



City of Stayton

Department of Planning and Development

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MEMORANDUM

TO: Chairperson Ralph Lewis and Planning Commission Members
FROM: Dan Fleishman, Director of Planning and Development
DATE: September 24, 2018
SUBJECT: Possible Code Amendments regarding Recreational Vehicle Parks

ISSUE

The issue before the Planning Commission is the consideration of possible Code amendments do allow Recreational Vehicle Parks in additional zones, to allow permanent residences in recreational vehicle parks, and/or to adopt design standards for recreational vehicle parks. This issue was discussed at the August meeting, but no consensus was reached by those in attendance. Because there were two members absent from the meeting, those present wanted to further discuss the issue at the September meeting. The remainder of this memo is repeated from the August memo.

BACKGROUND

The Stayton Land Use and Development Code addresses Recreational Vehicle Parks in several different sections. However the Code does not contain design standards or operations standards for recreational vehicle parks.

The Code defines the term Recreational Vehicle as:

A vacation trailer or other vehicular or portable unit which is either self-propelled, towed, or carried by a motor vehicle and which is intended for human occupancy and is designed for vacation or recreational purposes but not a permanent residence.

Section 17.16.070 currently permits RV Parks and Recreational Camps in the Interchange Development Zone and the Industrial Agriculture Zone. There are not any RV Parks currently located within the City Limits.

REQUEST

The City has received the attached letter from Mr. Eugene Jones requesting the Planning Commission initiate Code amendments to allow the development of a “resident RV Zone.” Mr. Jones is interested in a parcel of land on the north side of Fern Ridge Rd. The parcel is not yet annexed into the City and is designated as Residential by the comprehensive plan map.

While our Code does not define the term RV Park and Recreational Camps, the Code indicates that the North American Industrial Classification System, 2002 shall be used to determine the meaning and classification of a commercial or industrial land use that is not particularly defined in the Code. The 2002 NAICS defines the industry as comprised of “establishments primarily engaged in operating recreational vehicle parks and campgrounds and recreational and vacation camps. These establishments cater to outdoor enthusiasts and are characterized by the type of accommodation and by the nature and the range of recreational facilities and activities provided to their clients.”

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POSSIBLE AMENDMENTS

Mr. Jones intends for his park to be residential in nature, like a manufactured home park that allows recreational vehicles, rather than recreational in nature. In order for this to be accommodated, the Code would need to be amended in one or more ways. Among the various Code amendments that are possible are:

- Amend the Code to allow RVs in a mobile home park. Currently, the Code requires that any unit placed in a mobile home park bear an Oregon insignia of compliance or a federal Dept of Housing and Urban Development. This standard was put in place several years ago when one of the mobile home parks was allow transient RVs on a short term basis.
- Amend the Code to allow RV parks in the Medium Density Residential Zone. Currently, the MD zone allows mobile home parks.
- Amend the definition of recreational vehicle to remove the phrase regarding their not being used as a permanent residence.
- Establish design and operational standards for RV parks. Currently, the Code includes a set of design standards for mobile home parks (see Section 17.20.130.4). Whereas RV parks are a permitted use, in a number of zones already, the Code should include some design standards. These standards could include a minimum area to assure they don't locate throughout the city, vegetative buffer requirements, minimum site area requirements, etc.

Staff has serious concerns with recreational vehicles being used as a residence. Recreational vehicles are not built to the same construction specifications and codes as manufactured housing units or site-built homes. Staff contacted the Oregon Building Codes Division to find out the differences in the codes requirements for recreational vehicles compared to manufactured housing units. The response receive from Brian Lamb was

Oregon Revised Statute 446.003 definition of a "Recreational Vehicle" means a vehicle with, or without motive power, that is designed for human occupancy and to be used temporarily for recreational, seasonal, or emergency purposes and as further defined, by rule, by the director." A recreational vehicle is built to the NFPA 1192 Standards on Recreational Vehicles and do not have any structural requirement as far as wind loads, roof loads, floor loads etc. Manufactured Dwelling are built to the federal HUD standard 24 CFR 3280, in which each section of the home is inspected at some point in production and are designed for full time occupancy as single family dwellings.

This was, in part, the reasoning behind inserting the standards into the mobile home park requirements that units be installed in accordance with the Oregon Manufactured Dwelling Installation Specialty Code and have an Oregon insignia of compliance or a HUD Certification Label.

RECOMMENDATIONS

Staff recommends that the Planning Commission consider adoption of design and operational standards for RV Parks and Campgrounds. Staff further recommends that these uses continue to be considered commercial uses, not residential uses and that occupancy be limited to no more than 90 days. Staff also recommends that the RVs not be allowed to be used as dwellings unless documentation is provided that the meet the structural and safety standards of the HUD Code.

Once the Planning Commission makes a decision as to which, if any, Code amendments to pursue, staff will return with a draft for review and discussion.