



June 23, 2022

Cannon Beach Planning Commission  
c/o Cannon Beach Community Development Department  
Cannon Beach, OR

Re: P 22-01 and CU 22-02, Request for a Partition and a Conditional Use Permit for a three-lot partition in the Wetland Overlay Zone

Via Email: [planning@ci.cannon-beach.or.us](mailto:planning@ci.cannon-beach.or.us)

Dear Chair Newton and members of the Planning Commission,

Oregon Coast Alliance (ORCA) is an Oregon nonprofit corporation whose mission is to protect coastal natural resources and work with coastal communities to increase livability. We write this letter today out of concern for the Forest Lawn partition proposed in the wetland overlay zone.

This has been a controversial project because of the presence of a .68-acre palustrine, seasonal wetland on the site, identified in the city's wetland inventory. Nevertheless, the site is zoned R-2, with a designation of Residential. Portions of the site lie within the city's Wetland Overlay zone (17.43.050).

According to the application, all three proposed lots now meet the lot area, width and depth requirements, as well as the minimum upland area requirement for lots in the Wetland Overlay zone.

The city's determination of whether to allow this project, modify it or find it does not meet ordinance requirements will hinge in good measure whether the three lots are proposed for the *upland* portion of each lot, and whether the integrity of the wetland would be thereby maintained. As the application itself notes, (p. 7), the site is generally flat "with minimal topographic variation," which will require of the planning commission a close scrutiny to

determine if there is adequate upland for the houses proposed. This is especially important as buffer areas for "Wetland A" encroach onto each proposed lot, and the partition could not have apparently been done without including both the wetland and the buffer areas.

ORCA would caution the planning commission likewise on the grounds of geological hazard. The hazard report prepared by Earth Engineers for this property makes it clear there are large ancient landslide deposits, and the parcel is within a landslide hazard area. A report by geological professionals which states, "... it is our professional opinion that the site is likely at risk from shallow and deep global landslides" (p. 13) is an opinion Cannon Beach decision-makers need to take seriously. All the more is this the case when the report concludes with "Ultimately, owning a home in this area means there is an acceptance of risk that the property is located among very large ancient landslide deposits and within a landslide hazard area ..."

Given these two serious issues on this property, the planning commission needs to look at alternatives, such as fewer houses, or finding the property unbuildable given its ecological and geological constraints.

Please place this testimony into the record for this matter.

Sincerely,

*/s/ Cameron La Follette*

Cameron La Follette

