

**ADDITIONAL  
PUBLIC TESTIMONY  
SUBMITTED FOR  
NOVEMBER 20, 2024  
CITY COUNCIL HEARING  
Land Use Appeal # 24-1  
Nedonna Wave Planned Unit  
Development - Phase 2**

(Received as of 3:00 pm on 11/19/2024)

---

**From:** Lucy Brook <[REDACTED]>  
**Sent:** Monday, November 18, 2024 11:21 AM  
**To:** City Hall <cityhall@corb.us>  
**Subject:** Nedonna Wave PUD development

*To City of Rockaway,*

*Planning Commission  
City Council*

*There are many residences already in the wetland where this development is proposed.*

*These residences all have septic systems.*

*I think it is an insane idea to add any number of new residences to a wetland that is already compromised by the present septic systems.*

*For these reasons I oppose the proposed Nedonna Wave PUD development.*

*Each of us deserves clean, uncontaminated drinking water.*

*Respectfully,*

*Lucile W. Brook  
Nehalem, Tillamook County resident*

To: Rockaway Beach City Council

From: Danny J. Wilhelmi

██████ Chieftain Dr

Rockaway Beach, OR 97136

Date: 11/18/2024

Subject: Written public comments regarding #Appeal-24-1

Dear Rockaway Beach City Council,

As the fall rain sets in and I watch McMillan Creek rise to uncomfortably high levels behind my house, I am compelled to submit public comments regarding Appeal-24-1 (PUD-24-1).

Given that to my knowledge no action is being taken by the City to remediate this significant flood risk (despite my written complaints regarding violations of 94.042 by the property owner of this section of the creek) and that proceeding with this PUD will only amplify this risk, its imperative that the City Council consider the appeal with the intent of protecting existing homeowners in Nedonna Beach.

The issues raised by Oregon Shores Conservation Coalition are very clearly presented and it seems impossible to conclude that errors have not been made throughout this process, dating back to original PUD approval. Errors of the past should not prevent the Council from taking the right decisions today.

Issue1 is very clear to me. There was no schedule submitted as was required. Additionally, 16yrs have elapsed since the 2008 application and the plan has not been completed yet. If the City Council views 16yrs as acceptable, I must suggest the council consider what amount of time is not acceptable? 25yrs, 50yrs, 100yrs, 200yrs? If a clear limit of reasonable time cannot be defined, then the council should conclude that 16yrs has already exceeded this threshold.

Thank you for your consideration of my comments toward this appeal.

Sincerely,

Danny J. Wilhelmi

---

**From:** Daniel Howlett <[REDACTED]>  
**Sent:** Tuesday, November 19, 2024 9:54 AM  
**To:** Melissa Thompson  
**Subject:** Opposition to Proposed Nedonna Wave Development

Dear Members of the Council,

I am writing to express my strong opposition to the proposed Nedonna Wave Development. While I recognize the need for additional housing in Rockaway Beach, this particular project poses significant issues:

1. **Threat to Water Quality:** Leaking septic tanks and other contaminants risk compromising the backup water supply.
2. **Outdated Approvals:** The project's approval is 16 years old and does not align with current standards.
3. **Wetland Protection:** The development would destroy protected wetlands, impacting wildlife habitats.
4. **Safety Concerns:** Nedonna Beach has a single access point, creating a safety risk in emergencies.
5. **Flood Risk:** The area is prone to flooding, and displacing wetlands would exacerbate this issue.
6. **Regulatory Concerns:** Allowing developers to bypass wetland protections sets a troubling precedent.
7. **Litigation Risks:** This project could lead to costly and prolonged legal challenges.
8. **Conflict with Comprehensive Plan:** The city's plan emphasizes conserving natural resources, which this project contradicts.

The recent housing needs study identified two priorities: *commercial buildings* and *multi-family housing* to support the local workforce. Building more luxury single-family homes does not address these needs.

To encourage appropriate development, I recommend lowering development fees and water connection fees for downtown. This would incentivize the creation of mixed-use buildings, with storefronts on the ground floor and apartments above. Such projects would utilize existing infrastructure and avoid the need for costly expansions.

A few years ago, I proposed starting an urban renewal agency to revitalize downtown, similar to Garibaldi's successful program since 2006. Currently, downtown Rockaway Beach is subject to the same regulations as other areas, which stifles redevelopment. Adjustments, such as reducing parking requirements to one space per unit and lowering fees, could help fill vacant storefronts and revitalize the downtown corridor.

I urge the council to reconsider the proposed development and focus on sustainable, community-aligned growth that preserves our natural resources and enhances our city's future.

Sincerely,

Daniel Howlett

██████████ Grayling St

Dear Rockaway Beach City Council:

As a concerned community member and visitor, I support the appeal of the Nedonna Wave Planned Unit Development (PUD-24-1) for the following reasons:

- The aquifer at Nedonna Beach, is part of a groundwater system that supplies fresh water to the city. It is vital for the community's water supply, and its management is key to ensuring a reliable and safe source of water for residents. Development could lead to pollution and over extraction of wells needed for the city's water system.
- These wells are particularly susceptible to adverse effects from nearby septic systems of varying ages, as well as surface activities such as fertilizing and pesticide application for yard maintenance. Moreover, their proximity to the ocean has resulted in noticeable saltwater intrusion, as indicated by elevated sodium levels in water samples from the wells. Any further development is likely to intensify these negative impacts.
- Much of the proposed development is now in the city's Special Area Wetlands Zone (SA), the purpose of which is to "conserve significant freshwater wetlands and the shoreland and aquatic environment of Rockaway Beach's lakes."
- The would-be developer is trying to utilize an original approval for the project that is now 16 years old. Both state and local law have protections that prohibit such an old approval from coming back without further review based on current conditions. In those 16 years, the City has grown and changed, applicable regulations have evolved, and wetlands have moved. The City Council must deny this application because the 16-year-old approval is no longer valid.
- The issues with the outdated approval are demonstrated by the fact that much of this PUD is now in a protected wetland zone that does not allow any residential development. The City Council would be clearly violating its own standards for protecting sensitive wetlands if it approves this development.
- At risk are wetlands and the health of McMillan Creek, which flows past the area to be developed, and provides habitat for a range of wildlife including river otters, coyotes, beavers, deer and many species of birds.
- There are also risks to the community. Emergency evacuation via the one road outlet for the area is currently questionable as to effectiveness and safety. Adding more homes to the area, increasing the number of people needing to evacuate in the case of an emergency, would be highly irresponsible.
- The City has not done enough to mitigate the risk this development poses to its tsunami evacuation plan. To protect its residents, the City's code requires developments like this one make improvements to evacuation routes, including adding capacity by creating new routes. The developer here will make no improvements to the evacuation routes, but will instead only have to conduct a

"traffic study." That traffic study does nothing to improve the community's safety, and after it is conducted the City will no longer have any ability to require actual improvements from the developer based on the findings of the study.

- The area is already at risk of flooding, and adding more impervious surface would make this worse. For comparison, the ongoing filling and development in the south Rockaway Beach area of Washington Street has resulted in significant flooding issues. The existing neighborhood in Nedonna Beach relies on the flood mitigation properties of the wetlands, which must be preserved and not filled or developed, as was done in the Washington Street area.
- This neighborhood faces several significant fire hazards, such as inadequately maintained fire pits, beach fires positioned too close to driftwood, highly combustible dune grass, the wooded area south of the jetty, and the use of illegal fireworks on the Fourth of July. In the event of a major fire, the limited access points—only one entrance and exit—would severely hinder evacuation efforts. Adding more dense housing in this area would be highly irresponsible.
- This is about developers making money at the expense of residents, who are already concerned about water and wetlands.
- Everyone should have to play by the rules. The residents of the area have purchased or built their homes in good faith compliance with the land use laws and the city's plan. This developer should not be allowed to evade those regulations, including those protecting wetlands and the rule setting an expiration date for PUD approvals.
- Effective December 1, 2024, regulations for development in the Special Flood Hazard Area (commonly known as the "floodplain") will be changing. These changes are mandated by FEMA for jurisdictions that participate in the National Flood Insurance Program (NFIP).

Considering all of this, I sincerely hope you will choose to reject the proposed Planned Unit Development in order to protect these vital wetlands. This decision will help safeguard our community's safety, fresh water supply, and natural resources, for ourselves and future generations.

Thank you,

Jeff Johns

Name

Tillamook

City, Or

[REDACTED]  
Email address

Dear Rockaway Beach City Council:

As a concerned community member and visitor, I support the appeal of the Nedonna Wave Planned Unit Development (PUD-24-1) for the following reasons:

- The aquifer at Nedonna Beach, is part of a groundwater system that supplies fresh water to the city. It is vital for the community's water supply, and its management is key to ensuring a reliable and safe source of water for residents. Development could lead to pollution and over extraction of wells needed for the city's water system.
- These wells are particularly susceptible to adverse effects from nearby septic systems of varying ages, as well as surface activities such as fertilizing and pesticide application for yard maintenance. Moreover, their proximity to the ocean has resulted in noticeable saltwater intrusion, as indicated by elevated sodium levels in water samples from the wells. Any further development is likely to intensify these negative impacts.
- Much of the proposed development is now in the city's Special Area Wetlands Zone (SA), the purpose of which is to "conserve significant freshwater wetlands and the shoreland and aquatic environment of Rockaway Beach's lakes."
- The would-be developer is trying to utilize an original approval for the project that is now 16 years old. Both state and local law have protections that prohibit such an old approval from coming back without further review based on current conditions. In those 16 years, the City has grown and changed, applicable regulations have evolved, and wetlands have moved. The City Council must deny this application because the 16-year-old approval is no longer valid.
- The issues with the outdated approval are demonstrated by the fact that much of this PUD is now in a protected wetland zone that does not allow any residential development. The City Council would be clearly violating its own standards for protecting sensitive wetlands if it approves this development.
- At risk are wetlands and the health of McMillan Creek, which flows past the area to be developed, and provides habitat for a range of wildlife including river otters, coyotes, beavers, deer and many species of birds.
- There are also risks to the community. Emergency evacuation via the one road outlet for the area is currently questionable as to effectiveness and safety. Adding more homes to the area, increasing the number of people needing to evacuate in the case of an emergency, would be highly irresponsible.
- The City has not done enough to mitigate the risk this development poses to its tsunami evacuation plan. To protect its residents, the City's code requires developments like this one make improvements to evacuation routes, including adding capacity by creating new routes. The developer here will make no improvements to the evacuation routes, but will instead only have to conduct a



"traffic study." That traffic study does nothing to improve the community's safety, and after it is conducted the City will no longer have any ability to require actual improvements from the developer based on the findings of the study.

- The area is already at risk of flooding, and adding more impervious surface would make this worse. For comparison, the ongoing filling and development in the south Rockaway Beach area of Washington Street has resulted in significant flooding issues. The existing neighborhood in Nedonna Beach relies on the flood mitigation properties of the wetlands, which must be preserved and not filled or developed, as was done in the Washington Street area.
- This neighborhood faces several significant fire hazards, such as inadequately maintained fire pits, beach fires positioned too close to driftwood, highly combustible dune grass, the wooded area south of the jetty, and the use of illegal fireworks on the Fourth of July. In the event of a major fire, the limited access points—only one entrance and exit—would severely hinder evacuation efforts. Adding more dense housing in this area would be highly irresponsible.
- This is about developers making money at the expense of residents, who are already concerned about water and wetlands.
- Everyone should have to play by the rules. The residents of the area have purchased or built their homes in good faith compliance with the land use laws and the city's plan. This developer should not be allowed to evade those regulations, including those protecting wetlands and the rule setting an expiration date for PUD approvals.
- Effective December 1, 2024, regulations for development in the Special Flood Hazard Area (commonly known as the "floodplain") will be changing. These changes are mandated by FEMA for jurisdictions that participate in the National Flood Insurance Program (NFIP).

Considering all of this, I sincerely hope you will choose to reject the proposed Planned Unit Development in order to protect these vital wetlands. This decision will help safeguard our community's safety, fresh water supply, and natural resources, for ourselves and future generations.

Thank you,

Bonita Lane

Name

Tillamook OR 97141

City, Or

Email address

Dear Rockaway Beach City Council:

As a concerned community member and visitor, I support the appeal of the Nedonna Wave Planned Unit Development (PUD-24-1) for the following reasons:

- The aquifer at Nedonna Beach, is part of a groundwater system that supplies fresh water to the city. It is vital for the community's water supply, and its management is key to ensuring a reliable and safe source of water for residents. Development could lead to pollution and over extraction of wells needed for the city's water system.
- These wells are particularly susceptible to adverse effects from nearby septic systems of varying ages, as well as surface activities such as fertilizing and pesticide application for yard maintenance. Moreover, their proximity to the ocean has resulted in noticeable saltwater intrusion, as indicated by elevated sodium levels in water samples from the wells. Any further development is likely to intensify these negative impacts.
- Much of the proposed development is now in the city's Special Area Wetlands Zone (SA), the purpose of which is to "conserve significant freshwater wetlands and the shoreland and aquatic environment of Rockaway Beach's lakes."
- The would-be developer is trying to utilize an original approval for the project that is now 16 years old. Both state and local law have protections that prohibit such an old approval from coming back without further review based on current conditions. In those 16 years, the City has grown and changed, applicable regulations have evolved, and wetlands have moved. The City Council must deny this application because the 16-year-old approval is no longer valid.
- The issues with the outdated approval are demonstrated by the fact that much of this PUD is now in a protected wetland zone that does not allow any residential development. The City Council would be clearly violating its own standards for protecting sensitive wetlands if it approves this development.
- At risk are wetlands and the health of McMillan Creek, which flows past the area to be developed, and provides habitat for a range of wildlife including river otters, coyotes, beavers, deer and many species of birds.
- There are also risks to the community. Emergency evacuation via the one road outlet for the area is currently questionable as to effectiveness and safety. Adding more homes to the area, increasing the number of people needing to evacuate in the case of an emergency, would be highly irresponsible.
- The City has not done enough to mitigate the risk this development poses to its tsunami evacuation plan. To protect its residents, the City's code requires developments like this one make improvements to evacuation routes, including adding capacity by creating new routes. The developer here will make no improvements to the evacuation routes, but will instead only have to conduct a

"traffic study." That traffic study does nothing to improve the community's safety, and after it is conducted the City will no longer have any ability to require actual improvements from the developer based on the findings of the study.

- The area is already at risk of flooding, and adding more impervious surface would make this worse. For comparison, the ongoing filling and development in the south Rockaway Beach area of Washington Street has resulted in significant flooding issues. The existing neighborhood in Nedonna Beach relies on the flood mitigation properties of the wetlands, which must be preserved and not filled or developed, as was done in the Washington Street area.
- This neighborhood faces several significant fire hazards, such as inadequately maintained fire pits, beach fires positioned too close to driftwood, highly combustible dune grass, the wooded area south of the jetty, and the use of illegal fireworks on the Fourth of July. In the event of a major fire, the limited access points—only one entrance and exit—would severely hinder evacuation efforts. Adding more dense housing in this area would be highly irresponsible.
- This is about developers making money at the expense of residents, who are already concerned about water and wetlands.
- Everyone should have to play by the rules. The residents of the area have purchased or built their homes in good faith compliance with the land use laws and the city's plan. This developer should not be allowed to evade those regulations, including those protecting wetlands and the rule setting an expiration date for PUD approvals.
- Effective December 1, 2024, regulations for development in the Special Flood Hazard Area (commonly known as the "floodplain") will be changing. These changes are mandated by FEMA for jurisdictions that participate in the National Flood Insurance Program (NFIP).

Considering all of this, I sincerely hope you will choose to reject the proposed Planned Unit Development in order to protect these vital wetlands. This decision will help safeguard our community's safety, fresh water supply, and natural resources, for ourselves and future generations.


Thank you,

Cody Newton

Name

Nedonna Beach, OR

City, Or

  
Email address

Dear Rockaway Beach City Council:

As a concerned community member and visitor, I support the appeal of the Nedonna Wave Planned Unit Development (PUD-24-1) for the following reasons:

- The aquifer at Nedonna Beach, is part of a groundwater system that supplies fresh water to the city. It is vital for the community's water supply, and its management is key to ensuring a reliable and safe source of water for residents. Development could lead to pollution and over extraction of wells needed for the city's water system.
- These wells are particularly susceptible to adverse effects from nearby septic systems of varying ages, as well as surface activities such as fertilizing and pesticide application for yard maintenance. Moreover, their proximity to the ocean has resulted in noticeable saltwater intrusion, as indicated by elevated sodium levels in water samples from the wells. Any further development is likely to intensify these negative impacts.
- Much of the proposed development is now in the city's Special Area Wetlands Zone (SA), the purpose of which is to "conserve significant freshwater wetlands and the shoreland and aquatic environment of Rockaway Beach's lakes."
- The would-be developer is trying to utilize an original approval for the project that is now 16 years old. Both state and local law have protections that prohibit such an old approval from coming back without further review based on current conditions. In those 16 years, the City has grown and changed, applicable regulations have evolved, and wetlands have moved. The City Council must deny this application because the 16-year-old approval is no longer valid.
- The issues with the outdated approval are demonstrated by the fact that much of this PUD is now in a protected wetland zone that does not allow any residential development. The City Council would be clearly violating its own standards for protecting sensitive wetlands if it approves this development.
- At risk are wetlands and the health of McMillan Creek, which flows past the area to be developed, and provides habitat for a range of wildlife including river otters, coyotes, beavers, deer and many species of birds.
- There are also risks to the community. Emergency evacuation via the one road outlet for the area is currently questionable as to effectiveness and safety. Adding more homes to the area, increasing the number of people needing to evacuate in the case of an emergency, would be highly irresponsible.
- The City has not done enough to mitigate the risk this development poses to its tsunami evacuation plan. To protect its residents, the City's code requires developments like this one make improvements to evacuation routes, including adding capacity by creating new routes. The developer here will make no improvements to the evacuation routes, but will instead only have to conduct a

"traffic study." That traffic study does nothing to improve the community's safety, and after it is conducted the City will no longer have any ability to require actual improvements from the developer based on the findings of the study.

- The area is already at risk of flooding, and adding more impervious surface would make this worse. For comparison, the ongoing filling and development in the south Rockaway Beach area of Washington Street has resulted in significant flooding issues. The existing neighborhood in Nedonna Beach relies on the flood mitigation properties of the wetlands, which must be preserved and not filled or developed, as was done in the Washington Street area.
- This neighborhood faces several significant fire hazards, such as inadequately maintained fire pits, beach fires positioned too close to driftwood, highly combustible dune grass, the wooded area south of the jetty, and the use of illegal fireworks on the Fourth of July. In the event of a major fire, the limited access points—only one entrance and exit—would severely hinder evacuation efforts. Adding more dense housing in this area would be highly irresponsible.
- This is about developers making money at the expense of residents, who are already concerned about water and wetlands.
- Everyone should have to play by the rules. The residents of the area have purchased or built their homes in good faith compliance with the land use laws and the city's plan. This developer should not be allowed to evade those regulations, including those protecting wetlands and the rule setting an expiration date for PUD approvals.
- Effective December 1, 2024, regulations for development in the Special Flood Hazard Area (commonly known as the "floodplain") will be changing. These changes are mandated by FEMA for jurisdictions that participate in the National Flood Insurance Program (NFIP).

Considering all of this, I sincerely hope you will choose to reject the proposed Planned Unit Development in order to protect these vital wetlands. This decision will help safeguard our community's safety, fresh water supply, and natural resources, for ourselves and future generations.

Thank you,

Amanda Newton A. Newton  
Name

Portland & Rockaway Beach  
City, Or

  
Email address

Nov. 16, 2024

Dear Rockaway Beach City Council:

As a concerned community member and visitor, I support the appeal of the Nedonna Wave Planned Unit Development (PUD-24-1) for the following reasons:

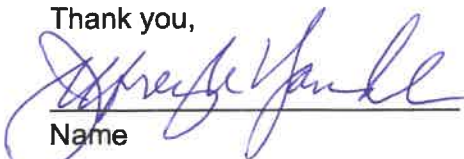
- The aquifer at Nedonna Beach, is part of a groundwater system that supplies fresh water to the city. It is vital for the community's water supply, and its management is key to ensuring a reliable and safe source of water for residents. Development could lead to pollution and over extraction of wells needed for the city's water system.
- These wells are particularly susceptible to adverse effects from nearby septic systems of varying ages, as well as surface activities such as fertilizing and pesticide application for yard maintenance. Moreover, their proximity to the ocean has resulted in noticeable saltwater intrusion, as indicated by elevated sodium levels in water samples from the wells. Any further development is likely to intensify these negative impacts.
- Much of the proposed development is now in the city's Special Area Wetlands Zone (SA), the purpose of which is to "conserve significant freshwater wetlands and the shoreland and aquatic environment of Rockaway Beach's lakes."
- The would-be developer is trying to utilize an original approval for the project that is now 16 years old. Both state and local law have protections that prohibit such an old approval from coming back without further review based on current conditions. In those 16 years, the City has grown and changed, applicable regulations have evolved, and wetlands have moved. The City Council must deny this application because the 16-year-old approval is no longer valid.
- The issues with the outdated approval are demonstrated by the fact that much of this PUD is now in a protected wetland zone that does not allow any residential development. The City Council would be clearly violating its own standards for protecting sensitive wetlands if it approves this development.
- At risk are wetlands and the health of McMillan Creek, which flows past the area to be developed, and provides habitat for a range of wildlife including river otters, coyotes, beavers, deer and many species of birds.
- There are also risks to the community. Emergency evacuation via the one road outlet for the area is currently questionable as to effectiveness and safety. Adding more homes to the area, increasing the number of people needing to evacuate in the case of an emergency, would be highly irresponsible.
- The City has not done enough to mitigate the risk this development poses to its tsunami evacuation plan. To protect its residents, the City's code requires developments like this one make improvements to evacuation routes, including adding capacity by creating new routes. The developer here will make no improvements to the evacuation routes, but will instead only have to conduct a

"traffic study." That traffic study does nothing to improve the community's safety, and after it is conducted the City will no longer have any ability to require actual improvements from the developer based on the findings of the study.

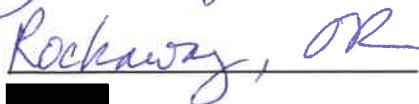
- The area is already at risk of flooding, and adding more impervious surface would make this worse. For comparison, the ongoing filling and development in the south Rockaway Beach area of Washington Street has resulted in significant flooding issues. The existing neighborhood in Nedonna Beach relies on the flood mitigation properties of the wetlands, which must be preserved and not filled or developed, as was done in the Washington Street area.
- This neighborhood faces several significant fire hazards, such as inadequately maintained fire pits, beach fires positioned too close to driftwood, highly combustible dune grass, the wooded area south of the jetty, and the use of illegal fireworks on the Fourth of July. In the event of a major fire, the limited access points—only one entrance and exit—would severely hinder evacuation efforts. Adding more dense housing in this area would be highly irresponsible.
- This is about developers making money at the expense of residents, who are already concerned about water and wetlands.
- Everyone should have to play by the rules. The residents of the area have purchased or built their homes in good faith compliance with the land use laws and the city's plan. This developer should not be allowed to evade those regulations, including those protecting wetlands and the rule setting an expiration date for PUD approvals.
- Effective December 1, 2024, regulations for development in the Special Flood Hazard Area (commonly known as the "floodplain") will be changing. These changes are mandated by FEMA for jurisdictions that participate in the National Flood Insurance Program (NFIP).

Considering all of this, I sincerely hope you will choose to reject the proposed Planned Unit Development in order to protect these vital wetlands. This decision will help safeguard our community's safety, fresh water supply, and natural resources, for ourselves and future generations.

Thank you,



Name







Email address



Dear Rockaway Beach City Council:

As a concerned community member and visitor, I support the appeal of the Nedonna Wave Planned Unit Development (PUD-24-1) for the following reasons:

- The aquifer at Nedonna Beach, is part of a groundwater system that supplies fresh water to the city. It is vital for the community's water supply, and its management is key to ensuring a reliable and safe source of water for residents. Development could lead to pollution and over extraction of wells needed for the city's water system.
- These wells are particularly susceptible to adverse effects from nearby septic systems of varying ages, as well as surface activities such as fertilizing and pesticide application for yard maintenance. Moreover, their proximity to the ocean has resulted in noticeable saltwater intrusion, as indicated by elevated sodium levels in water samples from the wells. Any further development is likely to intensify these negative impacts.
- Much of the proposed development is now in the city's Special Area Wetlands Zone (SA), the purpose of which is to "conserve significant freshwater wetlands and the shoreland and aquatic environment of Rockaway Beach's lakes."
- The would-be developer is trying to utilize an original approval for the project that is now 16 years old. Both state and local law have protections that prohibit such an old approval from coming back without further review based on current conditions. In those 16 years, the City has grown and changed, applicable regulations have evolved, and wetlands have moved. The City Council must deny this application because the 16-year-old approval is no longer valid.
- The issues with the outdated approval are demonstrated by the fact that much of this PUD is now in a protected wetland zone that does not allow any residential development. The City Council would be clearly violating its own standards for protecting sensitive wetlands if it approves this development.
- At risk are wetlands and the health of McMillan Creek, which flows past the area to be developed, and provides habitat for a range of wildlife including river otters, coyotes, beavers, deer and many species of birds.
- There are also risks to the community. Emergency evacuation via the one road outlet for the area is currently questionable as to effectiveness and safety. Adding more homes to the area, increasing the number of people needing to evacuate in the case of an emergency, would be highly irresponsible.
- The City has not done enough to mitigate the risk this development poses to its tsunami evacuation plan. To protect its residents, the City's code requires developments like this one make improvements to evacuation routes, including adding capacity by creating new routes. The developer here will make no improvements to the evacuation routes, but will instead only have to conduct a



"traffic study." That traffic study does nothing to improve the community's safety, and after it is conducted the City will no longer have any ability to require actual improvements from the developer based on the findings of the study.


- The area is already at risk of flooding, and adding more impervious surface would make this worse. For comparison, the ongoing filling and development in the south Rockaway Beach area of Washington Street has resulted in significant flooding issues. The existing neighborhood in Nedonna Beach relies on the flood mitigation properties of the wetlands, which must be preserved and not filled or developed, as was done in the Washington Street area.
- This neighborhood faces several significant fire hazards, such as inadequately maintained fire pits, beach fires positioned too close to driftwood, highly combustible dune grass, the wooded area south of the jetty, and the use of illegal fireworks on the Fourth of July. In the event of a major fire, the limited access points—only one entrance and exit—would severely hinder evacuation efforts. Adding more dense housing in this area would be highly irresponsible.
- This is about developers making money at the expense of residents, who are already concerned about water and wetlands.
- Everyone should have to play by the rules. The residents of the area have purchased or built their homes in good faith compliance with the land use laws and the city's plan. This developer should not be allowed to evade those regulations, including those protecting wetlands and the rule setting an expiration date for PUD approvals.
- Effective December 1, 2024, regulations for development in the Special Flood Hazard Area (commonly known as the "floodplain") will be changing. These changes are mandated by FEMA for jurisdictions that participate in the National Flood Insurance Program (NFIP).

Considering all of this, I sincerely hope you will choose to reject the proposed Planned Unit Development in order to protect these vital wetlands. This decision will help safeguard our community's safety, fresh water supply, and natural resources, for ourselves and future generations.

Thank you,

  
Name

  
City, Or

  
Email address

