

## Matt Martin

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**From:** Charles Stephens <cmstephens14@icloud.com>  
**Sent:** Tuesday, May 14, 2024 6:08 AM  
**To:** Matt Martin  
**Subject:** TA24-01; BLIS comments  
**Attachments:** TA24-01\_BLIS Comments\_051324.docx.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Good morning, Matt. Attached are the comments of our community group in anticipation of Thursday's hearing. See you there. Charlie

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## MEMO FOR THE RECORD

Date: May 13<sup>th</sup>, 2024

To: Matt Martin, Principal Planner, City of Sisters

From: Better Living in Sisters (BLIS)

**Re: TA24-01; Proposed Amendments to the Sun Ranch Tourist Commercial Zone**

The following are comments for this docket of Better Living in Sisters (BLIS), a citizen group promoting a more livable and thriving community for the citizens of Sisters, in alignment with the goals and objectives of the Sisters Country Vision (SCV).

**The current SDC zoning for the Sun Ranch Tourist Commercial Zone provides for a wide variety of development options that will provide new amenities for tourists, business travelers, and local citizens. The proposed changes in this docket, especially allowing an RV park as a permitted use, will seriously undermine all of the benefits that might otherwise be generated by the development of this district. We strongly recommend that the City reject all of the proposed changes to the Code for this district, and maintain the current regulations.**

We note at the outset that the term “*lodging establishment*” that is proposed by the applicant as a new definition is already in use in the Code language for this district, with or without a formal definition. It is used in referring to the *business* that operates a tourist *facility*. A facility is not *established*, it is *built, physically*. A *business* is *established* and licensed. The SDC regulates facilities while the Sisters Municipal Code (SMC) regulates businesses. **This distinction is already apparent in the existing Code language for this district, and is highly appropriate as is.**

In addition, the state of Oregon Health Authority, Public Health Division – Chapter 333, Div 29 Part 333-29-0015 makes a clear definition of a “lodging unit,” which is significantly different from a “tourist facility,” such as an RV park or campground. An RV park is significantly different than a traditional lodging facility such as a hotel, motel or cottages in that lodging *facilities* include rooms for sleeping and related traveler accommodations whereas RV parks, which are regulated under different standards, provide only an assigned space for the traveler’s own sleeping accommodations. As such, the health-related standards are significantly different for an RV park, which is why they are correctly regulated as campgrounds.

**The City’s current zoning for an RV park use, which is not permitted in its Commercial Zones except for Highway Commercial, is highly appropriate and should remain that way.**

### **RV Park as a Permitted Use**

In our previous comments, we provided detailed observations and critique of the whole package of proposals being made by the applicant(s) behind TA24-01. Here we are focused simply on the proposal to allow an RV park in the district, **the**

**approval of which would render the rest of the SDC provisions for this district irrelevant.**

An RV park in this district would be an extremely poor use of this important part of the City's core business district, at the edge of future residential development, for several reasons:

- **Revisions to Tourist Commercial Zone District are not consistent with the original intent of the District and the justification for its conversion from agricultural land.**

A major reason for the original designation of the Tourist Commercial Zone was to provide housing and gathering places for business travelers, tourists and residents. This would include "expansion of lodging facilities and improved accessory components of the commercial lodging establishment such as meeting facilities, restaurant, bar and neighborhood market, etc." None of these amenities are required or suggested by the applicant's proposed Code changes.

- **Such a facility fails to support Goal 9 of the Sisters Comprehensive Plan, to "specifically or indirectly attract tourists year round."**

As evidenced by the highly seasonal level of use (very low or non-existent during the winter months) in the RV park adjacent to the Sisters Rodeo grounds ((which, by the way, is considered one of the best RV parks in the Northwest US), RV parks are not an attractive option for tourists and travelers during much of the year. Compared to development that would be used and useful year round, the lack of winter use will adversely affect the City's lodging-related revenue and the revenue of other tourist-related businesses in Sisters.

- **When combined with the applicant's proposed 1,000 sq ft limit for any retail structures, an RV park provides no benefits whatsoever for business travelers or the surrounding community.**

State law requires that RV parks provide men's and women's shower and restroom facilities, but beyond that, according to the proposed Code changes, a developer need not provide any other amenity, for the RV park inhabitants or anyone else. It's highly likely that whatever amenities *are* provided will be focused on those valued by the RV "glampers."

- **It's not clear how the City, under current regulations, would earn any lodging tax revenue at all from this development.**

An RV park does not provide any overnight accommodation; it simply provides a parking space and utilities for patrons who bring their *own* overnight accommodations. And since Section 2.15.2700(D) of the Code prohibits the use of RVs as STRs (entirely appropriate), the only revenue potential would be from RVs that might be provided as rentals by the RV park for periods longer

than 30 days, an inappropriate scenario, given that RVs are not designed or warranted for extended or continuous habitation.<sup>1</sup>

- **Lack of winter use will reduce the revenue to the City for water and sewer service.**

The water and sewer service capacity will have to be sized for peak summer capacity, but the City will receive very little or no monthly revenue to amortize that investment during the winter.

- **Current Code for this district requires the design of any development to provide a transition between the differing design standards of the neighboring residential and commercial districts. How does one impose such design standards on a steadily changing array of visiting RVs?**

The current design standards appropriately require the use of styles that accomplish the goal of this requirement very well. An RV park would not only fail to comply, but would be jarringly out of place in a transition district.

**On the whole, the proposal to allow an RV park as a permitted use in this district provides almost no benefit to the City or its residents, perhaps even degrading the attributes of the City that cause tourists to want to visit. Such a development fails to contribute to meeting the goals and policies of the relevant portions of the City's Comprehensive Plan (see our comments of 4/15/24 on those specific issues).**

**We strongly recommend that the City disapprove this set of proposals and maintain the current SDC requirements for this district.**

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<sup>1</sup> [https://www.bishs.com/blog/rv-warranties-and-full-time-rving/?embedded\\_webview=true](https://www.bishs.com/blog/rv-warranties-and-full-time-rving/?embedded_webview=true)