



## PLANNING COMMISSION STAFF REPORT

**Hearing Date:** October 14, 2025  
**Item:** #187-25-000115-PLNG (Type IV – Text Amendments)  
**Applicant:** City of Coos Bay  
**Owner:** N/A  
**Permit Request:** Text Amendments to the Coos Bay Development Code  
**Subject Property:** City of Coos Bay city limits

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### **I. REQUEST**

The proposal, attached hereto as **Attachment A** and incorporated herein by reference, amends the text of the Coos Bay Development Code as follows:

- 1) Adds a new definition “mini storage” to CBDC 17.150.020.
- 2) Expressly prohibits mini storage facilities in the following zone districts: Medium Density Residential (MDR), Commercial (C), Industrial Commercial (I-C), Waterfront Heritage (W-H), Waterfront Industrial (W-I), Hollering Place (HP), Urban Public (UP), and Medical Park (MP).  
*[Commercial uses are already expressly prohibited in all other zone districts (SLR, LDR, LDR Overlay, and WS).]*

See, **Exhibit 1** of **Attachment A**, attached hereto and incorporated herein by reference.

### **II. BACKGROUND**

On August 5, 2025, the Coos Bay City Council identified self-storage unit facilities as a type of land development that must be immediately restricted in city-limits to protect the City’s limited commercial and industrial lands. Near-term approval of additional self-storage unit facilities would displace higher-employment or mixed-use opportunities on limited corridor and employment sites; reduce storefront activity critical to small-business growth and walkability; and, impair progress toward adopted economic development and corridor plans such as the Empire Area Blueprint and Front Street Blueprint. On August 19, 2025, Coos Bay City Council subsequently passed Resolution 25-29, imposing an immediate moratorium on approval of new self-storage unit facilities in Coos Bay city limits.

The City recently completed an updated Economic Opportunities Analysis (EOA, 2025) which finds the City has a deficit of needed commercial and industrial lands, approximately 30-acres and 36-acres respectively. The City prioritizes economic development types that bring jobs, housing, active streetscapes, and increased assessed values to the community. Self-storage unit facilities do not

provide jobs, housing, or an active streetscape for citizens nor does the development type lend to large increases in assessed values. There are 13 self-storage unit facilities existing in city limits, these units will be allowed to remain and be maintained; additional self-storage unit facilities are deemed unnecessary.

The current proposal updates the text of the Coos Bay Development Code (CBDC) to prohibit self-storage unit facilities in city limits and is in line with City of Coos Bay Comprehensive Plan Economic Goal #3 – Align land use and infrastructure with economic priorities.

### **III. NOTICE**

The Department of Land Conservation and Development (DLCD) was notified of the proposal to amend the text of the Coos Bay Comprehensive Plan on August 29, 2025.

Public notice was sent to interested parties and posted at City Hall on August 29, 2025, posted on the City’s website on September 2, 2025, and published in the City’s newsletter on October 3, 2024. A special Ballot Measure 56 notice was mailed to all affected property owners on September 9, 2025. Legal notice was published in the September 30, 2025, edition of The World Newspaper.

### **IV. COMMENTS**

The following comments have been received:

#### **Staff / Agency Comments**

As of the date of this staff report, no comments from staff or outside agencies have been received.

#### **Public Comments**

Staff received multiple inquiries from the public regarding this matter. As of the date of this staff report, the following public comments have been recorded:

#### **In Support**

- 169 S. Marple, Black, John D & Alayna B
- 1640 Ocean Blvd, Trevor Thomas
- 729 Johnson, Destinee Gustafson
- 234 S. Mill, Joseph Penniman
- 1420 Anderson Ave, Jill Christiana

#### **Neutral**

- 1149 Minnesota, Patricia Brown
- 610 Lindy Lane, Kevin Brawley
- 845 S. Broadway, Gerald Pratt
- 718 9<sup>th</sup> Avenue, David Geist
- 253 1<sup>ST</sup> Avenue, Gary Adishian

- 1460 Southwest Blvd, Olene Foley

#### **In Opposition**

- None.

### **V. APPROVAL CRITERIA**

Chapter 17.130 CBDC, Procedures.

**VI. RECOMMENDED FINDINGS**

Based on the findings as presented in **Exhibit 2** of **Attachment A**, attached hereto and incorporated herein by reference, staff finds that the Planning Commission can recommend City Council **APPROVE** Land Use Application #187-25-000115-PLNG.

**VII. PLANNING COMMISSION RECOMMENDATION**

The Planning Commission makes a recommendation to the City Council for a final decision. The Planning Commission may recommend approval or denial of the application or a continuance of the hearing to an upcoming meeting.

The Planning Commission recommendation can be supported by taking one of the following actions (**A**, **B**, or **C**):

**Motion: The Planning Commission recommends:**

- A.** The City Council **APPROVE** Land Use Application #187-25-000115-PLNG based on the information presented by the applicant and recommended findings of approval.
- B.** The City Council **DENY** Land Use Application #187-25-000115-PLNG based on findings that the application does not comply with applicable standards. [*make supportive findings*]
- C.** A **CONTINUANCE** of the public hearing on Land Use Application #187-25-000115-PLNG to a certain date/time [*set date/time*] to provide the applicant the opportunity to revise, respond, or clarify issues raised during the public hearing.

**VIII. ATTACHMENTS**

- Attachment A – Land Use Application #187-25-000115-PLNG
- Exhibit 1 – Proposed Coos Bay Development Code Amendments
- Exhibit 2 – Recommended Findings

*Chelsea Schnabel*  
Chelsea Schnabel, AICP, CFM | Community Development Director

September 24, 2025  
Date



**CITY OF COOS BAY**  
 Community Development Department  
 500 Central Avenue, Coos Bay, Oregon 97420  
 Phone 541-269-8918 Fax 541-269-8916

Permit No. **187- 25 - 000115-PLNG**

Date Received: 08/27/2025

## LAND USE/PLANNING APPLICATION

<sup>1</sup>**Type of Review** (Please check all that apply):

*\*Pre-application review may be required*

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Adjustment Review (Type II, III)*           | <input type="checkbox"/> Estuarine Use/Activities (Type I)         | <input type="checkbox"/> Subdivision (Type II, III)*                  |
| <input type="checkbox"/> Annexation (Type IV)*                       | <input type="checkbox"/> Comp. Plan Amendment-Map/Text (Type IV)*  | <input type="checkbox"/> Temporary Use (Type I, II)                   |
| <input type="checkbox"/> Appeal and Review (Type III)                | <input type="checkbox"/> Dev. Code Amendment-Map/Text (Type IV)*   | <input type="checkbox"/> Tourist Habitation-Home Stay (Type II)       |
| <input type="checkbox"/> Architectural Design Review (Type II, III)* | <input type="checkbox"/> Home Occupation (Type I, II)              | <input type="checkbox"/> Tourist Habitation-Vacation Rental (Type II) |
| <input type="checkbox"/> Accessory Dwelling Unit-Historic (Type I)   | <input type="checkbox"/> Partition (Type II)                       | <input type="checkbox"/> Variance (Type I, II)                        |
| <input type="checkbox"/> Conditional Use (Type II, III)*             | <input type="checkbox"/> Property Line Adjustment (Type I, II)     | <input type="checkbox"/> Zone Change (Type III, IV)*                  |
| <input type="checkbox"/> Cultural Resources (Type II, III)*          | <input type="checkbox"/> Planned Unit Development (Type II, III)*  | <input type="checkbox"/> Code Interpretation (Type I)                 |
| <input type="checkbox"/> Cottage Cluster (Type II, III)*             | <input type="checkbox"/> Modification to Approved Permit (Type II) | <input type="checkbox"/> Legal Lot Determination (Type I)             |
| <input type="checkbox"/> General Review _____                        | <input type="checkbox"/> Floodplain Development (Type I)           | <input type="checkbox"/> Other: _____                                 |
- (Identify Type: See [Table 173.130.030](#))

Site Location/Address	Assessor's Map No. & Tax Lot #
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Zoning	Total Land Area
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Applicant/Owner Name	Address
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Phone	Email
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Applicant's Representative Name	Address
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Phone	Email
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**Project Description:** Describe the project in detail, including what is being proposed, its size, hours of operation, any proposed phasing, timetable for improvements etc. Attach separate sheet with additional details as needed.

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**Your submittal must also include:**

- Nonrefundable application fee. Applications subject to a pre-application conference may be eligible to apply the nonrefundable pre-application conference fee to a Type III or IV application. **Waived.**

<sup>1</sup>*Pre-Application and Appeal applications require a different application form, inquire of staff*

- Evidence of ownership or written statement from the owner that you are authorized to represent him/her. When there is more than one owner, all owners must authorize the application. **N/A**
- Most recent conveyance deed showing current ownership and legal description (trust deeds are not acceptable). **N/A**
- A copy of the pre-application conference summary, if the application was subject to pre-application review, which shall include all information required by the director to address issues, comments, and concerns in the summary. **N/A**
- Detailed written statement of findings (description/narrative). With all land use applications, the “burden of proof” is on the applicant. A written statement of findings **must** be provided with your application that clearly describes the nature of the request with an explanation as to how the proposal complies, or can comply, with **all** applicable Chapters of the Coos Bay Development Code (CBDC). If a section/item in an applicable Chapter is not applicable to your request, provide that statement and include an explanation as to why it is not applicable to your proposal. You must address each of the criteria on a point-by-point basis in order for your application to be deemed complete. A supplementary development/use application may be available for this purpose. The application should also evidence how the proposal complies, or can comply, with each applicable section of the Coos Bay Municipal Code (CBMC) and other city and state policies and regulations applicable to the proposal. **If you need help with findings please contact a land use attorney or consultant.**
- A detailed project site plan identifying existing conditions and the proposed development and/or land use. The site plan shall include all relevant information from [Table 17.130.040\(2\)](#) – Site Plan Requirements. **N/A**
- Supplementary information required by virtue of the application type, including but not limited to (if required) storm drainage report, traffic impact study/analysis or other studies/reports related to the project.

Any additional information including but not limited to [Table 17.130.040\(3\)](#) – Additional Contents required by the director to demonstrate the proposed development and/or land use complies, or can be conditioned to comply, with each applicable CBCP, this title, and other city and state policies, regulations, and approval criteria applicable to the application.

Additional application contents associated with a specific application required for the proposed development and/or land use. See [Table 17.130.040\(4\)](#) for specific permit/review applications and applicable code sections with additional application contents and process requirements.

**The processing of your application does not begin until your application is deemed complete. An incomplete application will postpone the decision, or may result in denial of the request.**

**Land use approval is required prior to authorization of any other required permits/licenses.**

**I am the owner, applicant, or representative of the property/site and am authorized to complete this land use/planning application.** I completed this land use/planning application; its contents are true and correct. I understand: 1) City application acceptance does not infer a complete submittal; 2) the information herewith submitted is true and correct; 3) the application processing and fee payment does not obligate City authorization and City authorization does not give authority to violate or cancel the provisions of any other applicable law. I will pay the City land use/planning application fees and additional expenses incurred by the City for professional services should such services, at City discretion, be required. I understand that the application fees submitted are non-refundable.

Where there are multiple property owners, all owners must authorize/sign the permit application.

\_\_\_\_\_  
SIGNATURE of Owner(s)

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
DATE

*Chelsea Schnabel*  
\_\_\_\_\_  
SIGNATURE of Applicant/Representative

\_\_\_\_\_  
Print Name

08/27/2025  
\_\_\_\_\_  
DATE

# **DRAFT Proposed Text Amendments**

## Coos Bay Development Code PROPOSED Text Amendments

**Section A:** A new definition is added to the text of CBDC 17.150.020 (inserted in alphabetical order) to read as follows:

“Mini storage” means a self-storage facility designed to be rented or leased for private storage of personal belongings.

**Section B:** A new use is added to the text of Section “Other” of CBDC Table 17.225.030 to read as follows (new text / ~~deleted~~ text):

Use	MDR
<b>Other</b>	
Uses deemed by the director to be similar to and/or compatible with this table and state regulations	P
All manufacturing and commercial uses or services not listed determined by the director to be similar to or compatible with the permitted and conditionally permitted uses in the MDR zone.	P
<u>Moving and storage (mini-storage)</u>	<u>X</u>

**Section C:** The text of Section “Services – General” of CBDC Table 17.230.020 is amended to read as follows (new text / ~~deleted~~ text):

Use	C	MX
<b>Services – General</b>		
Business support service – Establishments primarily engaged in the provision of services of a clerical, employment, protective, or minor processing nature to firms rather than individuals and where the storage of goods other than samples is prohibited. Typical uses include secretarial services, telephone answering services, blueprint services, or printing and duplicating firms.	P	
Professional and administrative services – Offices or private firms or organizations which are primarily used for the provision of professional, executive, management, or administrative services. Typical uses include administrative offices, legal offices, or architectural firms.	P	
Building/property maintenance service – Establishments primarily engaged in the provision of maintenance and custodial services to firms rather than individuals. Typical uses include janitorial, landscape maintenance, or window cleaning services.	P	
Moving and storage (mini-storage)	<u>EX</u>	X

Use	C	MX
Financial, insurance, and real estate services – Establishments primarily engaged in the provision of financial, insurance, real estate, or securities brokerage services. Typical uses include banks, insurance agencies, or real estate firms.	P	
Event facilities	P	C
RV storage	P	C
Other similar uses deemed by the director to be compatible with the C/MX districts and adjacent land uses.	Review type dependent upon size and intensity of use.	

**Section D:** The text of Section “Services – General” of CBDC Table 17.235.020 is amended to read as follows (new text / ~~deleted~~ text):

Use	I-C
<b>Services – General</b>	
Business support service – Establishments primarily engaged in the provision of services of a clerical, employment, protective, or minor processing nature to firms rather than individuals and where the storage of goods other than samples is prohibited. Typical uses include secretarial services, telephone answering services, blueprint services, or printing and duplicating firms.	P
Professional and administrative services – Offices or private firms or organizations which are primarily used for the provision of professional, executive, management, or administrative services. Typical uses include administrative offices, legal offices, or architectural firms.	P
Building/property maintenance service – Establishments primarily engaged in the provision of maintenance and custodial services to firms rather than individuals. Typical uses include janitorial, landscape maintenance, or window cleaning services.	P
Moving and storage (mini-storage)	PX
Financial, insurance, and real estate services – Establishments primarily engaged in the provision of financial, insurance, real estate, or securities brokerage services. Typical uses include banks, insurance agencies, or real estate firms.	P
Event facilities (commercial recreation facilities enclosed and unenclosed and auditoriums and civic centers)	P
Art galleries, libraries and museums	P
RV storage	P

**Section E:** A new Subsection (b) is added to the text of CBDC 17.240.050(2) to read as follows (new text / ~~deleted~~ text):

**17.240.050 Uses expressly prohibited.**

The following uses are expressly prohibited in the WH district:

(2) Commercial Use Types.

[\(b\) Moving and storage \(mini-storage\).](#)

**Section F:** A new Section 17.245.025 is added to the text of Chapter 17.245 CBDC to read as follows (new text / ~~deleted~~ text):

**[17.245.025 Prohibited uses.](#)**

[\(1\) Moving and storage \(mini-storage\).](#)

**Section G:** A new Subsection (2) is added to the text of CBDC 17.250.040 to read as follows (new text / ~~deleted~~ text):

**17.250.040 Prohibited uses.**

[\(2\) Moving and storage \(mini-storage\).](#)

**Section H:** The text of CBDC Table 17.255.020 is amended to read as follows (new text / ~~deleted~~ text):

<u>Use</u>	<u>UP</u>
<b>Residential</b>	
A single-unit dwelling in conjunction with a permitted use	P
<b>Civic Use Types</b>	
Community facilities including but not limited to libraries and recreation facilities	P
Parking service	P
Government offices and related uses	P
Bus shelter	P
Educational services and related buildings	P
<b>Commercial Use Types</b>	
Funeral and interment services – Cemetery	P
Dining establishments, only in conjunction with a permitted use	P
<b>Other Uses</b>	
Park model parks (subject to standards at CBDC 17.322.040)	C/S
Single room occupancy	S

Other uses and development deemed by the director to be similar to and/or compatible with this table, the CBDC and state regulations	P
<b>Uses Expressly Prohibited</b>	
All nonrelated uses	X
All marijuana related businesses	X
<a href="#">Moving and storage (mini-storage)</a>	<u>X</u>

**Section I:** The text of Section “Nonresidential” of CBDC Table 17.260.020 is amended to read as follows (new text / ~~deleted~~ text):

Use	MP
<b>Nonresidential</b>	
Medical services – Establishments primarily engaged in the provision of personal health services ranging from prevention, diagnosis, and treatment, or rehabilitation services provided by physicians, dentists, nurses, and other health personnel as well as the provision of medical testing and analysis services	P
Ambulance services	C
Sanitaria, convalescent and rest homes	C
Other similar uses deemed by the director to be compatible with the MP district and adjacent land uses.	C
All marijuana related businesses	X
<a href="#">Moving and storage (mini-storage)</a>	<u>X</u>

# **DRAFT Recommended Findings**

## RECOMMENDED FINDINGS OF FACT

### I. REQUEST

This proposal amends the text of the City of Coos Bay Development Code as follows:

- Adds a new definition “mini storage” to CBDC 17.150.020.
- Expressly prohibits mini storage facilities in the following zone districts: MDR, C, I-C, W-H, W-I, HP, UP, and MP. [*Commercial uses are already expressly prohibited in all other zone districts (SLR, LDR, LDR Overlay, and WS).*]

See Land Use Application # attached hereto as Attachment and incorporated herein by reference.

### II. BACKGROUND

On August 5<sup>th</sup>, 2025, the Coos Bay City Council identified self-storage unit facilities as a type of land development that must be immediately restricted in city-limits to protect the City’s limited commercial and industrial lands. Near-term approval of additional self-storage unit facilities would displace higher-employment or mixed-use opportunities on limited corridor and employment sites; reduce storefront activity critical to small-business growth and walkability; and, impair progress toward adopted economic development and corridor plans such as the Empire Area Blueprint and Front Street Blueprint. On August 19<sup>th</sup>, 2025, Coos Bay City Council subsequently passed Resolution 25-29, imposing an immediate moratorium on approval of new self-storage unit facilities in city limits.

The City recently completed an updated Economic Opportunities Analysis (2025) which finds the City has a deficit of needed commercial and industrial lands, approximately 30-acres and 36-acres respectively. The City prioritizes economic development types that bring jobs, housing, active streetscapes, and increased assessed values to the community. Self-storage unit facilities do not provide jobs, homes, or an active streetscape for citizens nor does the development type lend to large increases in assessed values. There are 13 self-storage unit facilities existing in city limits; additional facilities are deemed unnecessary.

The current proposal updates the text of the Coos Bay Development Code (CBDC) to prohibit mini storage unit facilities in city limits and is in line with City of Coos Bay Comprehensive Plan Economic Goal #3 – Align land use and infrastructure with economic priorities.

### III. NOTICE

The Department of Land Conservation and Development was notified of the proposal to

amend the text of the City of Coos Bay Comprehensive Plan on \_\_\_\_\_, 2025. Notice was mailed to interested parties and posted at City Hall and on the City website on \_\_\_\_\_, 2025, published in the City's Friday Update newsletter on \_\_\_\_\_, 2025, and published in The World Newspaper on \_\_\_\_\_, 2025.

#### IV. COMMENTS

As of the date of this application, the following written comments have been received:

\_\_\_\_\_

#### Staff / Agency Comments

As of the date of this staff report, the following staff and agency comments have been received:

\_\_\_\_\_

#### V. APPROVAL CRITERIA

Chapter 17.130 CBDC, Procedures.

Chapter 17.360 CBDC, Plan Amendments and Zone Changes.

##### ***CBDC 17.360.020 Initiation of amendment.***

*(1) Amendments of the comprehensive plan text or map, zoning map, or this title may be initiated by the city council, the planning commission, the director, or by application of a property owner or their authorized agent by following: (b) Legislative Process. Subject to a Type IV land use procedure. See CBDC [17.130.110](#).*

**FINDING:** In August 2025, the Coos Bay City Council imposed a moratorium (Resolution 25-29) on new self-storage unit facilities in city limits. A moratorium on land use must be concluded with a permanent change, in this case, to the City Code. The Community Development Director is responsible for the official application for necessary text amendments to address the moratorium. This application for Development Code text amendment is consistent with CBDC 17.360.020.

##### ***CBDC 17.130.035 Pre-application review.***

*(1) Requirement. Unless otherwise expressly provided in this title, all applications subject to Type III or Type IV review are subject to pre-application review unless the director waives the requirement in writing.*

**FINDING:** This application is city-initiated and city-led making a pre-application review unnecessary. Therefore, this application is consistent with CBDC 17.130.035(1).

**CBDC 17.130.040 Application contents for all application types.**

*(1) All land use applications subject to a Type I, II, III, or IV review shall contain at a minimum the contents listed in Table 17.130.040(1) – Minimum Requirements for All Applications.*

*(2) A project site plan identifying existing conditions to remain, and the proposed development and/or land use. The site plan shall include all relevant information from Table 17.130.040(2) – Site Plan Requirements determined by the director to demonstrate the proposed development and/or land use complies, or can be conditioned to comply, with each applicable CBCP, this title, and other city and state policies, regulations, and approval criteria applicable to the application.*

*(3) Any additional information including but not limited to Table 17.130.040(3) – Additional Contents required by the director to demonstrate the proposed development and/or land use complies, or can be conditioned to comply, with each applicable CBCP, this title, and other city and state policies, regulations, and approval criteria applicable to the application.*

*(4) Additional application contents associated with a specific application required for the proposed development and/or land use. See Table 17.130.040(4) for specific permit/review applications and applicable code sections with additional application contents and process requirements.*

**FINDING:** A complete application including the DRAFT text amendments and supportive findings to address the criteria was submitted on [REDACTED], 2025. Therefore, this application is consistent with CBDC 17.130.040.

Amendment applications are, also, subject to CBDC 17.360.040.

**CBDC 17.360.040 Application contents.**

*(1) An amendment application shall include the requisite fee and three paper copies and one electronic copy of the applicable information required by CBDC 17.130.050(2), Technically Complete Status.*

*(2) A technically complete application shall contain:*

*(a) A map of the proposed amendment, if applicable; (b) The complete proposed text amendment, if applicable; (c) A narrative describing the potential effects the proposal will have on public services, including streets, schools, parks and utilities, to the extent applicable; (d) An analysis of the potential cumulative effects of the proposal; (e) Materials required under CBDC 17.130.050(2); and (f) Other materials the director deems necessary.*

The fee for this application is waived because it is City-initiated. The proposal implicates all land within city limits. The application submittal

includes the proposed DRAFT text amendments and a written narrative with supportive findings that address the criteria. One paper copy and one electronic copy of the application was provided because it has been determined that one paper copy and one electronic copy is a sufficient number of copies for review. Therefore, this application is consistent with CBDC 17.360.040.

**CBDC 17.130.050 Review for technically complete status.**

*(1) Applicability and Schedule. Before accepting an application subject to a Type I, II, or III review, the director shall determine within 30 calendar days after the application is submitted whether the application is technically complete.*

FINDING: This application is for a Type IV review. Therefore, CBDC 17.130.050 is not implicated.

**CBDC 17.130.060 Distribution of notices.**

*The city shall provide all required notices subject to Type II, III, or IV review to:*

*(1) The applicant and the applicant's representative; (a) The property owner of record; shall be the person(s) listed in the records of the Coos County assessor; and (b) Failure of a property owner to receive notice shall not affect the decision if the notice was sent. A sworn certificate of mailing or transmittal confirmation executed by the person who did the mailing or notification shall be conclusive evidence that notice was provided to parties listed or referenced in the certificate;*

*(2) Agencies with jurisdiction, including transportation and transit agencies; and*

*(3) Other persons with standing who request such notice in writing.*

FINDING: This application is for a Type IV Legislative Land Use Review. The City is the applicant. Notice of this land use application review was provided to affected agencies including but not limited to the Department of Land Conservation and Development, the Coos County Board of Realtors, and all affected property owners via a Ballot Measure 56 Notice. Therefore, this application is consistent with CBDC 17.130.060.

**CBDC 17.130.070 Approval criteria.**

*The authorizing authority shall approve a land use application if the applicant has sustained the burden of proving that:*

*(1) The application complies with the applicable regulations of the Coos Bay comprehensive plan and development code; or that the application can comply with all applicable regulations by complying with adopted conditions of approval; or that necessary variances have been approved; or that adopted conditions of approval have been met prior to final plat approval.*

FINDING: Refer to findings under CBDC 17.360.060(1).

*(2) The development makes adequate provision for public services consistent with the level of service provided in adopted city policies, plans and regulations.*

FINDING: The current proposal does not include new development; therefore, CBDC 17.130.070(2) is not implicated.

*(3) The development will not have a significant adverse effect on adjacent properties or public facilities.*

FINDING: The current proposal does not include new development; therefore, CBDC 17.130.070(3) is not implicated.

**CBDC 17.130.110 Type IV procedure.**

*(1) Application contents as noted in CBDC 17.130.040. Refer to CBDC 17.130.070 for approval criteria.*

FINDING: An application for Type IV Land Use Review (Amendments) consistent with CBDC 17.130.040 was submitted to initiate a Type IV procedure. The approval criteria for text amendments are set forth in CBDC 17.360.060, addressed below in this final order.

*(2) Notice of Application. Twenty days prior to the director's decision, the city shall mail a written notice of the application to property owners within 300 feet of the application site.*

*(a) Contents of a Notice of Application Subject to Type IV Review. The notice of Type IV application shall contain at least the following information: (i) The file number; (ii) The name(s) and address(es) of the applicant and owner; (iii) The legal description of the site; (iv) The street address or other easily understood geographical reference to the subject property; (v) A description of the proposal and a listing of the approval criteria by applicable code section number; (vi) A statement that the application can be reviewed at City Hall during working hours, and that copies can be obtained for a fee equal to the city's cost for providing the copies; (vii) The name and contact information of the city representative to contact regarding the application; (viii) An invitation to comment, in writing, on the proposal and the place, date and time that comments are due; (ix) A statement outlining the appeals process. (x) The date, time and place of the hearing; (xi) A statement that the planning commission will conduct the hearing in accordance with the rules of procedure adopted by the planning commission; (xii) A statement that the staff report will be available at least seven days prior to the hearing and how the report may be viewed; (xiii) A statement that interested parties may testify orally or in writing at the public hearing; (xiv) A statement of the date, time, and place for the city council public hearing in accordance with the rules of procedure adopted by the city*

council; and (xv) A statement that the staff report will be available at least seven days prior to the hearing and how the report may be viewed.

**FINDING:** This application is for a legislative Type IV Land Use Review that implicates more than a single/small area of land. Therefore, CBDC 17.130.100(2) is technically not applicable. Note, Ballot Measure (BM) 56 notification procedures were followed to notify all affected property owners of the proposal. A BM56 notice includes similar language to that required under CBDC 17.130.100(2); therefore, this criterion is satisfied.

**(b) Comments.** *The city shall provide the applicant a copy of comments timely received in response to the notice.*

**FINDING:** The City of Coos Bay is the applicant for this text amendment application and the record keeper of all comments received. CBDC 17.130.100(2)(b) is satisfied.

**(c) Distribution of Notices.** *Refer to CBDC 17.130.060.*

**FINDING:** Refer to findings under CBDC 17.130.060, above in this final order.

**(3) Public Hearing.** *An application subject to a Type IV process will be considered at one or more public hearings before the planning commission and one or more public hearings before the city council. The planning commission and city council may combine their meetings into one public meeting.*

**FINDING:** The Planning Commission conducted a public hearing on this matter on \_\_\_\_\_, 2025. The City Council conducted a public hearing on this matter on \_\_\_\_\_, 2025. Therefore, CBDC 17.130.100(3) is satisfied.

**(a) Notice of the Initial Planning Commission Hearing.** *At least 20 calendar days before the date of the first planning commission hearing regarding an application subject to a Type IV process, the director shall mail public notice of the hearing to parties who have requested such notice and to other individuals, firms or agencies as deemed appropriate. If the Type IV procedure is related to a specific property, public notice shall be mailed as specified in subsection (2) of this section to property owners within 300 feet of the application site. At least 10 days before the date of the hearing, the city shall cause notice of the hearing to be posted at City Hall, on the city website, and in the local newspaper.*

**FINDING:** Proper notice of the Planning Commission public hearing was mailed to interested/affected persons and posted at City Hall and on the City Website on \_\_\_\_\_, 2025, and published in The World Newspaper on \_\_\_\_\_, 2025, prior to a decision, in accordance with CBDC 17.130.100(3)(a).

*(b) Staff Report. At least seven calendar days before the date of the first planning commission or joint planning commission/council hearing, the city shall issue a written staff report regarding the application. The staff report shall set out the relevant facts and applicable standards for the application and a summary of how the application complies with those standards. The city shall mail a copy of the staff report to the review authority and to other parties who request it and post an electronic copy of the staff report on the city website. Copies of the staff report also shall be available at the public hearing.*

**FINDING:** The staff report was made available on \_\_\_\_\_, 2025, more than seven (7) days in advance of the scheduled public hearing. Therefore, this application complies with CBDC 17.130.100(3)(b).

*(c) Public Hearing Procedure. Public hearings shall be conducted in accordance with the rules of procedure adopted by the review authority, except to the extent waived by the review authority. A public hearing shall be recorded on audio or audiovisual tape.*

*(i) At the conclusion of a planning commission or joint planning commission/council hearing on an application subject to a Type IV process, the planning commission or, in the case of a joint planning commission/council meeting, the council shall announce one of the following actions, which may not be appealed: (A) That the hearing is continued. If the hearing is continued to a place, date and time certain, then additional notice of the continued hearing is not required to be mailed or published. If the hearing is not continued to a place, date and time certain, then notice of the continued hearing shall be given as though it was the initial hearing; or (B) That the planning commission recommends against or in favor of approval of the application(s) with or without certain changes, or that the planning commission makes no recommendation regarding the application(s), together with a brief summary of the basis for the recommendation. (C) That, in the case of a joint planning commission/council hearing, the council may take action as noted in subsection (3)(c)(iii) of this section.*

**FINDING:** This land use application was considered at a public hearing conducted in accordance with the procedures set forth in CBDC 17.130.100(3)(c) on \_\_\_\_\_, 2025, before the Planning Commission, and on \_\_\_\_\_, 2025, before the City Council. Therefore, this application is consistent with CBDC 17.130.100(3)(c).

#### **CBDC 17.130.140 Expiration and extension of decisions.**

*(1) Except as otherwise expressly provided by the Coos Bay development code or the decision in question, decisions made pursuant to this chapter expire four years after the effective date of the decision unless, within that time, the applicant or a successor in interest files an application for an extension of the decision or the permit is inaugurated as defined in Chapter 17.150 CBDC.*

**FINDING:** This legislative land use decision is final as of the effective date of Ordinance No. \_\_\_\_\_. CBDC 17.130.140 is not implicated when the City

Council adopts a legislative land use decision by ordinance.

**CBDC 17.360.060 Approval Criteria.**

*(1) With a Type IV review, the city council shall approve the proposal upon finding that:*

*(a) The proposed amendment is consistent with the applicable policies of the comprehensive plan or that a significant change in circumstances requires an amendment to the plan or map.*

Finding: The City recently completed an updated Economic Opportunities Analysis (2025) which finds the City has a deficit of needed commercial and industrial lands, approximately 30-acres and 36-acres respectively. The City prioritizes economic development types that bring jobs, housing, active streetscapes, and increased assessed values to the community. This is evidenced by area plans such as the [Empire Area Blueprint](#) and the [Front Street Blueprint](#).

Self-storage unit facilities do not provide jobs, housing, or an active streetscape for citizens nor does the development type lend to large increases in assessed property values. There are 13 self-storage unit facilities existing in city limits. The current average need for self-storage rentable space per capita is approximately seven (7) square-feet per person.<sup>1</sup> The 2020 Census shows the City to have a population of 15,981 persons, or a need for approximately 112,000 square-feet of net rentable storage space. The average size of a storage unit facility in the U.S. is 46,000 net rentable square feet.<sup>2</sup> Taking a conservative assumption that each of the 13 facilities in Coos Bay are less than the average size (20,000 square-feet), the City has more than double (260,000 square-feet) the net rentable storage space available for its citizens. Additional self-storage unit facilities are deemed unnecessary.

The proposal is consistent with the Coos Bay Comprehensive Plan as follows:

***Economic Goals***

***Goal 3: Align land use and infrastructure with economic priorities.***

The proposal restricts self-storage unit facility developments in city-limits to protect needed commercial and industrial lands for higher-employment or mixed-use opportunities and in support of developments that add jobs, homes, active streetscapes, and further progress on adopted area plans (ie. Empire Area Blueprint, Front Street Blueprint) in line with current Coos Bay City Council economic priorities. For this reason, the proposal is consistent with Economic Goal 3.

<sup>1</sup> <https://selfstorage.loan/investor-glossary/key-metrics-in-self-storage>

<sup>2</sup> <https://storeganise.com/blog/how-many-storage-units-per-acre>

## **Housing Goals**

**Goal 4:** *Ensure that the Development Code enables the development of housing options that are affordable.*

**Goal 5:** *Allow for, encourage and support the development of housing units in conjunction with commercial development (e.g., housing located above commercial uses).*

The proposal continues to support the development of housing units in conjunction with commercial development and enables the development of housing options that are affordable because needed commercial and industrial lands will no longer be available for the development of self-storage unit facilities but remain available for the development of housing in conjunction with other commercial and industrial uses. For this reason, the proposal is consistent with Housing Goals 4 and 5.

## **Public Participation Strategies**

**CI.1** *Coos Bay shall continue to utilize, support, and publicize its Citizen Involvement Program and the efforts of the Committee for Citizen Involvement (CCI), which is charged with the responsibility of coordinating general public knowledge about and involvement in all phases of the ongoing planning and community development process. The city recognizes the advantages of broad-based community input to the quality and public acceptability of its planning and community development decisions.*

The City has a robust public involvement program, providing opportunities to disseminate information to the public via public meetings, the local newspaper, the City website, the Friday Update newsletter, and social media. The City Council initially discussed this proposal at their August 5<sup>th</sup>, 2025 regular meeting and, again, at their August 19<sup>th</sup>, 2025 regular meeting where they enacted Resolution 25-29 imposing a moratorium on self-storage unit facilities in Coos Bay. Staff subsequently initiated steps to address the moratorium via the necessary text amendments to the Coos Bay Development Code (CBDC). Information about the proposal was disseminated to the community via postings at City Hall, on the City website and social media sites, as well as via the City's Friday Update newsletter. Through the legislative text amendment process, proper public notice was provided including but not limited following newspaper publication procedures and Ballot Measure (BM) 56 notification procedures; the Coos Bay Planning Commission held the first public hearing on the matter where public comment was received; the Coos Bay City Council held the second public hearing on the matter where additional public comment was received prior to adopting a final decision.

For these reasons, this proposal is consistent with Public Participation Strategy Cl.1.

*(b) The proposed amendment is in the public interest.*

**FINDING:** Adoption of the proposed amendments is in the public interest because limited commercial and industrial lands are protected from a development type that does not provide the community with jobs, housing, an active streetscape, or large increases in assessed property values and because the proposal preserves property for higher-employment and mixed-use opportunities in line with adopted economic development plans that the City and the community have prioritized and invested time and resources in to achieve economic revitalization.

Therefore, this proposal will provide a long-term benefit to the community and is in the public interest of the citizens of Coos Bay and is consistent with CBDC 17.360.060(1)(b).

*(c) Approval of the amendment will not result in a decrease in the level of service for capital facilities and services identified in the Coos Bay capital improvement plan(s).*

**FINDING:** The proposal restricts property from being used for the development of new self-storage unit facilities. The proposal does not allow a new development type nor does it allow for any new uses or activities nor any new policies that would impact capital facilities and services.

Therefore, this application is consistent with CBDC 17.360.060(1)(c).

*(d) The proposed amendment is consistent with the city of Coos Bay's planned transportation system as described within the transportation system plan;*

**FINDING:** The proposal to prohibit new self-storage unit facilities city-wide does not include changes to the planned transportation system.

Therefore, CBDC 17.360.060(1)(d) is not implicated.

*(e) The proposed amendment is consistent with the adopted transportation system plan and would facilitate the planned function, capacity, and performance standards of the impacted facility or facilities; and*

**FINDING:** The proposal to prohibit new self-storage unit facilities city-wide remains consistent with the adopted transportation system plan because no new facilities, land uses, or activities are proposed that would impact the performance standards of a transportation facility.

Therefore, the proposal is consistent with CBDC 17.360.060(1)(e).

*(f) The proposed amendment shall be consistent with the OAR 660-012-0060 requirements. Where it is found that a proposed amendment would have a significant effect on a transportation facility in consultation with the applicable roadway authority, the city shall work with the roadway authority and applicant to modify the amendment request or mitigate the impacts in accordance with the TPR and applicable law.*

**FINDING:** The proposal to prohibit new self-storage unit facilities city-wide has no significant effect on a transportation facility because no new uses or activities are contemplated to be added to the existing list of permitted uses and activities in Coos Bay; no new impacts to a transportation facility are expected as a result of the proposal.

Therefore, the proposal is consistent with CBDC 17.360.060(1)(f).

## **VI. COMPLIANCE WITH STATEWIDE PLANNING GOALS**

**FINDING:** This proposal is consistent with Oregon Statewide Planning Goals. The following Statewide Planning Goals are not applicable to the proposed code amendment: Goal 3—Agricultural Lands, Goal 4—Forest Lands, Goal 5—Natural Resources, Scenic and Historic Areas, and Open Spaces, Goal 6—Air, Water and Land Resources Quality, Goal 7—Areas Subject to Natural Hazards, Goal 8—Recreational Needs, Goal 12—Transportation, Goal 13—Energy Conservation, Goal 14—Urbanization, Goal 15—Willamette River Greenway, Goal 18—Beaches and Dunes, Goal 19—Ocean Resources.

### **This proposal is consistent with Goal 1—Citizen Involvement.**

Adequate public notice of the proposed changes has been provided through the Type IV public notice process as specified in CBDC 17.130.110. The Department of Land Conservation and Development was notified of the intended amendments on \_\_\_\_\_, 2025. Public notice was provided via Ballot Measure (BM) 56 mailings, postings at City Hall and on the City’s website and social media sites, as well as publications in the City’s Friday Update newsletter and in The World Newspaper on \_\_\_\_\_, 2025. Public hearings were held before the Planning Commission on \_\_\_\_\_, 2025, and before the City Council on \_\_\_\_\_, 2025.

**This proposal is consistent with Goal 2—Land Use Planning.** The City has established a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions. The proposal followed the process established in CBMC Title 17 for text amendments to the City Code.

**This proposal is consistent with Goal 9—Economic Development.** The

City recently completed an updated Economic Opportunities Analysis (EOA) that includes analysis of the community's economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends and inventories buildable commercial and industrial lands, providing the City with current information about the state of the Coos Bay economy. The EOA finds that the City has a deficit of commercial and industrial lands. This proposal addresses an immediate need to protect the City's limited commercial and industrial lands and is in line with Coos Bay Comprehensive Plan Economic Development Goal 3, aligning land use with the City's economic priorities for jobs, housing, active streetscapes, and increased assessed property values.

**This proposal is consistent with Goal 10—Housing.** This proposal has a neutral, if not positive, effect on the development of housing because restricting self-storage unit facilities in city-limits does not reduce the availability of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and because the City's current standards on flexibility of housing location, type, and density remain unchanged. Housing developments continue to be encouraged and supported in both commercial and industrial zone districts.

**This proposal is consistent with Goal 16-Estuarine Resources.** The City has adopted the Coos Bay Estuary Management Plan (CBEMP). This proposal does not result in the permitting of any new uses or activities, or the restriction of any existing water dependent uses, in areas subject to the CBEMP.

**This proposal is consistent with Goal 17—Coastal Shorelands.** The proposal to restrict self-storage unit facilities in city-limits furthers the preservation of shorelands especially suited for water dependent uses because self-storage unit facilities are not a water dependent development type.

**CONCLUSION:** Based on the application submittal and information available at City Hall, and as outlined herein, the proposal complies with all criteria for approval of an application for a Comprehensive Plan Text Amendment. Therefore, Land Use Permit Application # \_\_\_\_\_-PLNG is APPROVED.