

## BOCC Decision Matrix

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### Tumalo RV Park Text Amendment Land Use File Nos. 247-25-000106-TA

Issue Area 1 and Approval Criteria	Hearings Officer's Recommendation	Opponent's Position	Applicant's Position	Staff Comment	Board Determination
Did the applicant adequately address all relevant Deschutes County Comprehensive Plan policies, Statewide Planning Goals, and legal and technical arguments?	Based on evidence in the record, the Hearings Officer found that the proposal complies with applicable County provisions and state statute. The Hearings Officer noted that the majority of comments received in opposition were not directed at specific approval criteria. Furthermore, the Hearings Officer did not identify any applicable goals and policies beyond those identified in the application materials and staff report. The Hearings Officer found that there were no legal or technical reasons to deny the application.	Oppositional comments state an RV park is inconsistent with the rural nature and intended purpose of the Tumalo Commercial District (TUC). Though most comments were not directed at specific approval criteria, concerns included impacts to natural resources such as the Deschutes River as well as impacts to neighborhood livability. Oppositional comments questioned the local economic benefit of permitting RV parks as well as the impacts to water and wastewater systems.	<p>The applicant notes that DCC 18.67.040(C)(8) currently allows for the use and expansion of an RV park that existed as of June 12, 1996, which indicates they are compatible with the TUC Zone. The application materials note existing and potential commercial uses within the TUC Zone which could have greater adverse impacts than a potential RV park.</p> <p>The applicant also notes that the proposed amendment to the purpose statement of the TUC Zone is consistent with OAR 660-022-0030(4)(C) and will provide better clarity regarding permitted uses, as well as more economic opportunities within Tumalo.</p> <p>The applicant modified their proposal to address concerns regarding environmental and health risks. Under the currently proposed language, each RV space would be required to be connected to a central sewer system.</p>	<p>Staff reiterates that the subject application is solely a Text Amendment to Chapter 18.67 of Deschutes County Code. The proposed Amendment does not approve or deny a specific RV park on any parcel. The applicant provided a site plan and renderings for illustrative purposes only, and future development would require Conditional Use Permit and Site Plan Review approval.</p>	<p>Does the Board agree with the Hearings Officer's findings related to Comprehensive Plan Policies and Statewide Planning Goals, along with the findings related to the legal and technical arguments raised in the record?</p> <p>If yes, the Board may continue reviewing the application and move to Issue Area #2.</p> <p>If no, the Board may review Issue Areas #3-4 and determine whether they are met.</p>

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Issue Area 2 and Approval Criteria	Hearings Officer's Recommendation	Opponent's Position	Applicant's Position	Staff Comment	Board Determination
Are there policy reasons to approve the proposed Amendments?	The Hearings Officer evaluated applicable approval criteria but did not provide a policy recommendation.	<ul style="list-style-type: none"> <li>• Negative impacts of an RV park would disproportionately burden local residents.</li> <li>• An RV park would not provide economic benefit to surrounding property owners.</li> <li>• The livability and natural resources of Tumalo could be degraded by the increased number of short-term visitors.</li> </ul>	<ul style="list-style-type: none"> <li>• There is a documented shortage of RV parks and campgrounds within Deschutes County.</li> <li>• Providing approved RV parks may minimize the negative impacts associated with dispersed camping on public land.</li> <li>• Tourism provides economic development for Deschutes County.</li> </ul>	<p>Staff reiterates that the subject application is solely a Text Amendment to Chapter 18.67 of Deschutes County Code. The proposed Amendment does not approve or deny a specific RV park on any parcel. The majority of the oppositional comments are more relevant to later stages of review (e.g. Conditional Use Permit and Site Plan Review approval) if the text amendment is approved and the owner desires to move forward with development.</p> <p>The Board may choose to provide additional policy reasons to approve or deny the Amendments, in addition to those listed here.</p>	<p>Does the Board choose to make policy determinations relating to the proposed Amendments?</p> <p>If yes, the Board may approve or deny the application based on policy reasons listed here, or provide additional policy reasons.</p> <p>If no, the Board does not need to adopt policy reasons to approve or deny the application.</p>

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Issue Area 3 and Approval Criteria	Hearings Officer's Recommendation	Opponent's Position	Applicant's Position	Staff Comment	Board Determination
Traffic Impacts:  Has the applicant demonstrated compliance with Transportation Planning Rule (TPR) OAR 660-012?	The Hearings Officer found that the applicant had demonstrated compliance with the Transportation Planning Rule, as outlined in OAR 660-012-0060 and Statewide Planning Goal 12. The Hearings Officer noted that many of the comments regarding traffic impacts and safety concerns were speculative and did not refute the analysis provided by the applicant's traffic engineer.	Opponent comments state traffic impacts will negatively impact local residents, and there are existing concerns regarding pedestrian safety and road capacity within Tumalo. Comments cite existing issues such as the lack of a complete sidewalk network and note that access to the subject site would require RV traffic on residential streets. Comments also state that an exception to DCC 18.128.170(O) should not be granted due to the narrow local roads within Tumalo.	The application materials include a transportation memorandum dated January 8, 2025, prepared by a professional traffic engineer. The applicant provided an addendum dated October 28, 2025 that responded to concerns regarding the ability of large vehicles and trailers to maneuver on surrounding roads.  The applicant's materials note that the TUC District allows for a range of commercial uses, which could have significantly greater traffic impacts than an RV park.	The Deschutes County Transportation Planner submitted comments on April 14, 2025, which agree with the methodology and conclusions of the applicant's transportation memorandum. These comments note that additional site-specific information may be required at the time of a specific development proposal in order to address DCC 18.116.310.	If yes, the Board may continue reviewing the application.  If no, the Board may deny the subject application.

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Issue Area 4 and Approval Criteria	Hearings Officer's Recommendation	Opponent's Position	Applicant's Position	Staff Comment	Board Determination
Is the proposal consistent with the Tumalo Community Plan?	<p>The Hearings Officer found that allowing RV parks in limited circumstances is consistent with the Community Plan, and will depend on the fact-specific proposal. The Hearings Officer provided findings specific to the Economic Development Goal and corresponding Policies 4 and 5. The Hearings Officer responded to general claims that an RV park is incompatible with "small town rural character" by noting that RV parks exist in rural areas, but found that many oppositional comments did not provide enough specificity to address the Plan's policies.</p>	<p>Opponents state the recent Tumalo Community Plan (TCP) update captured residents' desire to maintain the small-town character of Tumalo, and an RV park does not align with that goal. Opponents state the proposed amendment to DCC 18.67.040, the purpose statement of the TUC District, does not align with the Community Vision Statement or Goals of the TCP. Oppositional comments raise concerns regarding the number of transient guests that an RV park would bring to the unincorporated community, and whether it would degrade the existing small town character or strain public services.</p>	<p>The applicant states the proposed amendments are consistent with the Tumalo Community Plan and cites, among others, Economic Development Policy #4, which is "Support economic development initiatives and tourism in the Tumalo area." The applicant states the Community Plan does not expressly prohibit or limit RV park development; the Plan's language is intentionally broad and the community vision is implemented through DCC 18.67. The applicant notes the existence of rural RV parks, including nearby Tumalo State Park, to rebut the argument that RV parks are inherently an urban use.</p>	<p>Staff found the proposal complies with the Tumalo Community Plan.</p>	If yes, the Board may continue reviewing the application.
					If no, the Board may determine that the Tumalo Community Plan goals and policies are significant factors to be considered and may be treated as applicable approval criteria.