

February 1, 2026

Dunes City Hall, Dunes City, Oregon

Dear Mayor and Members of the Dunes City Council,

I respectfully urge the City to adopt a purpose-driven, evidence-based approach to short-term rentals (STRs) that distinguishes owner-managed, single-property homes from commercial, multi-property operations. The City's stated objectives, protecting neighborhood character while supporting the local economy, are best achieved by regulating impact, rather than by imposing a blanket prohibition that treats materially different uses as identical. With only 27 of the 35 permitted STRs currently in operation, STR activity remains capped, limited, and demonstrably non-saturating. Property owners who have complied with escalating fees and requirements have relied in good faith on this framework. Eliminating the use entirely under these conditions would be disproportionate to demonstrated impact.

The structural distinction between these models is central. Owner-managed STRs are low-volume and locally accountable, owners screen guests directly, respond immediately to concerns, and bear the full social and financial consequences of their decisions. Commercially managed vacation rentals, by contrast, operate portfolios, optimize for occupancy through centralized marketing and dynamic pricing, and diffuse accountability. Public policy that fails to distinguish based on scale, control, and local accountability risks misdirecting regulation, burdening responsible residents while leaving higher-impact models insufficiently tailored. Policy that differentiates by operational scale and local accountability is more precise, more enforceable, and more consistent with the City's stated objectives.

There is also a predictable and recurring economic cost to eliminating owner-managed STRs. These homes primarily host families and returning visitors who stay multiple nights and spend locally on groceries, restaurants, fuel, cleaning services, maintenance, landscaping, and local trades, often during shoulder and off-season months. If these visitors can no longer stay in Dunes City, their spending will not disappear, it will shift to neighboring jurisdictions, reducing local revenue and work for local service providers without producing a meaningful increase in long-term housing supply. A balanced framework that preserves owner-managed or locally managed STRs while tightening standards for commercial operations best aligns regulation with actual impact, preserves neighborhood stability, and sustains community-wide economic benefit.

Respectfully submitted,

*A Dunes City Property Owner*

