6%	562	649
Rockaway Beach UGB	272	0.00%	-	2.27	120	73.7%	336	456
Garibaldi UGB	73	0.75%	0.5	2.62	28	31.8%	13	41
Wheeler UGB	72	1.45%	1.0	2.62	27	29.4%	11	38
<b>Total</b>	<b>2,936</b>	<b>0.9%</b>	<b>27</b>		<b>1,076</b>	<b>53.3%</b>	<b>1,229</b>	<b>2,305</b>

Notes: <sup>1</sup> population forecast from PSU Population Research Center, interpolated by FCS GROUP; <sup>2</sup> based on 2017 ACS. Numbers may not add due to rounding.

**Scenario B: Baseline + Workforce Housing Forecast**

This scenario includes the baseline housing forecast based on future growth along with a capture of a portion of the current market gap for workforce housing.

As discussed earlier in this report, there is a demonstrated “market gap” for workforce housing in Tillamook County. In this scenario, it is assumed that the overall housing demand over the next 20 years equates to the baseline demand described in Scenario A plus an additional 400 units of pent up demand for rental housing. This would include approximately 200 units of moderate income rental housing attainable to households earning 50% to 120% of the MFI; and another 200 units for households earning less than 50% of the MFI level.

This forecast scenario assumes that the majority of the housing production would occur in communities that can provide water and sanitary sewer service, with capacity that can be increased as needed to accommodate new housing development. As shown in **Exhibit 2.16**, the housing forecast under Scenario B equates to 2,730 dwelling units over 20 years.

**Exhibit 2.16 Baseline + Workforce Housing Forecast Scenario B**

	Demand Dist. (Scenario A)	Demand Dist. (Scenario B)	Pent Up Rental Workforce Housing Need (units)	Baseline Total Housing Need (Scenario A)	Total Housing Need (Scenario B)
Tillamook UGB	15%	25%	106	349	455
Nehalem UGB	6%	5%	21	144	165
Bay City UGB	5%	5%	21	119	140
Manzanita UGB	28%	10%	43	649	691
Rockaway Beach UGB	20%	10%	43	456	499
Garibaldi UGB	2%	5%	21	41	62
Wheeler UGB	2%	5%	21	38	59
Subtotal UGBs	78%	65%	276	1,795	2,071
<b>Unincorporated areas</b>	<b>22%</b>	<b>35%</b>	<b>149</b>	<b>510</b>	<b>659</b>
<b>Total Dwelling Units</b>	<b>100%</b>	<b>100%</b>	<b>425</b>	<b>2,305</b>	<b>2,730</b>

### Scenario C: Coordinated Policy Forecast

This scenario assumes that same level of overall Countywide housing demand as with Scenario B, but takes into account the fact that many of the coastal communities may have achieved market prices for land and housing that is out of reach for most residents. Small cities and resort communities in Tillamook County may not be capable of accommodating all of the potential market demand. Limiting factors may include inadequate infrastructure (particularly sewer) and environmental risks associated with developing housing in floodways, floodplains and tsunami hazard areas.

As shown in **Exhibit 2.17**, with this scenario it is assumed that the share of housing demand that will be accommodated within incorporated cities is 59% of total demand, down from about three quarters of total demand in the prior scenarios. Hence, the level of demand that would need to be addressed within unincorporated portions of Tillamook County would increase to 41% of the Countywide housing demand, compared with 22% to 24% in Scenarios A and B.

**Exhibit 2.17 Housing Market Share by Scenario**

	Demand Dist. (Scenario A)	Demand Dist. (Scenario B)	Demand Dist. (Scenario C)	Total Housing Need (Scenario C)
Tillamook UGB	15%	17%	30%	819
Nehalem UGB	6%	6%	5%	137
Bay City UGB	5%	5%	5%	137
Manzanita UGB	28%	25%	5%	137
Rockaway Beach UGB	20%	18%	10%	273
Garibaldi UGB	2%	2%	2%	55
Wheeler UGB	2%	2%	2%	55
Subtotal UGBs	78%	76%	59%	1,611
<b>Unincorporated areas</b>	<b>22%</b>	<b>24%</b>	<b>41%</b>	<b>1,119</b>
<b>Total Dwelling Units</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>2,730</b>

## Comparison of Housing Forecast Scenarios

These findings indicate that the future housing market in Tillamook County is expected to remain strong, barring natural disasters or global or national economic downturns. Population increases due largely to second home investors will likely account for just over half of the future housing demand. In order for housing prices and rents to be attainable to households at 120% or less of the local median income level for the County (\$45,060), for sale housing would need to be priced at \$299,000 or less and rentals priced at \$1,352 or less (per month for 2 bedroom unit). For additional analysis of housing affordability levels, please refer to **Appendix A**.

**Exhibit 2.18** provides a comparison of the housing demand within local areas for each of the three forecast scenarios. The findings indicate a low and high range of housing needs along with a mid-point demand forecast, which is referred to as Scenario D.

**Exhibit 2.18**

<b>Tillamook County 20-year Housing Forecast Scenarios (dwelling units)</b>			
	<b>Scenario A</b>	<b>Scenario B</b>	<b>Scenario C</b>
Tillamook UGB	349	455	819
Nehalem UGB	144	165	137
Bay City UGB	119	140	137
Manzanita UGB	649	691	137
Rockaway Beach UGB	456	499	273
Garibaldi UGB	41	62	55
Wheeler UGB	38	59	55
Subtotal UGBs	<b>1,795</b>	<b>2,071</b>	<b>1,611</b>
Unincorporated areas	<b>510</b>	<b>659</b>	<b>1,119</b>
<b>Total Dwelling Units</b>	<b>2,305</b>	<b>2,730</b>	<b>2,730</b>

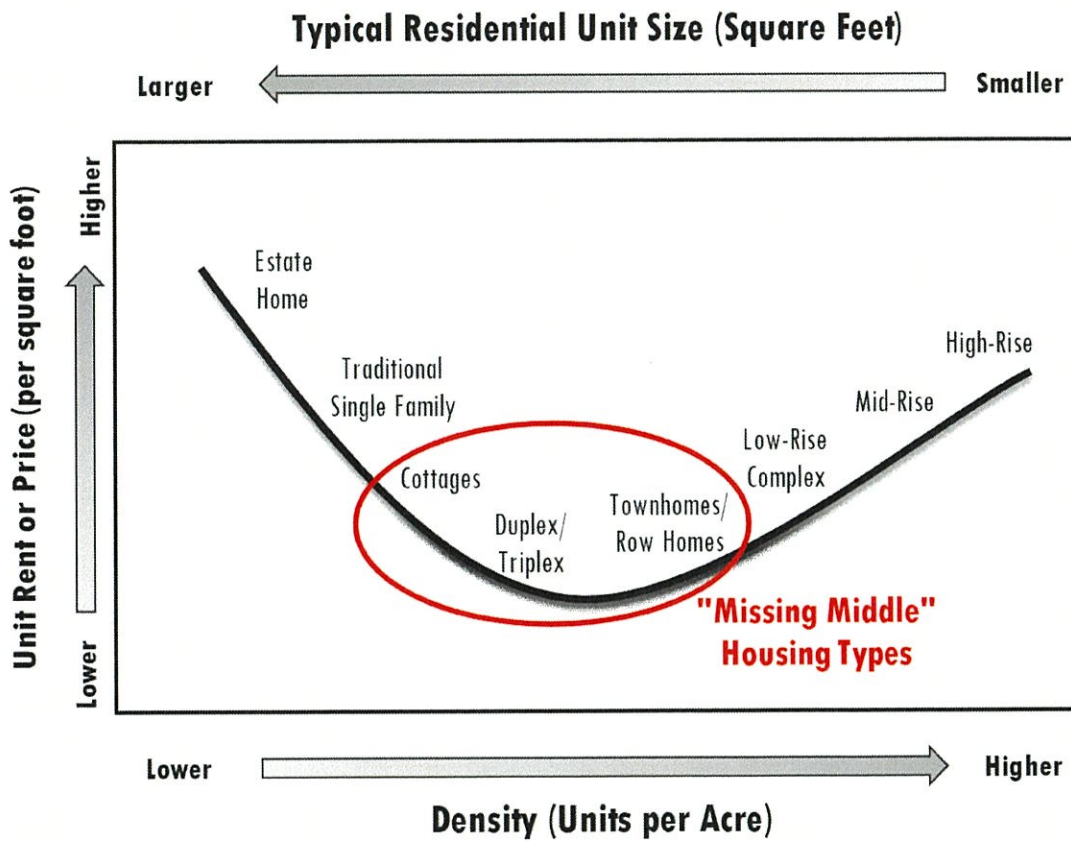
	<b>Low</b>	<b>High</b>	<b>Midpoint (Scenario D)</b>
Tillamook UGB	349	819	584
Nehalem UGB	137	165	151
Bay City UGB	137	140	138
Manzanita UGB	137	691	414
Rockaway Beach UGB	273	499	386
Garibaldi UGB	55	62	58
Wheeler UGB	55	59	57
Subtotal UGBs	<b>1,141</b>	<b>2,435</b>	<b>1,788</b>
Unincorporated areas	510	1,119	815
<b>Total Dwelling Units</b>	<b>1,651</b>	<b>3,554</b>	<b>2,603</b>

Source: prior exhibits.

## Projected Needs by Housing Type

In light of the current housing affordability challenges, the future demand for attainably priced housing within Tillamook County will need to increase measurably in the future. This would require development of affordable “missing middle” housing types, such as market rate and government assisted plexes, townhomes and apartments as well as cottage homes, manufactured homes and accessory dwelling units (ADUs). As shown in **Exhibit 2.19**, these housing types can be delivered at a lower cost and rent level per square foot than other housing types.

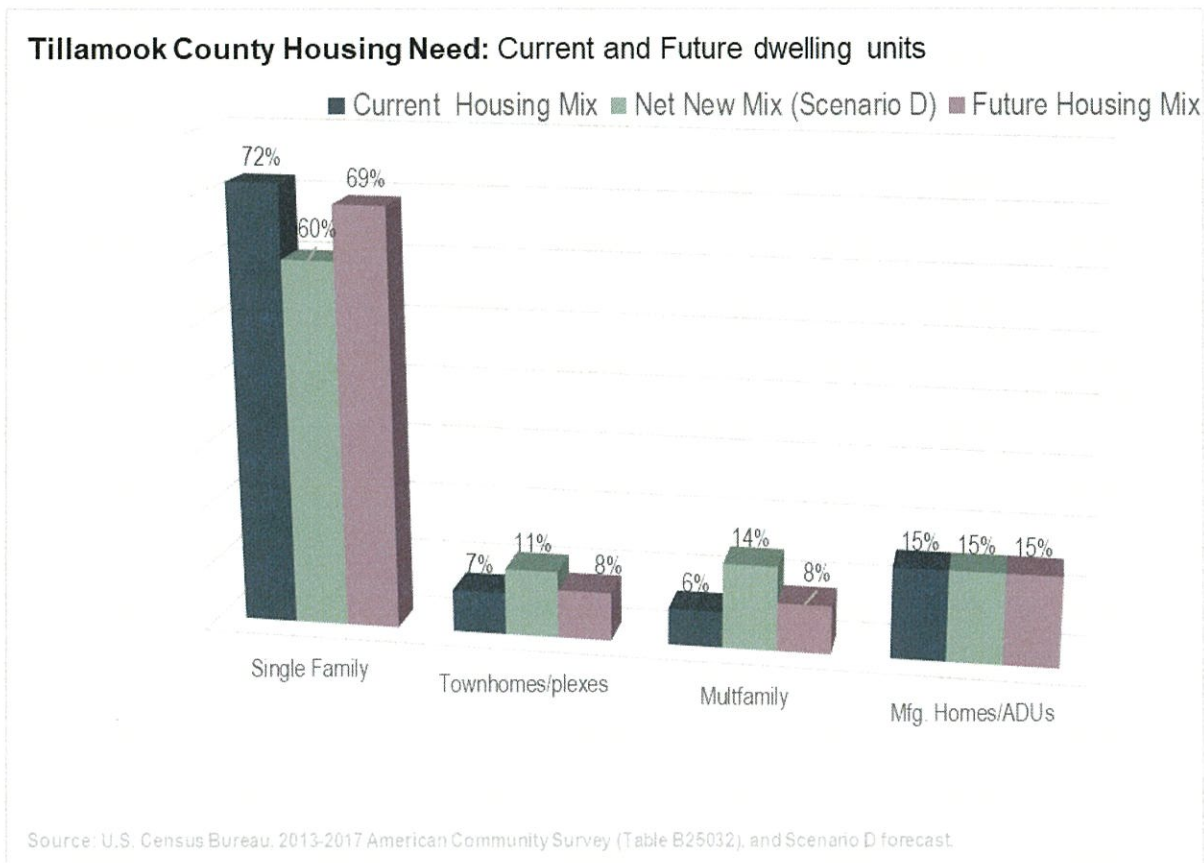
Exhibit 2.19



The forecasted housing mix that addresses future demand will likely consist of: 1,562 single-family detached homes (including cottage homes), 286 townhomes/duplexes/ADUs, 364 multifamily housing units and 390 manufactured housing units (see **Exhibit 2.20**). There will also be some “group quarters” housing demand for about 30 additional residents that will require shared living arrangements (such as congregate care or interim housing).

The graph below juxtaposes the housing mix in Tillamook County today compared with the projected mix of units to be added in the next twenty years and the overall housing mix observed in the county after twenty years. As shown in **Exhibit 2.21**, the Policy Scenario D would increase the overall share of multifamily, townhomes, and plexes in comparison to the current mix. The share of single family detached housing would decline and the share of manufactured housing would remain relatively constant.

**Exhibit 2.20**



At midpoint of the forecast scenarios (Scenario D), the net new housing need is expected to consist of: 1,796 owner-occupied dwellings and 807 renter-occupied dwellings. As shown in **Exhibit 2.21**, the types of housing that is most suited to meet qualifying income levels for home ownership vary by family income level. The owner and rental housing forecast that's suited to meet qualifying income levels is shown below



**Exhibit 2.21 Current and Future Housing Mix, Scenario D**

	Current Housing Mix	Net New Housing Mix (Policy Scenario C)	Future Housing Mix
Single Family	72%	60%	69%
Townhomes/Plexes	7%	11%	8%
Multi family	6%	14%	8%
Mfg. home / other	15%	15%	15%
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

	Current Housing Mix	Net New Housing Mix (Policy Scenario C)	Future Housing Mix
Single Family	7,501	1,562	9,063
Townhomes/Plexes	781	286	1,067
Multi family	641	364	1,005
Mfg. home / other	1,531	390	1,921
<b>Total</b>	<b>10,454</b>	<b>2,603</b>	<b>13,057</b>

**Source:** prior exhibits.

As we consider the demand for housing by affordability level, the vast majority of housing demand needs will be from households at 120% or below of the Median Family Income level for Tillamook County (see **Exhibit 2.22**).

For additional analysis regarding housing affordability price points for owner occupied and renter occupied housing please refer to **Appendix A**.

**Exhibit 2.22 Forecasted Housing Demand by Affordability (Scenario D)**

Approximate Attainable Home Price*	Owner-Occupied	Renter-Occupied	Total	Dist. %	Attainable Housing Products
Upper (120% or more of MFI)	790	166	956	36.7%	Standard Homes, Townhomes, Condos
Upper Middle (80% to 120% of MFI)	647	135	782	30.0%	Small Homes, Townhomes, Apartments
Lower Middle (50% to 80% of MFI)	269	163	433	16.6%	ADUs, Townhomes, Mfgd. Homes.
Low (30% to 50% of MFI)	90	190	279	10.7%	Govt. Assisted Apts. & Plexes
Very Low (less than 30% of MFI)	0	153	153	5.9%	Govt. Assisted Apts.
<b>Total</b>	<b>1,796</b>	<b>807</b>	<b>2,603</b>	<b>100.0%</b>	

\*Assumes 30% of income is used for rental or mortgage payments. Derived from Appendix A.

## Projected Residential Land Needs

Using the mid-points of the housing demand forecasts, the buildable land that will be needed to accommodate planned housing production is shown in **Exhibit 2.23**. **At the midpoint of the growth forecast scenarios (Scenario D), the overall amount of residential land that will be needed within all of Tillamook County over the next 20 years equates to just over 1,340 buildable acres of land area.**

It should be noted that actual gross land needs could be much higher given the limited availability of sewer infrastructure capacity with in Tillamook County.

The forecast of residential land that is needed within each local community and incorporated cities is provided below by general land use type (low, medium and high density) for discussion and policy planning purposes.

**Exhibit 2.23**

<b>Tillamook County 20-year Housing Land Need Forecast at Midpoint</b>										
	Total Housing Need (Midpoint)	Housing Mix*				Land Need (Buildable acres)				Total Land Need (buildable acres)
		Very Low Density (single family homes)	Low Density (single family and mfg. homes)	Medium Density (townhomes, plexes)	Higher Density (apartments)	Very Low Density	Low Density	Medium Density	Higher Density	
Tillamook UGB	584	-	292	124	169	-	97	21	14	132
Nehalem UGB	151	-	75	32	44	-	25	5	4	34
Bay City UGB	138	-	69	29	40	-	23	5	3	31
Manzanita UGB	414	-	207	88	120	-	69	15	10	94
Rockaway Beach UGB	386	-	193	82	112	-	64	14	9	87
Garibaldi UGB	58	-	29	12	17	-	10	2	1	13
Wheeler UGB	57	-	28	12	17	-	9	2	1	13
Subtotal UGBs	<b>1,788</b>	-	<b>894</b>	<b>378</b>	<b>518</b>	-	<b>298</b>	<b>63</b>	<b>43</b>	<b>404</b>
Unincorporated areas**	<b>815</b>	<b>407</b>	326	81	-	<b>815</b>	109	14	-	<b>937</b>
<b>Total</b>	<b>2,603</b>	<b>407</b>	<b>1,220</b>	<b>460</b>	<b>518</b>	<b>815</b>	<b>407</b>	<b>77</b>	<b>43</b>	<b>1,341</b>
*Assumes mix and density as follows:										
	City/Town Housing Mix	Unincorp. Area Mix**	Dwellings per acre (avg.)							
Very Low Density*	0%	50%	0.5							
Low Density	50%	40%	3							
Medium Density	21%	10%	6							
Higher Density	29%	0%	12							
<b>Total</b>	<b>100%</b>	<b>100%</b>								
Source: compiled by FCS GROUP based on midpoint of housing forecast scenarios and expected market demand.										

## Section III. BUILDABLE LAND INVENTORY

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This section includes a summary of the residential buildable land inventory (BLI) in Tillamook County. The focus of this 2019 BLI analysis is on the following geographic areas:

- Tillamook County, unincorporated areas outside existing urban growth boundaries (UGBs)
- Tillamook UGB
- Manzanita UGB
- Bay City UGB

In addition to these locations, this report cites findings from prior adopted plans and BLI studies to ascertain buildable lands in the following locations:

- Garibaldi UGB
- Nehalem UGB
- Rockaway Beach UGB
- Wheeler UGB

### METHODOLOGY

As part of Tillamook County's Housing Needs Analysis process, an estimate of buildable lands was completed to assess the supply of available land for housing development in unincorporated areas as well as three cities that opted to update their land inventories at this time. The Buildable Lands Inventory (BLI) was completed in accordance with OAR 660-008-0005 (2) and guidance provided by the Department of Land Conservation and Development (DLCDC).<sup>1</sup>

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<sup>1</sup> While Oregon state regulations pertaining to BLI methods apply only to UGBs of incorporated areas, the same methodology was applied to unincorporated portions of Tillamook County with one exception which was reviewed by the Housing Committee: the removal of 100-year flood zones from the vacant land inventory for unincorporated areas only. The BLIs for incorporated areas assume land within 100-year flood zones is considered to be unconstrained and buildable.

The objective of the residential BLI is to determine the amount of developable land available for future residential housing development. The steps taken to perform this analysis are as follows:

1. Create a unified environmental constraints layer. These are areas where land is unsuitable for development due to natural hazards
2. Generate the residential land base by identifying all taxlots that are zoned to allow residential development (either permitted outright or as a conditional use)
3. Subtract all environmentally constrained land from the residential land base
4. Classify land by development category (vacant, partially vacant, or redevelopable)
5. Calculate total net buildable acres by netting out land needed for public facilities such as roads and utility infrastructure and factoring a redevelopment rate for parcels deemed redevelopable

**Please refer to the separate Tillamook County Residential Buildable Land Inventory reports by Cascadia Partners for additional details regarding the methodology used for each location.**

## ALL AREAS OF THE COUNTY

An estimate of the total buildable land for residential development is provided in **Exhibit 3.1**. The results indicate that overall there is over 3,700 acres of buildable residential land area throughout the county, with the vast majority located in unincorporated areas.

It should be noted that the term density is used to reflect the average number of housing units per buildable acre on a particular site. Density is a relative term that generally reflects the type of housing that a land use zone is planned to accommodate. Based on local construction trends and market activity in Tillamook County, the density and housing types generally fall into the following categories:

- Very Low Density: 1 dwelling per 2 acres on average. Rural development typically relies on septic systems and connections to local water systems.
- Low Density: average of 3 dwellings per acre. Typically single family detached housing or mobile homes.
- Medium Density: 6-9 dwellings per acre. May include duplexes, townhomes and small lot cottage homes.
- High Density: typically 9-18 dwellings per acre. Includes townhomes and apartments.

## TILLAMOOK COUNTY (UNINCORPORATED AREAS)

Based on the BLI finding for the unincorporated portions of Tillamook County shown in **Exhibit 3.2 and Map 3.1**, approximately 2,135 acres of land are available in the residential buildable lands inventory. Not surprisingly, as most of unincorporated Tillamook County is rural, most of the land available falls under low density residential zoning (roughly 54%). Medium density residential and high density residential make up 34% and 10% of the residential buildable lands inventory

respectively. Only 2% of the residential land base is comprised of land zoned as commercial / mixed-use.

Vacant land represents by far the largest opportunity for development, comprising more than 95% of the land available in the buildable lands inventory. While less partially vacant and redevelopable land is available, the location of specific parcels are important as they may represent geographies where development is highly desired (i.e., areas close to commercial cores) or where infrastructure (water and sewer) is available.

**Exhibit 3.1: Summary of Residential Buildable Lands Inventory, Unicorp. Tillamook County (acres)**

Location (BLI Source)	Relative Zoned Housing Density Class				Total
	Very Low	Low	Medium	High	
County Commercial (Cascadia 2019)	30		25		54
County Residential Zones (Cascadia 2019)	1,710	286	11	11	2,017
Manzanita UGB (Cascadia 2019)		52	69	6	127
Neahkahnie (Cascadia 2019)		13	25	76	114
Nehalem (2018)		207	95	43	345
Nehalem (COG 2007)		36	94	19	149
Neskowin (Cascadia 2019)	235	158	2	0	395
Netarts (Cascadia 2019)		59	56	18	133
Oceanside (Cascadia 2019)		82	1		82
Pacific City (Cascadia 2019)	30	49	34	83	196
Tillamook UGB (Cascadia 2019)	-	-	17	45	62
Wheeler (COG 2007)		61	18		79
<b>Total</b>	<b>2,004</b>	<b>1,001</b>	<b>446</b>	<b>302</b>	<b>3,753</b>

**Source:** various Tillamook County and local area Buildable Land Inventory studies, as noted.

**Exhibit 3.2: Residential Buildable Lands Inventory, Unincorporated Tillamook County, 2019**

Housing Category	Vacant	Partially Vacant	Redevelopable	Total Buildable
Very low density Residential	1,097	27	21	1,145
Medium Density Residential	694	29	4	727
High Density Residential	205	8	1	214
Commercial / Mixed-use	45	2	1	48
<b>Total:</b>	<b>2,042</b>	<b>66</b>	<b>27</b>	<b>2,135</b>

**Source:** Tillamook County Buildable Land Inventory by Cascadia Partners et al., September 2019.

**Incorporated Cities**

In addition to the 2019 BLI studies by Cascadia Partners and FCS GROUP, other communities in Tillamook County have completed residential buildable land inventories (BLIs) within the last 15 years. The objective of the residential BLI is to determine the amount of developable land available for future residential housing development within the UGB. BLI highlights include the following

- **Tillamook:** draft findings by FCS GROUP/Cascadia Partners indicate that there is a current need for additional low- and medium-density zoned land area within the Tillamook UGB that ranges from approximately 48 to 76 acres of net buildable land area.
- **Nehalem:** according to the City of Nehalem, no residential land shortages were identified for the planning horizon (2007-2027) with an overall residential buildable land **surplus of 121.4 acres**. The City is in the process of approving a new buildable land inventory which indicates a **supply of 377.15 acres of residential land**. That BLI work is still in process.
- **Wheeler:** according to the City, no residential land shortages were identified for the planning horizon (2007-2027) with an overall residential buildable land **surplus of 66.7 acres**.
- **Rockaway Beach:** according to the City of Rockaway Beach, no residential land shortages were identified for the planning horizon (2007-2027) with an overall residential buildable land **surplus of 57 acres**.
- **Bay City:** Buildable Land Inventory is in process; however Housing Needs Analysis appears to be outdated.

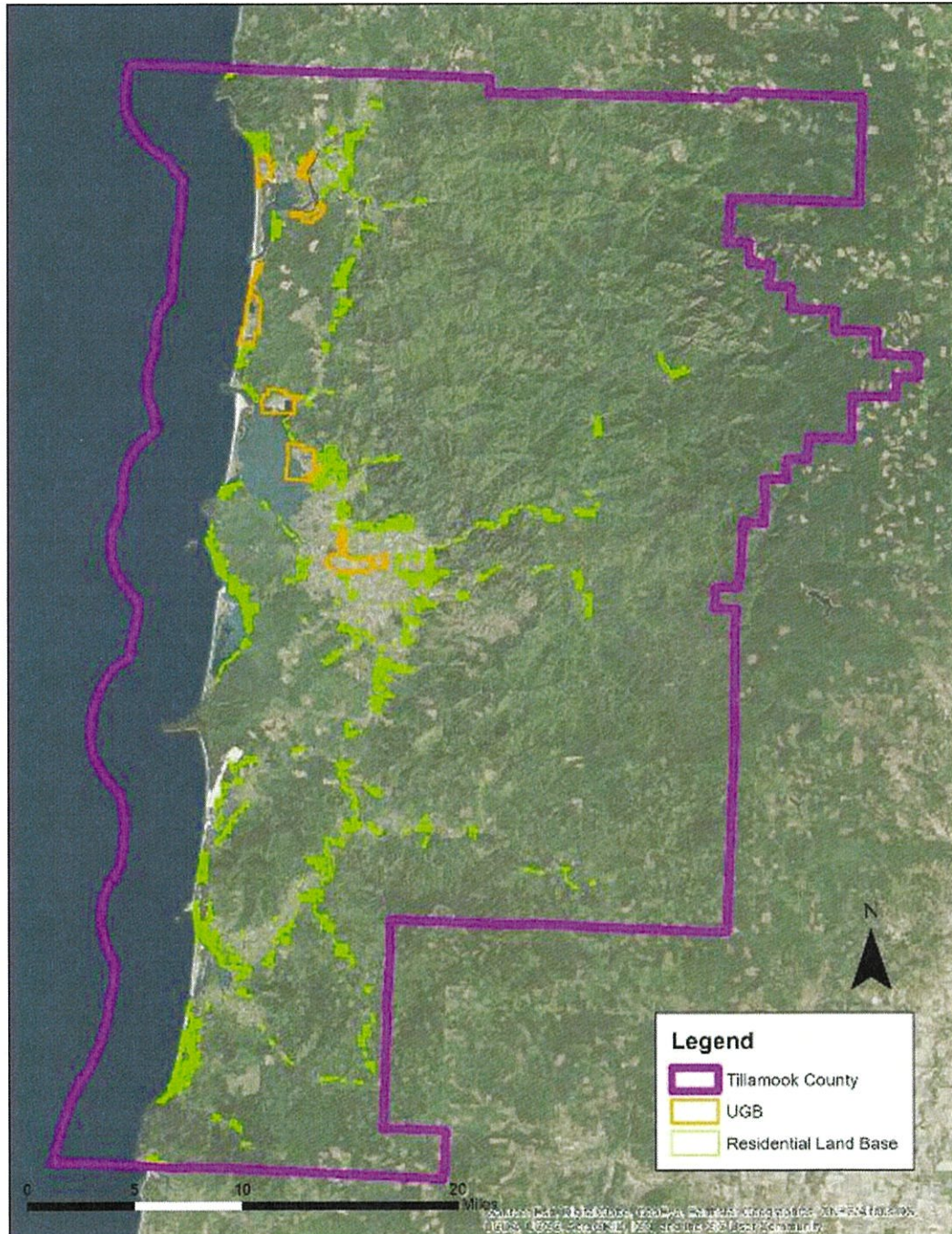
- **Manzanita:** FCS/Cascadia identified a total land inventory of 122 net acres (residential zones) plus 4 acres of mixed use zoning (BLI adopted by City in Sept. 2019). This level of supply appears to be adequate for meeting the 20 year demand identified earlier in this report (94 acres at midpoint of low and high forecast scenarios).

These findings indicate the City of Tillamook may be able to justify a UGB expansion or a Comprehensive Plan amendment and with changes in zoning to allow for more housing. However, it is unlikely that other cities can do so in the near future.

In light of the significant level of housing demand outside the incorporated cities and their urban growth boundaries, and the desire to encourage more development in those locations, several local and state policy actions are identified in the next Section of this report for additional consideration.



Map 3.1 Residential Land Base, Unincorporated Tillamook County



## Section IV. ACTION PLAN

# POLICY RECOMMENDATIONS

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This section summarizes relevant federal and state housing policies and identifies a set of Action Plan recommendations.

### RECENT POLICIES

Several recent policy changes have occurred at the federal, state and regional level that may affect the future housing supply and demand in Tillamook County.

#### Federal Policies

##### **Tax Cuts and Jobs Act**

Passed in 2017, the Tax Cuts and Jobs Act initiates large scale federal tax reform. The reform made changes in many ways but most notable was the shift in the federal corporate tax rate, decreasing from 35% to 21%. The new tax cuts also lower most individual income tax rates, including the top marginal rate from 39.6 percent to 37 percent. The lower tax rates potentially affect Tillamook County and its municipalities because it makes tax free municipal bonds and affordable housing tax credits less attractive to investors because the relative advantage of lowering taxable income by investing in tax exempt bonds would decrease in most cases. However, with the adoption of measure 102 (see below), Oregon voters have expressed the need for investing in affordable housing bonds, and these state measures should mitigate the impact of this federal act.

##### **Low Income Housing Tax Credits**

The Low Income Housing Tax Credits program is a series of tax incentives administered by the IRS to encourage developers to construct affordable housing. Currently the program accounts for the largest source of new affordable housing in the U.S. In securing these credits, developers agree to rent out housing at an affordable level, often below market price (this is referred to as a use restriction). State agencies distribute credits to developers based on a state designed application process. These credits come in two forms, 9% (this raises about 70% of total cost) and 4% (this raises about 30% of the total cost), where 4% tax credits are often complimented with support from state bonds. In Oregon and in Tillamook County's case, Measure 102 (see below) should enable more funding of housing tax credit bonds and strengthen the effect of these tax credits on a for affordable housing development in Tillamook County.

## Oregon Policies

### **Oregon's Statewide Housing Plan: "Breaking New Ground"**

Oregon's 2018 Statewide Housing Plan is a long-term plan designed to increase housing in Oregon. The plan was researched and developed by Oregon Housing Community Services (OHCS) and its implementation will rely on OHCS in conjunction with local governments and private businesses. OHCS is Oregon's housing finance agency and as such the organization issues grants and loans to help facilitate home ownership in the state. OHCS regards housing in Oregon as a statewide crisis. Housing production has failed to keep up with Oregon's population growth therefore demand has outpaced supply, pushing up home prices. From 2000 to 2015, an additional 155,156 housing units would need to have been built throughout Oregon to keep up with demand.<sup>2</sup>

The Statewide Housing Plan calls for over 85,000 new units to be constructed for households earning below 30% of Median Family Income (MFI). The plan is outlined in six priorities and each promotes increased housing supply. Priorities include an increase housing supply that: (1) improves racial equity; (2) combats homelessness; (3) increases housing stability for families; (4) makes rent affordable; (5) proliferates homeownership; and (6) empowers rural communities. With this in mind, OHCS will triple the existing pipeline of affordable rental housing — up to 25,000 homes in the development pipeline by 2023.

The plan proposes increased access to housing through partnerships with community organizations, loans with low interest rates, better access to OHCS resources, funding grants for housing projects, improved technology, and streamlined processes with a foundation of collaboration. Implementation seems to rely on each area's ability to utilize and engage with OHCS as the plan clarifies goals and does not specify implementation policies.

### **Senate Bill 1533**

Enacted by the 2016 Oregon Legislature, this bill aims to promote affordable housing development through local regulations and a new source of funding: the Affordable Housing Construction Excise Tax (CET). The bill allows municipalities to adopt regulations that impose conditions on development for new multifamily structures (20 units or more per project), including: requirements for the inclusions of some affordable housing; or the option of paying an in-lieu fee (construction excise tax) not to exceed \$1 per square foot of floor area for residential, and \$0.50 per square foot for nonresidential structures (with a maximum cap of \$25,000 per building or structure). For new

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<sup>2</sup> Up for Growth, "Housing Underproduction in the U.S.: Economic, Fiscal and Environmental Impacts of Enabling Transit-Oriented Smart Growth to Address America's Housing Affordability Challenge," Up For Growth National Coalition, 2018, 9.

affordable housing projects, this legislation supports special incentives including: full or partial exemption of ad valorem property taxes, SDC waivers or reductions and other incentives.

**Tillamook County voters soundly defeated a local CET ballot measure in 2017, and there is little appetite to pursue another CET at this time.**

#### **Measure 102: Passed by Oregon voters in November 2018**

Measure 102 is intended to empower the collaborative partnerships described in Oregon's Statewide Housing Plan. Measure 102 amends the state's constitution to allow cities and counties to issue bonds for the construction of affordable housing construction without retaining 100% public ownership of the property. The goal is to allow local governments to pursue private public partnerships to better facilitate demand for housing.

## KEY FINDINGS AND POLICY RECOMMENDATIONS

Based on the 20-year population growth forecasts for Tillamook County (forecasted increase of 2,936 year-round residents) and seasonal housing and demographic characteristics, **the recommended housing needs for Tillamook County requires 2,305 to 2,603 net new dwelling units.** The Tillamook County Housing Needs Analysis supports a variety of housing is needed over the next 20 years, including approximately 1,692 owner-occupied dwellings and 911 renter-occupied dwellings.

### Recommended Actions

Market factors combined with limiting state and local land use policies have led to unprecedented housing challenges facing Tillamook County today. Addressing these challenges will require a coordinated effort by local and state government officials.

**Vacancy rates for long-term rental units are now near zero in most communities in Tillamook County.** While there is a strong and stable level of near term and long term demand for new housing construction throughout Tillamook County, there are very few local builders/developers that are focused on constructing the missing middle housing types needed for the workforce. To attract private investment and development of new workforce housing, a mix of local, state and federal policies, incentives and actions need to occur.

#### **Local Policies and Actions**

**Challenge: Relatively high land and development costs in coastal areas hamper financial viability of developing attainable workforce housing for permanent residents. As a result, Tillamook County has an existing deficit for "missing middle" housing.**

Tillamook County is tied for the second highest rate of economically distressed households in Oregon. Cities including Tillamook and Bay City have the highest share of severe rent burdened households at 28% and 30% of households, respectively.

To help encourage or incentivize construction of missing middle housing priced at 120% or below of the median family income levels, the County should continue to pursue state OHCS housing investment grants and work with local cities to consider the following policies:

### Short-term Actions (1-2 years)

- ✓ Identify public-owned properties (excluding park/open space areas) that could be developed for a mix of housing types.
- ✓ Work with cities and sewer districts to update SDCs so that they are lower for smaller housing units than larger homes. Encourage SDC deferrals so that payments can be deferred for a period of time after building permit issuance for developments that contain deed restricted housing units.
- ✓ Consider a tax abatement program, such as the multiple-unit limited tax exemption program to promote development of affordable housing.
- ✓ Embark on a program that encourages Accessory Dwelling Units (ADUs) and “Cottage Homes” and “Tiny Home Communities” as an allowed use or conditional use within low density zones.
- ✓ Allow “lot size averaging” so that the site of individual lots in a short-plat development can vary from the zoned minimum or maximum density, in a manner that the overall development still meets average lot size requirements.
- ✓ Encouraging upper-level redevelopment and conversions in downtown Tillamook and other locations through financial assistance programs, such as use of urban renewal funds as loans.
- ✓ Tillamook County and its eligible local communities should leverage CDBG funds, state grants and bonds to help communities expand water, sewer and transportation infrastructure within areas planned for workforce housing through establishment of local improvement districts or reimbursement district programs.



### Long-term Actions (2-5 years)

**Challenge: locations with available sewer capacity are limited to areas such as the city of Tillamook.**

- ✓ Support Tillamook UGB expansion and potential rezoning efforts that result in additional housing development opportunities. The current Tillamook UGB contains 98 acres of buildable residential land inventory, yet residential land needs are forecasted to be up to 175 acres. In light of this finding the City and County should identify ways to increase low and medium density housing development opportunities through a UGB expansion
- ✓ Work local sewer and water districts to document their current and planned capacity levels to address future housing needs and inform the county wide housing strategy.

**Challenge: Tillamook County like many rural locations has a short supply of qualified residential construction workers and specialty contractors.** This results in higher housing prices as construction workers and crews must be obtained from the Willamette Valley region and temporarily housed.

- ✓ Facilitate development of trade related certification programs for people interested in residential construction and trades offered by Tillamook Bay Community College and Tillamook High School in partnership with home builders and general contractors.

### State Policies and Potential Actions<sup>3</sup>

**Challenge: Oregon planning requirements for urban areas hamstring local cities and counties ability to create coordinated and creative housing strategies.**

- ✓ Engage DLCD and Oregon Legislature to draft new planning guidelines for rural counties (e.g., population under 50,000) to adopt a coordinated county-wide Housing Needs Strategy. This would enable jurisdictions to prepare housing strategies that meet PSU's baseline forecasts countywide and allows for a localized allocation of housing and population (among cities and rural centers). This regional HNA approach would be intended to reflect unique market conditions and development opportunities and constraints in order to optimize the provision of more attainable housing.
- ✓ Engage DLCD and Oregon Legislature to include new state rules that allow rural development centers (outside UGBs) to rezone land for housing as long as there are adequate public facilities.

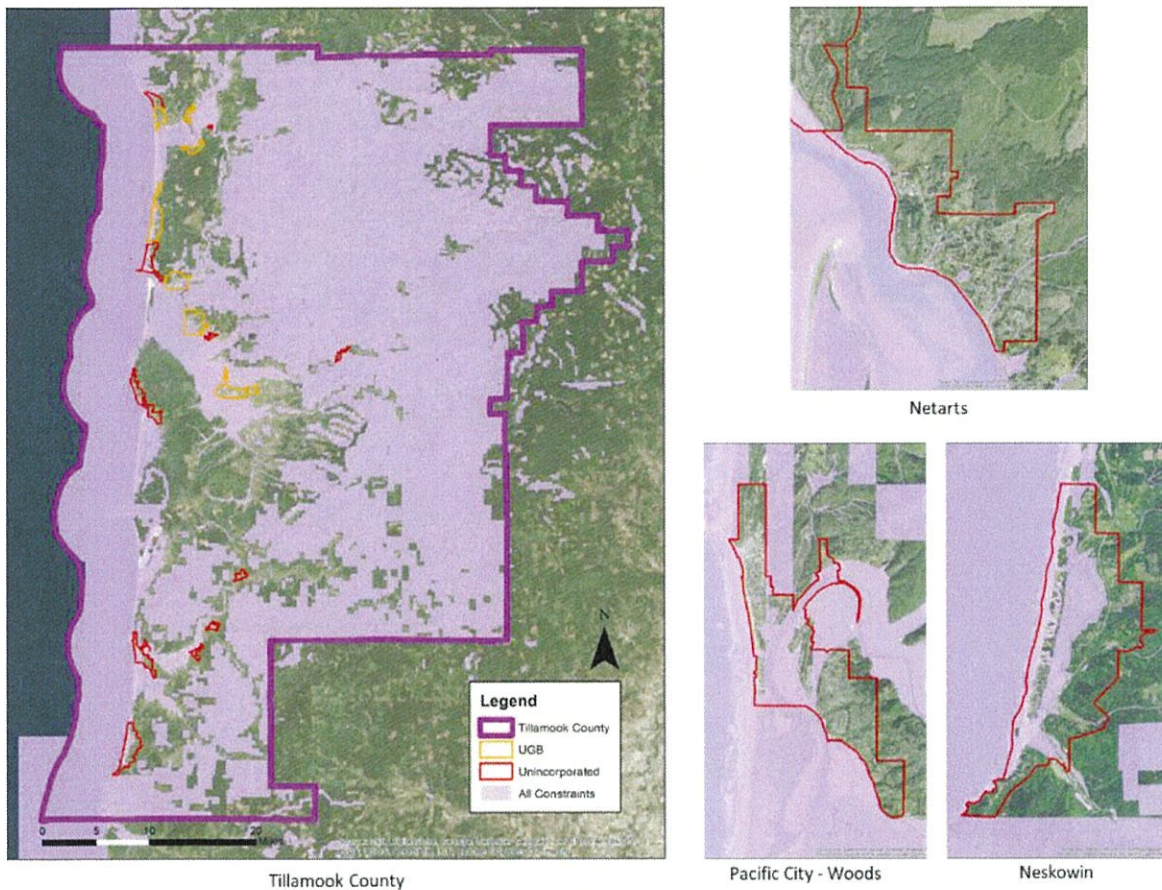
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<sup>3</sup> Input received from DLCD staff regarding current interpretation of state rules applying to local HNAs and Economic Opportunity Analysis (EOA) compliance is provided in Appendix B.

**Challenge:** Tillamook County has a large share of vacant lands in areas that are subject to frequent flooding and agricultural use restrictions. This restricts the amount of development that is likely to occur in rural residential zones (see **Map 3.2**).

- ✓ The County should pursue Oregon Legislature initiated amendments to the Oregon Administrative Rules to allow property owners to transfer future development rights (TDRs) from environmentally sensitive areas (such as vacant land within floodplains and tsunami hazard zones) and agricultural areas onto receiving areas that are located in communities that can provide adequate public facilities, such as roads, sewer and water services.

**Map 3.2 Constrained Land Areas**



## APPENDIX A. HOUSING ATTAINABILITY ANALYSIS

### Appendix A. Housing Attainability Analysis for Tillamook County

Median Family Income Level (2017)*		\$45,061	
<b>Market Segment by Income Level</b>			
	<b>Lower-end</b>	<b>Upper-End</b>	
High (120% or more of MFI)		120%	
Upper Middle (80% to 120% of MFI)	80%	120%	
Lower Middle (50% to 80% of MFI)	50%	80%	
Low (30% to 50%)	30%	50%	
Very Low (less than 30% of MFI)	30%		
<b>Qualifying Income Level</b>			
	<b>Lower-end</b>	<b>Upper-End</b>	
High (120% or more of MFI)	\$54,073	or more	
Upper Middle (80% to 120% of MFI)	\$36,049	\$54,073	
Lower Middle (50% to 80% of MFI)	\$22,531	\$36,049	
Low (30% to 50%)	\$13,518	\$22,531	
Very Low (less than 30% of MFI)	\$13,518	or less	
<b>Available Annual Housing Payment (@30% of income level)</b>			
	<b>Lower-end</b>	<b>Upper-End</b>	
High (120% or more of MFI)	\$16,222	or more	
Upper Middle (80% to 120% of MFI)	\$10,815	\$16,222	
Lower Middle (50% to 80% of MFI)	\$6,759	\$10,815	
Low (30% to 50%)	\$4,055	\$6,759	
Very Low (less than 30% of MFI)	\$4,055	or less	
<b>Available Monthly Rent or Payment (@30% of income level)</b>			
	<b>Lower-end</b>	<b>Upper-End</b>	
High (120% or more of MFI)	\$1,352	or more	
Upper Middle (80% to 120% of MFI)	\$901	\$1,352	
Lower Middle (50% to 80% of MFI)	\$563	\$901	
Low (30% to 50%)	\$338	\$563	
Very Low (less than 30% of MFI)	\$338	or less	
<b>Approximate Attainable Home Price**</b>			
	<b>Lower-end</b>	<b>Upper-End</b>	
High (120% or more of MFI)	\$299,000	or more	
Upper Middle (80% to 120% of MFI)	\$199,000	\$299,000	
Lower Middle (50% to 80% of MFI)	\$104,000	\$166,000	
Low (30% to 50%)	\$62,000	\$104,000	
Very Low (less than 30% of MFI)	\$62,000	or less	

\* based on U.S. Census American Community Survey 2013-17.

\*\* High and upper middle income levels assume 20% down payment on 30-year fixed mortgage at 5% interest.

\*\* Lower middle and low income levels assume 0% down payment on 30-year fixed mortgage at 5% interest.

Source: Housing and Urban Development guidelines, and U.S. Census data, analysis by FCS Group



**Tillamook County Owner-Occupied Housing Needs, 20-year Forecast\***

Family Income Level	Upper Range of Qualifying Income	Upper Range of Home Price*	Attainable Housing Products	Estimated Distribution of Owner-Occupied Units	Projected Owner-Occupied Units Needed
Upper (120% or more of MFI)	Greater than \$54,073	Greater than \$299,000	Standard Homes	44%	790
Upper Middle (80% to 120% of MFI)	\$54,073	\$299,000	Small Homes, Townhomes	36%	647
Lower Middle (50% to 80% of MFI)	\$36,049	\$166,000	Mfgd. Homes, Plexes	15%	269
Low (30% to 50% of MFI)	\$22,531	\$104,000	Govt. Assisted	5%	90
Very Low (less than 30% of MFI)	\$13,518			0%	0
<b>Total Dwelling Units</b>				<b>100%</b>	<b>1,796</b>

\*Assumes 30% of income is used for mortgage payment, with 5% interest, 30-year term with 20% downpayment for upper middle and high income levels, and 5% downpayment for lower income levels.

**Tillamook County Renter-Occupied Housing Needs, 20-year Forecast\***

Family Income Level	Upper Range of Qualifying Income	Upper Range of Monthly Rent*	Attainable Housing Products	Estimated Distribution of Units	Projected Renter-Occupied Units Needed
Upper (120% or more of MFI)	Greater than \$54,073	Greater than \$1,551	Standard Homes, Townhomes, Condos	21%	166
Upper Middle (80% to 120% of MFI)	\$54,073	\$1,551	Small Homes, Townhomes, Apartments	17%	135
Lower Middle (50% to 80% of MFI)	\$36,049	\$1,034	ADUs, Townhomes, Mfgd. Homes, Plexes, Apts.	20%	163
Low (30% to 50% of MFI)	\$22,531	\$646	Govt. Assisted Apts.	23%	190
Very Low (less than 30% of MFI)	\$13,518	\$388	Govt. Assisted Apts.	19%	153
<b>Total Dwelling Units</b>				<b>100%</b>	<b>807</b>

\*Assumes 30% of income is used for rental payments.

## APPENDIX B. DLCD STAFF INPUT

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**From:** "Phipps, Lisa" <[lisa.phipps@state.or.us](mailto:lisa.phipps@state.or.us)>  
**Date:** Monday, December 16, 2019 at 10:40 AM  
**To:** Paul Wyntergreen <[pwyntergreen@tillamookor.gov](mailto:pwyntergreen@tillamookor.gov)>  
**Subject:** FW: HNAs and EOAs

Hi, Paul,

Here are the answers to the questions regarding the life span of a document and HNA approach. I met with Kevin Young in Salem to address these questions:

- 1) Do EOAs have a lifespan? The City of Tillamook had an EOA completed around 2013 and are now looking at updating their HNA, etc. Is it possible that a review of the EOA could show that it is still relevant (or mostly still relevant)? Would a letter just accompany that review showing it is still relevant? Or regardless, do they need to go through a full-blown process?

*In 2013 it should have projected a 20-year need for employment lands. Since then, best practice would be to track what has developed since that time so they have a current understanding of their inventory of employment lands. There's no requirement for periodic updates of EOAs at this time, but what often drives a local gov. to do that is running short on land supply. The most recently adopted EOA remains valid until it is replaced by an updated EOA. There's no expiration date, but if they run out of land it becomes pretty irrelevant.*

- 2) The City of Tillamook is currently having a BLI completed. I held a Planning Commission 101 workshop for the city before Thanksgiving and one of the questions that came up was whether it was acceptable to do a regional HNA? I know that 10-13 years ago, three of the cities and Tillamook County did a regional BLI and HNA with each community getting a HNA that was unique to them as well. So there was this broad overview of the area and its needs and then the community-specific HNAs were completed. Are you comfortable with this approach? Also, the commission asked about Safe Harbor and what pitfalls there might be in moving in that direction.

*I think a regional HNA makes sense, as we discussed. I would not encourage use of the safe harbor methods from Div. 24. Reportedly, those have not worked that well. They created quite a bit of confusion with the recent Dallas HNA.<sup>4</sup>*

Paul, I talked to Kevin about several different ways to approach the HNA. The first was to do an HNA just for the city, but one that included a regional overview given the City's place as the County seat and home of most of the industry. He thought that made good sense but wanted to make sure that in terms of any decisions that might come out of the HNA with this approach, that it was related to the city limits only – but that the overview could provide good context.

The second was that the City partner with the county (and other cities), to do a broader and more global HNA – however, in order for it to be of value for the City (in terms of UGBs, etc.) it would also need to include an HNA specific to the City of Tillamook (and the other cities).

Does that make sense? I did ask, that as you get closer, if we could hold a workshop for Tillamook and he said yes...if you want one!

Thanks!

Lis



**Lisa M. Phipps**

North Coast Regional Representative | Ocean/Coastal Services Division

Cell: 503-812-5448 | Main: 503-842-8222 ext 4004

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<sup>4</sup> Note by T. Chase, FCS GROUP with respect to Safe Harbors. "**Safe harbor**" means an optional course of action that a local government may use to satisfy a requirement of Goal 14 (urbanization) based on projected population, and residential zoned density levels; and if the city needs to expand their urban growth boundary, a safe harbor analysis lends protections from appeals on certain elements which can cost time and money. A safe harbor approach per OAR 660-024-0040(1)-(8) is not the only way or necessarily the preferred way to comply with the requirements of a housing needs analysis. It was employed for the city of Dallas (along with other approaches) as an alternative way of looking at residential land need scenarios for the 20-year forecast. The Dallas City Council successfully adopted their HNA in December 2019 without appeal.

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From: Paul Wyntergreen [mailto:[pwyntergreen@tillamookor.gov](mailto:pwyntergreen@tillamookor.gov)]  
Sent: Monday, December 16, 2019 2:11 PM  
To: Phipps, Lisa <[lhipps@dlcd.state.or.us](mailto:lhipps@dlcd.state.or.us)>  
Cc: Debbi Reeves <[dreeves@tillamookor.gov](mailto:dreeves@tillamookor.gov)>  
Subject: Re: HNAs and EOAs

Thank you Lisa; this is very helpful and yes let's schedule up a workshop for February or March.

It is wonderful to see that a regional approach is a possibility. I am still a bit confused by your last couple of paragraphs; I understand that the City and the County (with other cities) would each do an HNA, but it is unclear as to whether the project demand could be allocated. Since High-premium cities at the beach will probably not produce sufficient approachable housing at rent levels that its service workers could afford, but places like Tillamook City could, is it allowable to assign additional growth allocation to certain cities if agreement is reached between communities?

***Paul Wyntergreen***  
**City Manager**  
**City of Tillamook**  
**210 Laurel Avenue**  
**Tillamook, OR 97141**

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**From:** "Phipps, Lisa" <[lisa.phipps@state.or.us](mailto:lisa.phipps@state.or.us)>  
**Date:** Friday, December 20, 2019 at 1:29 PM  
**To:** Paul Wyntergreen <[pwyntergreen@tillamookor.gov](mailto:pwyntergreen@tillamookor.gov)>  
**Cc:** Debbi Reeves <[dreeves@tillamookor.gov](mailto:dreeves@tillamookor.gov)>  
**Subject:** RE: HNAs and EOAs

Hi, Paul,

That is a great question with a good philosophical foundation. But, I am not sure that the laws have caught up with the realities of what regions like ours face. I will reach out again with the nuance described below, but my initial reaction, that while the regional approach will give people a better understanding of the how and why, the growth will still be confined to the PSU estimate for each city.

But, I will follow up.

Thanks, Lisa



**Lisa M. Phipps**

North Coast Regional Representative | Ocean/Coastal Services Division  
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# EXHIBIT D

# Hello, Neighbor!

## Short Term Vacation Rental Direct and Indirect Economic Impacts in Tillamook County



### Common Myths

*"Short term vacation rentals only provide minimum wage jobs."*

### Total number of employees reported

112

*56 Full Time; 56 Part Time*

### Actual Average Wage Reported

**\$22.41 Hourly**

*Wages reported from \$18 - \$30 hour*

### Average number of employees reported per STVR

14

*'We currently employ 2 full-time care supervisors in Tillamook County and are looking for a seasonal part-time supervisor for the summer. They average \$19/hr, but we also have bonuses and pay mileage.*

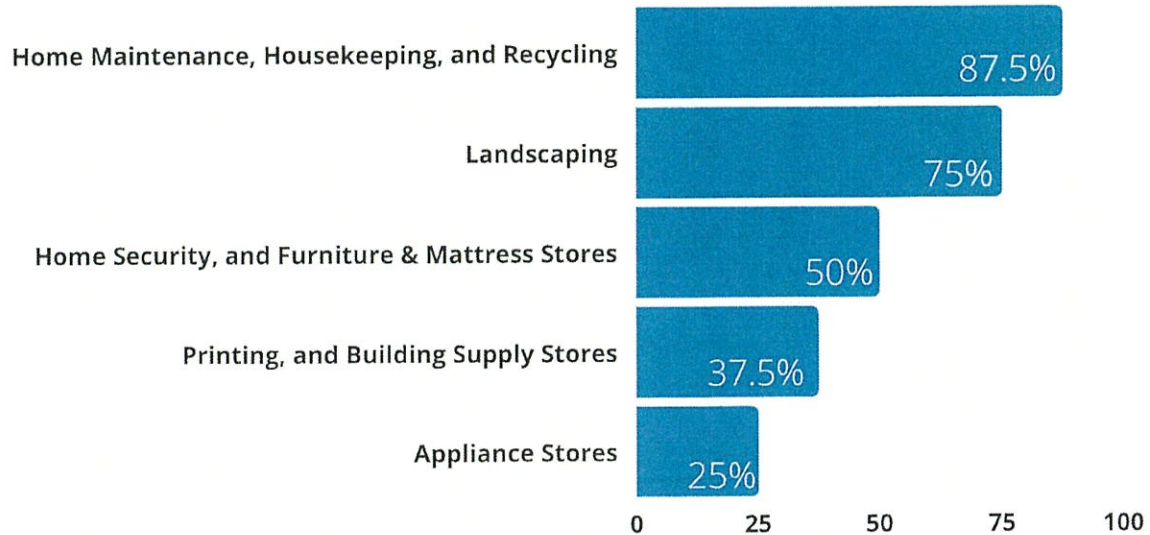
*We manage approximately 30 homes in Tillamook County.'*

**STVR Property Manager**

Percentage of surveyed STVRs that report offering discounts and incentives to shop at local businesses

**37.5%**

Based on completed surveys, this is the percentage breakdown of monthly spend at local businesses:  
"How much and where?"



Percentage of STVRs that report retaining these service providers on monthly contract

 **37.5%**

This information was provided by Short Term Vacation Rental Management companies within Tillamook County. 24 agencies were surveyed, and 8 surveys were returned for a completion rate of 33%



# EXHIBIT E



Transient Lodging Tax (TLT) collected by Tillamook County and Year-over-Year (YoY) Plus or Minus percentage																		
Year	2014		2015		2016		2017		2018		2019		2020		2021		2022	
		YoY		YoY		YoY		YoY		YoY		YoY		YoY		YoY	YoY in \$\$	
Q1	\$271,768	\$347,583	+28%	\$372,408	+7%	\$428,548	+15%	\$592,489	+38%	Q1	\$698,966	+17%	\$583,432	-17%	\$1,502,169	+157%	\$1,560,668	+ \$55,570
Q2	\$516,547	\$622,615	+21%	\$710,225	+14%	\$785,772	+11%	\$1,017,417	+29%	Q2	\$1,144,806	+13%	\$622,199	-48%	\$2,077,090	+233%	\$2,001,624	- \$80,116
Q3	\$1,175,049	\$1,374,272	+17%	\$1,463,778	+7%	\$1,573,159	+7%	\$1,748,400	+10%	Q3	\$1,943,681	+11%	\$2,262,693	+16%	\$2,780,411	+20%	\$3,013,480	+ \$191,624
Q4	\$335,062	\$411,297	+23%	\$430,203	+4%	\$485,714	+10%	\$630,878	+22%	Q4	\$709,038	+12%	\$1,241,553	+75%	\$1,219,318	-2%	\$1,159,015	-\$60,303
TOTALS	\$2,298,426	\$2,755,767	+22%	\$2,976,614	+8%	\$3,273,193	10%	\$3,989,184	+25%	Total	\$4,496,491	+13%	\$4,747,449	+5%	\$7,578,988	+60%	\$7,734,787	+\$155,799
Data as of 02/08/2022 per Tillamook County Community Planning Department										TLT Collected by county: Grand Total 2014-2022: \$39,989,292 30% roads: \$11,996,787								

County-Wide Gross Lodging Receipts											
	2014	2015	2016	2017	2018		2019	2020	2021	2022	
Q1	\$4,926,624	\$6,533,832	\$6,731,876	\$8,334,802	\$10,760,740	Q1	\$12,466,788	\$13,067,909	\$26,290,402	\$27,666,281 (+ \$1,375,156)	
Q2	\$9,405,545	\$11,318,943	\$12,769,920	\$14,456,140	\$18,075,890	Q2	\$20,145,913	\$14,083,178	\$35,747,229	\$35,374,909 (- \$ 375,398)	
Q3	\$21,529,620	\$24,642,800	\$26,516,400	\$28,988,598	\$31,126,052	Q3	\$34,587,676	\$53,149,357	\$48,470,289	\$52,664,340 (+ \$3,138,143)	
Q4	\$6,369,943	\$7,381,531	\$7,941,654	\$9,226,510	\$11,239,105	Q4	\$12,387,260	\$30,008,334	\$21,643,943	\$19,753,133	
Totals	\$42,231,732	\$49,877,106	\$53,959,850	\$61,006,050	\$71,201,787	Totals	\$79,587,637	\$110,308,778	\$132,151,863	\$135,458,663 YOY: +\$3,306,800	
Lodging Receipts Grand Total, 2014- 2022: \$710,824,704											

# EXHIBIT F



# Short-Term Rental Data Report

**MAY 18, 2022**

**PREPARED BY:**

County Manager's Office | Legal Counsel | Assessment and Taxation | GIS | Community Development

## SECTION 1: BACKGROUND

On April 13, 2022, your Board directed staff to collect and analyze additional data documenting the impact of short-term rental units on housing prices and availability within Clatsop County.

County Management, County Counsel, and staff from Assessment and Taxation, GIS and Community Development met on April 21 to identify what data was required and what data was accessible by staff. On April 28, staff again met to review the data that had been compiled. This information consists of documentation regarding:

- Number, location and zoning of permitted short-term rental units
- 2018 Certified Values Countywide
- Single-Family Residential Sales Countywide
- Single-Family Residential Median Values for STR and non-STR properties
- Summary of Residential Market Appreciation 2021-2022
- Clatsop County Median Income

This information is documented and discussed in further detail below.

## SECTION 2: DATA

The data provided below demonstrates that there is not a correlation between the issuance of short-term rental permits and housing prices. The data illustrates that the increased housing prices have occurred and continue to occur for both short-term rental properties and non-short-term rental properties. Communities such as Cannon Beach, which has severely curtailed short-term rentals, saw the largest real market value increase between 2018 and 2021 for properties holding an STR permit. This is likely due to the value placed on what is perceived as a limited and scarce ownership opportunity, thus commanding a higher price.

### SECTION 2A: NUMBER OF PERMITTED STRs

Per information from Clatsop County Assessment and Taxation, there are 177 permitted short-term rental units in unincorporated Clatsop County. This area also includes properties within the unincorporated Urban Growth Boundary (UGB) of the City of Gearhart.

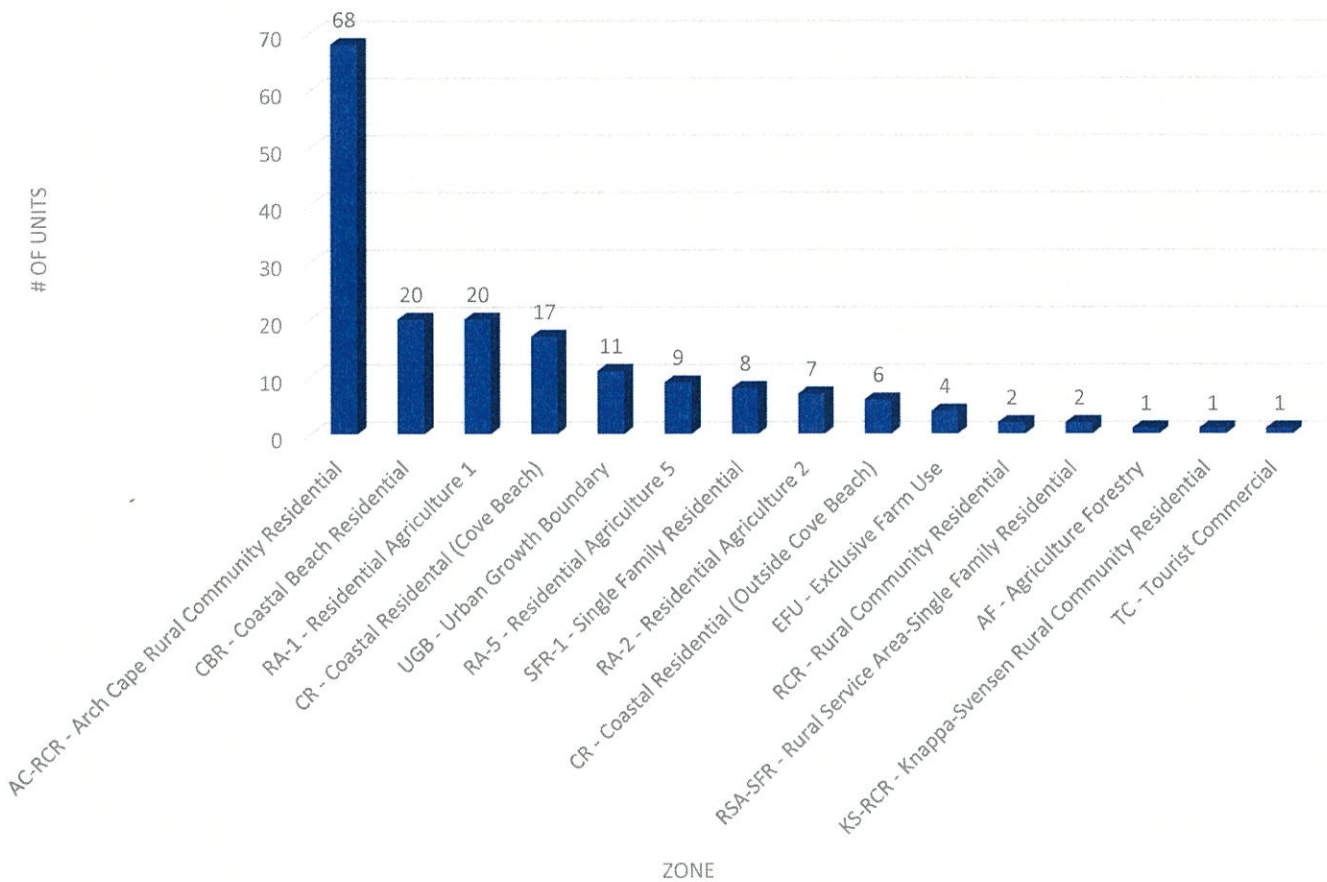
**Figure 1** provides information regarding the zones where short-term rentals are located. **Figure 2** documents the annual rental activity for short-term rentals during 2021. This data shows that 67% of transient room tax accounts rented 100% of the year. Ten percent of the transient room tax account did not rent during 2021. **Figures 3-15**, below, detail the general location and numbers of short-term rental units. Sixty-eight (38.4%) of short-term rental units are located

within the Arch Cape – Rural Community Residential (AC-RCR) zone. Per Assessment and Taxation, in 2004 there were 55 transient room tax accounts with a situs city of Arch Cape. Those accounts included properties within the Arcadia Beach/Arch Cape/Cove Beach area. Per information shown on **Figures 4-6** there are currently 95 licensed short-term rentals in this same approximate area. Twenty-seven of those rental units have been continuously permitted since 2004, although they may not have been continually rented during that time.

There are 17 licensed STRs in Cove Beach, constituting 9.6% of the total number of short-term rentals within unincorporated Clatsop County. The remaining 92 short-term rental units are dispersed throughout the county, with 53 (29.9%) units located in the Clatsop Plains and 11 (6.2%) within the Gearhart UGB. It should not be surprising that the majority of STRs are located in close proximity to the Pacific Ocean, as the state’s beaches are highly desirable vacation areas.

**Figure 1**

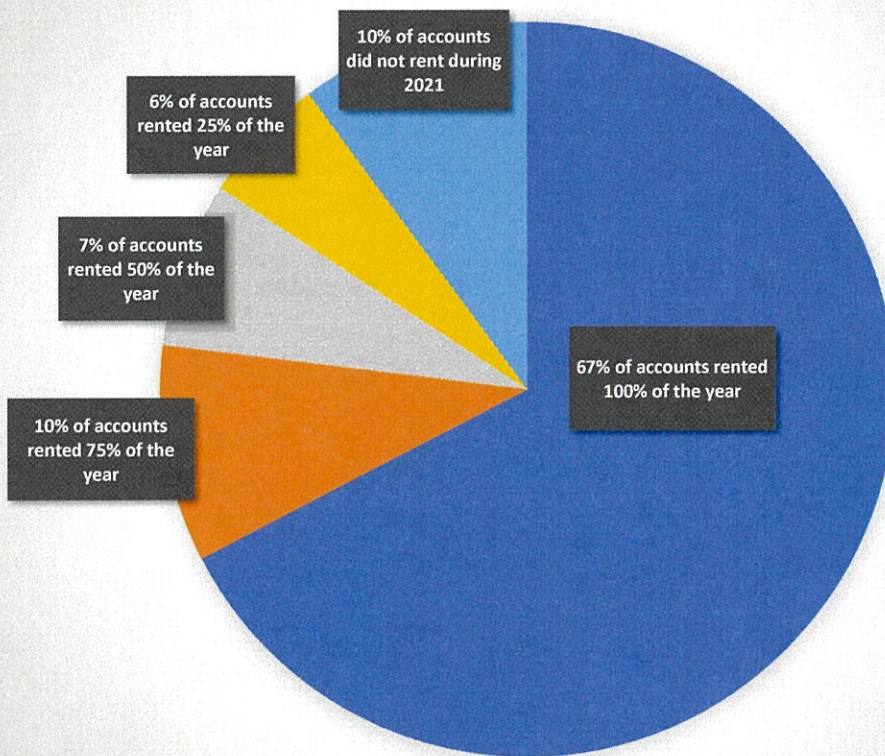
### Short-Term Rentals by Zone



Source: Clatsop County GIS

Figure 2

### STR Accounts Annual Rental Activity



\*Percentages are based on the TRT accounts that filed returns for each Quarter in 2021

Figure 3

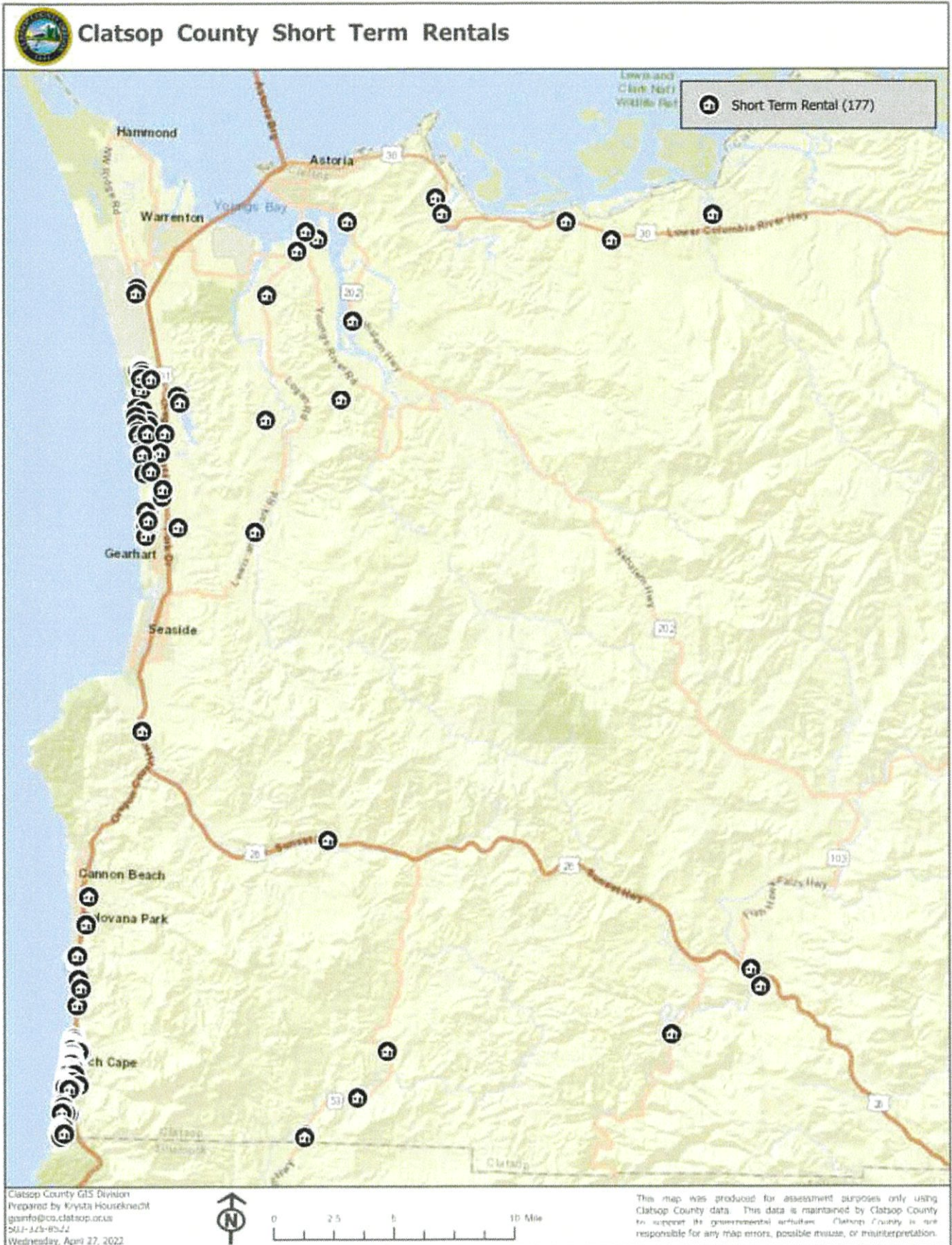


Figure 4

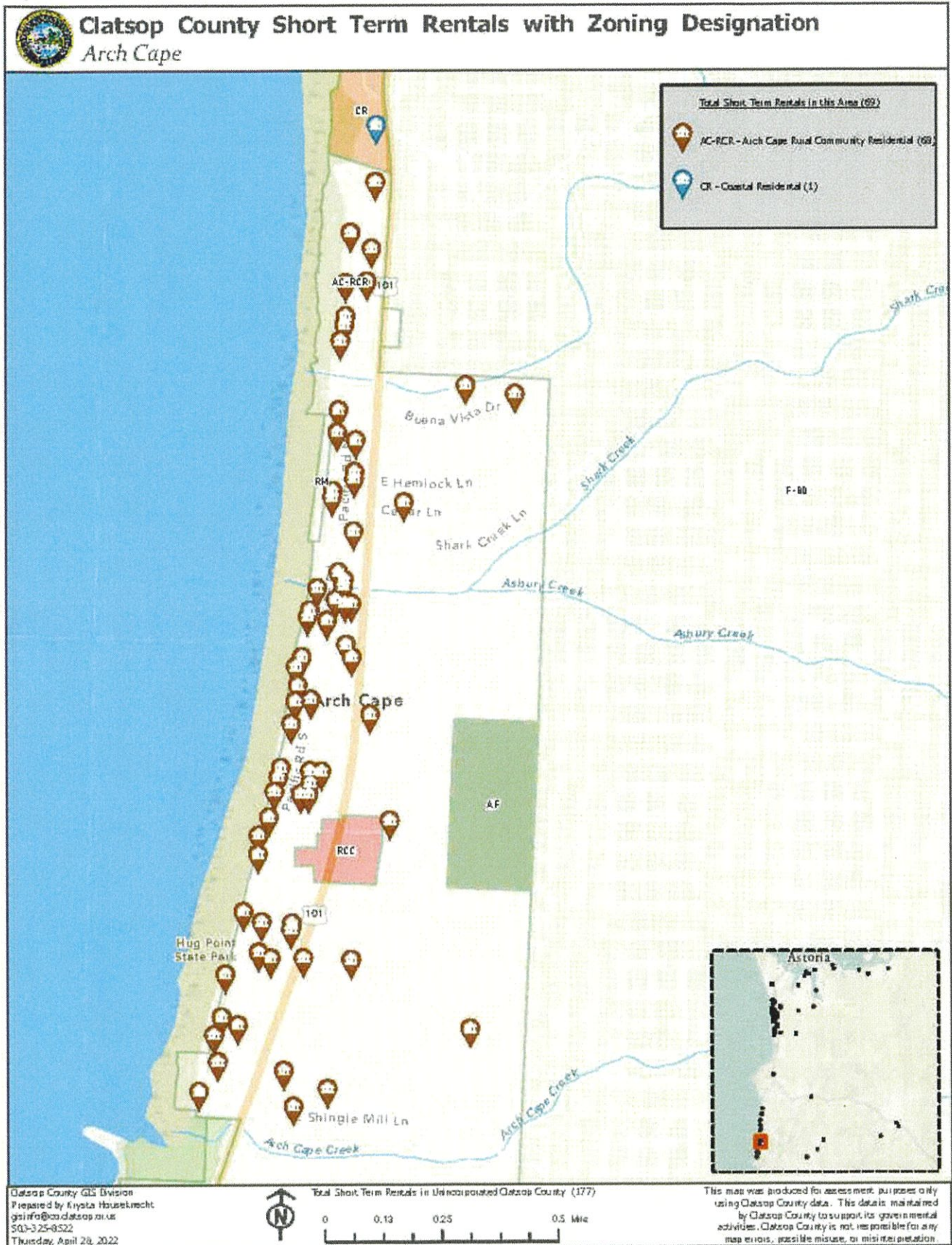




Figure 5

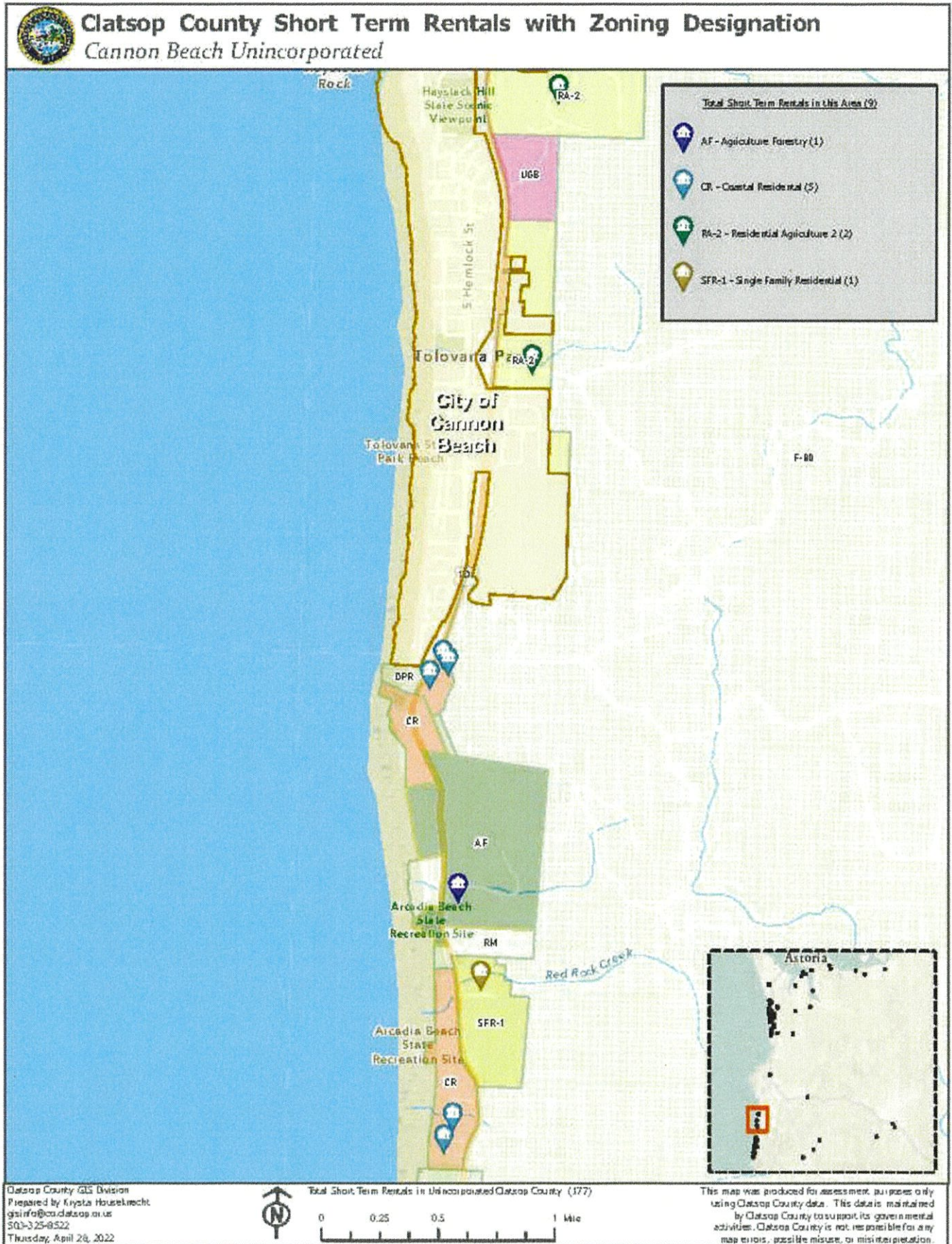


Figure 6

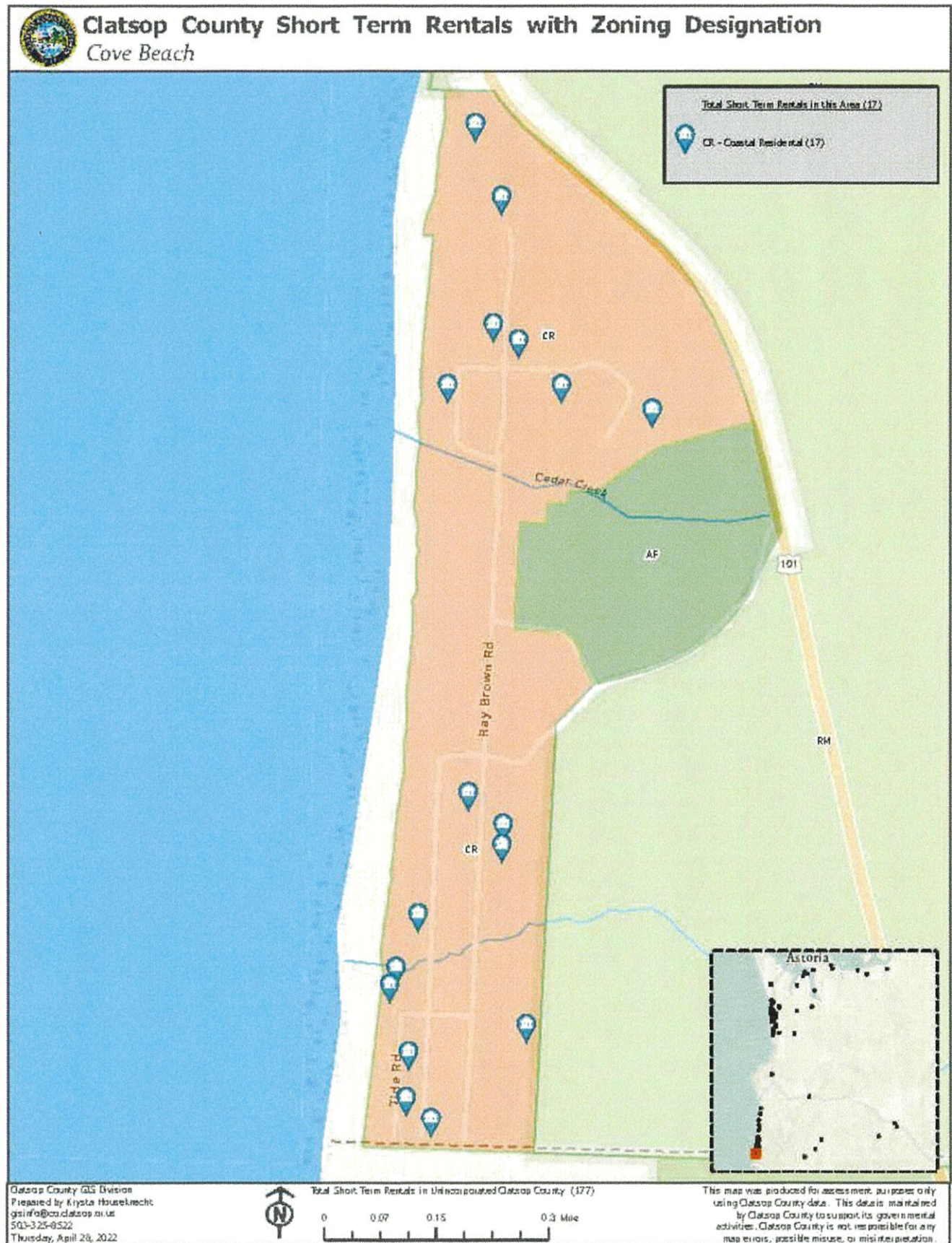


Figure 7

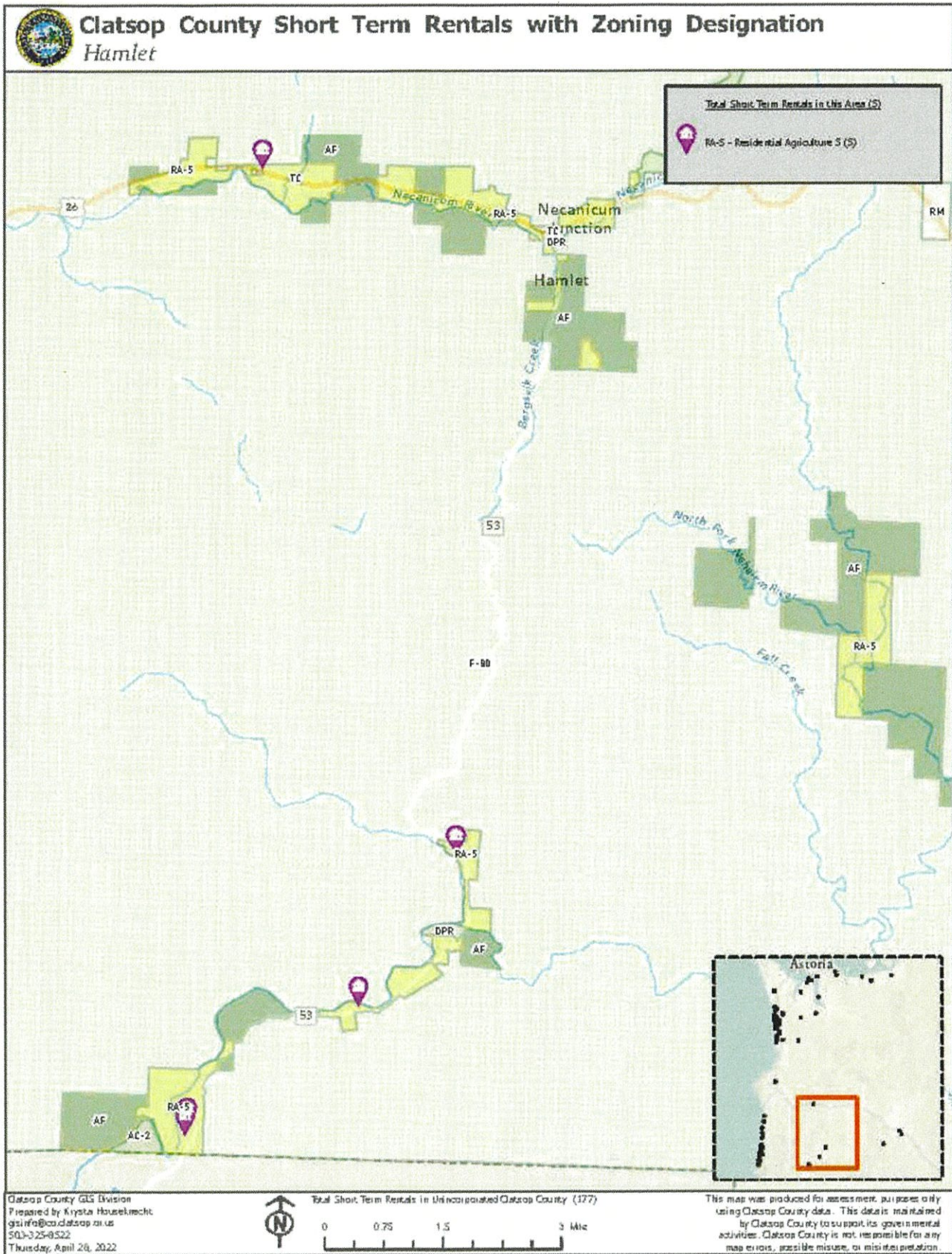


Figure 8

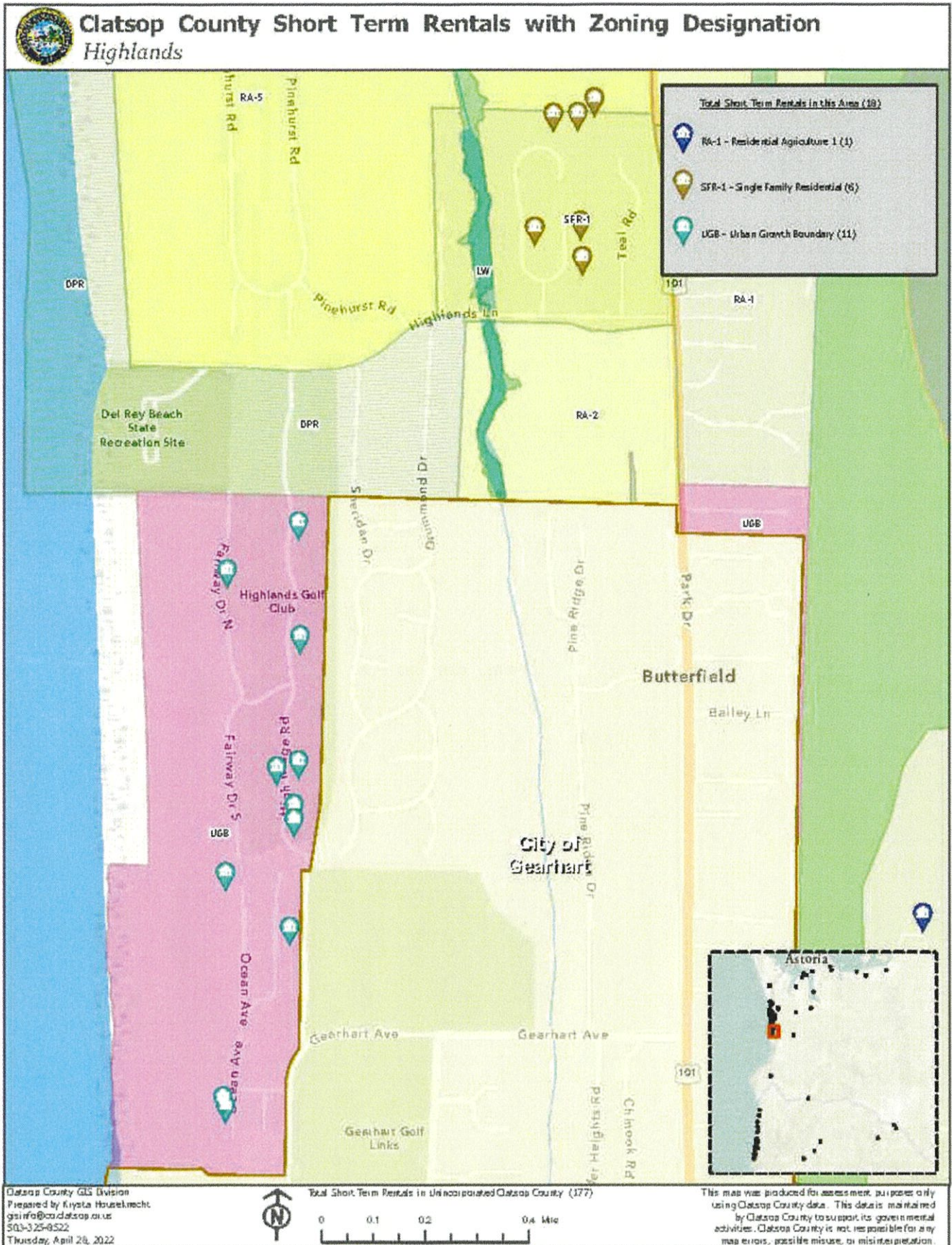


Figure 9

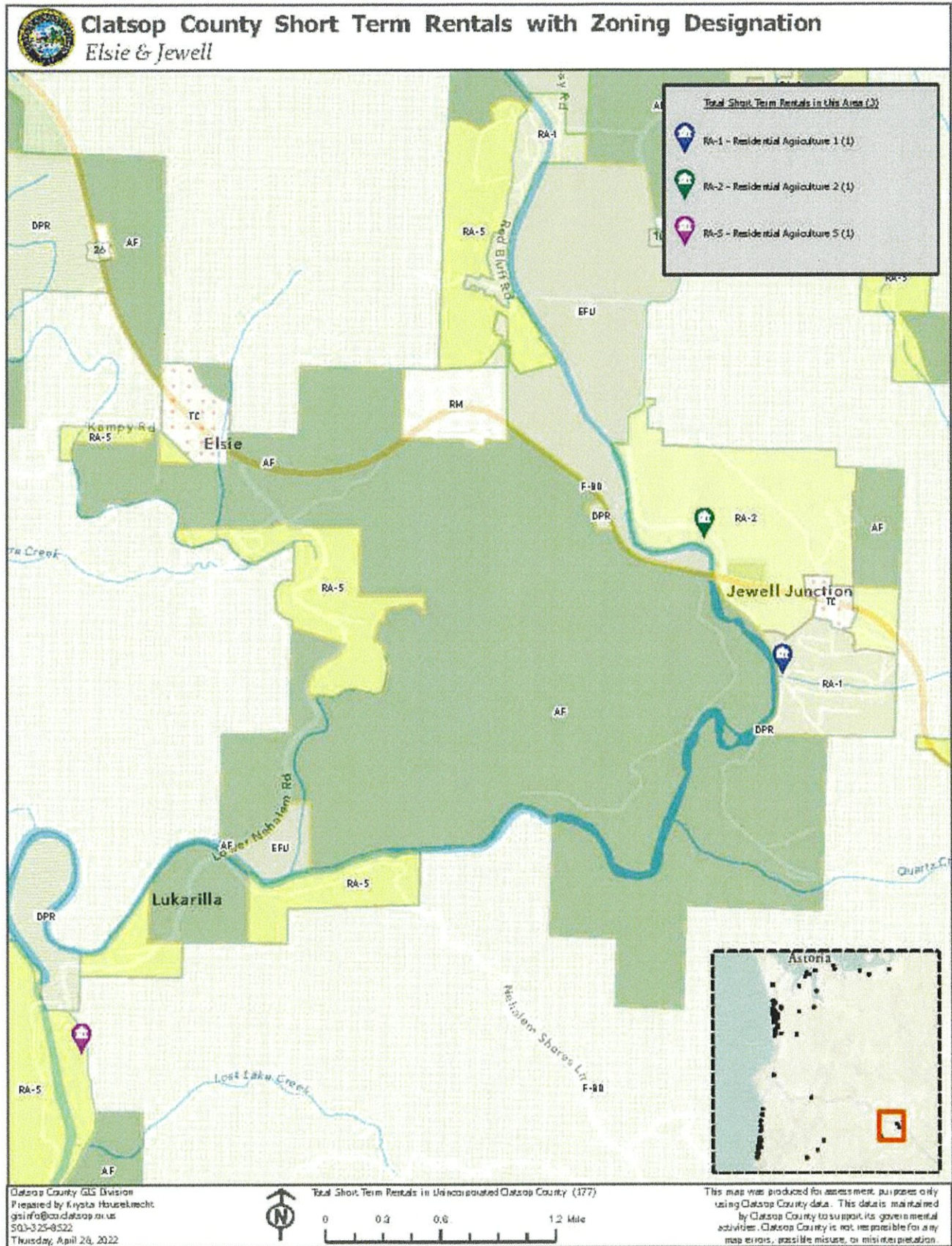




Figure 11



Figure 12

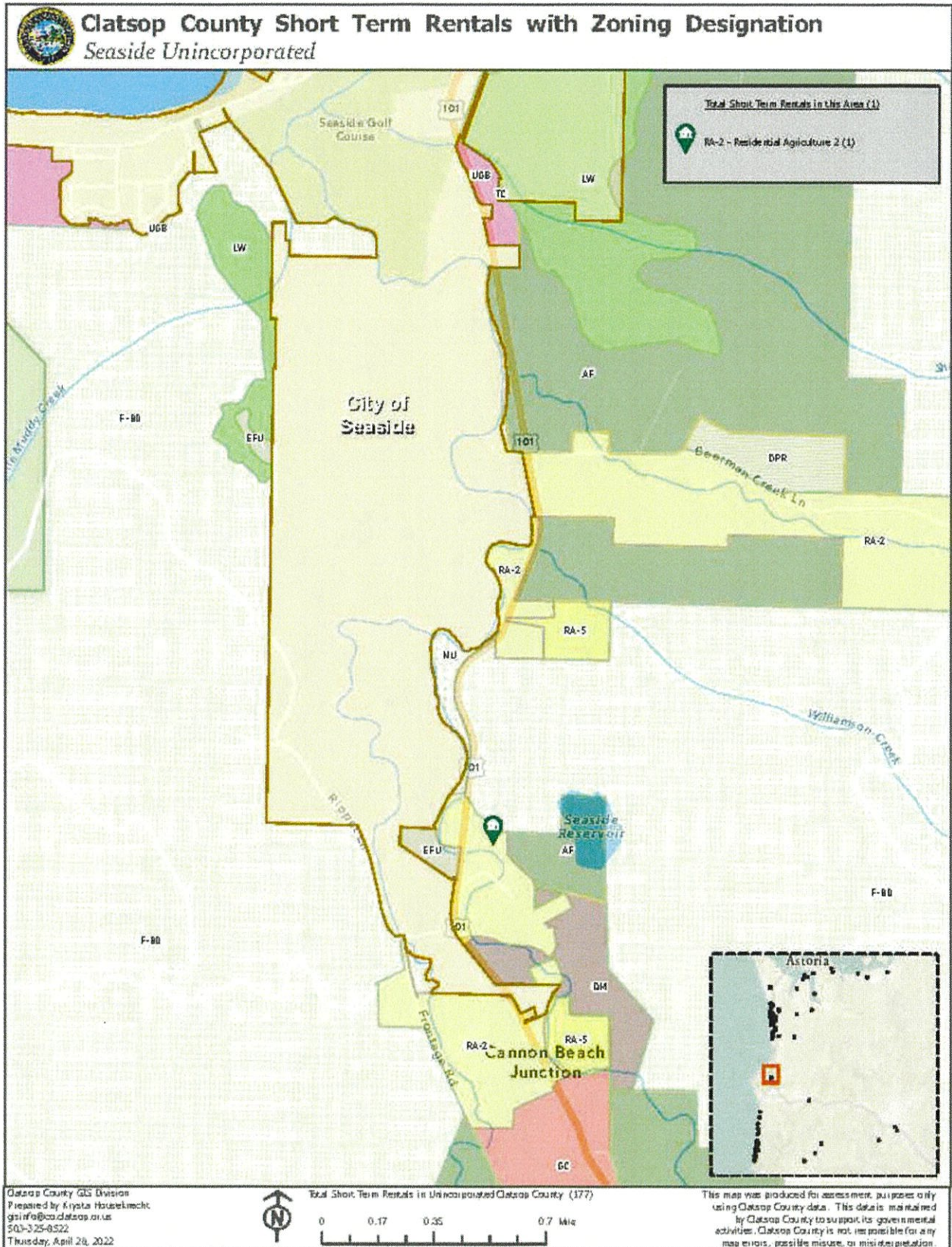




Figure 13

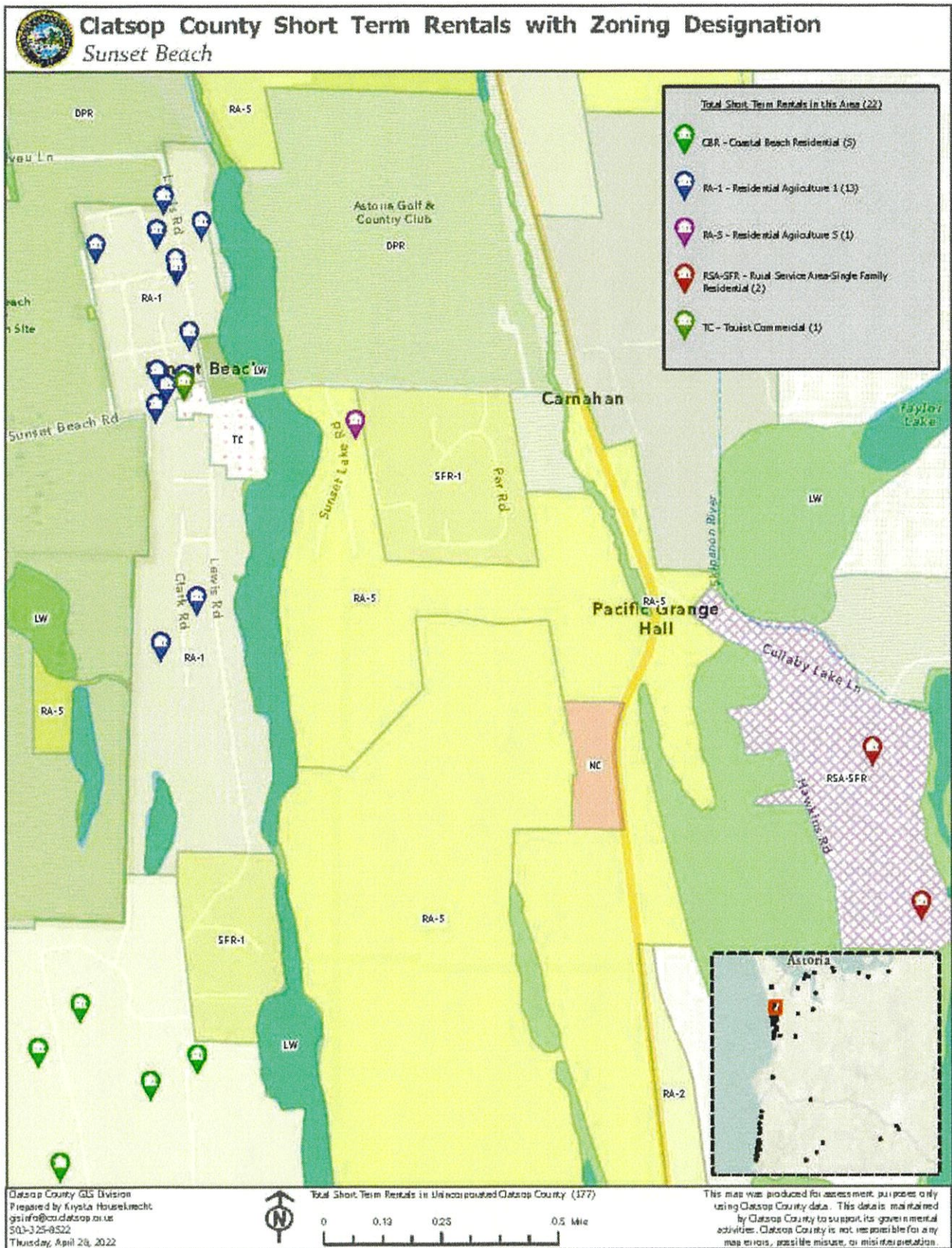


Figure 14

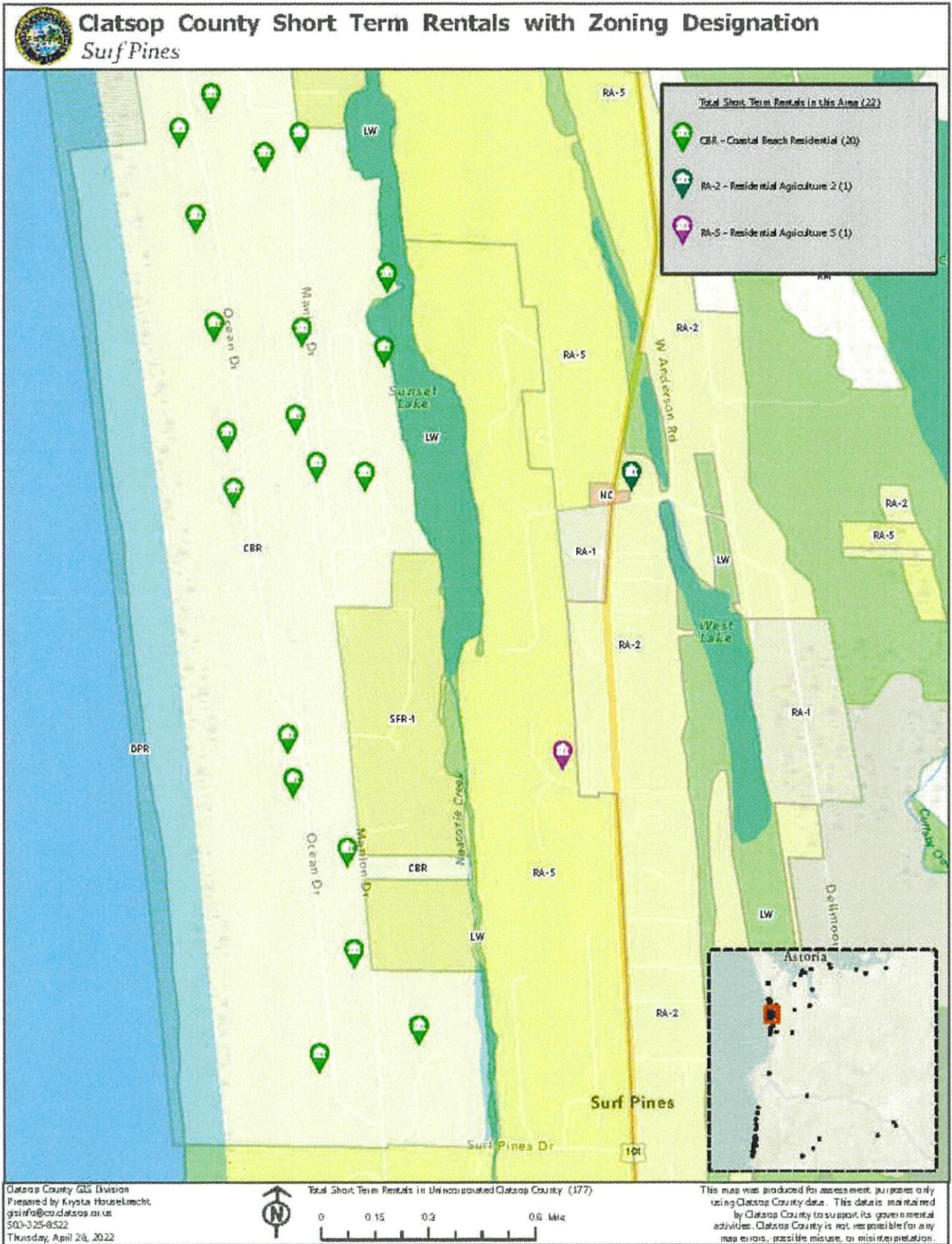
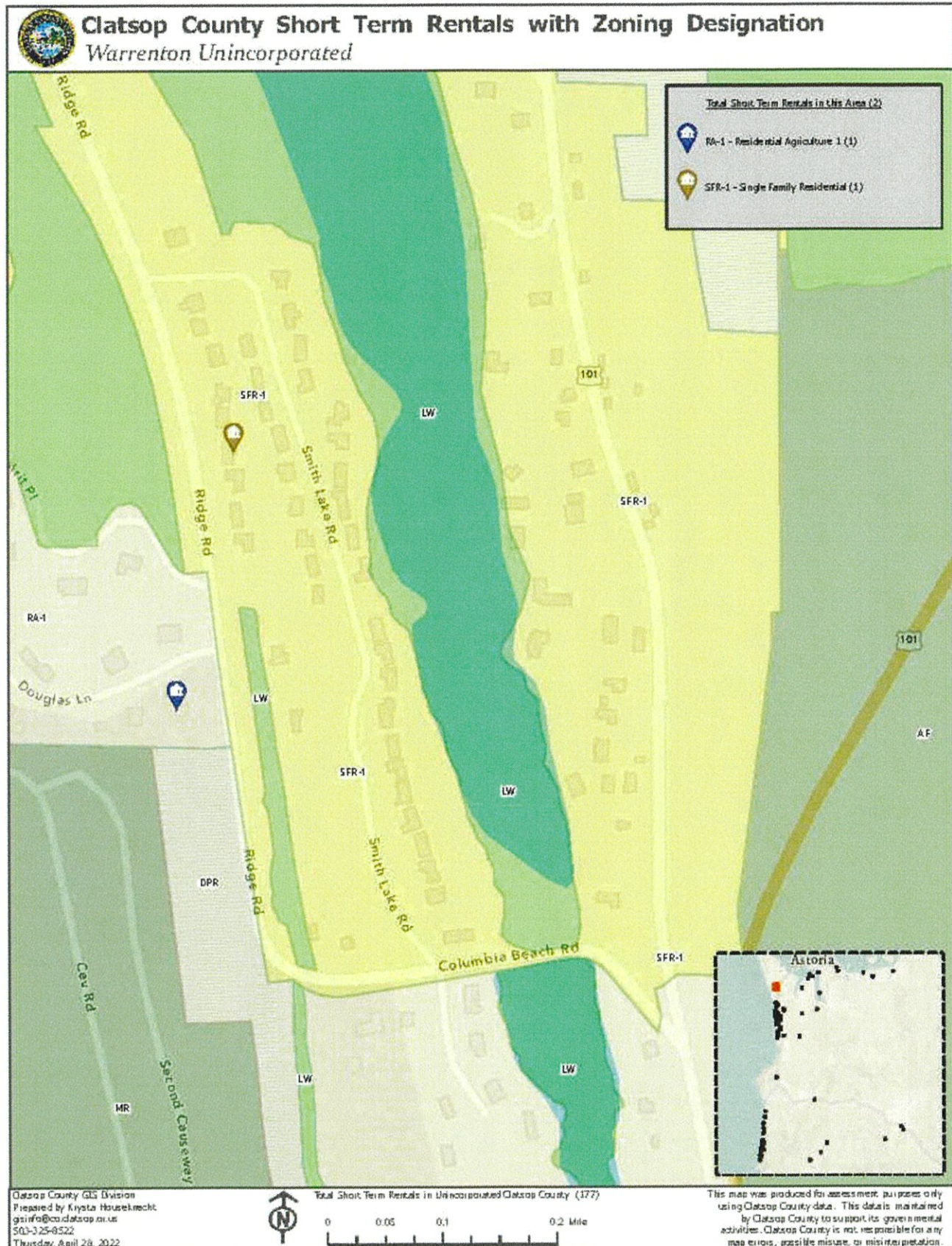


Figure 15



## SECTION 2B: PROPERTY VALUES

**Figure 16** details sales information on properties located in the Arch Cape and Cove Beach areas between January 2018 and March 2022. Overall, 12 properties with STR permits were sold during that period. Eight of those properties sold for a higher price than the Real Market Value (RMV). Conversely, 31 non-STR-permitted properties sold during that same time period. Twenty-one of those properties had a sales price higher than RMV. Sixty-seven percent of properties with STR permits were sold above RMV, while 68% of the properties without STR permits were purchased at a sale price above RMV.

**Figure 17** details the sale prices of properties in unincorporated areas of Astoria, Warrenton, Gearhart, Seaside and Cannon Beach. The majority of properties sold in these areas *were not* licensed as a short-term rental (19 STR-permitted properties vs. 711 non-STR-permitted properties). Of the 730 total properties in these unincorporated areas that were sold between January 2018 and March 2022, 600 (82.2%) sold above RMV.

The average sale price of STR-permitted properties was \$765,000 with an average RMV of \$707,679. The average sale price of non-STR-permitted properties was \$647,210 with an average RMV of \$565,737. Assuming a 20% down payment on a \$647,210 home with a 30-year mortgage at a fixed rate of 3.633%, the monthly mortgage payment would be \$2,364. That total does not include insurance or taxes. To be considered “affordable” housing costs should not exceed 30% of household income. As noted in Section 2E, below, the median household income in Clatsop County is \$57,466. Based upon this median income, an “affordable” monthly rental payment, including utilities, would be \$1,436.65.

The data in Figures 16 and 17 would appear to indicate that the overall level of demand far exceeds the level of housing supply. This trend, which is occurring nationwide, has been fueled by a combination of factors including low interest rates and increased opportunities for remote work during the pandemic. The data does not demonstrate that short-term rentals have driven up housing prices or that houses are being purchased to be converted to short-term rentals.

The information provided on **Figures 18 and 19** show that single-family housing prices for properties *not* holding an STR permit have risen across the county 22-33% between 2018 and 2021. Single-family residences *with* an STR permit have risen in real market value 5-42% over that same timeframe.

Arch Cape/Cove Beach/Falcon Cove Single Family Residence Sales: Permitted STR vs. Not Permitted  
01/01/2018 through 03/21/2022

Figure 16

Acct ID	Year Permitted	STR	Sale Date	Ocean-Front	Year Built	Acres	Mult. Accts Sold	Situs Address	Situs City	Total RMV	Sale Price	Sale Price % above RMV	
2899	2020	Yes	08/28/19	No	1999	0.11	No	79929 W Beach Rd	Arch Cape	522,907	445,000	-15%	
3255	2019	Yes	11/16/18	No	1995	0.57	No	79209 Ray Brown Rd	Arch Cape	646,642	565,000	-13%	
3108	2019	Yes	08/21/20	Yes	1941	0.46	Yes	79815 Ocean Point Rd	Arch Cape	893,122	850,000	-5%	33%
2585	2019	Yes	08/28/18	Yes	1951	0.44	No	80416 Carnahan Rd	Arch Cape	1,024,010	985,000	-4%	sold below RMV
3175	2018	Yes	08/06/18	No	1997	0.79	No	31912 Clatsop Ln	Arch Cape	451,140	455,000	1%	
2728	2020	Yes	05/30/19	Yes	1956	0.20	No	80192 Pacific Rd	Arch Cape	1,185,052	1,200,000	1%	
51983	2018	Yes	05/10/18	No	2008	1.01	No	31971 Clatsop Ln	Arch Cape	710,796	735,000	3%	
55259	2018	Yes	01/09/18	No	2015	0.22	No	79799 E Beach Rd	Arch Cape	358,780	390,000	9%	8%
3294	2018	Yes	07/15/20	No	1981	0.22	No	78986 Cove Beach Rd	Arch Cape	571,674	655,000	15%	67%
3251	2020	Yes	06/05/20	No	1994	0.46	Yes	79238 Ray Brown Rd	Arch Cape	663,892	775,000	17%	sold above RMV
3136	2019	Yes	09/28/18	No	1940	0.21	No	31912 E Shingle Mill Ln	Arch Cape	343,708	475,000	38%	
2511	2018	Yes	08/25/21	Yes	1961	1.22	No	79878 Hwy 101	Arch Cape	1,120,426	1,650,000	47%	2%

Acct ID	Year Permitted	STR	Sale Date	Ocean-Front	Year Built	Acres	Mult. Accts Sold	Situs Address	Situs City	Total RMV	Sale Price	Sale Price % above RMV	
54572	N/A	No	07/26/19	No	2007	0.30	No	32073 Cedar Ln	Arch Cape	666,152	585,000	-12%	
3212	N/A	No	03/03/21	Yes	1973	0.63	Yes	79364 Ray Brown Rd	Arch Cape	1,082,730	955,000	-12%	
2792	N/A	No	08/27/19	No	1962	0.32	No	31972 Donlon Ln	Arch Cape	423,346	375,000	-11%	
2658	N/A	No	09/18/20	No	2002	0.60	Yes	32105 Hemlock Ln	Arch Cape	691,703	649,000	-6%	
2636	N/A	No	08/22/19	No	2016	0.11	No	31983 Cedar Ln	Arch Cape	419,769	396,000	-6%	
3022	N/A	No	06/08/18	No	1962	0.23	No	79804 Fire Rock Rd	Arch Cape	346,756	328,000	-5%	10%
3242	N/A	No	08/19/19	Yes	1965	0.72	Yes	79084 Cove Beach Rd	Arch Cape	832,286	801,200	-4%	32%
2837	N/A	No	05/18/20	No	1997	0.18	No	31948 Star Mooring Ln	Arch Cape	597,125	575,000	-4%	
3271	N/A	No	01/15/21	Yes	1972	0.41	Yes	79070 Cove Beach Rd	Arch Cape	1,207,842	1,170,000	-3%	
2649	N/A	No	10/15/19	No	2007	0.22	No	32067 Hemlock Ln	Arch Cape	340,940	339,000	-1%	
2912	N/A	No	01/15/19	No	1990	0.11	No	79924 W Beach Rd	Arch Cape	473,526	489,000	3%	
2767	N/A	No	08/23/18	Yes	1957	0.16	No	80166 PACIFIC RD	Arch Cape	863,482	910,000	5%	
2696	N/A	No	11/20/18	No	1993	0.22	No	32103 Buena Vista Dr	Arch Cape	443,768	475,000	7%	
2901	N/A	No	03/29/18	No	1981	0.09	No	79917 W Beach Rd	Arch Cape	310,529	336,800	8%	
2851	N/A	No	09/25/19	Yes	1990	0.13	No	80090 Pacific Rd	Arch Cape	1,433,533	1,563,000	9%	
3023	N/A	No	05/30/18	No	1986	0.20	No	32001 E Shingle Mill Ln	Arch Cape	319,693	355,000	11%	
53450	N/A	No	03/22/19	No	1950	0.41	No	79435 E Hwy 101	Arch Cape	339,936	385,000	13%	
59438	N/A	No	07/05/18	No	2016	0.23	No	31973 Oceanview Ln	Arch Cape	524,798	595,000	13%	
2833	N/A	No	07/26/18	No	2003	0.15	No	31922 Star Mooring Ln	Arch Cape	686,425	780,000	14%	
2748	N/A	No	11/14/18	No	2006	0.09	No	80105 PACIFIC RD	Arch Cape	527,699	600,000	14%	21%
2740	N/A	No	02/22/19	No	1955	0.17	No	31960 Montbrechia Ln	Arch Cape	351,957	421,000	20%	68%
2787	N/A	No	09/06/19	No	1957	0.13	No	80149 Pacific Rd	Arch Cape	473,074	574,000	21%	sold above RMV
2683	N/A	No	12/28/20	No	2003	0.22	No	32088 Buena Vista Dr	Arch Cape	622,903	855,000	37%	
2814	N/A	No	06/22/21	No	1990	0.12	No	79979 Pacific Rd	Arch Cape	471,123	650,000	38%	
2577	N/A	No	12/14/20	Yes	1976	0.28	No	80424 Carnahan Rd	Arch Cape	1,086,384	1,500,000	38%	
2649	N/A	No	05/27/21	No	2007	0.22	No	32067 Hemlock Ln	Arch Cape	333,609	470,000	41%	
2643	N/A	No	09/07/21	No	1978	0.12	No	80331 Pacific Rd	Arch Cape	297,827	500,000	68%	
3039	N/A	No	07/21/21	No	1920	1.35	No	32079 E Shingle Mill Ln	Arch Cape	435,146	750,000	72%	
3118	N/A	No	04/22/21	No	1952	0.13	No	79784 East Beach Rd	Arch Cape	354,542	625,000	76%	
2665	N/A	No	05/26/21	No	1999	0.24	No	32100 Hemlock Ln	Arch Cape	331,749	605,000	82%	
3094	N/A	No	09/28/21	No	1940	0.13	No	79812 Cannon Rd	Arch Cape	247,487	451,500	82%	11%

Clatsop County Single Family Residence Sales: Permitted STR vs. Not Permitted  
01/01/2018 through 03/21/2022

Figure 17

Unincorporated Area	Permitted STR	Total Sales	Sold Below RMV		Sold Above RMV	
			# of Sales	%	# of Sales	%
Astoria	Yes	2	0	0%	2	100%
Astoria	No	318	61	19%	257	81%

Unincorporated Area	Permitted STR	Total Sales	Sold Below RMV		Sold Above RMV	
			# of Sales	%	# of Sales	%
Warrenton	Yes	8	1	13%	7	88%
Warrenton	No	250	43	17%	207	83%

Unincorporated Area	Permitted STR	Total Sales	Sold Below RMV		Sold Above RMV	
			# of Sales	%	# of Sales	%
Gearhart	Yes	8	0	0%	8	100%
Gearhart	No	78	13	17%	65	83%

Unincorporated Area	Permitted STR	Total Sales	Sold Below RMV		Sold Above RMV	
			# of Sales	%	# of Sales	%
Seaside	Yes	1	1	100%	0	0%
Seaside	No	44	6	14%	38	86%

Unincorporated Area	Permitted STR	Total Sales	Sold Below RMV		Sold Above RMV	
			# of Sales	%	# of Sales	%
Cannon Beach	Yes	0	0	0%	0	0%
Cannon Beach	No	21	5	24%	16	76%

Figure 18

Clatsop County Median Real Market Values (RMVs) and Assessed Values (AVs), 2018 and 2021

\*\* PROPERTY TAXES ARE CALCULATED BASED ON THE ASSESSED VALUE (AV) \*\*

		Single Family Residence Properties - <b>NOT STR Permitted</b> 79% of SFR Homes in the Area (325 Homes) Median Home Values					
		2018		2021			
Area		RMV	AV	RMV	% change	AV	% change
Arch Cape, Cove Beach, Falcon Cove		489,500	364,014	597,666	22%	407,473	12%
		Single Family Residence Properties - <b>STR Permitted</b> 21% of SFR Homes in the Area (87 Homes) Median Home Values					
		2018		2021			
Area		RMV	AV	RMV	% change	AV	% change
Arch Cape, Cove Beach, Falcon Cove		612,124	404,870	644,150	5%	439,601	9%
		Single Family Residence Properties - <b>NOT STR Permitted</b> 93% of SFR Homes in the Area (114 Homes) Median Home Values					
		2018		2021			
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Cannon Beach		365,101	270,759	460,622	26%	303,897	12%
		Single Family Residence Properties - <b>STR Permitted</b> 7% of SFR Homes in the Area (8 Homes) Median Home Values					
		2018		2021			
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Cannon Beach		557,720	348,663	791,929	42%	396,267	14%
		Single Family Residence Properties - Median Home Values					
		2018		2021			
Area		RMV	AV	RMV	% change	AV	% change
Incorporated Cannon Beach		526,533	367,111	654,932	24%	406,077	11%

Figure 19

Clatsop County Median Real Market Values (RMVs) and Assessed Values (AVs), 2018 and 2021  
 \*\* PROPERTY TAXES ARE CALCULATED BASED ON THE ASSESSED VALUE (AV) \*\*

		Single Family Residence Properties - <b>NOT STR Permitted</b> 59.6% of SFR Homes in the Area (2,306 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Astoria		258,951	173,315	340,626	32%	194,830	12%

		Single Family Residence Properties - <b>STR Permitted</b> 0.4% of SFR Homes in the Area (10 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Astoria		240,357	158,489	303,433	26%	173,182	9%

		Single Family Residence Properties - <b>NOT STR Permitted</b> 55% of SFR Homes in the Area (308 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Gearhart		354,459	275,914	463,240	31%	285,103	3%

		Single Family Residence Properties - <b>STR Permitted</b> 5% of SFR Homes in the Area (16 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Gearhart		531,356	523,183	720,772	36%	573,939	10%

		Single Family Residence Properties - <b>NOT STR Permitted</b> 97% of SFR Homes in the Area (1,158 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Warrenton		299,623	219,613	398,020	33%	253,286	15%

		Single Family Residence Properties - <b>STR Permitted</b> 3% of SFR Homes in the Area (42 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Warrenton		340,263	237,559	441,556	31%	274,915	16%

		Single Family Residence Properties - <b>NOT STR Permitted</b> 59% of SFR Homes in the Area (415 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Seaside		232,554	183,020	284,394	22%	200,910	10%

		Single Family Residence Properties - <b>STR Permitted</b> 1% of SFR Homes in the Area (6 Homes) Median Home Values					
		2018			2021		
Area		RMV	AV	RMV	% change	AV	% change
Unincorporated Seaside		281,385	160,318	351,545	25%	175,180	9%



## SECTION 2C: RENTAL UNIT CHARACTERISTICS (CLATSOP COUNTY AND CITIES)

The 2020 American Community Survey 5-Year Estimates for all of Clatsop County estimates an average monthly rent of \$957. **Table 1** details the number of housing units within all of Clatsop County (incorporated and unincorporated areas) and includes information regarding unit age, size and monthly rental payments. Overall, the county's housing stock is largely owner-occupied (60.7%). The majority of the housing units is comprised of single-family detached dwellings (15,606; 69%). Over fifty-eight percent of the housing stock (13,250 units) is more than 50 years old. Twenty-three percent of the housing stock is over 80 years old.

**TABLE 1: RENTAL RATES AND UNIT CHARACTERISTICS**

**Clatsop County, Oregon (Incorporated and Unincorporated Areas)**

Description	Estimate	Percent
<b>HOUSING OCCUPANCY</b>		
<b>Total housing units</b>	<b>22,609</b>	<b>22,609</b>
Occupied housing units	16,019	70.9%
Vacant housing units	6,590	29.1%
Homeowner vacancy rate	1.4%	(X)
Rental vacancy rate	3.5%	(X)
<b>UNITS IN STRUCTURE</b>		
<b>Total housing units</b>	<b>22,609</b>	<b>22,609</b>
1-unit, detached	15,606	69.0%
1-unit, attached	613	2.7%
2 units	1,218	5.4%
3 or 4 units	1,438	6.4%
5 to 9 units	655	2.9%
10 to 19 units	379	1.7%
20 or more units	1,325	5.9%
Mobile home	1,331	5.9%
Boat, RV, van, etc.	44	0.2%
<b>YEAR STRUCTURE BUILT</b>		
<b>Total housing units</b>	<b>22,609</b>	<b>22,609</b>
Built 2014 or later	690	3.1%
Built 2010 to 2013	387	1.7%
Built 2000 to 2009	2,446	10.8%
Built 1990 to 1999	3,400	15.0%
Built 1980 to 1989	2,436	10.8%
Built 1970 to 1979	3,179	14.1%
Built 1960 to 1969	1,345	5.9%
Built 1950 to 1959	1,680	7.4%
Built 1940 to 1949	1,842	8.1%

**TABLE 1: RENTAL RATES AND UNIT CHARACTERISTICS****Clatsop County, Oregon (Incorporated and Unincorporated Areas)**

Description	Estimate	Percent
Built 1939 or earlier	5,204	23.0%
<b>ROOMS</b>		
<b>Total housing units</b>	<b>22,609</b>	<b>22,609</b>
1 room	541	2.4%
2 rooms	730	3.2%
3 rooms	2,274	10.1%
4 rooms	4,027	17.8%
5 rooms	4,335	19.2%
6 rooms	4,123	18.2%
7 rooms	2,988	13.2%
8 rooms	1,714	7.6%
9 rooms or more	1,877	8.3%
Median rooms	5.4	(X)
<b>BEDROOMS</b>		
<b>Total housing units</b>	<b>22,609</b>	<b>22,609</b>
No bedroom	789	3.5%
1 bedroom	2,146	9.5%
2 bedrooms	6,751	29.9%
3 bedrooms	9,147	40.5%
4 bedrooms	3,026	13.4%
5 or more bedrooms	750	3.3%
<b>HOUSING TENURE</b>		
<b>Occupied housing units</b>	<b>16,019</b>	<b>16,019</b>
Owner-occupied	9,727	60.7%
Renter-occupied	6,292	39.3%
Average household size of owner-occupied unit	2.57	(X)
Average household size of renter-occupied unit	2.21	(X)
<b>YEAR HOUSEHOLDER MOVED INTO UNIT</b>		
<b>Occupied housing units</b>	<b>16,019</b>	<b>16,019</b>
Moved in 2019 or later	1,139	7.1%
Moved in 2015 to 2018	4,836	30.2%
Moved in 2010 to 2014	3,347	20.9%
Moved in 2000 to 2009	3,124	19.5%
Moved in 1990 to 1999	1,736	10.8%
Moved in 1989 and earlier	1,837	11.5%
<b>VEHICLES AVAILABLE</b>		

**TABLE 1: RENTAL RATES AND UNIT CHARACTERISTICS****Clatsop County, Oregon (Incorporated and Unincorporated Areas)**

<b>Description</b>	<b>Estimate</b>	<b>Percent</b>
<b>Occupied housing units</b>	<b>16,019</b>	<b>16,019</b>
No vehicles available	1,427	8.9%
1 vehicle available	5,836	36.4%
2 vehicles available	5,388	33.6%
3 or more vehicles available	3,368	21.0%
<b>SELECTED CHARACTERISTICS</b>		
<b>Occupied housing units</b>	<b>16,019</b>	<b>16,019</b>
Lacking complete plumbing facilities	27	0.2%
Lacking complete kitchen facilities	338	2.1%
No telephone service available	212	1.3%
<b>GROSS RENT</b>		
<b>Occupied units paying rent</b>	<b>5,868</b>	<b>5,868</b>
Less than \$500	313	5.3%
\$500 to \$999	2,909	49.6%
\$1,000 to \$1,499	1,957	33.4%
\$1,500 to \$1,999	483	8.2%
\$2,000 to \$2,499	157	2.7%
\$2,500 to \$2,999	13	0.2%
\$3,000 or more	36	0.6%
<b>Median (dollars)</b>	<b>957</b>	<b>(X)</b>
No rent paid	424	(X)
<b>GROSS RENT AS A PERCENTAGE OF HOUSEHOLD INCOME (GRAPI)</b>		
<b>Occupied units paying rent (excluding units where GRAPI cannot be computed)</b>	<b>5,816</b>	<b>5,816</b>
Less than 15.0 percent	1,022	17.6%
15.0 to 19.9 percent	823	14.2%
20.0 to 24.9 percent	677	11.6%
25.0 to 29.9 percent	714	12.3%
30.0 to 34.9 percent	448	7.7%
35.0 percent or more	2,132	36.7%
Not computed	476	(X)

Source: 2020 ACS 5-Year Estimates

## SECTION 2D: VACANT STRUCTURES

Per the 2020 Decennial Census there are 23,017 housing units within incorporated and unincorporated Clatsop County. The 177 licensed STRs in unincorporated Clatsop County represent ~~0.07%~~ 0.7% of those residential units.

The 2020 Decennial Census identified 17,533 of all housing units (76.2%) as occupied, while 5,484 units (23.8%) were categorized as vacant. The 2020 American Community Survey (ACS) 5-Year Estimates estimated that 16,019 housing units in Clatsop County were occupied. The margin of error for that estimate is  $\pm 399$  units.

The Current Population Survey and Housing Vacancies and Homeownership data (CPS/HVS) compiled by the U.S. Census Bureau classifies residential dwellings as “Vacant Housing Units” if:

no one is living in it at the time of the interview, unless its occupants are only temporarily absent. In addition, a vacant unit may be one which is entirely occupied by persons who have a usual residence elsewhere. New units that are not yet occupied are classified as vacant housing units if construction has reached a point where all exterior windows and doors are installed and final usable floors are in place. Vacant units are excluded if they are exposed to the elements, that is, if the roof, walls, windows, or doors no longer protect the interior from the elements, or if there is positive evidence (such as a sign on the house or block) that the unit is to be demolished or is condemned. Also excluded are quarters being used entirely for nonresidential purposes, such as a store or an office, or quarters used for the storage of business supplies or inventory, machinery, or agricultural products. Vacant sleeping rooms in lodging houses, transient accommodations, barracks, and other quarters not defined as housing units are not included in the statistics.

Since 1990, the CPS/HVS also included year-round vacant mobile homes as part of the year-round vacant count of housing units. “Year-round units” are those intended for occupancy at any time of the year, even though they may not be in use the year round. In resort areas, a housing unit which is usually occupied on a year-round basis is considered a year-round unit. Year-round units temporarily occupied by persons with usual residence elsewhere are included with year-round vacant units.

The CPS/HVS classifies vacant units into the following categories:

- Vacant units for rent
- Vacant units for sale only
- Vacant units rented or sold (but owner/renter has not yet moved in)
- Vacant units held off the market

- Units held for occasional use:
- Units temporarily occupied by persons with usual residences elsewhere:
- Other vacant:
  - in need of or under repair/renovation
  - in probate
  - foreclosure
  - preparing to rent/sell)
  - abandoned
  - extended absence

Seasonal Vacant Units, as defined by CPS/HVS are “those intended for occupancy only during certain seasons of the year and found primarily in resort areas. Housing units held for occupancy by migratory labor employed in farm work during the crop season are tabulated as seasonable.”

## **SECTION 2E: CLATSOP COUNTY INCOME LEVELS AND HOUSING COSTS**

**Table 2** documents income levels, housing costs and percentage of housing costs for households in Clatsop County (Source: 2020 American Community Survey (ACS) 5-Year Estimates). This data includes both incorporated and unincorporated areas. The 2020 ACS 5-Year Estimates estimate the median owner-occupied housing income as \$71,644. The median renter-occupied household income, however, is \$41,225.

As defined by the U.S. Department of Housing and Urban Development, affordable housing is “housing on which the occupant is paying no more than 30 percent of gross income for housing costs, including utilities.”

As shown on the information on Table 1, households earning less than \$35,000 are more likely to pay more than 30% of their income for housing. A household earning \$35,000 per year would be able to pay up to \$875 per month (including utilities) for an “affordable” housing unit. As also shown on Table 2, 7,649 of the estimated housing units within the County are below the \$1,000 per month price range. The remaining 8,370 units are above \$1,000 in monthly costs.

**TABLE 2: HOUSING UNITS AND HOUSING COSTS**

**Clatsop County, Oregon**

	Occupied housing units	Percent occupied housing units	Owner-occupied housing units	Percent owner-occupied housing units	Renter-occupied housing units	Percent renter-occupied housing units
Label	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate

Occupied housing units	16,019	100%	9,727	60.7%	6,292	39.3%
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**HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2020 INFLATION-ADJUSTED DOLLARS)**

Less than \$5,000	414	2.6%	227	2.3%	187	3.0%
\$5,000 to \$9,999	396	2.5%	100	1.0%	296	4.7%
\$10,000 to \$14,999	575	3.6%	210	2.2%	365	5.8%
\$15,000 to \$19,999	906	5.7%	320	3.3%	586	9.3%
\$20,000 to \$24,999	621	3.9%	288	3.0%	333	5.3%
\$25,000 to \$34,999	1,875	11.7%	933	9.6%	942	15.0%
\$35,000 to \$49,999	2,180	13.6%	1,119	11.5%	1,061	16.9%
\$50,000 to \$74,999	2,922	18.2%	1,891	19.4%	1,031	16.4%
\$75,000 to \$99,999	2,281	14.2%	1,472	15.1%	809	12.9%
\$100,000 to \$149,999	2,564	16.0%	1,960	20.2%	604	9.6%
\$150,000 or more	1,285	8.0%	1,207	12.4%	78	1.2%
<b>Median household income (dollars)</b>	<b>57,466</b>	<b>57,466</b>	<b>71,644</b>	<b>71,644</b>	<b>41,225</b>	<b>41,225</b>

**MONTHLY HOUSING COSTS**

Less than \$300	675	4.2%	522	5.4%	153	2.4%
\$300 to \$499	1,551	9.7%	1,391	14.3%	160	2.5%
\$500 to \$799	3,372	21.1%	1,907	19.6%	1,465	23.3%
\$800 to \$999	2,051	12.8%	607	6.2%	1,444	22.9%
\$1,000 to \$1,499	3,962	24.7%	2,005	20.6%	1,957	31.1%
\$1,500 to \$1,999	2,256	14.1%	1,773	18.2%	483	7.7%
\$2,000 to \$2,499	931	5.8%	774	8.0%	157	2.5%

**TABLE 2: HOUSING UNITS AND HOUSING COSTS**

Clatsop County, Oregon

	Occupied housing units	Percent occupied housing units	Owner-occupied housing units	Percent owner-occupied housing units	Renter-occupied housing units	Percent renter-occupied housing units
Label	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
\$2,500 to \$2,999	445	2.8%	432	4.4%	13	0.2%
\$3,000 or more	352	2.2%	316	3.2%	36	0.6%
No cash rent	424	2.6%	(X)	(X)	424	6.7%
<b>Median (dollars)</b>	<b>1,017</b>	<b>1,017</b>	<b>1,139</b>	<b>1,139</b>	<b>957</b>	<b>957</b>

**MONTHLY HOUSING COSTS AS A PERCENTAGE OF HOUSEHOLD INCOME IN THE PAST 12 MONTHS**

<b>Less than \$20,000</b>	2,078	13.0%	791	8.1%	1,287	20.5%
Less than 20 percent	126	0.8%	83	0.9%	43	0.7%
20 to 29 percent	148	0.9%	106	1.1%	42	0.7%
30 percent or more	1,804	11.3%	602	6.2%	1,202	19.1%
<b>\$20,000 to \$34,999</b>	2,440	15.2%	1,221	12.6%	1,219	19.4%
Less than 20 percent	394	2.5%	368	3.8%	26	0.4%
20 to 29 percent	695	4.3%	369	3.8%	326	5.2%
30 percent or more	1,351	8.4%	484	5.0%	867	13.8%
<b>\$35,000 to \$49,999</b>	2,065	12.9%	1,119	11.5%	946	15.0%
Less than 20 percent	736	4.6%	568	5.8%	168	2.7%
20 to 29 percent	622	3.9%	161	1.7%	461	7.3%
30 percent or more	707	4.4%	390	4.0%	317	5.0%
<b>\$50,000 to \$74,999</b>	2,866	17.9%	1,891	19.4%	975	15.5%
Less than 20 percent	1,254	7.8%	870	8.9%	384	6.1%
20 to 29 percent	930	5.8%	495	5.1%	435	6.9%
30 percent or more	682	4.3%	526	5.4%	156	2.5%
<b>\$75,000 or more</b>	6,028	37.6%	4,639	47.7%	1,389	22.1%
Less than 20 percent	4,441	27.7%	3,217	33.1%	1,224	19.5%

**TABLE 2: HOUSING UNITS AND HOUSING COSTS**

Clatsop County, Oregon

	Occupied housing units	Percent occupied housing units	Owner-occupied housing units	Percent owner-occupied housing units	Renter-occupied housing units	Percent renter-occupied housing units
Label	Estimate	Estimate	Estimate	Estimate	Estimate	Estimate
20 to 29 percent	1,242	7.8%	1,115	11.5%	127	2.0%
30 percent or more	345	2.2%	307	3.2%	38	0.6%
Zero or negative income	118	0.7%	66	0.7%	52	0.8%
No cash rent	424	2.6%	(X)	(X)	424	6.7%

Source: 2020 ACS 5-Year Estimates



## SECTION 2F: HOUSING NEED

The 2019 *Housing Strategies Report* identified a deficit of 1,500 housing units would be required in order to accommodate growth while allowing for a continued supply of vacation rentals.

The recently-completed Regional Housing Needs Analysis, produced by Oregon Housing and Community Services, estimates that 3,020 residential units are needed between the five incorporated cities within Clatsop County over the next 20 years.

**TABLE 3: CLATSOP COUNTY INCORPORATED AREAS - NEEDED UNITS**

Median Family Income	New Units for Each of the Following:					Total Units	% of Units
	Single-Family Detached	Single-Family Attached	Manufactured and Other	Multifamily			
+120%	977	0	0	0	977	32.4%	
80-120%	466	0	0	0	466	15.4%	
50-80%	557	0	0	0	557	18.4%	
30-50%	191	0	0	181	372	12.3%	
0-30%	36	0	299	313	648	21.5%	
<b>Total Units</b>	<b>2,227</b>	<b>0</b>	<b>299</b>	<b>494</b>	<b>3,020</b>	<b>100%</b>	

**Sources:** ECONorthwest analysis; PSU, 2020-2070 Coordinated Population Forecasts; HUD, FY 2018 Income Limits; U.S. Census Bureau, 2018 ACS 1-year PUMS estimates; HUD, 2019 PIT count

## SECTION 2G: 2019 HOUSING STUDY

In 2018, Clatsop County partnered with the cities of Astoria, Warrenton, Gearhart, Seaside and Cannon Beach to undertake a [housing study](#). The stated purpose of the study was to find potential solutions to the region's housing crisis.

The study analyzed the existing housing supply, housing and demographic trends, existing plans and data, including an analysis of the local governments housing goals, policies and codes. The completed document included proposals for initiatives to encourage more production of needed housing types, as well as recommendations on building partnerships and capacity-building strategies.

The final report was issued in January 2019. The 10 recommended strategies included in the report focused on five overarching findings:

- Sufficient supply, but not the right types of housing
- Focus strategies on adding the right types of supply
- Control commercial use of residential land
- Use available residential land efficiently
- Focus on workforce housing

**The study has never been formally accepted by the Board of Clatsop County Commissioners and no action has been taken by the Board on recommendations forwarded by the Planning Commission.**