

LURA 2023-02

Planning Commission

16 August 2023

I am submitting this for the record of the 16 August 2023 Planning Commission hearing.

An annual mailing notifying property owners and residents within 200' of an STR of the local property management is just not adequate. This assumes no problems requiring attention or complaints can be addressed if management has changed at any time during the year. If management changes in January, no contact information will be available until the following January. This is exactly what happened in our neighborhood. The code should be amended to require that "The STR owner must annually or at the time of a change in the Local Representative mail via". Without this change, the code is essentially unenforceable and the neighborhood surrounding an STR has no way to deal with the expected issues.

A 200' radius surrounding an STR is inadequate. STRs are either vacant or occupied by transients. Either of these situations disrupts the fabric of neighborhood relationships and therefore interferes with normal social interactions and knowledge of normal and abnormal neighborhood patterns. This creates both social and safety issues. The 500' radius adopted by McMinnville this year is more reasonable. Please consider that the increased number of allowed STRs will increase significantly as the city develops the Riverside 300 acres. These STRs could be concentrated in specific areas of the city.

Odors are a problem that is difficult to address. We experience second hand marijuana smoke from the nearby supposedly nonsmoking STR. There are other masking odors – concealing the smoking, I suspect. And unidentifiable odors. Odors are chemicals in the air. I would appreciate knowing which chemicals are crossing our property line.

Elizabeth Sundeen

392 SW Dogwood Drive

10 August 2023

19 July 2023

I am submitting this for the record of the 19 July 2023 Planning Commission hearing and for inclusion in the Commission packet for this hearing.

17.203.240 E.1. This section states that "any concerns identified" are to be addressed in an undefined "application review process". This is unclear. It also prevents issues from being reported and remedied at any time other than an "application review process". Many issues need immediate attention. This section needs clarification.

17.203.240.F.4.b. This section should be amended to " The STR owner must annually or at the time of a change in the Local Representative mail via". Unless this change is made, the requirements of 17.203.240.F.4.c. and 17.203.240.K.c. for a complaint log cannot be met. If no Local Representative can be contacted, no complaints can be logged. Enforcement of STR requirements is inherently difficult as

police reports are not forwarded either to the city or to a Local Representative. It is necessary to have a clearly designated Local Representative at all times, especially in case of an emergency.

Three types of STRs are currently allowed in Dundee. 17.203.050 allows Bed and Breakfast Inns in residential zones with a maximum stay of 28 days/ guest. Bed and Breakfast Inns, as STRs, must be required to comply with 17.203.240 sections B through K in addition to the requirements in 17.203.050. The occupancy limit of 10 guests should be applied to Bed and Breakfast Inns. The three bedroom limit and the Conditional Use process for allowing four or more bedrooms should be eliminated. This is unclear and the Code should be consistent with respect to number of bedrooms and the occupancy limit set for all STRs. The Planning Commission could choose to alter 17.203.050 or to add Bed and Breakfast Inns to 17.203.240. The Bed and Breakfast Inns are currently unlimited in number. As STRs, they must be included in the 5% limit and must comply with the spacing/density requirements of all STRs.

It is necessary to consider that Dundee has an exceptionally large amount of undeveloped land within the urban growth boundary of the city. To the east, the city limits extend to the Willamette River, about a mile from the Rolling Acres subdivision. The eastern urban growth boundary extends to the floodway of the river established by the 1996 floods. The city extends to the south along Fulquartz Road beyond the sewage treatment plant and natural area park. Part of this land has been rezoned Public and part has been rezoned High Density Residential. It's highly improbable that future residential zoning will be anything other than High Density Residential. Currently about 50 STRs – excluding the unlimited Bed and Breakfast Inn STRs – are allowed. That number can reasonably be expected to increase to at least 150 STRs as foreseeable development occurs. The city of McMinnville, this year, imposed a moratorium on STRs until the radius around each was extended to 500 feet. The 500 foot radius is now required and the moratorium has been lifted. The 200 foot radius around each STR is inadequate. The 200 foot radius would permit a density of STRs that cannot comply with the requirements of Goal 10 and therefore cannot comply with the requirements of the Dundee Comprehensive Plan. Continuing to exclude Bed and Breakfast Inn STRs from the STR requirements would exacerbate noncompliance with Goal 10 and the Comprehensive Plan.

Oregon Statewide Planning Goal 10 applies to all changes in land use in the state of Oregon. This was reaffirmed by the state legislature before the close of this year's legislative session. Goal 10 requires the city to have a Comprehensive Plan which is required to comply with Goal 10. Dundee's Comprehensive Plan requires consideration of Dundee's adopted vision statement. Both Goal 10 and the city's Comprehensive Plan override Dundee's Development Code which must therefore comply with both.

Elizabeth Sundeen

392 SW Dogwood Drive

12 July 2023