Housing in Unincorporated Communities Rulemaking

Public Comments - Combined

August 16, 2026 through October 29, 2026

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- August 28, 2026 – Olken
- August 28, 2026 – Parker
- August 28, 2026 – Reagan
- August 28, 2026 – S. Lawwill
- August 28, 2026 – Strelova and Rasmussen
- August 28, 2026 – Van Winkle
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- August 30, 2026 – Dare
- August 30, 2026 – Prag
- September 1, 2026 – Gideonse
- September 7, 2026 – Giersbach
- September 13, 2026 – Corrie
- September 13, 2026 – Danner
- September 15, 2026 – Stock

- September 30, 2026 – Dooley
- October 2, 2026 – Hartford
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- October 8, 2026 – Wittwer
- October 10, 2026 – Orf
- October 11, 2026 – Bull
- October 12, 2026 – Chaney
- October 12, 2026 – Rawson
- October 12, 2026 – Tomosy
- October 13, 2026 – Gaty
- October 13, 2026 – McCurdy
- October 26, 2026 – Creswell
- October 27, 2026 – E. Fertig
- October 27, 2026 – K. Fertig
- October 29, 2026 - Fish

1000 friends of Oregon

Main Office • 340 SE 6th Ave • Portland, OR 97214

July 29, 2026

To: Palmer Mason and Jon Jinings, DLCD
Commissioner Mark Bennett, LCDC liaison to Unincorporated Communities RAC

From: Mary Kyle McCurdy, Associate Director and Managing Attorney

Re: Unincorporated Communities Rulemaking

I appreciate being appointed to the Land Conservation and Development Commission's Rules Advisory Committee (RAC) on Housing in Unincorporated Areas. As you know, LCDC anticipates that the RAC will have three meetings in August to prepare recommendations on this subject to DLCD.

In preparation for the RAC meetings and to ensure an efficient and informed discussion, it seems to me that it is critical for the department to make available before the first RAC meeting certain technical data related to two key elements of the Commission's charge:

> "Provide a voluntary option whereby counties may increase housing opportunities within existing urban unincorporated communities and other unincorporated communities with appropriate characteristics (e.g., population size, urban form and uses, availability of public facilities, community support, etc.)."

> "To protect public health and safety, ensure that any expansion, increased densities or greater intensity of use will be adequately supported by available or planned public facilities, including consideration for impacts to adjacent communities."

Therefore, for at least the urban unincorporated communities (660-022-0010(9)), and for the other three types of unincorporated communities if known, the following information would be very useful:

- Population
- Size, including a map
- Number or percentage of acres zoned for residential use
- Existing residential development pattern, such as range of parcel sizes, vacant parcels, density, predominant type of existing housing
- Other types of development in the community (commercial, industrial, institutional, parks, etc…) and their extent

- The nature of sewage and water infrastructure, including the extent of the community on septic systems, wells, community water systems, within a special service district for water or sewage, etc.…
- The current condition and capacity of sewage and water systems for additional development
- Nature of the housing need in the area.
- Where the unincorporated community is located in relation to areas of declared droughts, groundwater management areas, groundwater administrative areas including groundwater critical areas, and wildfire hazard areas

We realize this information might not all be available, but if critical significant information is not known, that would argue for being conservative in this rulemaking.

Thank you.

WILLIAMSON Angela * DLCD

From: JININGS Jon * DLCD
Sent: Saturday, August 8, 2026 10:26 AM
To: TAYLOR Casaria * DLCD; WILLIAMSON Angela * DLCD; MARL Adam * DLCD; HAMMER Alexis * DLCD; AMAN Leila * DLCD; GREENE Kirstin * DLCD; BENNETT Mark * DLCD
Cc: MASON Palmer * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from peter

FYI

Jon Jinings
Community Services Specialist | Community Services Division
Pronouns: He/His
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Cell: 541-325-6928 | Main: 503-373-0050
jon.jinings@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cdf768a1e446b46daa73e08def5721338%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639218067522611120%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=UXVilXddT2fWX0RBwPFV5iF39Rqoozahb9eNM1giiS8%3D&reserved=0

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Friday, August 7, 2026 9:26 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: rockmann@myctl.net
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from peter

[You don't often get email from hello@protectruraloregon.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Land Conservation and Development Commission Care of: Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

My name is Peter, and I am a rural resident living in Marcola, Oregon. I am writing to you today with deep concern regarding the proposed rulemaking that would permit urban-density subdivisions in unincorporated rural areas. This change would fundamentally alter the landscape and way of life for myself and countless other Oregonians who cherish our rural communities.

Living in a rural area like Marcola, I see firsthand how interconnected our lives are with the land and its resources. The thought of urban-density housing appearing in our countryside is deeply troubling, especially when considering our water supply. Most of us here rely on wells, drawing directly from the groundwater. Introducing thousands of new residents and their collective demand for water would place an unsustainable strain on our aquifers. This isn't just an abstract concern; it threatens the very source of our drinking water and the ability of local farms to irrigate their crops, impacting the economic viability and ecological balance of our community.

Our rural landscape is not merely undeveloped land; it is working land. It is made up of farms that produce food and forests that provide timber, clean air, and vital habitat. Allowing urban-style subdivisions to spread across these areas means permanently paving over irreplaceable resource land. Once these lands are developed, they are lost forever, along with their productive capacity and natural beauty. Furthermore, pushing development into the wildland-urban interface dramatically increases wildfire risk for everyone, a threat that feels increasingly real and urgent to those of us living close to forested areas.

Beyond the immediate impact on land and water, this proposed change would fuel unchecked sprawl, leading to a host of other problems. Our existing rural roads are not designed for urban levels of traffic, and increased congestion would compromise safety and erode the quiet character of places like Marcola. Furthermore, the cost of extending urban-level infrastructure – roads, utilities, and emergency services – into distant rural areas would fall heavily on existing taxpayers. This approach also undermines the very urban centers Oregon has worked so hard to invest in, by encouraging people to move out of the growth boundaries, hollowing out urban communities.

I urge the Land Conservation and Development Commission to uphold Oregon's long-standing commitment to strong Urban Growth Boundaries. Please reject these proposed changes that would allow urban densities to creep into our rural lands. Protect the unique character, vital resources, and long-term sustainability of places like Marcola and the rural communities across Oregon.

Sincerely,

Peter
Rural Resident of Marcola

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Unincorporated communities RAC
Date: Monday, August 24, 2026 10:45:34 AM
Attachments: image002.png

Public comment re: the HUC rulemaking.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Sent: Sunday, August 16, 2026 1:50 PM
To: GREENE Kirstin * DLCD <Kirstin.GREENE@dlcd.oregon.gov>; AMAN Leila * DLCD <leila.aman@dlcd.oregon.gov>; HAMMER Alexis * DLCD <alexis.hammer@dlcd.oregon.gov>; MARL Adam * DLCD <adam.marl@dlcd.oregon.gov>
Cc: MASON Palmer * DLCD <Palmer.MASON@dlcd.oregon.gov>
Subject: FW: Unincorporated communities RAC

FYI

Jon Jinings
Community Services Specialist | Community Services Division
Pronouns: He/His
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Cell: 541-325-6928 | Main: 503-373-0050
jon.jinings@dlcd.oregon.gov | www.oregon.gov/LCD

From: Sarah Deumling <sdeumling@gmail.com>
Sent: Sunday, August 16, 2026 1:46 PM
To: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>
Cc: HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Rep Scharf <Rep.AnnaScharf@oregonlegislature.gov>; Sen Starr

<Sen.BruceStarr@oregonlegislature.gov>
Subject: Unincorporated communities RAC

> You don't often get email from sdeumling@gmail.com. Learn why this is important

To: Allan Lazo - Chair of the LCDC
From: Sarah Deumling - Chair of Friends of Polk County
Rural Family Forest Land Owner/Manager

I am now the matriarch of the 4th, 5th and 6th generations of a "wagon train" Oregon family, having spent the last 40 years engaged with both local and state land use issues while managing the Zena Forest/Zena Forest Products, now with my son Ben.

I am deeply concerned about both the formation and the charge of this RAC. It is full of vague, widely interpretable language and being fast tracked with "affordable housing" as a disingenuous justification for multifaceted development on rural EFU and forest land.

The need for additional housing in expanded unincorporated communities has not been documented. The RAC is being asked to make significant, even drastic changes without adequate data as to the number of dwellings that can be located within each of our city's UGBs or on non-resource land outside UGBs. Data is also needed on the cost/price of homes that might reasonably be built in 2027 and who could afford them. Existing rural towns have existing electrical, road, sewer, etc. infrastructure and are welcoming both residential and commercial/industrial re-development to make them the busy community hubs they once were. Let's put the development there.

Climate Change is by far the biggest threat to the livability of Oregon. If we don't get a handle on it all the other issues won't matter. This RAC would take us in the wrong direction in more ways than I want to mention here. Unincorporated communities seem to be doing just fine as they are. This RAC is a big juicy bone being thrown to developers and the like who stand to profit - and is definitely stacked with supporters of such. NO RAC NOW! At the very least do the research, provide some honest,credible data to show us how this might help ordinary and low income Oregonians. NO RAC NOW!

Sincerely,
Sarah Deumling

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Rulemaking re unincorporated communities
Date: Monday, August 24, 2026 10:43:33 AM
Attachments: image001.png

And another public comment re: HUC rulemaking.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: hopsbran@aol.com <hopsbran@aol.com>
Sent: Tuesday, August 18, 2026 1:28 PM
Cc: HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Rulemaking re unincorporated communities

You don't often get email from hopsbran@aol.com. Learn why this is important

Land Conservation and Development Commission
Care of the Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Chair Lazo,

I'm Robert Emmons, President of LandWatch Lane County, a non-profit that for over 30 years has been working with neighbors, and guided by Lane code and state statute, to keep the county's rural lands rural. That work has been blindsided by the order before you calling for an unprecedented and intolerable assault on the state's unincorporated communities.

Unincorporated communities are distinctly rural settlements tailored to the needs and occupations, the history and culture, of the local populace. Housing is generally spread out in the surrounding countryside and often associated with farm and forest management.

Like most of the unincorporated communities in Oregon, Fall Creek, two miles down the road from me, is surrounded by a mix of farm and forest land. And, like most of those communities, our land is threatened every summer by wildfire with few avenues for escape.

Under the Governor's direction, all of the state's unincorporated communities would be required to permit urban type housing, commercial and light industrial development, such as data centers and Amazon warehouses, and boundary expansions. As a result, rural enclaves will become small cities by allowing developers and speculators to convert cheaper farm and forest land in rural communities into unaffordable housing, data centers, other commercial development and massive profits. Exactly what our land use protection program was intended to prevent. While traffic, fire danger, global warming and taxes increase, wildlife habitat and groundwater will decrease.

Governor Kotek is pursuing this peremptory environmental and cultural travesty regardless of data that show there is more than enough land, and existing buildings that could be repurposed, within urban growth boundaries (UGBs) to meet the projected housing need. Exactly as the land use program meant to provide.

Therefore, we implore you to deny the Governor's order and direct her attention to the housing opportunities within UGBs made available by a land use program that has served Oregon well for over 50 years.

Thank you.

Robert Emmons, President
LandWatch Lane County

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: No need just greed!
Date: Monday, August 24, 2026 10:44:52 AM
Attachments: image002.png

Public comment re: the HUC rulemaking.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Sent: Monday, August 17, 2026 8:27 AM
To: HAMMER Alexis * DLCD <alexis.hammer@dlcd.oregon.gov>; MARL Adam * DLCD <adam.marl@dlcd.oregon.gov>; GREENE Kirstin * DLCD <Kirstin.GREENE@dlcd.oregon.gov>; AMAN Leila * DLCD <leila.aman@dlcd.oregon.gov>; Sylvia@mosaicresolutions.com; CARNEY Sadie * DLCD <Sadie.CARNEY@dlcd.oregon.gov>
Cc: MASON Palmer * DLCD <Palmer.MASON@dlcd.oregon.gov>
Subject: FW: No need just greed!

FYI

Jon Jinings
Community Services Specialist | Community Services Division
Pronouns: He/His
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Cell: 541-325-6928 | Main: 503-373-0050
jon.jinings@dlcd.oregon.gov | www.oregon.gov/LCD

From: Michele Riley <purseonality4@gmail.com>
Sent: Sunday, August 16, 2026 4:32 PM
To: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>
Cc: HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Rep

Gomberg <Rep.DavidGomberg@oregonlegislature.gov>; Sen Anderson <Sen.DickAnderson@oregonlegislature.gov>
Subject: No need just greed!

> You don't often get email from purseonality4@gmail.com. Learn why this is important

Dear Chair Lazo,

Well, this morning started out with a bang as I read the proposed changes to rural zoning that would all but eliminate what makes Oregon Oregon. Your rulemaking would completely change the character of our beautiful state. It would make everywhere unliveable for all but the richest and greediest- it will be the Hunger Games on steroids! Gordon Gekko was right in your world: "Greed is good!"

Who is driving this crazy train you are all aboard? Certainly not the average citizens of Oregon. This under the guise of housing too. What a joke. You do not put housing for the poor in rural areas with no infrastructure. And that is precisely what this rulemaking does; as usual in Oregon: put the cart before the horse.

Where is the data? Where is/are the study/ies on this issue? Oh, there are none? Why the knee jerk reaction? Is this to placate rich land owners and developers watering at the mouth for more money and more development? Is this to satisfy Governor Kotek's desire to stop homelessness across the state?

If you build everywhere you will have problems everywhere. I live in a small, unincorporated community in Lincoln County where all the homes are on private septic systems. My home was built in 2007 and I have to have twice yearly septic inspections, file $100 paperwork with the County and pay about $300 for the annual septic contract. I have two bedrooms and another room that is only allowed to be an office or den due to the septic limitations.

Your rulemaking is proposing changing this to allow additional dwelling units in areas where I cannot even have three bedrooms! But another 1500 square foot dwelling is OK? This is ridiculous.

Chair Lazo, there are zoning codes for a reason. There is an UGB for a reason--it is what has kept Oregon from the sprawl of California and many

other states. Lincoln County does not have the infrastructure, the resources (human and otherwise) to handle more population on our roads, in our schools, using our water and neither do many other rural areas across our state.

Why aren't you, the Governor and all of the LCDC people looking at large cities like Portland for your expansion? The infrastructure is there, the resources are there, the services are there--not here in rural Oregon.

Who is this housing for? Are you housing the homeless? At an average of $450,000 per door? I think not. And without any services (public transportation, mental health support, addiction recovery services etc) how are these individuals supposed to function? How will all of this be paid for?

Lincoln County already has too much housing for the rich in the form of second homes and short-term rentals and giant mansions where once stood simple single family homes. The rich do not need the help of LCDC and zoning changes for more profiteering. And this proposed rulemaking changes nothing for the poor.

Here in Lincoln County we just lost our Newport Safeway, our Rite Aid pharmacies too. How are people going to buy their groceries? How will they get to appointments? We don't have good public transit options. Older neighbors have been forced to move when they are no longer able to drive.

We also do not have a good law enforcement component either. Unincorporated Lincoln County has no police force, we rely on the State Police and the Lincoln County Sheriff. When we were having an issue with a neighbor who was coming out of the State Hospital we called the Sheriff's Department and asked what we could do if this person tried to harm a neighbor. The person we spoke with told us to buy a firearm as the quickest they could arrive in our neighborhood was 45 minutes, that was without the giant increase in traffic during the summer months.

Chair Lazo, this is not hyperbole, these are actual facts from my life in rural Oregon. Here is one more: the Echo Mountain Fire Complex. We woke up to orange skies, tons of misinformation and a whole lot of fear when those fires took place in 2020. People living in north Lincoln City told of hours long drives to get out of harm's way and south to safety due to the large volume of

traffic on Highway 101.

Fortunately there were no fatalities as a result of the tourists and locals trying to get away from the fires and the first responders trying to get to the fires. But what about the next time? Adding hundreds or thousands more people will only multiply the problem and do nothing for the solution.

Strong land use planning and good zoning has kept Oregon a beauty for many decades, let us not make her another casualty of a greedy few who will take away so much from the rest of us who call Oregon home.

Respectfully,

Michele Riley, resident Unincorporated Lincoln County, Oregon

Evans Elder Brown & Seubert
COMMERCIAL REAL ESTATE

RECEIVED
AUG 17 2026
DEPT. OF LAND CONSERVATION AND DEVELOPMENT

8/14/26

TO: Land Conservation and Development Commission
Care of the Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

My name is Alan Evans, and I am writing to you today as a rural resident of Fall Creek, Oregon. I live in and cherish the rural character of our state, and I am deeply concerned about the proposed rulemaking that would allow urban-density subdivisions to sprout up on unincorporated rural land.

New housing, while needed, should come within already established UGBs. State law requires that there is enough land inside these boundaries for 20 years projected growth.
Nearby Eugene is a great example of how growth can and should happen. With increased densification and height, Eugene has added many thousands of new housing units inside its UGB.

Thanks to our former leaders and legislators we have had Senate Bill 100 which has served Oregon very well since its adoption 50 years ago. This proposed rulemaking is being done without the legislature and or the people of Oregon and would severely compromise those values that make our State so unique.

Living in a rural area means we depend on our natural resources in a way many urban residents might not fully appreciate. Here in Fall Creek, our water comes from wells, drawing directly from the groundwater. Each new home would mean more wells, more septic systems, and a significant increase in demand on our shared aquifers. This isn't just an abstract problem; it directly impacts the aquifer on which we all depend.

Furthermore, these proposals represent a direct threat to Oregon's invaluable resource lands. When we allow urban-density developments to consume our working farms and forests, we're not just building houses; we're permanently altering the landscape. We lose productive agricultural land, timberland, and the open spaces that define rural Oregon. The beauty and economic backbone of our state are intrinsically linked to preserving these lands, not paving them over for suburban-style housing.

Commissioners, I implore you to consider the long-term consequences of these proposed changes. Our state's unique character, its sustainable growth, and the quality of life for rural residents like myself depend on thoughtful land use planning. Please retain the strict Rural/Urban Growth Boundary lines that have served Oregon so well for decades. Reject the proposed changes that would allow urban densities in rural areas and safeguard our water, our resource lands, and our communities for future generations.

Sincerely,

Alan Evans

Evans, Elder, Brown & Seubert
541.345.4860
alan@eebcre.com

WILLIAMSON Angela * DLCD

From: Angela.WILLIAMSON@dlcd.oregon.gov
Subject: RE: RAC

-----Original Message-----
From: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Sent: Thursday, August 20, 2026 10:11 AM
To: WILLIAMSON Angela * DLCD <Angela.WILLIAMSON@dlcd.oregon.gov>
Cc: JININGS Jon * DLCD <Jon.JININGS@dlcd.oregon.gov>; TAYLOR Casaria * DLCD <Casaria.TAYLOR@dlcd.oregon.gov>; AMAN Leila * DLCD <leila.aman@dlcd.oregon.gov>
Subject: FW: RAC

Everyone - another comment re: the HUC rulemaking.

Angela - please add this comment to the appropriate file.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: Mike Mccarthy <comicepear@aol.com>
Sent: Wednesday, August 19, 2026 5:35 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Cc: BATEMAN Brenda O * DLCD <brenda.o.bateman@dlcd.oregon.gov>
Subject: RAC

[You don't often get email from comicepear@aol.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Mr Palmer Mason:

I am reading about the current RAC. This is very unfortunate to create a RAC with members selected in a manner to favor development. A very biased set of members with known dislike for any and all land use laws.
This RAC should be terminated until members can be selected that care about community values, climate, have experience with economics of community services and taxation and care about our natural resources.
This is obviously an effort to destroy the Oregon Land Use System that protects our ability to have land to farm and our certainty that we will have invested in a farming zone.
Please halt this farce!
Mike McCarthy PhD
McCarthy Family Farm
Ag for Oregon (Advocates for the Land)
Sent from my iPhone

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Cc: JININGS Jon * DLCD
Subject: FW: UIC RAC
Date: Monday, August 24, 2026 10:40:12 AM
Attachments: image001.png

Public comment to the HUC rulemaking. This one has an actual email address, so hopefully we can share the response if that hasn't happened already.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Hope S <lsv1953@gmail.com>
Sent: Thursday, August 20, 2026 4:12 PM
To: BATEMAN Brenda O * DLCD <Brenda.o.bateman@dlcd.oregon.gov>; GREENE Kirstin * DLCD <kirstin.greene@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Subject: UIC RAC

> You don't often get email from lsv1953@gmail.com. Learn why this is important

Ms. Bateman, Ms. Greene, Mr. Mason, Mr. Jinings-

I have lived in Oregon since 1977. I planted trees for the Hoedads for five years, earned a Master's degree in Community and Regional Planning from the University of Oregon, and have been working with nonprofit land use organizations for many many years. I care deeply about protecting our rural working lands.

I am writing to express my disappointment in the composition of the Unincorporated Communities RAC that was formed under the authority of each of you.

First, it appears six of the chosen members were solicited. I reached this

conclusion because six of the members did not respond at all to the application question regarding one's motivation to 'serve.'
Of those six, four are lobbying organizations either focused on housing and/or eliminating protections for rural lands.

Secondly, representation from a diversity of unincorporated communities is absent; there are, at most, two of eighteen members representing the 256 unincorporated communities that exist statewide. No government representative from the county having the largest number of UIC's, Lane County, was chosen.

Then there's the coast; it appears not a single citizen from a coastal community was chosen.

But you did manage to appoint at least six lobbyists, overall. That's one third of the members.

Given that ORS 183.333 requires that advisory committee membership must represent the interests of "communities likely to be affected by the rule' as well as those of 'persons' likely to be affected by the rule", it seems that community members, rather than lobbyists or for profit development interests, should have been the focus. It is unlikely that the legislative body thought that 'persons likely to be affected' were monied development interests and lobbyists.

This rush (4 total meetings) to open rural Oregon to development does not appear to be based on facts, data, and publicly available factual information. Rather, it appears it is based on assertions, fear mongering, and pressure from monied interests.

Meanwhile, what about some rulemaking to address the loopholes that consume medical hardship and replacement dwellings on resource lands, or protections for farmland and rural communities from the dangers associated with data centers?

Thank you for your time.

Hope Vaccher

WILLIAMSON Angela * DLCD

From: JININGS Jon * DLCD
Sent: Monday, August 24, 2026 9:11 AM
To: TAYLOR Casaria * DLCD; WILLIAMSON Angela * DLCD; AMAN Leila * DLCD; GREENE Kirstin * DLCD
Cc: BENNETT Mark * DLCD; Sylvia Ciborowski
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Leslie Rubinstein

Follow Up Flag: Follow up
Flag Status: Completed

FYI

Jon Jinings
Community Services Specialist | Community Services Division
Pronouns: He/His
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Cell: 541-325-6928 | Main: 503-373-0050
jon.jinings@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C091c44aa73df41380edd08df01fa4a90%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639231846638368642%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=KByst8h07JK6a33V3VsllTi%2BOioQmlcSDsG9OZldGs8%3D&reserved=0

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Sunday, August 23, 2026 6:21 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: ruby56@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Leslie Rubinstein

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Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
Rules that ruin rural Oregon are wrong! There is already room for housing inside pre-existing urban growth boundaries, which are mandated for all incorporated communities and cities in our state. And those UGBs are already required to have enough land for housing over the next 20 years. I am also concerned that relaxing regulations about development on rural land will lead to fancy homes and short-term rentals on timber, farm and rangelands rather than affordable housing. And depletion of the water supply in rural areas is an issue that has already forced some rural businesses to truck in water rather than using what is available from local wells. In addition, rezoning rural areas usually leads to a rise in property tax, which is hard on rural residents. I would also like to note that the title "Housing in Unincorporated Communities" belies the truth because it's not just about housing; once "commercial and light industrial" development is allowed in rural areas, those areas are then commercial and industrial, not rural.

I live in an unincorporated area in Lane County, and I do not support rules that ruin regulations that keep Oregon rural.

Sincerely,
Leslie Rubinstein
Cottage Grove

WILLIAMSON Angela * DLCD

From: JININGS Jon * DLCD
Sent: Tuesday, August 25, 2026 4:00 PM
To: WILLIAMSON Angela * DLCD; TAYLOR Casaria * DLCD; BENNETT Mark * DLCD; AMAN Leila * DLCD
Cc: MASON Palmer * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from cynthia barlow

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

Jon Jinings
Community Services Specialist | Community Services Division
Pronouns: He/His
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
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https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C191383bd48d548f785c308df02fc8a19%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639232955803290435%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=WtfiX3o9lrXNQmDMxC42fiSTK7KbNZge3gqr7LbAkXY%3D&reserved=0

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, August 25, 2026 3:58 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: cleebarlow@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from cynthia barlow

Land Conservation and Development Commission Care of Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

My name is cynthia barlow, and I am writing to you today from Cottage Grove, not just as a resident, but as a dedicated hiker and recreationist who deeply cherishes Oregon's natural beauty and rural landscapes. I am writing to express my profound concern and strong opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land. These changes threaten the very essence of what makes Oregon special, and I urge you to reject them.

When I lace up my boots and head out to the trails around Cottage Grove, I'm not just seeking exercise; I'm seeking connection to the wild places that define our state. This connection makes me acutely aware of the delicate balance in our environment, especially concerning wildfire risk. Building dense subdivisions in wildland-urban interface areas isn't just an abstract concern; it's an invitation to disaster. I've seen firsthand how quickly fires can spread, and introducing more homes into these vulnerable zones puts lives, property, and our cherished forests at greater risk. It's irresponsible to ignore the escalating threat of wildfires by encouraging more people to live where the forest meets the subdivision.

My hikes also take me past many creeks and streams, and I often reflect on the preciousness of our water resources. The idea of allowing urban-density developments in rural areas raises serious alarms about our water supply and local wells. Drawing groundwater for hundreds of new homes impacts finite aquifers, threatening the water security of existing rural residents and vital agricultural operations. Oregon's farms are not just businesses; they are part of our landscape and our heritage, sustained by these very water sources. Depleting groundwater for new subdivisions would have devastating, long-term consequences for our environment and economy.

As a recreationist, I often traverse Oregon's working farms and forests. They are not just scenic backdrops; they are productive lands that contribute to our economy and way of life. The proposed changes invite unchecked sprawl, which means destroying these invaluable resource lands. When we allow subdivisions to creep out into rural areas, we're not just building homes; we're hollowing out the investments we've made in our existing towns and cities, and we're permanently paving over working farms and forests that can never be recovered. This loss is irreversible and diminishes Oregon's unique character for future generations.

Finally, while my hikes clear my mind, I can't help but think about the practical costs that these changes would impose. Extending roads, utilities, and emergency services to dispersed, urban-density developments in distant rural areas is incredibly expensive. These costs don't just magically appear; they fall squarely on the shoulders of existing taxpayers, including residents like me in Cottage Grove. It's an unfair burden to ask established communities to subsidize the

infrastructure of sprawling new developments that go against the very principles of smart growth and land conservation that Oregon has championed for decades.

Commissioners, Oregon's land use planning goals were designed to protect our natural resources, support our communities, and maintain a clear distinction between urban and rural areas. These goals are why I love living here and why I believe so many others do too. Please listen to the voices of Oregonians who value our landscapes, our water, and our thoughtful approach to growth. I implore you to retain the strict Rural/Urban Growth Boundary lines and reject these proposed changes that would allow urban densities in our precious rural areas. Our future depends on it.

Sincerely,

cynthia barlow

WILLIAMSON Angela * DLCD

From: JININGS Jon * DLCD
Sent: Tuesday, August 25, 2026 1:45 PM
To: WILLIAMSON Angela * DLCD; TAYLOR Casaria * DLCD; BENNETT Mark * DLCD; AMAN Leila * DLCD
Cc: MASON Palmer * DLCD; Sylvia Ciborowski
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Laurin Bradley

Follow Up Flag: Follow up
Flag Status: Flagged

Another comment email.

Jon Jinings
Community Services Specialist | Community Services Division
Pronouns: He/His
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Cell: 541-325-6928 | Main: 503-373-0050
jon.jinings@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C0b092edbaa5a4f7e7e8008df02e9c600%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639232875206682934%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=scpHKI5GdFNl5kHCKLzn8iEQb5XJokhZJuTPtnKW2FI%3D&reserved=0

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, August 25, 2026 1:43 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: Laurinbradley1@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Laurin Bradley

[You don't often get email from hello@protectruraloregon.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Land Conservation and Development Commission c/o Department of Land Conservation and Development

635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing to express my profound concern and opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land in Oregon. As Laurin Bradley, a rural resident from the 97424 area, I urge you to consider the far-reaching negative consequences these changes would have on our communities and the fundamental principles of Oregon's land use planning goals.

Allowing urban development in rural areas directly undermines the very vision that has preserved Oregon's unique character. This proposal represents a significant step towards unchecked **traffic and sprawl**. It will inevitably lead to increased congestion on our rural roads, longer commute times, and a hollowing out of investments in existing urban centers. Instead of fostering vibrant cities and towns, we risk creating scattered, inefficient development that degrades both rural and urban environments.

Furthermore, these changes threaten the precious **loss of resource land** that defines Oregon. Our rural landscapes are not empty spaces; they are working farms, productive forests, and critical natural habitats. Introducing urban-density subdivisions directly converts these irreplaceable lands, diminishing our agricultural capacity, impacting our timber industry, and destroying the natural ecosystems that support our state's biodiversity and economy.

The financial burden of such development cannot be overstated. The **taxes and public cost** associated with extending urban-level services—roads, water, sewer, internet, schools, and emergency services—to distant, dispersed rural developments would be immense. These costs do not disappear; they fall disproportionately on existing taxpayers, both urban and rural, straining local budgets and diverting resources from essential services. This is not a sustainable or fiscally responsible approach to growth.

Our rural communities also face critical issues concerning **water and wells**. Increased population density in areas reliant on groundwater will place an unsustainable demand on our aquifers. This drawing of groundwater will not only impact the quality and availability of water for new residents but will also directly affect existing wells and the agricultural operations that depend on consistent water access for irrigation and livestock. Our water resources are finite and must be managed with extreme care.

Finally, the proposed changes would gravely exacerbate **wildfire risk**. Building more homes in the wildland-urban interface (WUI) is a dangerous proposition that puts lives, property, and emergency responders at greater peril. This increases the likelihood and severity of wildfires,

placing immense strain on our already overstretched firefighting resources and raising insurance costs for all. We must prioritize sensible land use that reduces, not increases, our vulnerability to natural disasters.

Commissioners, I implore you to uphold the spirit and letter of Oregon's groundbreaking land use planning system. Our state's prosperity and quality of life are directly tied to the thoughtful separation of urban and rural lands. Please retain the strict Rural/Urban Growth Boundary lines that have served our state so well, and reject the proposed changes that would allow urban densities in rural areas. Let us protect our working lands, preserve our natural resources, and ensure a sustainable, community-focused future for all Oregonians.

Sincerely,

Laurin Bradley
Rural Resident, 97424

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Wednesday, August 26, 2026 8:34 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Evan Carmi

Another HUC related public comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cab715bad9ffb439143e608df0387821b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639233552662994925%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Ml%2FpY%2FfsJfQ7E9ILrvkwydpq0jrF%2FF2TT8Z%2FSI%2F%2BbMo%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, August 25, 2026 7:29 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: evan@evancarmi.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Evan Carmi

Land Conservation and Development Commission Care of the Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing with an urgent message regarding the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land. My name is Evan Carmi, and as a Forest & Water Advocate residing in Oregon's 97212 region, I am profoundly concerned about the devastating and irreversible impacts this proposal would unleash upon our state.

This rulemaking represents a dangerous erosion of Oregon's foundational land use planning goals, particularly concerning water resources. Allowing urban-scale development in rural areas will place immense, unsustainable pressure on our precious groundwater supplies. New wells for these subdivisions will inevitably draw down aquifers, directly impacting existing rural residents, agricultural operations that depend on these water sources, and vital ecosystems. This is a direct threat to the long-term viability of our rural communities and local food systems.

Furthermore, this proposal constitutes a wholesale abandonment of our commitment to preserving resource land. Urban-density development in rural areas will lead to an uncontrollable wave of sprawl, consuming irreplaceable working farms and forests. These are not merely undeveloped parcels; they are the backbone of Oregon's economy, ecological health, and cultural heritage. Expanding urban development into these critical areas hollows out investments made within existing urban growth boundaries, undermines smart growth principles, and ultimately destroys the very character of rural Oregon.

The implications extend to public safety and taxpayer burden. Building dense subdivisions in the wildland-urban interface drastically increases wildfire risk, placing lives, homes, and emergency responders in greater peril. Moreover, providing essential infrastructure – roads, water, sewer, and emergency services – to scattered, distant rural developments is astronomically expensive. These costs will disproportionately fall upon existing taxpayers, diverting funds from crucial urban and rural investments.

Commissioners, the intent of Oregon's land use laws is clear: to maintain strict, defensible boundaries between urban and rural lands. Your responsibility is to uphold these protections, not to dismantle them through ill-conceived rule changes.

I urge you, the Land Conservation and Development Commission, to reject this destructive proposed rulemaking. You must retain the integrity of our Rural/Urban Growth Boundary lines and prevent urban densities from encroaching upon our irreplaceable rural landscapes. The future of Oregon's water, forests, and rural character depends on your decisive action.

Sincerely,

Evan Carmi
Forest & Water Advocate

97212

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, August 25, 2026 5:29 PM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Robin Cushman

Another public comment re: HUC rulemaking

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C1761e6b64d454d65477f08df0308f84b%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639233009182186856%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ZsI4dKYR3NyGF1NvC8RCPZvpak6GsT8Z%2FgT521IFYcs%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, August 25, 2026 5:23 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: robinbcushman@comcast.net
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Robin Cushman

Land Conservation and Development Commission Care of Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing as a 20-year resident of Cottage Grove, during which I was photographer and photo editor for the weekly paper, The Cottage Grove Sentinel. This allowed me to spend time in all the unincorporated towns in the area. I married a man who lived in London, OR.
I know firsthand the need for decent, affordable housing in Cottage Grove and all the local towns. I also know how fiercely protective rural residents are of their land, whether wild or agricultural. They typically DO NOT welcome city people or their "upgrades." For example, Culp Creek residents wanted no part of the railroad being turned into a Rails to Trails path. They were ready to defend their privacy. I can imagine how they'd react to a data center.
Our family, now living in Eugene, are avid campers, hikers, paddlers and anglers want me to express urgent and unreserved opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land. This proposal represents a dangerous departure from Oregon's foundational land use principles and poses severe, irreversible threats to our state.

Allowing urban densities in rural areas will directly exacerbate Oregon's already critical wildfire risk. Developing in the wildland-urban interface (WUI) significantly increases the probability and severity of wildfires, placing lives, homes, and natural resources in grave peril. Our rural fire services are already stretched thin; introducing densely populated communities into high-risk areas is an irresponsible burden that we simply cannot afford. It is a direct pathway to more devastating fire seasons and greater loss.

Furthermore, this proposal will impose unsustainable taxes and public costs on existing taxpayers. Extending essential infrastructure—roads, utilities, water, and emergency services—to distant rural subdivisions is extraordinarily expensive and inefficient. These costs will inevitably fall back on the public, diverting funds from critical urban investments and straining municipal budgets. Moreover, drawing groundwater for these new developments will deplete vital aquifers, directly impacting local agriculture and the long-term water security of our communities. This is an economic burden we must not accept.

Finally, opening rural lands to urban-density development means an irreplaceable loss of our precious resource land. This rampant sprawl will hollow out smart urban investments and permanently destroy productive working farms and forests, which are vital to Oregon's economy, environment, and quality of life. As a recreationist, I deeply value Oregon's open spaces and natural beauty; these areas are essential for wildlife, agriculture, and public enjoyment. Sacrificing them for haphazard development is a short-sighted and tragic mistake.

The Land Conservation and Development Commission has a clear mandate to protect Oregon's unique landscape and ensure responsible growth. To uphold this mandate, you must retain the strict Rural/Urban Growth Boundary lines that have historically safeguarded our state. I urge you, Commissioners, to unequivocally reject the proposed changes that would allow urban

densities in rural areas. Do not compromise the future of Oregon's natural heritage, public safety, and fiscal stability.

Sincerely,

Robin Cushman and family
Eugene, OR

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Wednesday, August 26, 2026 8:35 AM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Alice Doyle

Another HUC related public comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C0e175adb898c4cb9a01b08df03879bff%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639233553097693950%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Grg9R%2BzOgrS5Mr20yJpjepEv6XuhGzujCgA4AGkyLcw%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, August 25, 2026 6:10 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: Alice@loghouseplants.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Alice Doyle

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
Please think again about pursuing this project. We in Lane County rural areas are struggling due to the current economic situation. The rampant land speculation and purchasing that would occur with the proposed changes to land use would increase land values, our taxes and hurt our quality of rural life.
Sincerely,
Alice Doyle
Cottage Grove, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, August 25, 2026 11:07 AM
To: WILLIAMSON Angela * DLCD
Cc: JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Linda Gaskill

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Angela-

Another public comment re: the HUC rulemaking. Please share the response.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C4fc10ba5bba542263ada08df02d3a7dc%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639232780208574714%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ez7%2BCQ7P7Id%2BlwPDv76WpGk660%2BEMvMp92J4CIc4OYs%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, August 25, 2026 10:31 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: lindygaskill@hotmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Linda Gaskill

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Land Conservation and Development Commission c/o Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing to express my urgent and unreserved opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land across Oregon. As a concerned citizen, hiker, and recreationist living in Cottage Grove (ZIP 97424), I enjoy the surrounding forests and wild lands daily through hiking and camping. This proposal threatens the very landscape and quality of life that makes Oregon special.

This rulemaking recklessly escalates Oregon's already critical wildfire risk. Allowing urban-density housing in the wildland-urban interface inherently increases the potential for catastrophic fires, putting new residents, first responders, and existing rural communities in immense danger. The logic of building more dense communities in areas prone to fire is deeply flawed and irresponsible.

Furthermore, this proposal represents a direct assault on Oregon's invaluable resource lands. Enabling urban sprawl into working farms and forests will lead to their irreversible destruction. This conversion not only diminishes our agricultural and timber productivity but also places unsustainable demands on precious groundwater resources, impacting vital aquifers and threatening the livelihoods of local farmers who depend on them. Once these lands are developed, they are lost forever.

The consequences for our infrastructure and communities are equally dire. Expanding urban-density subdivisions into distant rural areas will inevitably lead to increased traffic congestion and longer commutes, burdening our existing road networks. The immense costs of extending and maintaining essential services – roads, utilities, and emergency services – to these remote developments will fall directly onto the shoulders of existing taxpayers, diverting funds from necessary urban investments. This type of sprawl hollows out our cities and towns by encouraging development where it is least efficient and most costly.

Commissioners, I implore you to uphold Oregon's foundational land-use planning goals. You have a solemn responsibility to protect our state’s natural resources, manage growth responsibly, and safeguard the well-being of all Oregonians. Reject this dangerous proposal that undermines decades of sensible land-use planning. Retain the strict integrity of our

Rural/Urban Growth Boundary lines and prevent urban densities from encroaching upon our invaluable rural lands.

Sincerely,

Linda Gaskill

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, August 25, 2026 4:15 PM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Evelyn Hunter

Fyi, another public comment re: HUC rulemaking

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cc8b0d6cfeaa443037b8908df02feb355%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639232965096974242%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=d0hsbuKCCRunybpl6%2BfvEe%2ByjT17xhx3znGxeAZmspk%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, August 25, 2026 4:02 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: ech8944@yahoo.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Evelyn Hunter

Land Conservation and Development Commission Care of Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing as Evelyn Hunter, a backyard farmer from Cottage Grove, to formally submit my public comment in strong opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land. Such a policy shift would profoundly undermine the foundational principles of Oregon's statewide land use planning goals and introduce significant detrimental impacts across our rural landscapes.

Foremost among my concerns is the exacerbated **Wildfire Risk**. Introducing urban-density residential developments into the Wildland-Urban Interface (WUI) significantly increases the probability of human-caused ignitions and places undue strain on rural fire services, which are often volunteer-based and lack the capacity to manage structure fires across expanded, dispersed areas. This policy directly contravenes efforts to mitigate wildfire hazards and protect both property and lives.

The impact on **Water and Wells** presents another critical issue. Urban-density housing relies heavily on groundwater, necessitating new wells that would collectively draw down aquifer levels. This depletion directly impacts existing agricultural wells, which are vital for crop irrigation and livestock, and threatens the long-term sustainability of local water resources. Such intensified groundwater extraction also heightens the potential for conflicts over water rights, especially during periods of drought.

Financially, the proposal is unsustainable, leading to increased **Taxes and Public Cost**. Extending essential public services such as roads, utilities, and emergency response to scattered urban-density subdivisions in distant rural areas is inherently inefficient and exceptionally costly. These infrastructure investments and ongoing maintenance burdens would inevitably fall upon existing taxpayers, both urban and rural, diverting funds from necessary improvements within established urban growth boundaries and creating fiscal inequities.

Perhaps most critically, this rulemaking would lead to an irreversible **Loss of Resource Land**. Oregon's statewide planning goals are designed to protect high-value agricultural and forest lands from conversion. Allowing urban densities on unincorporated rural land directly facilitates the permanent destruction of productive working farms and forests, essential for Oregon's economy and food security. As a farmer and rancher, I can attest to the irreplaceable value of these lands and the direct threat this proposal poses to our livelihoods and the future of agriculture in Oregon.

Finally, the proposed changes will inevitably contribute to increased **Traffic and Sprawl**. Dispersed urban-density development necessitates greater reliance on private vehicles, increasing vehicle miles traveled (VMT), exacerbating traffic congestion on rural roads, and prolonging commute times. This pattern of development undermines investments in existing

urban infrastructure and public transit by encouraging outward migration rather than compact growth, thereby contributing to inefficient and unsustainable land use patterns.

Commissioners, I urge you to recognize the profound and detrimental consequences of allowing urban-density development outside designated urban growth boundaries. These boundaries are fundamental to protecting our natural resources, ensuring fiscal responsibility, and maintaining the unique character of both our urban and rural communities.

I respectfully request that the Land Conservation and Development Commission retain the strict Rural/Urban Growth Boundary lines and unequivocally reject the proposed rulemaking that would allow urban densities in rural areas.

Sincerely,

Evelyn Hunter
Farmer / Rancher
Cottage Grove, OR 97424

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Wednesday, August 26, 2026 3:31 PM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Judy Anderson

HUC rulemaking comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cf41b06a448904e97179408df03c1a3fc%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639233802376808038%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=81H%2BQAQ3csswrfYXtawG8cK0tiLqNSRhIsK3Cllw6qk%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Wednesday, August 26, 2026 2:58 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: jjantiques@aol.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Judy Anderson

To the Land Conservation and Development Commission Care of the Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

My name is Judy Anderson, and I am a rural resident from Cottage Grove 97424. We live in a rural area outside the city of Cottage Grove and are very concerned about how urban sprawl could change the quality of life here. I am writing to express my urgent and absolute opposition to the proposed rulemaking that would allow urban-density subdivisions on unincorporated rural land. This proposal is a direct threat to the very fabric of rural Oregon and must be rejected.

Allowing urban development in rural areas will lead to an irreversible **Loss of Resource Land**. Oregon's invaluable working farms and forests are not just scenery; they are critical economic engines and essential habitats. Subdividing these lands for urban-style housing destroys our agricultural capacity and fragments vital ecosystems. Furthermore, pushing dense development into the wildland-urban interface dramatically increases wildfire risk, endangering homes, lives, and emergency responders. This is a dangerous gamble with our natural resources and rural safety.

This rule change will inevitably result in increased **Traffic & Sprawl**, degrading our quality of life and straining existing infrastructure. Sprawl doesn't just spread outward; it hollows out investments in our cities and towns by drawing residents away from established urban centers. More cars, longer commutes, and increased congestion on rural roads are not improvements; they are burdens that undermine the very reasons people choose to live in rural communities. This is an unsustainable and irresponsible approach to growth.

Our rural communities depend on finite natural resources, especially **Water & Wells**. Introducing urban-density subdivisions on rural land will place an intolerable strain on our groundwater aquifers. The increased demand for water will impact existing rural wells, potentially lowering water tables and leaving long-time residents and local agriculture without adequate supply. Our aquifers are not an endless resource; drawing down groundwater for new subdivisions without a plan for replenishment is shortsighted and risks a water crisis for current rural users.

Finally, the financial implications of this proposal are severe. It will create an unfair and unacceptable burden on existing **Taxes & Public Costs**. Providing new roads, utilities, and essential public services like fire and police to distant rural subdivisions is extraordinarily expensive. These costs will not be borne by the new developments alone but will fall squarely on the shoulders of existing taxpayers, both urban and rural. This is an inefficient use of public funds and will strain budgets already struggling to maintain current infrastructure.

Commissioners, the integrity of Oregon's land use planning system hinges on clear distinctions between urban and rural areas. Do not sacrifice the future of rural Oregon for short-sighted development. I urge you to uphold the foundational principles of statewide land use planning.

Retain the strict Rural/Urban Growth Boundary lines and unequivocally reject any proposed changes that would allow urban densities in our precious rural areas.

Sincerely,

Judy Anderson
Rural Resident
Cottage Grove 97424

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD; TAYLOR Casaria * DLCD
Subject: FW: Public Comments - Housing in Unincorporated Rural Communities
Date: Wednesday, August 26, 2026 3:31:16 PM
Attachments: Public Comments - Rural Housing.pdf
image001.png

FYI, specifically addressed to LCDC

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Linda Eyerman <linda@gaylordeyerman.com>
Sent: Wednesday, August 26, 2026 3:29 PM
To: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>
Cc: HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen.FloydProzanski@oregonlegislature.com; Rep.CyrusJavadi@oregonlegislature.com; Sen Weber <Sen.SuzanneWeber@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Bob Boehmer <duxboehmer@gmail.com>
Subject: Public Comments - Housing in Unincorporated Rural Communities

> Some people who received this message don't often get email from linda@gaylordeyerman.com. Learn why this is important

Greetings,
Attached are public comments on DLCD's initiation of rulemaking focused on housing opportunities in unincorporated rural communities. Please make these comments a part of the record of proceedings for the upcoming public hearing. Thank you for your consideration.

Arch Cape Falcon Cove Beach Community Club Inc.
79729 Highway 101, Arch Cape. OR 97102
Submitted by Linda Eyerman, Treasurer
linda@gaylordeyerman.com

ARCH CAPE
FALCON COVE BEACH
COMMUNITY CLUB
79729 Highway 101, Arch Cape, OR 97102

August 26, 2026

DLCD Chair Allan Lazo
allan.lazo@dlcd.oregon.gov

RE: Public Comments – Urbanizing Unincorporated Rural Communities

Dear Chair Lazo,

Arch Cape Falcon Cove Beach Community Club (Community Club) is a 501(c)(3) non-profit organization founded in 1966. Our mission is to maintain and enhance the livability and sense of community in Arch Cape - Falcon Cove Beach, and to protect the natural, scenic, open space, historical and cultural aspects of the area and land.

We are writing in opposition to DLCD's initiation of rulemaking focused on housing in unincorporated rural communities. We ask that you stop this rulemaking process, or at least defer it until the impacts on each individual community have been determined.

Lack of Data on Housing Needs
Oregon has 241 incorporated cities. Under SB 100 and its progeny, cities are responsible for providing needed housing. We have not seen data to support a claim that our cities cannot meet the projected housing need. The data we have seen suggests that Portland alone has the capacity to meet almost half of the projected need.

Urban and Rural are Equally Important
The Oregon Way, which segregates urban from rural lands, rests on the principle that most people need to live where urban public services and facilities exist, including jobs, schools and infrastructure. People need rural lands for different purposes including environmental health, agriculture and recreation. They are equally important, and 50 years of keeping them separate has served Oregon well.

Each Rural Residential Community is Unique
The Community Club serves Arch Cape located at the south end of Clatsop County, and Falcon Cove Beach located in both Clatsop and Tillamook Counties. The two coastal communities are similar in some ways yet different in others including size, zoning and infrastructure. It is our understanding the proposed rulemaking would impact both.

Arch Cape is one of four communities in Clatsop County that was recently rezoned to increase density and allow multi-family dwellings. While the Community Club supports affordable housing for our workforce, we objected to those amendments because the County took a one-size-fits-all approach to housing expansion. The same amendments were proposed and adopted for isolated coastal Arch Cape, for the suburban community of Miles Crossing/Jeffers Garden where Astoria's workforce lives, and for the inland communities along Highway 30 which provide urban-level services for a significant geographic area. Not only does each of these rural communities have markedly different demographics and readiness factors for urbanization, they also have different topographic constraints and are at risk for different environmental hazards.

The Cost of Urbanization

While some communities which have formed in rural areas are quasi-cities, some are like Arch Cape and Falcon Cove Beach have no jobs, no public schools, very few roads, and only basic infrastructure. Water and sanitary systems are aging and have limited capacity. For gas, food and other services, people travel north or south to the nearest cities (Cannon Beach and Manzanita). Children ride the bus 25 miles or more a day to school in Seaside. As for public transportation, there is just one bus that runs daily between Tillamook County and Cannon Beach. There are too few post office boxes for the resident population, no public restrooms, and beaches with no designated parking. The expense of adding urban-level services to communities like ours would be cost-prohibitive, and who would pay for it?

Commercial and Light Industrial Upzoning

The DLCD charge appears to require that each county create a plan not only for housing but also for commercial and light industrial uses in its rural communities. Neither Arch Cape or Falcon Cove Beach has any industry, and the only commercial activity is short-term rentals. Visitors stay in small inns and private homes in order to get away from the urban lifestyle. They value our oceanside location, rural feel and natural beauty. Subdivisions, pavement, industrial sites, and increased traffic would not be appreciated by visitors or residents.

Negative Environmental Impacts

Most of the undeveloped land within our community is forest, providing significant health benefits plus a tree canopy and habitat for wildlife. The community itself is adjacent to thousands of acres of forest. While beautiful, it also puts us at risk for wildfires, a risk that is increasing with climate change. Drinking water is supplied by creeks which run low by summer's end. Much of Arch Cape is located in a mapped tsunami inundation zone. Wetlands, wildlife, a fragile ecosystem, and steep slopes are valuable resources which constrain development.

The Short-Term Rental Problem

In 2019 the cities in Clatsop County joined with the County to conduct a housing study which produced a confounding finding. There is in fact ample housing within Clatsop County, it said, to meet population projections for the foreseeable future. The problem is, much of that housing is not available for workforce or other long-term rental use because it is being used as vacation homes or short-term rentals. In addition, when housing comes on the market, it is priced

beyond the reach of the average home buyer because of its size, assessed value, and income-producing potential. This problem is in significant part driving the need for housing and should be addressed.

We appreciate the opportunity to offer comments, and we hope DLCD will consider them in deciding whether to initiate rulemaking focused on unincorporated rural communities.

ARCH CAPE FALCON COVE BEACH COMMUNITY CLUB INC
79729 Highway 101, Arch Cape, OR 97102

Contact:
Robert G Boehmer, President
duxboehmer@gmail.com

CC: Geoff Huntington (geoff.huntington@oregon.gov)
CC: Mark Bennett (mark.bennett@dlcd.oregon.gov)
CC: Rep Pam Marsh (Rep.PamMarsh@oregonlegislature.gov)
CC: Sen Floyd Prozanski (Sen.FloydProzanski@oregonlegislature.gov)
CC: Rep Cyrus Javadi (Rep.CyrusJavadi@oregonlegislature.gov)
CC: Sen Suzanne Weber (Sen.SuzanneWeber@oregonlegislature.gov)
CC: Jon Jinings (jon.jinings@dlcd.oregon.gov)
CC: Palmer Mason (palmer.mason@dlcd.oregon.gov)

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 8:00 AM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from John Craig Hazen

FYI, another HUC related comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C8c29248aeda64e089aa308df044beb65%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234396271720426%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ixtmNI6CfvfH%2Fc8Cibk7T5fOse%2Bpk%2FQsQR9WXw4Yaro%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Wednesday, August 26, 2026 6:43 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: johnplumber@comcast.net
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from John Craig Hazen

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,

I am supportive of low income housing. As a plumber I donated my time and profit in the construction of several units built by Square One Villages. I support the increased density created recently through legislation on single family residence lots. In my neighborhood a recently completed project replaced an aging single family house with 6 energy efficient dwellings. I have an ADU on my own single family residence under regulations allowing those units several years ago and my renters qualify for subsidies that allowed me to upgrade their heating system to include air conditioning.

I cannot support the proposed changes allowing expansion of houses and industry in unincorporated rural areas. This would impact those areas in adverse ways and allow inappropriate housing and industry to take advantage of inexpensive land and building costs. The unincorporated areas I am familiar with, Fall Creek, Dorena, Culp Creek and London, would change and become less desirable for the present residents. Infrastructure costs would not be adequately covered by the permit process resulting in tax payer and users of existing utilities covering the additional costs.

I ask that you do not support this proposed legislation.

Sincerely,
John Craig Hazen
Eugene 97405

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Wednesday, August 26, 2026 8:34 AM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Bruce Tinker

Another HUC related public comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C64614c0cc8f940cdae4108df03876ccc%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639233552309597762%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=OtwqQlPExli0bgG%2BBhHp28jhOx3aFAj4vIsaVie7zkA%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Wednesday, August 26, 2026 8:25 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: bruce.tinker@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Bruce Tinker

Land Conservation and Development Commission c/o Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing to express my strong opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land in Oregon. As Bruce Tinker, a Forest & Water Advocate from Eugene, I am deeply concerned about the long-term impacts these changes would have on our state's natural resources and the well-being of our communities.

One of my primary concerns, and one that directly impacts the safety and well-being of Oregonians, is the increased wildfire risk. Allowing dense housing developments in what are often wildland-urban interfaces creates significant new fire hazards. These developments not only put new residents at risk but also strain emergency services and threaten existing rural communities and natural areas, potentially leading to more devastating and widespread fires across the state. This is a risk our communities cannot afford to take.

Equally critical is the impact on our precious water resources. The expansion of urban-density housing into rural areas would inevitably lead to increased reliance on groundwater through private wells. This draws down our aquifers, which are vital for local agriculture, ecosystems, and existing rural households. As a Forest & Water Advocate, I've seen firsthand how climate change is already affecting the amount of water available. We need to be strategic in how we utilize what we have, and allowing widespread groundwater extraction for new subdivisions is anything but strategic. It jeopardizes water security for everyone.

Furthermore, these proposed changes threaten the very fabric of Oregon's land use planning – our commitment to protecting resource lands. Allowing urban sprawl into rural areas means the irreversible loss of working farms, forests, and other valuable resource lands that are essential for our economy and environment. This approach undermines the health of our urban centers by hollowing out investments there and burdens existing taxpayers with the immense costs of extending roads, utilities, and public services to distant, dispersed rural subdivisions. It is an inefficient and unsustainable path for our state.

The Urban Growth Boundary system has served Oregon well for decades by protecting our rural landscapes and fostering vibrant, compact communities. Eroding these protective measures for short-sighted development will have profound and lasting negative consequences for our environment, public safety, and financial health. I urge the Land Conservation and Development Commission to prioritize the long-term health and sustainability of all Oregon communities. Please retain the strict Rural/Urban Growth Boundary lines and reject any proposed changes that would allow urban densities in our vital rural areas.

Sincerely,

Bruce Tinker
Forest & Water Advocate

Eugene, OR

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Thursday, August 27, 2026 4:48:38 PM
Attachments: image001.png

FYI …

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Ashley Bradfield <ashley.bradfield@gmail.com>
Sent: Thursday, August 27, 2026 4:43 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from ashley.bradfield@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Williams in Josephine County. It appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I am a 10 year resident of rural Josephine County and 6 year resident of Williams. I am a small business owner, volunteer with local organizations and serve as Vice Chair of the Williams Citizens Advisory Committee and Community Council.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have

not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely,
Ashley Bradfield
Williams, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 9:29 AM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Philip H Carver, Co-coordinator 350 Salem Oregonn

FYI, HUC related comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C6c08d6b31b9e48aac30208df04584078%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234449228902465%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=MMDNukCJ362mvUylqLINUOY9%2FCwD5mOvD0SDChpM7h8%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Thursday, August 27, 2026 9:19 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: philiphcarver@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Philip H Carver, Co-coordinator 350 Salem Oregonn

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
This effort to stop an unwise rule from going forward is a statewide effort. 350 Salem is one of many organizations participating.

In April, the Oregon Land Conservation and Development Commission (LCDC) quietly launched a rule making that would open many rural unincorporated communities (there are 56 such areas in Marion and Polk Counties) to urban development outside urban growth boundaries for the first time in more than fifty years.

It's being called a housing rule, but it would require participating counties to rezone rural farmland and forestland for commercial and "light industrial" uses. In practice, that means data centers, Amazon warehouses, and urban development on working lands -- while doing nothing to build housing most Oregonians can afford.

Oregon's urban growth boundaries are good policy. They keep development inside cities. That keeps homes near jobs, bus routes and services which reduces the need to drive. Living far from cities is expensive. And it will be difficult to raise taxes to provide water, sewer and other services that development requires.

This rule making is not just poor climate policy, it’s a generally bad policy.

There's been no showing of need. No maps. No inventory of the communities affected. No analysis of wildfire, water, or wildlife impacts, even though the state holds that data. Oregon has spent recent years building real housing capacity inside cities, where infrastructure already exists, and no agency has found that our housing needs can't be met there.

And who wins? These remote dwellings won’t be affordable places to live. They will be far from jobs. The winners will be land speculators who are probably already buying around these communities, and developers who want farmland prices with industrial zoning. There is no need here – just greed.

What do the rest of us get? Higher taxes or worse services. Wells and rivers drawn down by facilities that employ almost nobody. Farmland and forestland paved over forever.

Sincerely,
Philip H Carver, Ph. D.
Co-coordinator
350 Salem Oregon
Salem

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Thursday, August 27, 2026 3:56:33 PM
Attachments: image001.png

FYI ...

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Mona Daniels <princesspea05@gmail.com>
Sent: Thursday, August 27, 2026 3:08 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

You don't often get email from princesspea05@gmail.com. Learn why this is important

To Whom It May concern, I live in Sunny Valley Oregon. I live here because it's Rural and I picked and like the community that I live in because it is rural. I live here because I don't want to live with a bunch of houses around me and neighborhoods. If I wanted that I could live in Grants Pass or Medford. I like to live in the country without neighborhoods as do my neighbors.

Please stop the housing unincorporated communities rule making.

Thank you ,
Mona Daniels
1059 Placer Road
Sunny Valley Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Cc: JININGS Jon * DLCD
Subject: FW: Stop this rulemaking and preserve working small farms and diversified agricultural landscapes in Oregon
Date: Thursday, August 27, 2026 5:30:44 PM
Attachments: image001.png

FYI, another HUC comment … you may need to respond tomorrow

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: stacey weddingflora.com <stacey@weddingflora.com>
Sent: Thursday, August 27, 2026 5:04 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Stop this rulemaking and preserve working small farms and diversified agricultural landscapes in Oregon

> Some people who received this message don't often get email from stacey@weddingflora.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I am asking you to stop the Housing in Unincorporated Communities rulemaking.

I live in Williams, and I farm here and I own forestland here. I have worked this land since 2012 and have a successful cut flower farm. In the time that I have lived on this land, I have watched the climate change significantly-- we now have 6-8 more weeks each year without frost which means longer, hotter spring/summer/fall and the associated impacts of drier soils, less water for irrigation, and greater wild fire risk.

The state holds detailed data on wildfire hazard, water depletion, and wildlife habitat.

None of it appears anywhere in this rulemaking. You are proposing to put more homes, more businesses, and required light industrial development into fire-prone country without taking into account that more development will lead to: habitat loss for critters; removal of vegetation for roads and homes will result in warmer soils or more heat storage from impermeable surfaces, and greater water demand from new residents and possible light industrial activities. Essentially, it will lead to more warming and drying of an already parched Southern Oregon landscape!

Rezoning also raises land values past what is economically viable for farm or sustainable forestry operations. We don't want rural Oregon to become like California where only the wealthy or heavily capitalized agricultural projects like wineries can afford to own rural property.

Please stop this rulemaking.

Sincerely,
Stacey Denton
Williams, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 1:50 PM
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking

FYI, in just case you haven't seen this HUC comment yet

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cd8bc2e5a1be3409d220e08df047cd286%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234606317704644%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=EHOVau3QRvLxz7oGg0t4lBGK2zpato70JXQMW%2FSBJqQ%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: Rick Faist <faist@thumbfunkalimbas.com>
Sent: Thursday, August 27, 2026 1:29 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

[You don't often get email from faist@thumbfunkalimbas.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

What?!!!!!! How dare you to be able to take our community and turn it into something that is not what we are living here for… We love our sleepy quiet and yes, economy strapped community. Please, Plead don't make this a norm for our and other communities to open up the rules and let greed in!
Honestly,
Louann Faist
PO Box 343 Williams, OR
97544

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Current rulemaking will negatively impact rural, unincorporated communities
Date: Thursday, August 27, 2026 2:51:06 PM
Attachments: Megan Fehrman, LCDC Written Comments, 8.28.26.pdf
image001.png

FYI

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Megan Fehrman <megan@agreaterapplegate.org>
Sent: Thursday, August 27, 2026 2:18 PM
To: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>
Cc: HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; Rep Marsh <rep.pammarsh@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Current rulemaking will negatively impact rural, unincorporated communities

You don't often get email from megan@agreaterapplegate.org. Learn why this is important

Dear Chair Lazo,

I have been a resident of rural, unincorporated Oregon for 20 years and currently serve as the Executive Director of A Greater Applegate, a community-based organization in southern Oregon's Applegate Valley. The Applegate Valley is made up of five recognized but unincorporated rural communities (Applegate, Murphy, Ruch, Wilderville, and Williams) in two counties (Jackson and Josephine). With 20,000 people spread out over 500 square miles of rugged mountains and river valleys and few discrete political boundaries, its dispersed, rural nature leaves it with no formal governmental structure, limited and uneven services, and inconsistent access to funds or revenue sources to address these issues– which is why I applied to serve on this rules advisory committee.

As a rural resident and a leader of a community development organization, I have serious concerns and perspectives on what a change in these rules could mean to our unincorporated areas that other stakeholders do not. Yet, I was turned down. And, to my knowledge, there is no representation on the commission from Jackson and Josephine Counties even though we stand to be greatly impacted by this

process. In the non-selection letter I received on July 20th, I was told that I would be added “to the list of interested parties to receive GovDelivery e-mail notices about this rulemaking as our work moves forward. This will include meeting notices, draft rule language, and other opportunities to engage.” However, it took other concerned citizens notifying me on Wednesday, August 26th that there was a hearing on Friday the 28th and that I could submit testimony. At the very least, this seems like a failing in the state’s public process and gives me even more reason to be concerned about what is happening here.

After spending the past 8 years developing and implementing the Applegate Valley Vision, and 15 years before that working with farmers on agricultural issues, I can agree that we do have challenges with affordable housing, that there is limited infrastructure to serve our communities, and there is a need to look at economic revitalization. However, this current approach is not the way. Unincorporated areas need a seat at the table to be able to establish what should be place-based and community-led initiatives for our own well-being instead of a top-down prescriptive approach that will do more harm than good to our rural way of life, which depends on our farms, forests, rivers, and local businesses staying intact.

To that end, I am asking the commission to stop the unincorporated communities rulemaking at this juncture, because it will not do what it is claiming to do. Instead, I invite you to visit us and other unincorporated areas. Have these conversations with the people that live here. Look at our community vision and economic development plan, work with us to work with our counties to address our issues, but please do not come up with a “one-size fits all” plan that will allow outside interests to greatly change and impact everything we know and love about the place we call home.

Sincerely,
Megan Fehrman
Ruch, Oregon

--

AGreaterApplegate.org

ApplegateConnect.org - *For the Applegate Valley Community*

WanderApplegate.com - *For Visitors, Travelers, & Guests*

August 28th, 2026

Dear Chair Lazo,

I have been a resident of rural, unincorporated Oregon for 20 years and currently serve as the Executive Director of A Greater Applegate, a community-based organization in southern Oregon's Applegate Valley. The Applegate Valley is made up of five recognized but unincorporated rural communities (Applegate, Murphy, Ruch, Wilderville, and Williams) in two counties (Jackson and Josephine). With 20,000 people spread out over 500 square miles of rugged mountains and river valleys and few discrete political boundaries, its dispersed, rural nature leaves it with no formal governmental structure, limited and uneven services, and inconsistent access to funds or revenue sources to address these issues– which is why I applied to serve on this rules advisory committee.

As a rural resident and a leader of a community development organization, I have serious concerns and perspectives on what a change in these rules could mean to our unincorporated areas that other stakeholders do not. Yet, I was turned down, and now there is no representation on the commission from Jackson and Josephine Counties even though we stand to be greatly impacted by this process. In the non-selection letter I received on July 20th, I was told that I would be added "to the list of interested parties to receive GovDelivery e-mail notices about this rulemaking as our work moves forward. This will include meeting notices, draft rule language, and other opportunities to engage." However, it took other concerned citizens notifying me on Wednesday, August 26th that there was a hearing on Friday the 28th and that I could submit testimony. At the very least, this seems like a failing in the state's public process and gives me even more reason to be concerned about what is happening here.

After spending the past 8 years developing and implementing the Applegate Valley Vision, and 15 years before that working with farmers on agricultural issues, I can agree that we do have challenges with affordable housing, that there is limited infrastructure to serve our communities, and there is a need to look at economic revitalization. However, this current approach is not the way. Unincorporated areas need a seat at the table to be able to establish what should be place-based and community-led initiatives for our own well-being instead of a top-down prescriptive approach that will do more harm than good to our rural way of life, which depends on our farms, forests, rivers, and local businesses staying intact.

To that end, I am asking the commission to stop the unincorporated communities rulemaking at this juncture, because it will not do what it is claiming to do. Instead, I invite you to visit us and other unincorporated areas. Have these conversations

with the people that live here. Look at our community vision and economic development plan, work with us to work with our counties to address our issues, but please do not come up with a “one-size fits all” plan that will allow outside interests to greatly change and impact everything we know and love about the place we call home.

Sincerely,
Megan Fehrman
Ruch, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 12:48 PM
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking

Another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Ce0d2f609a70c40ddff9c08df0474258f%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234569057734057%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=fOhpaarLYq%2BNf3OWmjW4Eho9PhbzTh1%2Bz2BGlEaDpb8%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: Sha'ana <shavana@indra.com>
Sent: Thursday, August 27, 2026 12:42 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

[Some people who received this message don't often get email from shavana@indra.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

This rulemaking would impact the reason I have lived in Oregon for the past 21 years.

MANY Oregonians like me chose Oregon specifically because of the rural lifestyle available here in the small unincorporated areas. WE ARE OREGONIANS TOO, and we deserve the right to live in our chosen way, away from small lots, busier roads, commercial activities, and industrial activities, where there is land for critical farms to feed folks.

There is ample land is already available for more homes - cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and housing reforms have more than doubled the capacity inside those boundaries. The issue is AFFORDABLE housing.

Please stop the Housing I Unincorporated Communities rule making - this is NOT the solution - the solution is more AFFORDABLE homes in the areas already designated for more homes - the cities.

If you change the options within Oregon, you hurt Oregon.

Sincerely,
Psychologist and Rural Resident,
Ellen Fineberg
Williams, Josephine County

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Thursday, August 27, 2026 6:45:15 PM
Attachments: image001.png

FYI, another HUC comment although not addressed to LCDC (but Chair Lazo is copied).

I am signing off for the night. I'm back at work on Monday.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Amber Guient <amber@mroregon.com>
Sent: Thursday, August 27, 2026 6:39 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from amber@mroregon.com. Learn why this is important

Dear Representative Body,

I am writing to you as a member of the Williams Citizens Advisory Committee, the final remaining advisory committee to the Josephine County Planning Department. I have lived in the unincorporated town of Williams for nearly 25 years and have served on this committee for over 5 years. We consistently hear from long-standing community members who want us to submit comments whenever a proposed land-use change threatens the character of our rural community.

Over the past 10 to 15 years, the Williams CAC has held packed meetings at our Grange Hall to oppose projects like a proposed cellular tower and industrial hemp and cannabis

production facilities.

Furthermore, rural Josephine County lacks the resources to improve our infrastructure. Our Volunteer Fire Department relies on just two employees alongside volunteers. As a member of the Budget Committee, I know we face potential grant reductions that could end our 24/7 staffing. We simply cannot accommodate more industry or residents without first addressing our capacity to handle increased traffic, fire risks, and water usage in this dry, forested landscape.

I urge you to vote no on loosening the rural land-use laws that protect the integrity of the rural Oregon way of life.

Kind regards,

Amber Guient

--

Amber Guient
amber@mroregon.com

CONFIDENTIALITY NOTICE: This email is intended for the named recipient(s) only. It may contain privileged and confidential information. Any use of this information by persons other than the intended recipient(s) is prohibited. If you are not the addressee please notify us immediately by returning the original message to the sender by e-mail and deleting the material from any computer.

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 9:49:26 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Hayriya Heidi A Hansen <hayriya1@gmail.com>
Sent: Thursday, August 27, 2026 8:53 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from hayriya1@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Williams Oregon, in Josephine County. My small community appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I have lived and owned property in this community for 27 years. Our community has been a beautiful place to live (tho the Jo Co Commissioners have sold off WAY too much land to loggers!). I have raised three children here and we still happily own our beautiful property. We choose to live RURALLY and want our community to REMAIN as unspoiled as possible. we do not want to live in a community which is being set forth in the new proposed Housing in Unincorporated Communities proposal. We want our roads to remain less populated (it is already growing too much!). We like our small rural school. I

am happy with my well water and enjoy my drive to town. I DO NOT WANT MY COMMUNITY of Williams to change. I do not want to be included in this Unincorporated Community Rulemaking. Representing my family I say NO…DO NOT include Williams. Let the cities grow. Folks chose to live in the city and that's where the growth needs to occur.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely,
Heidi A Hansen, Angie Sherer, Talon Sherer, Sage Sherer…Toward the One LLC
Williams, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 9:49 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Stop this rulemaking until you can answer some vital questions

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C5a8e7d5659e14368e6a608df077fbbe5%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639237917362203046%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=vDRpnrcOi9VKYKM25rWYLMgos3RAnkgj8bScqFOoJj0%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: lisaj@mind.net <lisaj@mind.net>
Sent: Thursday, August 27, 2026 11:38 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Stop this rulemaking until you can answer some vital questions

[Some people who received this message don't often get email from lisaj@mind.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Chair Lazo and Commissioners,

I am asking you to stop the Housing in Unincorporated Communities rulemaking.

I live in White City, on 7 acres on the Rogue River. I was recently under threat from the 15,000 acres E Evans Creek wildfire that came only one evacuation zone away from my home of 39 years. The quarter size ash and embers landing on my deck filled three stressful weeks with sleepless nights and hardworking days doing additional fire hardening activities like raking away bark and shoveling gravel around the foundation of my home.

We pay extra taxes to have the county Sherrif department serve as our "police force" - but if a neighbors burglar alarm goes off and 911 is called - we can wait nearly an hour before they can tell us if someone is coming out to survey the property.

I'm on a well we had to drill 200' deep, and a septic system that is being serviced tomorrow. Many of my neighbors in Sam's Valley four miles away run out of water entirely and must truck in large quantities to survive. There isn't enough water in the water table - but are you thinking about that? More homes will only further deplete a LIMITED RESOURCE.

I own and manage 10 light industrial warehouses in White City and have been involved with development and commercial construction for 40 years.
I'm uniquely aware of tracts of developable land both in the unincorporated areas as well as within the expanding UGB of most cities in Jackson and Josephine Counties. There is plenty of buildable land within the UGB of our municipal cities. We have to fundraise each year just to pay for the water to have a splash pad for children in the hot summers in White City- and if you haven't lived in southern Oregon, we get MUCH HOTTER than the northern end of the state - 115 degrees isn't common in Portland or Salem? It's a different climate - a higher fire risk - a more stressed economy and environment.

And I've lived in Portland for 20 years as well - most recently as the Executive Director of the Lan Su Chinese Garden 2016-2020 after raising the $32 million to expand the Portland Japanese Garden. I had homes in both ends of the state.

The state holds detailed data on wildfire hazard, water depletion, and wildlife habitat. None of it appears anywhere in this rulemaking. You are proposing to put more homes, more businesses, and required light industrial development into fire-prone country without having put your own maps in front of yourselves first.

EVERY SINGLE FIRE THIS SUMMER WAS MAN CAUSED! And they've been fighting fires continuously. Come on down - I'll give you a tour. We need investment and help in rebuilding the loss of 3,000 homes and businesses from the fires in 2020 - at both ends of Jackson County - starting on the same day! The Almeda fire and the Obenchain Fire which burned 40,000 acres

of rural country and homes - which I could also see from my home, just like the recent one this summer.

Rezoning also raises land values past what a farm, agriculture or a forest operation can carry. Daily I drive between cattle land, hay fields, wineries and vineyards and Harry & David pear orchards - within just 4 miles. These rural lands are also the last refuges for elk, deer, bear, cougar, beaver, coyotes and much more.

Please stop this rulemaking.

Sincerely,
Lisa James
1738 Pine Gate Way
White City, Oregon
541-941-3223

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 7:56 AM
To: WILLIAMSON Angela * DLCD; JININGS Jon * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Ann Jamison

FYI, another HUC related comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C319aa8db5fa644e5f1f208df044b4eee%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234393642492723%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=%2BcmRbgWs6vKOjTpbdBVOiJf7zyX%2BlGNrZSCevHz05T4%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Thursday, August 27, 2026 2:58 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Ann Jamison

Ann Jamison
Cottage Grove, OR 97424

Land Conservation and Development Commission Care of Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing as a fisherman and outdoors enthusiast who lives in Cottage Grove. I would like to express my strong opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land. This proposal fundamentally undermines the basic principles of Oregon's land use planning system and creates an opportunity for significant detrimental impacts.

Allowing urban densities in rural areas is inconsistent with the long-standing statewide planning goals designed to protect resource lands. As shown by the Forest Service's own research, development in wildland-urban interface zones increases wildfire risk. It also disrupts essential natural ecosystems and threatens our diminishing water resources, draining groundwater aquifers and decreasing water for existing rural residents and agriculture.

The proposed changes are also economically unsustainable. Our last election showed that voters are unwilling to have their taxes increased to maintain existing roads----and taxpayers will be expected to pay for expanding roads and utilities beyond established urban growth boundaries.

Extending urban densities in rural areas will also create congestion and sprawl, precisely what our land use planning laws were created to prevent. Oregon can't afford to lose more working farms and forests to development. Oregon's land use planning laws must be followed, not destroyed.

This proposed rulemaking is a lazy fix for Oregon's housing needs and tramples Oregon's public interests. I urge the Land Conservation and Development Commission to reject these proposed changes and strictly follow Oregon's strong land use planning rules, which have clearly delineated boundary lines between rural and urban areas.

Sincerely,

Ann Jamison

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Stop Housing in Unincorporated Communities Rulemaking
Date: Monday, August 31, 2026 9:49:41 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: John White <joruwh@hotmail.com>
Sent: Thursday, August 27, 2026 8:45 PM
To: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>
Cc: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Stop Housing in Unincorporated Communities Rulemaking

> Some people who received this message don't often get email from joruwh@hotmail.com. Learn why this is important

Dear Chair Lazo,

I am hoping that governor Kotek and the LCDC commission reconsider rulemaking for Housing in Unincorporated Communities.

We moved from Eugene to an RR zoned property along the Coast Fork of the Willamette river and over the years have been surprised at how little wildlife we see. There are parts of Eugene that have more bears, deer, birds, etc. than we do. Urbanizing the unincorporated communities in Lane County will only degrade the rural environment further. Existing UGB's can absorb the growth we need.

Oregon will not remain Oregon under new rulemaking nominally done for housing but actually done for expanding commercialization.

Thank you.

John White
Creswell

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 2:53 PM
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking

FYI ...

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cda0d9fdb8f5647ab9c2808df04859de5%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234644056319901%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=sO%2BROofNjIc3MRpqSlyxmQqKwxxqp8F3mbiJvGywxXw%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: Conny Lindley <connyjolindley@gmail.com>
Sent: Thursday, August 27, 2026 2:52 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

[You don't often get email from connyjolindley@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Chair Lazo and Commissioners,

I live in Williams, Oregon, in Josephine County. It appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I have lived here for 52 years, raising my family here, starting and running businesses from here, volunteering in the elementary school here, working at the Farmer's Market here, and always staying involved and connected in this wonderful rural and diverse community of caring and community-minded people. We who live here value the small size of the community, we take care of each other, support each other and appreciate the old-fashioned nature of life, far away from housing developments and big stores. We shop at our local Farmer's Market and 2 small local stores, supporting our neighbors in doing so. We do not want this area to grow bigger in any way, housing or commercial enterprises. PLEASE, PLEASE protect this rural community that wants the quality of life to stay the way it is.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely, and thank you for protecting our very special community, Conny Lindley Williams, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Thursday, August 27, 2026 1:54:46 PM
Attachments: image001.png

FYI, in case you haven't seen this HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Michelle McAfee <mcafee.michelle@gmail.com>
Sent: Thursday, August 27, 2026 1:05 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from mcafee.michelle@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Williams, in Josephine County. It appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I've lived here for 17 years. I moved here for the forest, the quiet, the rare dark skies, and the space to be able to grow a big garden for me and my family. I love that I can drive out my driveway and hop on Cedar Flat Road to run down to the local farmers market or neighbor 's farm to pick up a dozen eggs or locally grown produce and meat. Nearly every evening I walk with a friend out my driveway and up Cedar Flat Road, onto Davidson Road at sunset. We never worry about traffic, and we always run into someone we know out there. This lifestyle is why I moved here and bought land.

Not everyone can thrive in the same kind of living environment. Some of us need dark, quiet nights to sleep, forests to walk in, open space around us. We have vineyards and organic farms throughout this valley that make this place a true gem, along with the Applegate. PLEASE do not make these incredible destination valleys more urban, industrial, congested, or busy. Don't destroy a good thing – thriving communities – when there is plenty of space already available in urban areas for new housing.

The impact of your new rules here would be devastating to those of us who have invested in making a life here. Devastating to the forests and farms and open spaces that make this valley and our neighboring Applegate valley so incredibly special.

Please, I ask you to stop these rules, stop imposing these changes on those of us who have invested in and worked so hard to live a rural life.

Sincerely,
Michelle McAfee
Williams, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Thursday, August 27, 2026 12:48:43 PM
Attachments: image001.png

Another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Stacey Raffety <sraffety@gmail.com>
Sent: Thursday, August 27, 2026 12:39 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from sraffety@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Josephine County. It appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I have lived in Williams for 2 1/2 years now. I chose a rural, quiet setting to retire in. Increasing housing in this area is not a good idea because of limited employment and water. Fire safety and protection for the area is limited.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have

not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely,
Dr. Stacey Raffety
Williams, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 2:51 PM
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking

FYI

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Ccc76f855cbe84ad3fe1b08df048540ef%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234642527938524%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=DSkNtMI9oGNwoA%2BN8l%2FNCztsa3XyuJgwzn9FuYpbj7o%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: Maya Reames <mayareames@icloud.com>
Sent: Thursday, August 27, 2026 1:57 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

[You don't often get email from mayareames@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

home owner Williams Or Tax payer brought my kids up in public school josp co i am against these proposed ideas we dont have enough ground water we are a organic AG community small farms big hardens The herb pharm and their farms , Forest Farm nursery) pacifica) siskiyou seeds strictly medicinals 7 seeds and flora flowers organic flower seeds & flower farm!whitoak farm& educational center oshala herb organic farm bluebird organic veggie farm whistling duvk farm and farm store we need our dwindling water for growing organic food& seeds not for subdivisions and industrial businesses!!!
Sent from my iPhone

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please STOP the Housing in Unincorporated Communities rulemaking
Date: Thursday, August 27, 2026 12:50:06 PM
Attachments: image001.png

FYI

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Evelyn Roether <evelynkr@gmail.com>
Sent: Thursday, August 27, 2026 12:49 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please STOP the Housing in Unincorporated Communities rulemaking

> You don't often get email from evelynkr@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Williams, in Josephine County Oregon, so this rulemaking directly affects me, my home, my investments and my community. It is on your list of unincorporated communities that would be affected by your actions.

I've lived here for 40 years and own two properties here. Everyone I know, myself included, lives here for the ***quality of life*** it provides. That is mainly defined by the RURAL NATURE of our town and the surrounding community. We are now not only faced with the potential devastation of our public lands, (which make up 52% of our watershed) due to Trump's pending reversal of the Roadless Rule, but also this proposed rulemaking which you hold in your hands.

If passed, this proposed rulemaking could DEVASTATE the rural nature of our community. I can tell you in no uncertain terms, that there is NO housing shortage around here. I am a landlord and have trouble finding tenants! There is commercially and light industrial zoned land that sits vacant. There is no need for our community to be included in this proposed rulemaking.

I have participated in multiple "listening sessions," over the past four decades, sponsored by various agencies, who have wanted to hear from our community members about what their wants and needs are for Williams. Without exception, the vast majority of responses have been to PRESERVE THE RURAL NATURE OF OUR COMMUNITY.

Furthermore, the water table in our community has shrunk due to decades of (even) slow development and ***well yields are decreasing***. I was personally responsible for a Groundwater Study conducted by our local watershed council (funded by the Oregon Watershed Enhancement Board (OWEB)) that proved as much. Any intensified development would exponentially worsen this depletion of groundwater.

Another consideration is that the two lane roads servicing the rural communities of the Applegate Valley are not adequate enough nor built to accommodate the increased load of traffic that would be produced by increased commercial, industrial and residential development. We already have to deal with logging trucks, adverse weather conditions and minimal emergency services that impact the safety of our roads. The introduction of subdivisions, commercial and/or industrial development pressure just increases the dangers on our already hazardous roads.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

It is ill-advised to increase urban sprawl to areas that do not have the infrastructure to support this population pressure. Oregon land use laws are still working well to contain human populations where jobs, affordable housing and infrastructure are already in place. There is no need to ruin productive agricultural, woodland and rural residential areas when there is still plenty of space to in-fill already urbanized areas.

I urge you to stop this rulemaking and reconsider your assumptions about the need to increase urban sprawl across the rural unincorporated communities in Oregon. People

who live in these areas like them the way they are for the reasons I listed above. We don't want to live in the city or the suburbs. We LIKE our rural lifestyles. Don't ruin them.

If you are unwilling to stop the rulemaking process for some reason, please explain why. I implore you to not continue this process until you can say which communities it affects, what hazards each of them faces, ***and until the people who live in them have been given real notice as to your proposed actions***. I just happened to get an email today, **one day** before the proposed rulemaking hearing from a local land use advocacy group**,** alerting me to this proposed action. Why is this taking place behind almost closed doors without input from people whose lives would be directly affected by your actions??

It is not ok for these rulemakings to proceed without due process involving the communities that stand to be affected by your actions.

RESIDENTS OF RURAL COMMUNITIES DESERVE THE RIGHT TO BE HEARD REGARDING ACTIONS THAT AFFECT OUR LIVES!

Please give us ***advance notice*** of what's going on so we can stand up for our homes, our communties, our livelihoods, our investments and the way we choose to live our lives!

Williams has a Citizen's Advisory Council (CAC) that is set up as a conduit for this kind of information sharing on land use decision-making. Please use it, just as our Josephine County Planning Commission and Planning Department do, to alert our community about proposed actions that affect our neighborhood.

Please ***add me to your mailing list*** so that I can be informed about these kind of actions being considered by your committee that AFFECT MY LIFE DIRECTLY!

Thank you for your service to Oregon and for considering my concerns about this proposed rulemaking.

Sincerely,
Evelyn Roether
POB 104
Williams, OR 97544

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Public comment, Housing in Unincorporated Communities rulemaking — Rogue Advocates
Date: Thursday, August 27, 2026 12:52:14 PM
Attachments: image001.png

FYI …

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Jamin Giersbach <Jamin@rogueadvocates.org>
Sent: Thursday, August 27, 2026 11:27 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>; LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>
Cc: HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Public comment, Housing in Unincorporated Communities rulemaking — Rogue Advocates

Some people who received this message don't often get email from jamin@rogueadvocates.org. Learn why this is important

Please enter the following written comment into the record for the August 28, 2026 commission meeting, agenda Item 12, general public comment.

Dear Chair Lazo and Commissioners:

I have lived in Ruch for nineteen years. Ruch appears on the state's own survey of Oregon's unincorporated communities, as do Applegate and McKee Bridge a few miles up the road. So when this commission talks about opening unincorporated communities to subdivisions, commercial development, and required light industrial zoning, it is talking about the place I live.

I want to tell you what that country is actually like, because the record in this rulemaking does not say.

On September 8, 2020, the Almeda Fire destroyed more than 2,600 structures in Talent and Phoenix in a single afternoon. It took two businesses I owned and a rental house. Thirty-five

people who worked for me were out of work. The Talent Health Club never reopened. Rogue Farmers relocated to Medford. My renter lost their home. Our school district lost 700 students overnight and is still down about 350, and Superintendent Brent Barry has been plain about the reason: “quite simply, due to the lack of available housing.”

FEMA scraped the lot where that house stood. Six years later, it is still empty.

I raise it because this commission has opened a rulemaking premised on the idea that Oregon has run out of room to build. That lot has been sitting there, available, for six years. Oregon already has hundreds of thousands of acres zoned rural residential, holding thousands of vacant lots, and cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries. Middle housing reforms more than doubled capacity inside those boundaries. Portland alone holds LCDC-approved capacity for 235,000 homes. No agency, including this commission, has ever found that Oregon’s housing need cannot be met on land that is already available.

What actually slowed the rebuild in my valley was not a shortage of land. It was insurance, construction costs, and how long disaster money takes to arrive. Rezoning the Applegate would not have put a single family back in Talent; it would not have kept my businesses open, and it would not have put one of my thirty-five employees back to work.

Which brings me to the part I know best, and the part this record is silent on.

The Applegate is fire country. So is most of the rural land this rulemaking would open. The state holds detailed wildfire hazard data. None of it appears anywhere in this rulemaking, and the rules advisory committee does not include a single member with hazards expertise. This commission is proposing to put more homes, more businesses, and required light industrial development into fire-prone landscapes without having read its own maps.

I lost most of what I had built in about four hours, in a corridor everyone assumed was safe. Adding people and buildings to country like mine means more ways for a fire to start, more people to evacuate on rural roads, and more to lose when one does.

It also means more that simply stops working. My other business, Highly Distributed, did not burn down. The outside of the back wall burned, but it still sat dark for close to a month because the power was gone. That is what fire does to a place well beyond the structures it destroys, and it is what this rulemaking would sign rural Oregon up for: businesses and households in country where the grid, the roads, and the emergency response are all thinner than they are inside a city, and where there is no city government to turn to when the lights go out. I would not want any commission to authorize that without first reading its own hazard maps.

Please stop this rulemaking.

If the commission is unwilling to stop, then do not go further until you can say which communities this affects, how many there are, what hazards each of them faces, and until the people who live in them have been given a voice. You cannot say any of that today. I certainly received none.

Thank you for reading this. I know what it cost my community to learn these lessons, and I would rather the rest of Oregon not have to.

Sincerely,

Jamin Giersbach
Executive Director, Rogue Advocates
Ruch, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 9:50:14 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Timothy White <timothywhite3600@gmail.com>
Sent: Thursday, August 27, 2026 8:26 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from timothywhite3600@gmail.com. Learn why this is important

Please stop the Housing in Unincorporated Communities rule making

Dear Chair Lazo and Commissioners,

I live in Williams, in Josephine County. I just learned that it appears on the state's own survey of unincorporated communities, so this rule making could directly impact my home.

I have lived in Williams for 26 years. I have watched the community grow and shrink over the years, and I don't want to see the community turned into a development

The state holds detailed data on wildfire hazard, water depletion, and wildlife habitat. None of it appears anywhere in your proposal. You are proposing to put more homes, more businesses, and required light industrial development into fire-prone country without considering the impact on those already living here.

No agency, including your commission, has ever found that Oregon's housing needs cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than

doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rule making. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely, James Timothy White
Williams, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Thursday, August 27, 2026 1:51:47 PM
Attachments: image001.png

FYI, just in case you hadn't seen this HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Dave Willis <sodamtn@mind.net>
Sent: Thursday, August 27, 2026 1:14 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: alan.lazo@dlcd.oregon.gov; HUNTINGTON Geoff * GOV <Geoff.HUNTINGTON@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Sen Golden <Sen.JeffGolden@oregonlegislature.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> Some people who received this message don't often get email from sodamtn@mind.net. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in the unincorporated "Greensprings" community of **Lincoln** in Jackson County, Oregon. I have lived here since 1979. "**Lincoln/Pinehurst**" appears on the state's own survey of unincorporated communities, so this rulemaking is about my home – and more.

More development in the "Lincoln/Pinehurst" area will further fragment already degraded important wildlife habitat and further weaken regionally important ecological connectivity in a nationally recognized area. Lincoln/Pinehurst is a forested rural area in the important Cascade-Siskiyou ecological corridor, which connects the botanically significant Siskiyou Mountains and the southern Cascade Range. BLM land here has been designated as a national monument to protect biodiversity and ecological connectivity. BLM has purchased significant private acreage from willing sellers in this area to prevent further development. Oregon's

governors, local legislators, local city councils/mayors, and chamber boards have supported national protection of federal public land here. Rulemaking that enables increased private development here runs counter to the highest and best use of this environmentally significant/recognized area – and is ecologically inconsistent with past positions of state and local officials/bodies.

More development here – and in any Wildland Urban Interface (WUI) area – increases human-caused wildfire risk.
The vast majority of wildfires are human-caused. Increased rural development means increased risk of wildfire. The State of Oregon should be discouraging – if not prohibiting – increased development in *any* "Wildland Urban Interface" (WUI) area. To enable – and functionally promote – development in the WUI is nonsensical and dangerous. To bemoan wildfire risk/damage while at the same time promoting increased rural development means the State of Oregon would be talking out of both sides of its mouth.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until people who live in them have been given real notice.

Sincerely,
Dave Willis
15187 Highway 66
Lincoln *on the Greensprings*
21 miles east of Ashland, OR 97520

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Thursday, August 27, 2026 3:55 PM
To: WILLIAMSON Angela * DLCD
Subject: FW: Stop this rulemaking until you have read your own hazard maps

FYI ...

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cd4f5f6d2148b42ffb5ec08df048e380f%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639234680994314882%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=jNFQ95XRuQeqFbbx2K0hq0BA1VgPcRedpp0Pf200gHM%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: dorya jan woods <idolikepie2@gmail.com>
Sent: Thursday, August 27, 2026 3:46 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Stop this rulemaking until you have read your own hazard maps

[You don't often get email from idolikepie2@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Chair Lazo and Commissioners,

I am asking you to stop the Housing in Unincorporated Communities rulemaking.

I live in [YOUR COMMUNITY], and [I farm here / I own forestland here / my family has worked this ground for ___ years / I evacuated in 2020].

[ONE OR TWO SENTENCES: what fire, water, or the loss of working land would mean where you live. Name the road you would evacuate on, or the well you depend on, or the ground next to yours that could be rezoned.]

The state holds detailed data on wildfire hazard, water depletion, and wildlife habitat. None of it appears anywhere in this rulemaking. You are proposing to put more homes, more businesses, and required light industrial development into fire-prone country without having put your own maps in front of yourselves first.

Rezoning also raises land values past what a farm or a forest operation can carry. That makes expansion impossible, it makes it impossible for the next generation to get in, and the economics push toward selling out.

Please stop this rulemaking.

Sincerely,
[YOUR NAME]
[YOUR COMMUNITY], Oregon

Sent from my iPhone

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 8:58 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: LCDC Unincorporated Communities Rulemaking

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C9129a55807cb4245d77f08df07789d32%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639237886738134024%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=RrYJ%2Fjz0%2Fe%2BSr34P%2FL8F6SCWEJRvivXPFM8p7%2Br7ifM%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: Jim Babson <jim@westerncascades.com>
Sent: Friday, August 28, 2026 3:57 PM
To: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>
Cc: HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: LCDC Unincorporated Communities Rulemaking

[Some people who received this message don't often get email from jim@westerncascades.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Commissioner Lazo,

I urge you to reconsider moving forward with the Unincorporated Communities Rulemaking. Please keep urban development inside urban growth boundaries. I live in Fall Creek, east of Eugene, and Fall Creek is on the list of communities targeted by this rulemaking. My neighbors and I don't want more development and the higher taxes that accompany urbanization. There are several properties for sale in our neighborhood that have been on the market for a long time and aren't selling, so there is no need for more rural housing here.

The summary from your April 9th meeting agenda states "Some unincorporated communities exhibit a settlement pattern resembling small towns or cities with public services capable of serving a higher intensity of development than surrounding rural areas." That doesn't describe Fall Creek. We have no public services capable of serving a higher intensity of development.

The charge for the RAC states "Require participating counties to plan and zone for ... commercial and light industrial uses, transportation, public safety, public facilities and urban services …". We don't want any of that in Fall Creek. The area is pretty much the same as when I moved here 34 years ago. It's rural, and we want to keep it rural.

Please stop this unnecessary rulemaking.

Thank you for considering my comments.

James Babson
Lane County

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 8:58 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Cathy Bellavita

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cf1e70cb85a1d47f5224008df077893ca%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639237886580734303%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=DOwKqyEpHq5bC8wsg%2BdGL%2BaSpwLDlfw6q5%2F90BWbTrY%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Friday, August 28, 2026 5:18 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: catherinebella@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Cathy Bellavita

Land Conservation and Development Commission Care of: Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I am writing to express my profound opposition as a rural resident of Cottage Grove to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land. My primary concern, and the focus of this comment, is the devastating and irreversible loss of Oregon's invaluable resource lands, which these changes would inevitably accelerate.

Oregon’s statewide land use planning goals have long established a robust framework for protecting productive farm and forest lands and containing urban development within defined urban growth boundaries (UGBs). The proposed rule change directly contravenes these fundamental principles, threatening to undermine decades of strategic land use planning designed to preserve our state's natural and economic resources.

Allowing urban-density development in rural areas introduces significant and avoidable risks, particularly concerning wildfire. Expanding residential footprints into the wildland-urban interface (WUI) substantially increases the probability and severity of wildfires, jeopardizing lives, property, and natural ecosystems. The costs associated with enhanced fire suppression, emergency services, and post-fire recovery in these vulnerable areas place an unsustainable burden on public resources and existing rural communities.

Furthermore, the proliferation of urban-density housing in rural areas will place immense strain on critical water resources. Increased demand for potable water, primarily drawn from groundwater, will deplete aquifers, reduce water availability for existing rural residents and agricultural operations, and destabilize local water tables. This impact is antithetical to sustainable resource management and threatens the viability of Oregon's agricultural sector.

The financial implications of rural urban-density sprawl are equally concerning. Extending essential infrastructure, such as roads, water, sewer, and utility services, to distant and dispersed subdivisions is exorbitantly expensive and inefficient. These costs are disproportionately borne by existing taxpayers, diverting funds from necessary improvements within established urban areas and imposing an unfair burden on rural residents who rely on existing infrastructure. Such development undermines public investment in compact, walkable urban communities.

Ultimately, this proposed rulemaking promotes unchecked urban sprawl, which fragments and destroys working farms and forests. It undermines the very purpose of urban growth boundaries by allowing urban land uses to leapfrog into protected rural landscapes. This leads to the irreversible conversion of prime agricultural soil and timberland, diminishing Oregon's capacity for food production and sustainable forestry, and eroding the distinct character and economic viability of rural communities.

Commissioners, I urge you to uphold Oregon's foundational land use planning goals. Please reject the proposed changes that would allow urban densities in unincorporated rural areas and retain the strict integrity of our Rural/Urban Growth Boundary lines. Protecting our resource lands is paramount for Oregon's environmental health, economic prosperity, and the well-being of all its citizens.

Sincerely,

Cathy Bellavita
Rural Resident, Cottage Grove

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities Rule Making
Date: Monday, August 31, 2026 8:59:41 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Wyling Cambrium <wyling@lifechi.com>
Sent: Friday, August 28, 2026 1:37 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Friends of Country Living <friendsofcountryliving@gmail.com>
Subject: Please stop the Housing in Unincorporated Communities Rule Making

> You don't often get email from wyling@lifechi.com. Learn why this is important

I live in Sunny Valley. The covered bridge over Grave Creek brings visitors from afar as they travel Rt 5. It seems to be a well known quiet refuge for travelers on the interstate. It's the tranquil, quaint rural character which draws them. Hopefully soon the museum will reopen. We have a couple of churches, a country store and a pair of food trucks across from the campground. That's about all we need, not even a post office. Rural America must remain rural and under local control to allow healthy, small, locally controlled, incremental growth. We don't want to become the next Silicon Valley, or even Napa Valley for that matter.

Please don't *"pave paradise to put up a parking lot ooh ba ba ba ba."* Regards to Joni Mitchel:-)

Thanks for your help,
Wyling Cambrium

PS I'm on a 30 acre parcel within 1/2 mile of the Rt 5 exit, a stones throw from the covered bridge. I take a walk over it most days. This property would certainly multiply in value MANY TIME$$$ if large scale development takes place. So what! This is home, not a profit center!!!

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: NO Housing in Unincorporated Communities Rulemaking!!
Date: Monday, August 31, 2026 9:18:58 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Lorianne Carey <lilayogini87@gmail.com>
Sent: Friday, August 28, 2026 11:51 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Subject: NO Housing in Unincorporated Communities Rulemaking!!

> You don't often get email from lilayogini87@gmail.com. Learn why this is important

To Whom it May Concern,

I am a 35-year resident of Unincorporated Williams, Oregon. The question of "Housing in Unincorporated Communities" is a moot point. May I remind the DLCD that your JOB, your MISSION that I, a taxpayer PAY for, is to: PROTECT and IMPROVE Resident's HIGH quality of life. To PROTECT NATURAL RESOURCE LEGACIES. Community resilience. Equitable engagement. And to conserve farmland and Natural areas.

Our Natural resources, especially WELL-WATER sources cannot withstand a massive influx of residents. Our poor, County ROADS cannot withstand this pressure. Our Volunteer FIRE DEPARTMENTS cannot address the increased pressure on wildland-interface FIRES. Our rural/County Sheriff Departments barely have 24-hour staffing, and are 30-60 minutes plus away on a good day.

There are few rural jobs, so people will be clogging rural roads, wasting resources to drive to 'town' for meaningful work. They will be forced to commute. Our communities do not need more residents to drain our natural resources but add nothing to local, rural

economic stability. They become a DRAIN on ALL infrastructure and resources. Especially WATER. Please see how our Reservoirs are suffering in this DROUGHT. We barely have the WATER to sustain current population numbers.

CLOSE THIS ISSUE and realize it is completely untenable. It goes against YOUR CHARTER. You MUST engage with these Communities directly and I guarantee NO ONE agrees with these ridiculous concepts.

Our State's viability depends on stability of Natural resources first and foremost. WATER is the main issue here. Southern Oregon specifically DOES NOT HAVE the water resilience to allow for this influx of residents. Period.

Thank you for your time. Close this debacle before it goes further. No good will come of these proposals. Do your jobs. FOR THE PEOPLE of Oregon and our Natural resources. Reaffirm what your roles ARE. To PROTECT. Not DESTROY.

Sincerely,

Lorianne E. Carey
Williams, OR

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Comment/Housing In Unincorporated Communities
Date: Monday, August 31, 2026 9:30:34 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Debra <debralawwill@gmail.com>
Sent: Friday, August 28, 2026 10:01 AM
To: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Sen Robinson <Sen.NoahRobinson@oregonlegislature.gov>; Rep.AlekSkarlatos@oregonlegislaturee.gov
Subject: Fwd: Comment/Housing In Unincorporated Communities

> You don't often get email from debralawwill@gmail.com. Learn why this is important

My name is Debra Lawwill, and I live in the rural hamlet of Sunny Valley, Oregon. I am a retired educational administrator and insurande specialist. Currently, I work with my husband homesteading our rural 5 acres, and also serve my community as the President of the Board of Directors of Friends of Country Living, a public charity dedicated to protecting Sunny Valley's rural character, natural resources, and history.

I strongly urge the Land Conservation and Development Commission to consider the unique needs of unincorporated communities as you develop the Housing in Unincorporated Communities rules. Because the rules have not yet been written, this is an important opportunity to ensure they address housing needs without compromising rural character, infrastructure, natural resources, and agricultural traditions.

Friends of Country Living, along with other community stakeholders, supports Little Free Harvest, a grassroots program that encourages local farmers and gardeners to grow food and share their abundance with the

community. It strengthens food security, supports small-scale agriculture, reduces waste, and builds community connections.

I urge you to consider how increased subdivision, commercial development, or industrial uses could undermine these rural assets and community-based efforts. Housing policy should not come at the expense of the agricultural and community systems that make these places thrive.

Please use this rulemaking process to create balanced rules that respect the people, land, and unique character of Oregon’s unincorporated communities.

Thank you for taking the time to consider these concerns.

Debra Lawwill

Sunny Valley, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 9:24:53 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Inka Goshorn <inka.goshorn@gmail.com>
Sent: Friday, August 28, 2026 10:40 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from inka.goshorn@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Williams, in Josephine County. It appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I was born in Williams, and have lived here my whole life. I love my home, and love the quiet, rural nature of it. I am raising my own family here now, and have serious concerns about how it could change if this rulemaking goes through.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have

not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely,
Inka Goshorn
Williams, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 9:48:27 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Clair H <yogawithclair@gmail.com>
Sent: Friday, August 28, 2026 6:21 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from yogawithclair@gmail.com. Learn why this is important

Greetings,

My name is Clair Highfield, and I am a resident of Williams Oregon. Williams Oregon is already experiencing many challenges from industry, a change of world, including the weather, and other conditions. It is important that places like Williams stay preserved for future generation as a place to connect with Nature. I am requesting that we protect unincorporated town from untethered development. Areas are agricultural ground that needs consideration before developing. They have been preserved for generation with the intention of protecting communities and the agricultural carrying capacity of Oregon. Additionally, with current condition untethered or intentionally designed development could further exasperate drought conditions, and leave these communities and other areas in severe water. Lastly, this issue needs popularize awareness in order or more folks to participate in the democratic process, especially those occupying the

unincorporated areas that are being considered. Please do not allow subdivision commercial facilities on tax development in our unincorporated world.

--

Clair Highfield
541-787-5762
clairityoga@protonmail.com
https://www.clairityoga.org/

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 8:57:23 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Keira Lani <keiralani@gmail.com>
Sent: Friday, August 28, 2026 7:33 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from keiralani@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Williams, in Josephine County. It appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I grew up here in the seventies and eighties riding my bike all over, hiking and feeling safe. I moved back to raise my family in this unique community that had maintained its charm and safety.

We are a community of farmers utilizing the land to create a sustainable future for our children and the world.

No agency, including this commission, has ever found that Oregon's housing need

cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely,
Keira Harrison
Williams, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 9:30 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: STOP the Housing in Unincorporated Communities rulemaking

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Ceb8f002cbdd64ad433ff08df077d0c1a%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639237905790347381%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=a%2F0yY8ZeUPsUK%2FbEuycev5K4cU9%2FI1gXuJUck%2BZlUfA%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: teri lea <sacredbeauty7@gmail.com>
Sent: Friday, August 28, 2026 10:23 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: STOP the Housing in Unincorporated Communities rulemaking

[You don't often get email from sacredbeauty7@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

dear CHAIR LAZO + COMMiSiONERS;

i have learned of a potential ruling to open my rural community to subivisions, commercial development + required light industrial zoning.
this is an unnessecary redesignation of land use.
this will affect my home + land.

i have lived in the williams valley for 51 years.
my youngest daughter + 4 oldest grandsons were born on this homestead.
i moved here from the city to raise my children in a safe + clean environment.
there is a well which provides sufficient clean water for all needs.
i grow a garden + care for an orchard which provides organic produce.
i wish to continue living in a relatively unpolluted environment.
valley residents drive to town to take care of business.
we have no need to have more shops + facilities here.
we want the peace + solitude of rural life to continue.

no agency, including this commission has ever found that Oregons housing need cannot be met on land that is already available.
cities are required to keep a 20 year supply of buildable land inside their urban growth boundaries + middle housing reforms more than doubled the capacity inside those boundaries those reforms have not finished rolling our.

Please stop this rulemaking.
our community has no deisre to live in a city.
thats why we choose to reside here.
THANX for your kind attention to my concerns.

sincerely;
Terry Harrison
williams, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: unincorporated communities potential rulemaking
Date: Monday, August 31, 2026 9:00:44 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Jennifer Miatke <jenmiatke@gmail.com>
Sent: Friday, August 28, 2026 1:18 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: allan.lazo@dlcd.oregon.gov <alan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <Geoff.HUNTINGTON@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Sen Golden <Sen.JeffGolden@oregonlegislature.gov>
Subject: unincorporated communities potential rulemaking

> You don't often get email from jenmiatke@gmail.com. Learn why this is important

Hello Chair Lazo and Commissioners:

I am disturbed to hear about the Pinehurst/Greensprings Community being included in a survey intended to further development in rural communities. I adamantly oppose further development up here on the Greensprings, as I live here BECAUSE of the rural, non-developed qualities of the forest and meadows around me. I live inside the Cascade-Siskiyou National Monument, and I treasure the biodiversity it protects and preserves, and further development would only compromise those values. Below is a copy of a letter forwarded to me by a neighbor on the Greensprings where I live, about 20 miles east of Ashland. I agree with everything it entails.

Thank you for including this opinion in the hearing regarding this matter. I would also

hope for further opportunities for others who live up here to be heard, who are not yet informed of this rulemaking proposal.

Sincerely,

Jennifer Miatke
15097 Hwy 66
Ashland, OR

Here is the letter:

Dear Chair Lazo and Commissioners,

I live in the unincorporated "Greensprings" community of Lincoln in Jackson County, Oregon. I have lived here since 1979. "Lincoln/Pinehurst" appears on the state's own survey of unincorporated communities, so this rulemaking is about my home – and more.

More development in the "Lincoln/Pinehurst" area will further fragment already degraded important wildlife habitat and further weaken regionally important ecological connectivity in a nationally recognized area. Lincoln/Pinehurst is a forested rural area in the important Cascade-Siskiyou ecological corridor, which connects the botanically significant Siskiyou Mountains and the southern Cascade Range. BLM land here has been designated as a national monument to protect biodiversity and ecological connectivity. BLM has purchased significant private acreage from willing sellers in this area to prevent further development. Oregon's governors, local legislators, local city councils/mayors, and chamber boards have supported national protection of federal public land here. Rulemaking that enables increased private development here runs counter to the highest and best use of this environmentally significant/recognized area – and is ecologically inconsistent with past positions of state and local officials/bodies.

More development here – and in any Wildland Urban Interface (WUI) area – increases human-caused wildfire risk.
The vast majority of wildfires are human-caused. Increased rural development means increased risk of wildfire. The State of Oregon should be discouraging – if not prohibiting – increased development in any "Wildland Urban Interface" (WUI) area. To enable – and functionally promote – development in the WUI is nonsensical and dangerous. To bemoan wildfire risk/damage while at the same time promoting increased rural development means the State of Oregon would be talking out of both sides of its mouth.

No agency, including this commission, has ever found that Oregon's housing need

cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until people who live in them have been given real notice.

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 9:30:12 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: sandy olken <sandyolken@gmail.com>
Sent: Friday, August 28, 2026 10:05 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from sandyolken@gmail.com. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Josephine] County. It appears on the state's own survey of unincorporated communities, so this rulemaking is about my home.

I choose to live rurally, for the quietude, spaciousness, and the small community here. I have no interest in urban development spreading to this primarily agricultural, small farm town.

Obviously, property taxes are a huge portion of the yearly revenue for Josephine County. My community and I have been paying property taxes for decades. If a change in housing in unincorporated communities passes, I know I won't be the only one who will be looking elsewhere to move.

I strongly encourage you to consider what a mass exodus would mean for the long term financial sustainability of Josephine County.

Would what replaces rural taxable properties yield higher property taxes? Or would, the most likely apartment complexes, create a deficit to the county ?

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Sincerely,
Sandy Olken
Williams, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 9:50 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Juliana Parker

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C16194a9bb47d43fcb95908df077fe25c%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639237917961211192%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=r0Z8yCJm%2BUMWTAouzxlZi3QsZmh7k7J7q%2BQt40LJ2go%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Thursday, August 27, 2026 8:29 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: vadarski@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Juliana Parker

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,

I am opposed to the proposed rules cited above.

Urban Grown Boundaries have been a pinnacle of protection of rural lands in Oregon for years. There's already enough land inside the UGBs for a half million housing units so why the change? Our need is really for low income households but the proposed changes will open up unincorporated communities to development that is instead likely to be luxury homes, strip malls, data centers, and other commercial development.

The changes would end up promoting more development while declaring wildfire emergencies. It's counter intuitive. And what about water availability?

I hope transparency will be afforded with planned public hearings. I'm hopeful that at those meetings or in advance, the Commission will put forth a map demonstrating that the number of houses that can already be built inside existing UGBs is insufficient.

Respectfully,

Juliana Parker
Eugene, OR 97405

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 1:19:10 PM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Sharon Reagan <reasha57@gmail.com>
Sent: Friday, August 28, 2026 8:49 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Housing in Unincorporated Communities rulemaking

> You don't often get email from reasha57@gmail.com. Learn why this is important

The rules concerning zoning and housing in unincorporated areas needs to be crafted carefully to continue to allow some local control.
Many of us remember the leapfrog subdivisions that plagued rural areas, wiping out the best farmland, degrading the roads and lacking sufficient water, sewer and electricity.
In Williams we do need low income housing, not high end subdivisions.
We are concerned about data centers (are they considered light industry?) and businesses that wouldn't fit well into our community.
Williams needs a laundromat and hardware store. We don't need a Dollar General with its corporate power that would wipe out our small local stores.
I acknowledge that housing and zoning is a complicated issue that pits the needs of the many (and the wants of the big and powerful) with the existing residents who are resistant to change. Accommodations should be made and balance between needs met.

Grants Pass has a lot of open space for infill. I oppose leapfrog development.

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Comment - Rural Housing in Unincorporated Oregon Communities
Date: Monday, August 31, 2026 9:29:54 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Steve Lawwill <triplepeakacres@gmail.com>
Sent: Friday, August 28, 2026 10:20 AM
To: denise.johnson@dlcs.oregon.gov
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; Sen Robinson <Sen.NoahRobinson@oregonlegislature.gov>; Rep Skarlatos <Rep.AlekSkarlatos@oregonlegislature.gov>
Subject: Comment - Rural Housing in Unincorporated Oregon Communities

You don't often get email from triplepeakacres@gmail.com. Learn why this is important

My name is Steven Lawwill, and I live in Sunny Valley, Oregon. I am a retired computer engineer and currently an avid farmer providing healthy food for my family and community. I also serve as a member of the Board of Directors of Friends of Country Living, a public charity dedicated to protecting Sunny Valley's rural character, natural resources, and history.

Friends of Country Living, along with other community stakeholders, supports Little Free Harvest**,** a unique and sustainable program that encourages local farmers and gardeners to grow food and share their abundance with the community. The program supports local agriculture, reduces waste, and brings neighbors together. Along with my wife, I am one of the members of this network of gardeners.

Please consider how increased subdivision, commercial development, or industrial uses could undermine these rural assets and community efforts. Meeting housing needs should not come at the cost of the agricultural traditions and community networks that help rural communities remain healthy and resilient. Besides, there are already vacant parcels here in Sunny Valley that could be developed for new small-scale homesteads that would not place additional pressure on our natural resources.

I ask that you use this rulemaking process to establish balanced rules that respect the people, land, resources, and unique character of Oregon's unincorporated communities.

Thank you for your service to Oregonians. Please seriously consider these far-reaching concerns for the preservation of what makes Oregon so special.

Steven A. Lawwill

Triple Peak Acres

Sunny Valley, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 1:20 PM
To: WILLIAMSON Angela * DLCD
Subject: FW: Stop this rulemaking until you have read your own hazard maps

Fyi, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Caf0f853b2ef44fedc8f608df079d2fff%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639238043822676585%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=V5B3n2CHjFpdlgwRInA%2FBxzPwRbpGdxlABzlUNNOpOw%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hounds.reach@icloud.com <hounds.reach@icloud.com>
Sent: Friday, August 28, 2026 8:47 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Stop this rulemaking until you have read your own hazard maps

[You don't often get email from hounds.reach@icloud.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear Chair Lazo and Commissioners,

We are asking you to stop the Housing in Unincorporated Communities rulemaking.

We live in Williams (Josephine County).We have lived and worked on our 29+acres for the last 23 years. We have invested many thousands of dollars in the maintenance of our 22 acres of forestland focusing on fire safety and wildlife habitat. We are on a north facing slope and have enjoyed the flow of groundwater that keeps our land hydrated most of the year. Because that hydration keeps us and our neighbors more fire safe; we have some concerns about groundwater depletion should there be development in the area.

We moved to this beautiful rural area for the quality of life which we have enjoyed while being responsible stewards of our property. We have already seen changes in traffic patterns with more vehicles and the addition of those who do not understand that our roads are not highways.
Rezoning would undoubtedly create more congestion on the roadways. This is not just a concern about convenience. We have a fire prone community with limited routes of escape, should we be faced with a major fire. The only alternative route that we would have to Williams Highway is to drive the forest/logging roads over the mountains to Cave Junction. Because our prevailing winds are from the west; that may be an unlikely option.

While we understand the need for housing in Oregon, we in Williams want to protect the rural nature of our town and are against any kind of development that would change the character of this place that we love.

The state holds detailed data on wildfire hazard, water depletion, and wildlife habitat. None of it appears anywhere in this rulemaking. You are proposing to put more homes, more businesses, and required light industrial development into fire-prone country without having put your own maps in front of yourselves first.

Please stop this rulemaking.

Sincerely,
Christina Strelova and Craig Rasmussen
Josephine County, Oregon

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 9:23:47 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: jenny van winkle <joyfullbirth@gmail.com>
Sent: Friday, August 28, 2026 10:51 AM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from joyfullbirth@gmail.com. Learn why this is important

Dear Public Servant. Thank you so much for your service to our state. I live in Williams in Josephine County, a rural town included on your list of unincorporated communities. I have lived here for 17 years, and have raised my daughter and a step-daughter here. I am a homeowner, a member of the board of the local Sugarloaf Community Association, and someone who cares deeply about this valley.

Williams is a tiny town with extremely limited resources and minimal exit routes in case of fire or other natural disaster. I live off a BLM road on a shared dirt driveway with three neighbors, as do many community members. Williams folks are self-sufficient and know how to maintain our wells and septic systems, prep acres of land for fire season, grow our own food, handle a chainsaw when a downed tree is blocking the driveway, and go days without electricity in the winter. We look out for each other, and the land on which we live. Life out here is not just an extension of the city.

Our community also utilizes and protects valuable agricultural and forest land for the greater region's benefit, as do many Applegate Valley residents. Rezoning raises land values past what a farm or a forest operation can carry. That makes expansion impossible, it makes it impossible for the next generation to get in, and the economics push toward selling out. That means less food grown here and less resources produced here in our region.

This community cannot handle the level of development being proposed by "Housing in Unincorporated Communities" rule making. In a drought year, we are already seeing stresses on our water systems, both the wells and the creek levels. This rule making is based on very limited information and is not a good fit for our region.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Thank you,
Jenny Van Winkle
Williams, Oregon

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 8:55 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Carrie Cooke

Follow Up Flag: Follow up
Flag Status: Completed

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C3ed76116924d42634f5f08df07783c96%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639237885150331732%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ksHnoStWJRqAGdJBT%2FpR924Bu%2Fxo2F2Sx%2BJcDh%2Blako%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Sunday, August 30, 2026 2:56 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: reachforthestars283@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Carrie Cooke

Land Conservation and Development Commission Care of the Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

I'm writing to formally submit my public comment regarding the proposed rule making that would permit urban-density subdivisions on unincorporated rural land in Oregon. As a rural resident residing in Jackson County, and having lived in Oregon my whole life, It's obvious that a horrible decision like this would have major irreversible impacts to everything Oregonians value and hold dear. Horrible changes like this would have detrimental implications to our state's land use principles and rural communities. It's also questionable whether changes of this magnitude can be brought in legally through this rulemaking process.

One major concern revolves around the critical issue of water resources and well integrity. Oregon's rural areas, particularly those beyond urban growth boundaries, are largely reliant on groundwater aquifers to support domestic wells and agricultural operations. Allowing urban-density subdivisions in these areas would inevitably lead to a substantial increase in groundwater extraction, placing immense strain on already finite resources. Such intensified drawing of groundwater risks depleting aquifers, lowering water tables, and directly impacting the viability of existing wells for both residents and local agriculture. This proposal appears to disregard the delicate balance of rural water systems and the long-term sustainability of our natural resources. It further overlooks the impact of septic systems and waste water issues where sewer infrastructure is non existent.

Furthermore, the proposed rulemaking poses a severe threat to Oregon’s invaluable resource land. The expansion of urban-density development into unincorporated rural areas inherently results in the loss of productive farms and forests, which are critical for Oregon’s economy, ecological health, and scenic beauty. This also dramatically fragments critical wildlife habitats. Oregon wouldn't be Oregon anymore.

Finally, the allowance of urban-density subdivisions in rural areas will exacerbate issues of traffic and sprawl. Increased population density in areas not designed for such volumes will inevitably lead to greater traffic congestion on rural roads, which are often not equipped to handle significant increases in vehicle load. Moreover, the demand for expanded infrastructure, including roads, utilities, and emergency services, in distant rural locations imposes a substantial and unfair fiscal burden on existing taxpayers. This approach promotes inefficient land use, increases commute times, and fundamentally conflicts with the principles of compact urban development and the protection of rural character that Oregon’s land use system was designed to uphold.

These changes threaten what Oregonians cherish and are the very reason they live here. It's unfathomable that a handful of people can make such a drastic change and take that away.

I urge the Land Conservation and Development Commission to carefully consider these profound negative impacts. It is imperative that the Commission retain the strict Rural/Urban Growth Boundary lines that have successfully protected Oregon's natural resources and agricultural lands for decades. I respectfully request that you reject the proposed changes that would permit urban densities in rural areas, thereby safeguarding the integrity of our land use planning system and the future of our rural communities.

Sincerely,

Carrie Cooke
Rural Resident, 97503

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Monday, August 31, 2026 8:56 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Barbara Dare

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7C3e8f38e2c79842948b4108df077859cb%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639237885603996975%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ueyq6kdYI3jiyWoGBWw5qOxXuwa%2BbtOt0m9LIUVux6M%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Sunday, August 30, 2026 6:36 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: dare2bee9@msn.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Barbara Dare

Land Conservation and Development Commission Care of the Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

Dear Commissioners,

As a rural resident of Lorane, Oregon (97451), I, Barbara Dare, write to express my strong opposition to the proposed rulemaking that would permit urban-density subdivisions on unincorporated rural land. These changes represent a fundamental departure from Oregon's foundational land use planning goals and threaten the very character and sustainability of our rural communities and natural resources.

Allowing urban densities in rural areas would lead directly to the irreversible loss of Oregon's vital resource lands. Our existing Urban Growth Boundaries (UGBs) were established to protect prime agricultural and forest lands, recognizing their irreplaceable value for food production, timber, and ecological services. Sprawl, encouraged by this proposal, not only destroys working farms and forests but also hollows out investments made within designated urban areas. This shift effectively undermines the economic viability of both rural resource industries and existing urban centers, creating inefficient development patterns detrimental to the state's long-term prosperity and environmental health.

The impact on water resources and wells presents another critical concern. Rural areas, including Lorane, rely heavily on groundwater aquifers for domestic use, agriculture, and ecosystem health. Introducing urban-density subdivisions would inevitably lead to a significant increase in groundwater draw, placing immense pressure on already finite resources. This increased demand risks depleting aquifers, lowering water tables, and directly impacting the reliability and quality of water for existing rural residents and agricultural operations, potentially exacerbating water scarcity during dry periods.

Furthermore, expanding urban-density development into rural, unincorporated lands dramatically escalates wildfire risk. Many rural areas fall within the wildland-urban interface (WUI), where homes directly abut or are intermingled with natural vegetation prone to fire. Building more densely in these high-risk zones not only puts new residents in harm's way but also increases the hazard for established rural communities and places an unsustainable burden on already strained rural fire districts and emergency services. This is a matter of public safety and responsible land stewardship.

Finally, the fiscal implications of this proposal cannot be overlooked. Providing the necessary infrastructure and public services—such as roads, water, sewer, and emergency response—to scattered urban-density developments in distant rural areas is inherently inefficient and expensive. These costs will inevitably fall upon existing taxpayers, both urban and rural, diverting essential funds from maintaining and improving infrastructure within established UGBs where services can be provided more cost-effectively.

For these compelling reasons—the irreplaceable loss of resource lands, the critical impact on water resources, the unacceptable increase in wildfire risk, and the fiscal irresponsibility of

supporting urban sprawl—I urge the Land Conservation and Development Commission to reject the proposed rulemaking. It is imperative that the Commission uphold and reinforce Oregon's strict Rural/Urban Growth Boundary lines and maintain the clear distinction between urban and rural land uses, thereby protecting our state's invaluable natural resources and ensuring sustainable development for all Oregonians.

Sincerely,

Barbara Dare
Rural Resident
Lorane, 97451

From: MASON Palmer * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: Please stop the Housing in Unincorporated Communities rulemaking
Date: Monday, August 31, 2026 8:55:42 AM
Attachments: image001.png

FYI, another HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: peg prag <Peg@pacificagarden.org>
Sent: Sunday, August 30, 2026 1:26 PM
To: JOHNSON Denise * DLCD <denise.johnson@dlcd.oregon.gov>
Cc: LAZO Allan * DLCD <allan.lazo@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; BENNETT Mark * DLCD <mark.bennett@dlcd.oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Please stop the Housing in Unincorporated Communities rulemaking

> You don't often get email from peg@pacificagarden.org. Learn why this is important

Dear Chair Lazo and Commissioners,

I live in Williams, in Josephine County. This rulemaking is about my home, my community, my world.

Forty years ago we fought hard to keep this community and this area rural. That sentiment has not changed. People who live here feel strongly that this area should stay rural. We love the mountains, the animals, the neighborliness, the peace.

The changes you're suggesting would change all of that without a good reason and without informing most of the people that it will affect. Iam pretty well informed and just heard about this proposal today. The fact that you would try to change our lives without even letting us have a say is even more abhorrent.

No agency, including this commission, has ever found that Oregon's housing need cannot be met on land that is already available. Cities are already required to keep a 20-year supply of buildable land inside their urban growth boundaries, and middle housing reforms more than doubled the capacity inside those boundaries. Those reforms have not finished rolling out.

Please stop this rulemaking. If you are unwilling to stop it, please do not go further until you can say which communities it affects, what hazards each of them faces, and until the people who live in them have been given real notice.

Thank you,
Margaret Prag
Williams, Oregon

--

Margaret Prag
541.846.9230

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, September 1, 2026 11:14 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Nick Gideonse

FYI, HUC comment

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Cfcf6ec3f7a7f439aaeca08df0854ca14%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639238832424130194%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=H%2BSgitQvjJF7TeIskaAvRHoBFMVpzbNRvyZNRsBL4dU%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, September 1, 2026 10:18 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: nick@gideonse.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Nick Gideonse

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
I am writing to OPPOSE changes to Oregon land use rules that would impose development outside urban growth boundaries in rural and unincorporated communities.
Our housing shortage is concentrated in urban areas, and the existing method for expanding urban growth boundaries is adequate for that purpose.
I live in an unincorporated area just outside thecommunity of Cottage Grove, that has expanded housing units within its urban growth boundary quite successfully, while maintaining the rural character of the surrounding area.
Please do not adopt policies that would fundamentally undermine Oregon's successful land use model.

Sincerely,
Nick Gideonse
97424

From: Jamin Giersbach
To: COMMENTS Huc * DLCD
Subject: Input before draft rules: Housing in Unincorporated Communities (OAR 660 Divisions 4, 11, 14, 22)
Date: Monday, September 7, 2026 12:15:27 PM

You don't often get email from jamin@rogueadvocates.org. Learn why this is important

Re: Housing in Unincorporated Communities rulemaking, input before the draft rules are written

Rogue Advocates wrote to the Commission on May 8, 2026 about this rulemaking. DLCD has said that communications received before the comment period opens will be used to inform the draft. This is that communication. It is short because we would rather help shape the text than argue with it in November.

Start with boundaries. Of the 23 unincorporated communities in Jackson and Josephine Counties, 15 have no acknowledged boundary under Division 22. A rule that lets a county expand or upzone a community has to say what the community is first. Please make an acknowledged boundary a precondition of any new authority, not something to be fixed afterward.

Do not let the rule become a Goal 14 exception by another name. Whatever flexibility the draft offers, keep the express findings obligation in ORS 197.732(2), so that a county has to show its reasons in writing rather than recite a rule.

Watch Division 11 most closely. Expanding a rural community means sewer and water. Today OAR 660-011-0060 limits sewer on rural land, and that limit is a large part of why those communities are still rural. In Josephine County that sequence has already started around Cave Junction and Kirby. If Division 11 is loosened alongside Division 22, the sewer line arrives before the housing question is ever asked.

Require findings on water. The Talent Irrigation District shut off deliveries on September 4 of this year for lack of water. Any rule that adds homes to Ruch, Applegate, Williams, Merlin, or Wolf Creek should require a finding that the water is there, and a finding on cumulative effects on the farm and forest operations next door.

Thank you for taking early input.

Jamin Giersbach
Executive Director, Rogue Advocates
PO Box 624, Ashland, OR 97520
458-763-0188

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, October 13, 2026 11:42 AM
To: crrmctigue@gmail.com
Subject: RE: Public Comment: Opposing Unincorporated Rural Housing Densities - from Corrie

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

A public comment opportunity will be available when the draft rules have been filed with the Oregon Secretary of State as a Notice of Proposed Rulemaking. The department anticipates this occurring near the end of 2026. The department will send an announcement with a link to the Notice of Proposed Rulemaking to individuals who have signed up to receive email updates.

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Information on the status of this rulemaking, materials for the rulemaking advisory committee and Frequently Asked Questions are available on the department's rulemaking webpage.

Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director’s Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CHUC.Comments%40DLCD.oregon.gov%7Cc0bfea6ba0f04114963108df29599d14%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639275136985389365%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=OczP%2BI4ZpOKZCj2ojuRb%2BDd9Sd6eOfsuzV%2FeeBQRTPc%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Sunday, September 13, 2026 10:16 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: crrmctigue@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Corrie

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,

We need to do all we can to stop the sprawl that is being proposed. We simply can't keep expanding residential areas into rural farm land. Farm lands, orchards and forests are what make our communities thrive and what defines us as Oregonians. Don't take away our identity, keep urban sprawl away!

Sincerely,
Corrie
97031

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, October 13, 2026 11:42 AM
To: spanekopita@gmail.com
Subject: RE: Public Comment: Opposing Unincorporated Rural Housing Densities - from Stacey Danner

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director’s Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CHUC.Comments%40DLCD.oregon.gov%7C2e48181c4b984c1925ad08df2959b8a4%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639275137449022270%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=psiUC2atb4P2YOZjRw9Zlh8dvRWsVgd1EYqyfveshz8%3D&reserved=0

I support DLCD’s efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Sunday, September 13, 2026 12:13 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: spanekopita@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Stacey Danner

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,

I am strongly opposed to proposed rules that would allow Oregon counties to bypass the sprawl protections of our state's city Urban Growth Boundaries. As I understand it, these rules would allow counties to convert rural residential, farm, and forest land to other uses, including subdivision scale development, commercial property, and light industrial uses.

Oregon Urban Growth Boundaries make our state unique and protect rural land from the unchecked development that has occurred in other parts of the country. It preserves the character of the land, the sanctity of open spaces, and the climate-protecting benefits of nature unspoiled by widespread, sprawling human encroachment.

I imagine these rules have been proposed to address housing shortages in the state. I applaud efforts to address the housing crisis but believe these efforts would be better placed toward infilling already existing developed areas. The benefits of this are many:

*Open space is preserved, as mentioned above. Humans and animals alike thrive--physically and emotionally-- when there is access to land not paved over and built upon.

*The risks of climate change indicate to me that we should be focusing on building communities where people can get around without individual cars--where we can walk to our

local grocery store, bike to work and school, or take public transport to visit the doctor. Development on rural land is likely to be classic American suburbia, in which cars are required to go about daily life.

*The volatile price of gas (and the fact that fossil fuels won't be around forever) also argue for dense housing development in areas with already existing infrastructure, allowing people to move about without cars.

*Opening rural land to development also opens the possibility of situations where developers are able to profit greatly by building new suburbs, but in ways that aren't always best for the pocketbooks of the people buying to buy homes in those neighborhoods.

Yes, let's build more housing, but let's build it smart and retain Oregon's unique, treasured open space. The character of our rural land is not something easily restored once it's been built upon. Please find another way and discontinue work on these rules.

Sincerely,
Stacey Danner
97031

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, October 13, 2026 11:41 AM
To: starstock31@gmail.com
Subject: RE: Public Comment: Opposing Unincorporated Rural Housing Densities - from Concerned Citizen

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

A public comment opportunity will be available when the draft rules have been filed with the Oregon Secretary of State as a Notice of Proposed Rulemaking. The department anticipates this occurring near the end of 2026. The department will send an announcement with a link to the Notice of Proposed Rulemaking to individuals who have signed up to receive email updates.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director’s Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CHUC.Comments%40DLCD.oregon.gov%7Cb8f818277e594e56f71708df295983aa%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639275136561352989%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=T5tmv9yg%2BXFsbGNSYkHtXIMvtrcm8vcZbjdQkuA%2FSe0%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, September 15, 2026 5:08 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: starstock31@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Concerned Citizen

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
Oregon doesn't need more luxury homes or short term rentals on timber, farm and range lands. There is already room enough inside pre-existing urban growth boundaries.
Urban and industrialized development should remain in zoned and regulated urban areas.
Depletion of the water supply in rural Oregon is ALREADY very concerning and costly issue.
Rezoning rural areas results in property tax hikes which is difficult for rural residents.
We certainly DO NOT need to rezone rural farmlands and forest land for commercial and "light industrial " uses including and especially data centers, Amazon warehouses, suburban subdivisions, luxury estates, strip malls, warehouses, factories and other urban development.
As a fourth generation Oregonian, I am strongly opposed to changing Oregon's existing urban growth boundaries.

Sincerely,
Marilyn Stock
97424

From: MASON Palmer * DLCD
To: Sheila Dooley
Subject: RE: Please stop the Housing in Unincorporated Areas rulemaking
Date: Tuesday, October 13, 2026 11:39:17 AM
Attachments: image001.png

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Sheila Dooley <sdooley3300@yahoo.com>
Sent: Wednesday, September 30, 2026 4:06 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Fw: Please stop the Housing in Unincorporated Areas rulemaking

> You don't often get email from sdooley3300@yahoo.com. Learn why this is important

----- Forwarded Message -----
From: Sheila Dooley <sdooley3300@yahoo.com>
To: governor.kotek@oregon.gov <governor.kotek@oregon.gov>
Cc: geoff.huntington@oregon.gov <geoff.huntington@oregon.gov>; Rep.PamMarsh@oregonlegislature.gov <rep.pammarsh@oregonlegislature.gov>; Sen.FloydProzanski@oregonlegislature.gov <sen.floydprozanski@oregonlegislature.gov>; Allan.Lazo@dlcd.oregon.gov <allan.lazo@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; palmer.mason@dlcd.gov <palmer.mason@dlcd.gov>; Rep Helfrich <rep.jeffhelfrich@oregonlegislature.gov>; sen.christinedrazan@oregonlegislature.gov <sen.christinedrazan@oregonlegislature.gov>
Sent: Wednesday, September 30, 2026 at 03:58:16 PM PDT
Subject: Please stop the Housing in Unincorporated Areas rulemaking

Dear Governor Kotek,

Please stop the inappropriate rulemaking by the RAC and keep urban development inside cities where it belongs. The Housing in Unincorporated Areas rules would dismantle Oregon's land use system county by county.

These rules are not designed to provide affordable housing but rather the opposite. In addition, there is already an adequate supply of land for housing in Oregon.

Participating counties would be required to rezone rural farmland and forest land for commercial and "light industrial" uses as well as other undefined non-residential development. This could potentially include data centers, Amazon warehouses, or other urban development.

For the future of Oregon's sake, please stop the rulemaking.

Sincerely,

Sheila Dooley
3300 Vensel Rd.
Mosier, Oregon 97040

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, October 13, 2026 11:37 AM
To: suehartford1@gmail.com
Subject: RE: Public Comment: Opposing Unincorporated Rural Housing Densities - from Susan Hartford

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

A public comment opportunity will be available when the draft rules have been filed with the Oregon Secretary of State as a Notice of Proposed Rulemaking. The department anticipates this occurring near the end of 2026. The department will send an announcement with a link to the Notice of Proposed Rulemaking to individuals who have signed up to receive email updates.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director’s Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CHUC.Comments%40DLCD.oregon.gov%7Cd9dcfd52bb644a187c0c08df2958f1f5%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639275134159759021%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=ByAKoQ9LOLN0lre%2Fabz8QoTRyW9yb020rfJsN1TPOSA%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Friday, October 2, 2026 11:46 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: suehartford1@gmail.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Susan Hartford

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
Please stop the Housing Unincorporated Areas rulemaking and keep it inside cities, where it belongs.
This is not a fit for Oregon. Building on rural lands drives up the price of housing for all residents. Existing residents will be required to pay for development. Recent legislation may already have provided housing opportunities in excess of any need. This RAC mandates sprawl and is contrary to the fundamental goal of land use in Oregon.
I am a 73 year old lifelong Oregonian. I love this state and I am here because of it's beauty and quality of life. It is a very special place that doesn't exhibit the sprawl of our neighboring states. Please keep it special.

Sincerely,
Susan Hartford
Hood River

WILLIAMSON Angela * DLCD

From: Mike Tucker <mike@highdesertdwelling.com>
Sent: Saturday, October 3, 2026 10:10 AM
To: COMMENTS Huc * DLCD
Subject: Question About ADUs, Sunriver, and Upcoming Oregon Rule Changes

[You don't often get email from mike@highdesertdwelling.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Hello,

I'm a real estate broker in Central Oregon, and I'm trying to better understand how the upcoming Oregon housing-rule changes may affect accessory dwelling units in unincorporated communities such as Sunriver.

My understanding is that Deschutes County currently allows ADUs in certain zoning districts, but that the Sunriver Single Family Residential (RS) zone does not currently allow an ADU as a separate dwelling. Sunriver's private governing documents also appear to be structured around one dwelling per residential lot.

With HB 2138 taking effect in 2027, I understand that HOA or planned-community governing documents generally will not be able to prohibit housing, including ADUs, that is otherwise allowed under the applicable zoning.

That leads to the part I'm trying to understand:

Is there anything in the current state rulemaking regarding housing in unincorporated communities that could eventually allow or require Deschutes County to permit ADUs in places such as Sunriver?

And, from the county's perspective, is there currently any discussion, planning work, or anticipated code amendment that could change the Sunriver RS zone to allow ADUs in the future?

I'm particularly interested in understanding whether the primary barrier going forward is the underlying county zoning rather than the Sunriver HOA restrictions themselves.

If there are draft rules, staff reports, upcoming hearings, advisory committee meetings, or other materials you would recommend following, I would greatly appreciate being pointed in the right direction.

Thank you for your help. I'm trying to understand the issue accurately so I can give clients good information as these rules develop.

Best,

Mike Tucker / Broker

Residential & Investment Specialist

Windermere Real Estate
WINDERMERE REALTY TRUST
mike@highdesertdwelling.com
MOBILE I 503-939-6155
OFFICE I 541-388-0404
807 SW Industrial Way / Bend, OR 97702
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.highdesertdwelling.com%2F&data=05%7C02%7CHUC.Comments%40dlcd.oregon.gov%7C10f92add52b34dd5c02d08df21711afc%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639266442738683044%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=%2Brq81Dn0z8d80MwjkkBjVGjhMrK2C6Fn4a2ID2HHFQM%3D&reserved=0
Facebook:
https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.facebook.com%2FGreenHomesBend&data=05%7C02%7CHUC.Comments%40dlcd.oregon.gov%7C10f92add52b34dd5c02d08df21711afc%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639266442738710320%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=rRpTCjJP5j0qKAAe0fCmKkqhsAQ6o83QNpuJV1me7sY%3D&reserved=0
Windermere Real Estate:
https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.windermere.com%2F&data=05%7C02%7CHUC.Comments%40dlcd.oregon.gov%7C10f92add52b34dd5c02d08df21711afc%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639266442738729178%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C60000%7C%7C%7C&sdata=zH9pWgH9aYNRAUUVXIfv%2FsYoGYFrExkY%2FtGwhfDvSCs%3D&reserved=0

From: MASON Palmer * DLCD
To: Paulette Wittwer
Subject: RE: Rule making for unincorporated communities
Date: Tuesday, October 13, 2026 11:34:34 AM
Attachments: image001.png

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Paulette Wittwer <wittwers@comcast.net>
Sent: Thursday, October 8, 2026 1:54 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: Rule making for unincorporated communities

You don't often get email from wittwers@comcast.net. Learn why this is important

Dear Palmer Mason,

I am concerned that LCDC, at the direction of Governor Kotek, is moving ahead with rulemaking that would drastically change Oregon's land use rules. These rules would abandon the principles that make rural Oregon livable and farmable. Through your Rulemaking Advisory Committee (RAC), the rules on the Urban Growth Boundary (UGB), may be changed to allow urban growth, primarily housing, in rural, unincorporated communities. It may also REQUIRE counties to allow industrial, commercial and other non-residential development in these unincorporated communities and open the door to expand UGB boundaries to adjacent farm, forest and other natural lands. As you know, there are over 200 unincorporated Oregon communities that might be affected, which would change Oregon into a state of rural sprawl, rather than the beautiful environment that we now enjoy.

As I understand it, the LCDC is responding to the housing estimate that our state needs a half million additional housing units in the next 20 years and has its sights on rural Oregon's land. However, there are questions; Has there been research on what kind of housing and what kind of resources and job opportunities are necessary to answer this need? Is the need for affordable housing a priority? Has the committee and the Governor's office taken into consideration assessments of housing and land opportunities already available in and near urban centers?

My family has a farm in the upper Hood River Valley and we see constant challenges in the form of development that will bring density, traffic, noise, expensive housing and increasing land prices to our area without the county's capacity to monitor or respond to problems. There has been an increasing issue of enough water in the summer for residential and farm use. With the change of climate and dry conditions, there is the threat of wildfires that would be exacerbated with density. There is an unincorporated community near us that has worked hard to limit development by a corporate entity that would overwhelm the community and surrounding area. If there's a rule change allowing development, it may well take away the power of the community to make its own decisions.

Please carefully reconsider altering the rules that now protect rural Oregon. Don't throw open the door to density and development that will change our state forever.

Sincerely,

Paulette Wittwer
Portland and Parkdale, Oregon
97212, 97041
wittwers@comcast.net

From: MASON Palmer * DLCD
To: Rebecca Orf
Subject: RE: Change in Land Use rules
Date: Tuesday, October 13, 2026 5:24:58 PM
Attachments: image001.png

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Rebecca Orf <orf.rebecca@gmail.com>
Sent: Saturday, October 10, 2026 1:23 PM
To: LAZO Allan * DLCD <Allan.Lazo@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>
Subject: Change in Land Use rules

You don't often get email from orf.rebecca@gmail.com. Learn why this is important

I am very concerned that LCDC, at the direction of Governor Kotek, is moving ahead with rulemaking that would drastically change Oregon's land use rules. One of the reasons I wanted to move to Oregon in 1977 was that agricultural and rural land was protected and land use laws prevented urban and rural sprawl.
These proposed rules would abandon the principles that make rural Oregon livable and farmable. Through a Rulemaking Advisory Committee (RAC), the rules on the Urban Growth Boundary (UGB) may be changed to allow urban growth, primarily housing, in rural, unincorporated communities. It may also *require* counties to allow industrial, commercial and other non-residential development in these unincorporated communities and open the door to expand UGB boundaries to adjacent farm, forest and other natural lands. There are over 200 unincorporated Oregon communities that might be affected, which would change Oregon into a state of rural and urban sprawl, rather than protecting the beautiful environment and agricultural and rural areas that we now enjoy.

As I understand it, the LCDC is responding to the lack of housing, which I understand and agree is a big problem—especially the lack of affordable housing. However, a change to our current land use laws must be approached with much caution. Any change should require that any additional housing that is to be allowed will all be affordable and that there is water and infrastructure to support it. Has there been an assessment of housing and land opportunities already available in and near urban centers? What will compensate for the reduced land available for agriculture, which is a major part of Oregon's economy and will be even more needed in the future to feed our population? Should there be more outreach to the public and additional time for input and comment before such a change is made?

Please carefully reconsider altering the rules that now protect rural Oregon and our agricultural lands, allow more public input and comment, and don't open the door to density and development that will change our state forever.

Thank you for your consideration.

Rebecca (Becky) Orf
1408 Princeton Ave.
Silverton OR 97381

541-840-5213

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, October 13, 2026 10:48 AM
To: bruce.bull@idcsinc.com
Subject: RE: Public Comment: Opposing Unincorporated Rural Housing Densities - from Bruce Bull

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director’s Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CHUC.Comments%40DLCD.oregon.gov%7Cf3dcb6565b8447fd3d5808df29522433%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639275104926627489%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=fpPM3zD5NPRJSkmlWb9fntFCSD1V%2F9dyg%2FpOKt4IywA%3D&reserved=0

I support DLCD’s efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Sunday, October 11, 2026 8:35 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: bruce.bull@idcsinc.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Bruce Bull

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,

I worked at the Oregon State Department of Education and very familiar with the OAR making process. However, I fail to see the data informed logic and due diligence for considering this housing in unincorporated communities. This is a significant shift for Oregon, incongruent with what Oregon is well known for, and admired for. The unintended consequences are HUGE and the environmental consequences devastating. Please don't rush into this. Big issues require time, data, and effort to make the best decision. That hasn't yet happened.

Sincerely,
Bruce Bull
Dallas, OR 97338

From: MASON Palmer * DLCD
To: Sarah Chaney
Subject: RE: Change in Land Use Rules
Date: Tuesday, October 13, 2026 10:28:41 AM
Attachments: image001.png

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Sarah Chaney <chaneysjean@gmail.com>
Sent: Monday, October 12, 2026 8:51 AM
To: LAZO Allan * DLCD <Allan.Lazo@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>
Subject: Change in Land Use Rules

> You don't often get email from chaneysjean@gmail.com. Learn why this is important

To Committee Members:

I am concerned that Oregon's Land Conservation and Development Commission is moving ahead with making new rules for housing in unincorporated communities. This rulemaking would change how much, and what kind of development counties can, or are required to, approve on unincorporated land with no regard to farmland designation or other best uses for the land.

Given the need to make smart and forward-looking decisions regarding our state's natural resources and the need for equitable outcomes, I have a number of questions for the committee:

1) With SB100 in place to protect farmland in Oregon, how is it legal that a committee appointed by the Governor, ***not*** by the people of Oregon, re-writes the rules of land use in Oregon?

2) How is expanding urban boundaries and building large housing developments helping house low and middle-income residents, as well as those who are currently un-housed?

> "The question was never whether Oregon builds half a million homes. It's whether they get built where people can afford to live in them — near jobs, schools, and services — or scattered across rural land where the documented record shows unaffordable housing tends to get built instead." (*Protect Rural Oregon*)

3) With the directive to open land availability to light industry, logging, housing and other projects, how is this different from requiring counties to let data centers build anywhere they want to? The process and the result are the same. A company finds a location where it can make a profit, a loosely-organized community finds out too late that there will be a large project constructed with concomitant extraction or destruction of natural resources. The residents find they will be paying for added roads, added infrastructure and its upkeep in perpetuity. One worse-case scenario could be the community will run out of water or find it needs to raise funds for a water-treatment or waste-water treatment facility.

4) How is it that in an era where our natural and fiscal resources are shrinking, that leaders are continuing to solely focus on the age-old pattern of acquiring more land to expand the

construction of new housing? Is it possible to shift the conversation to a more creative discussion? Has the Governor considered a paradigm that prioritizes making it easier to build new housing on vacant and underutilized lots in downtowns and surrounding neighborhoods in incorporated areas first? Could there be rules to make it easier to convert existing buildings into low-income housing? Could there be incentives for both converting buildings, along with incentives to build affordable housing in available lots in a given city? Are planners and rule makers laser-focused on honoring all designations of farmland to comply with SB100 as well as mindful of other ecosystems that will be vital for implementing Oregon HB 4134?

5) Will Oregonians, city by city, and in all unincorporated areas be given a chance to weigh in with their own recommendations and creative ideas for helping us deliver the housing and services we need?

Thank you for taking the time to read my letter.

Sincerely,

Sarah Chaney

3120 NW Manzanita Pl

Corvallis, OR 97330

From: MASON Palmer * DLCD
To: Becki Rawson
Subject: RE: RAC
Date: Tuesday, October 13, 2026 10:27:07 AM
Attachments: image001.png

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Becki Rawson <beckirawson@gmail.com>
Sent: Monday, October 12, 2026 8:53 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>
Subject: RAC

You don't often get email from beckirawson@gmail.com. Learn why this is important

Dear Mr. Mason,

I am writing to express my concerns about the Rulemaking Advisory Committee working on "Housing in Unincorporated Areas".

While the title of the RAC leads one to be hopeful that there may be a potential solution to the lack of available housing, it is very misleading.

My concerns are:

1. There is no rule criteria for affordability, such as requiring developments on newly available land to be developed at a certain percentage of AMI. I have been involved in housing advocacy for over 30 years and the only way to assure land isn't gobbled up for profit motives is if there are legislative requirements that will guarantee new housing options remain forever in the affordable "buckets" our communities desperately need. Inexplicably the RAC charge #3 states that participating counties are REQUIRED to zone for housing for a range of incomes, not just affordable housing. Firstly, affordable must be defined and secondly, the problem of lack of housing for low income and even workforce housing will NOT be solved. In my region, where there is out of control home prices, a significant percentage of residents would qualify for a house in the range of $320,000.00, but the median home price is in the $700,000.00 range, making home ownership impossible. In the rural unincorporated area where I live, 1000 people work in the region and only 15% can afford to live there. This rapidly worsening phenomenon demands legislative intervention for affordability.

Please do not allow further rulemaking changes without defining and mandating affordability (not having to spend more the 35% of income on housing as an example).

2. Insufficient data to justify expanding development into protected resource, farm or forest lands.

Has the DLCD compiled data showing that there aren't enough buildable parcels already available? I'm aware this was done in Deschutes County and that their housing profile indicates between now and 2047, an additional 2,077 housing units will be needed and at the same time there is ALREADY enough land available that is 6 times that need.

It appears to me that documenting all available land throughout the state is a priority before unincorporated areas are allowed to develop.

Please ensure the RAC compiles such data statewide before assuming more land is needed for development rather than focusing on smarter zoning options for existing parcels.

3. The proposed rules appear to be treating the four types of rural communities (resort, rural, rural service centers, and urban unincorporated communities all the same but their purposes and uses are inherently different. This seems to be an attempt at lumping together anything not urban and as such, can easily lead to loose interpretations that may solve one problem and create quite another, especially creating unmitigated sprawl and even industrial sites in rural areas. If you have driven through suburban Vancouver recently, you would get a taste of what happens when unrestrained development takes over farmlands. Protection for EFU lands has evaporated and there is one neighborhood after another with cookie cutter developments and complete obliteration of valuable farmland and open space.

Please ensure the RAC consider new rules that will continue to protect our rural areas from sprawl and industrialization such as data centers or factories.

Thank you for your thoughtful attention to this very important matter affecting the future character of our state.

Sincerely,

Rebecca Barrett Rawson

From: MASON Palmer * DLCD
To: Monica Tomosy
Subject: RE: Rushed, opaque changes to our Land Use Laws? Please read for today"s meeting.
Date: Tuesday, October 13, 2026 10:29:40 AM
Attachments: image001.png

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

A public comment opportunity will be available when the draft rules have been filed with the Oregon Secretary of State as a Notice of Proposed Rulemaking. The department anticipates this occurring near the end of 2026. The department will send an announcement with a link to the Notice of Proposed Rulemaking to individuals who have signed up to receive email updates.

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Information on the status of this rulemaking, materials for the rulemaking advisory committee and Frequently Asked Questions are available on the department's rulemaking webpage.

Other questions about the project? Contact Palmer Mason at palmer.mason@dlcd.oregon.gov, 503-269-2040 or Jon Jinings at jon.jinings@dlcd.oregon.gov, 541-325-6928.

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office
Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov | www.oregon.gov/LCD

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

From: Monica Tomosy <mtomosy@gmail.com>
Sent: Monday, October 12, 2026 7:53 AM
To: LAZO Allan * DLCD <Allan.Lazo@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>; MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; HUNTINGTON Geoff * GOV <geoff.huntington@oregon.gov>
Cc: Sen Prozanski <Sen.FloydProzanski@oregonlegislature.gov>; Rep Marsh <Rep.PamMarsh@oregonlegislature.gov>; Rep Levy E <Rep.EmersonLevy@oregonlegislature.gov>; Sen Broadman <Sen.AnthonyBroadman@oregonlegislature.gov>
Subject: Rushed, opaque changes to our Land Use Laws? Please read for today's meeting.

You don't often get email from mtomosy@gmail.com. Learn why this is important

Dear Allan, Jon, Palmer, and Geoff,

I understand that at the direction of Tina Kotek, the Land Conservation and Development Commission, through a Rulemaking Advisory Committee (RAC), the rules on the Urban Growth Boundary (UGB), may be changed to allow urbanization in rural, unincorporated communities.

As a student of Governor Tom McCall history, I am very concerned that the current Governor would make this move to drastically change Oregon's model Land Use rules. The rural landscapes of Oregon is what makes Oregon a leader in agriculture, tourism, and livability, and the new rules would ruin the progressive movement we have maintained since the 1970s. I ask that you and your staff and the Governor review this excellent summary created by Oregon Public Broadcasting:

https://www.opb.org/pressroom/opbs-new-growing-oregon-podcast-series-examines-the-history-and-impact-of-oregons-strict-land-use-laws/

Regarding the argument that there is an affordable housing shortage, I ask that you and the governor follow Senator Merkley's lead on what is really causing the problem. A major reason people have a hard time finding housing is that private equity investors have been buying up the properties and renting them for long-term or short-term, like for Air BnBs. I live in Central Oregon. The sprawl has been grotesque, making urban livability difficult for humans and making survival impossible for wildlife as they are losing places to feed, reproduce, and shelter.

We don't have a lack of housing here; we have a lack of affordable housing. We have a surplus of houses on the market for prices that few can afford, and that also is due to the private equity investors that ratcheted the prices up because they can beat the offers that individual citizens can pay. We have expensive new apartments vacant month after month. History is a good predictor of the future, and so I argue that stimulating housing construction will be to the continued benefit of the private equity investors, not the houseless. Please work with the Legislature to mimic the federal bill Senator Merkley produced in order to provide real housing access for Oregonians.

To my astonishment, over 200 unincorporated Oregon Communities could be impacted by these new rules, and the new rules may require Counties to allow non-residential, commercial, and industrial development in unincorporated communities, as well as require Counties to expand UGB boundaries to adjacent farm, forest and other natural lands. This is totally contrary to the intent and the word of our Land Use Laws.

It is pretty distressing to think about changes to our land use rules that would result in permanent destruction and degradation of our beautiful state, and that you seem to be rushing this process along, not actively seeking public comment, and in fact seem to be trying to keep this under the radar. Oregonians do not want to see a landscape that looks like Texas, California, or New Jersey. Please stop, and get back to whatever it is Tine Kotek defined as "the problem" you are trying to solve, and seek public input on whether you defined the problem accurately and input on how to solve it without breaking and bending the land use rules that Oregon has benefited from for 50 years.

One last thing: Doing this right before a very tight election when there is a Green, third, Party candidate is a risky move on Kotek's part. For disenchanted Oregonians this could be their last straw. I mean, politically speaking this is tone deaf.

Sincerely,

Monica Tomosy

Sisters, 97759

mtomosy@gmail.com

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Tuesday, October 13, 2026 10:49 AM
To: tgaty@msn.com
Subject: RE: Public Comment: Opposing Unincorporated Rural Housing Densities - from Theodore E Gaty

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for your time and interest in this rulemaking project. This email is to confirm that we have received your comments and to provide you with additional information on how to engage with the project.

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Palmer Mason
Inter-Agency Coordinator, J.D. | Director’s Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
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https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CHUC.Comments%40DLCD.oregon.gov%7C753639e294d541c709d108df2952407d%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639275105368902461%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=Vwv46gSAa%2BJFZzd9sLK%2F75t7ihjwtciU98XPCvuBBjw%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Sunday, October 11, 2026 7:09 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: tgaty@msn.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Theodore E Gaty

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
The beauty of Oregon, especially the Willamette Valley is a result of our land use laws. Just go visit almost any other state and you will see the results of either no land use laws or weak land use laws. You will see urban sprawl, isolated subdivisions surrounded by fallow farmland which have been abandoned because farming next to subdivisions is a no-win situation and obviously piecemeal development on what was once rural farmland. We don't want this in Oregon! You are supposed to be the watchdogs of our land use laws, not the group that sells our great state down the river to developers. So no, do not change the rules regarding unincorporated areas. Do not weaken or abandon these rules which were put into place to protect our farmland, which once it is gone it is gone forever. Do your job, protect our land use laws and the farms and farmers that depend on our strong land use laws.

Sincerely,
Theodore E Gaty
Salem

1000 friends of Oregon

Main Office • 340 SE 6th Ave • Portland, OR 97214

October 13, 2026

To: Commissioner Mark Bennett
Jon Jinings and Palmer Mason, DLCD

From: Mary Kyle McCurdy, Associate Director and Managing Attorney

Re: Housing in Unincorporated Communities - Preliminary Comments on Draft of Sept. 30, 2026

I. Introduction

A primary rationale behind undertaking an examination of housing in unincorporated communities (UCs) was to increase housing and related opportunities for those who live and work in the rural areas where these communities are located. Commissioners and staff made additional comments that these places should not unfairly compete with nearby cities and towns, or price out those who currently live and work in rural areas by becoming exurban commuter communities or attracting second homes and short term rental opportunities.

The draft rules have strayed from these principles, at times due to vague language and in other places because of the draft policies themselves. Our specific comments are below. We start with some general observations:

- No factual basis has been provided about any of the unincorporated communities or even a fair sampling of them, regarding any of the critical information needed to determine what rule changes make sense. For example:
    - 12 of the 36 counties - one third - have never designated unincorporated communities. Does this mean these counties are not subject to these rules?
    - No information has been provided regarding the buildable lands, infrastructure, density, mix of uses, or maps of the UCs or any reasonable sampling of them.
    - Deschutes County has prepared a report titled 2024 Rural Housing Profile, which we have previously provided to the Department for this RAC. It is a thorough evaluation of the existing opportunities in the county for housing outside all UGBs - and inside the rural communities, resorts, and rural residential areas of the county. The report finds that the county already

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has more than enough vacant residential parcels than it is projected to need for the next 20 years.[1] This is a clear example of why the Commission should pause this rulemaking until basic data is gathered about the status of existing UCs, and what if anything is needed to increase housing opportunities for those who live and work in these rural areas.

- The proposed rules create a “city lite” option with no obligation to actually plan for and invest in the housing rural workers and residents need. The proposed rules allow counties to designate and expand the community boundaries of Urban Unincorporated Communities (UUCs) and some Rural Communities (RCs) for housing, without holding them to the same housing standards that cities must meet. Goal 10 - which currently also applies to unincorporated communities - requires that "housing be provided to meet financial capabilities of Oregon households and allow for flexibility of housing location, type and density.” The proposed rules do not meet this Goal 10 requirement.

  The state of Oregon issues an annual report with the total number of homes needed by every city in the state, and the rural areas of each county, broken down by income categories. This sets the targets that guide cities in complying with Goal 10 (and for cities over 10,000 in population, Metro, and Tillamook County communities, their Housing Production Strategies). These proposed rules do not require counties to even consider the actual income needs of those in the unincorporated areas of the county, or in and near a given UC. There is no obligation to assess the housing needs of those in the rural area and then tie those needs to the housing proposed to be allowed in the UUCs or RCs.

  - This puts UCs and nearby incorporated cities and towns on an uneven and unfair playing field. Cities and towns have assessed their housing needs, provided land, and prepared and invested in public facilities to meet their current and future housing needs. These places are where schools, stores, and jobs are primarily located. Many of these rural towns and cities need and would like housing and economic development. If LCDC and other decision makers actually want to produce more housing

[1] See especially the tables on page 11, which show Deschutes County has the following opportunities for rural living of the next 20 years:
- Rural residential areas + two rural unincorporated communities (Terrebonne and Tumalo): 2944 vacant lots
- Resort areas (all): 714 vacant lots
- The remaining unincorporated communities: An unknown additional number of lots
- Historic and Rural Accessory Dwelling Unit eligible properties: 8,600 proprieties

more quickly, these cities and towns are where scarce public investments in infrastructure should be made.
    - This also opens up many UCs and RCs to become places for second homes and short term rentals, further pricing out those who actually need to live in these areas.

- The current rules on unincorporated communities already allow *any* level of housing density that is supported by infrastructure and meets the needs of the rural area. Existing 660-022-0030 already provides definitions and a process that works and is focused on the rural needs and economies. These should remain, and be incorporated into the proposed new rules on whether and how some UCs can expand their boundaries.

II. Specific Comments

Section 660-022-0010 - Definitions (p. 25 of pdf)

-0010(4): "Developable land" definition refers to the definition in OAR 660-021-0010(5), which refers to, for residential use, 660-008-0005(7). Because that latter section is about developable residential lands inside UGBs, it refers to a need for buildable land for 20 years. Because we oppose the use of a 20-year time frame (see below), we recommend appropriately qualifying the use of the referenced rule without the time frame.

Section 660-022-0020 - Designation of Community Areas (p. 28-29 of pdf)

-0020(7): Allows urban unincorporated communities (UUC) to have a 20-year boundary. We oppose this proposal for the following reasons:

- If a UUC wants a 20-year boundary, then it should incorporate as a city.
- Cities are the places for a broad range of economic development, civic and cultural institutions, people, housing, etc…. , as established and reinforced by Goals 9, 10, 11, 12, and 14 and years of planning and investment by cities and the state. UUCs are in rural areas and emerged to and still function as serving a much narrower set of rural needs (housing, rural based economies, processing and transportation of rural products, even drone testing, etc…)
- UUCs should not be encouraged to basically compete with cities, but with less rigorous standards that are not designed to meet local housing needs.

Recommendation: Do not include the 20-year option for designation or expansion of a UC boundary.

Section 660-022-0050 (new) - Exceptions for Expanding Unincorporated Community Boundaries. Long Range Growth Capacity (pp. 36-39 of pdf)

-0050(1) and throughout: Changes “long term need” to “long-range growth capacity.” We find this very problematic for the following reasons:

- UCs are about serving rural areas and needs, and removing “need” removes this consideration entirely.
- If based on “capacity,” what does that mean? Capacity of what, for what? For example, if an area has enough water and/or electrical capacity for a data center, can a data center be located there? Or any other large industrial user who is looking for easy access to water or power.
- Why insert the term “growth”? Growth is to be encouraged inside UGBs, not in rural areas. Some UUCs and RCs might be experiencing growth or expected to grow, but again, then base any expansion on the need to meet local, rural growth, coupled with whether there is water and sewage capacity to accommodate it. The proposed language seems to be encouraging growth based simply on “capacity.”
- What is the definition of “long-range growth capacity” and who measures it? Counties have stated throughout every planning process that they lack staff to revise existing plans and codes or to enforce permits.

Recommendation: Use a term like “long term need for housing to serve the UUC/RC and rural area, provided there is water and sewage service for the existing community and this service will be provided concurrently with any expansion.” Again, look to existing rule language in 660-022-0030 for guidance.

-0050(1)(a): This allows a UUC or RC that is already served by "community sewer and water systems” to expand their boundaries if (A) the existing systems have capacity or (B) if there is a plan in place "showing how and when existing services will be expanded.” We object to (B) for the following reasons:

- A “plan” is not enough. We have seen plenty of plans sit on shelves and never be executed because of lack of financing, or the funding takes many years and costs more than anyone anticipated.

- Therefore, the funding and service must be concurrent, which is in the existing rule (at -0040(5)(b)) and is repeated here, in -0050(4) on p. 37. Incorporate that language here.
- Again, what if one big user comes in and builds the water and sewer system for itself, and uses all or most of the water, energy, or other "capacity." This is not a far-fetched scenario, as we are seeing now with data centers.
- As best as we know (because no data has been provided to inform this rulemaking, everything is anecdotal), many of the UUCs and RCs that have community water and/or sewage systems have one or the other but not both, and in either case, the systems often do not cover the whole community but rather a portion of it. So, under the proposed rule, could a UUC or RC expand if only part of the existing community was served, but there was a "plan" to serve the expansion area? And skip over the existing, unserved community? This very scenario has been found to violate Goal 14 for cities - a UGB expansion cannot come at the expense of serving existing areas inside the existing UGB.

Recommendation: Require that the water and sewage systems serve the entire community prior to any expansion, and that the expansion area will be served concurrently with development. Use the existing rule's concurrency language.

-0050(1)(b): This section provides that for UUCs only, the boundary can be expanded even if the UUC is closer than the 20 or 10 mile current limit from a UGB if a few criteria are demonstrated.

- We do not object to this conceptually, but the criteria have to be tight, and (ii) is not. We object to the proposed language. It states: "The UUC will provide housing opportunities that are not easily accommodated within UGBs (i.e., Farmworker housing)." Here are some problems we see with the language:
    - If a nearby town or city is not providing housing opportunities for large lot detached homes, is that sufficient to expand a UUC? How does that relate to the housing needs of the existing and projected rural population?
    - If the land in the UGB is more expensive, even slightly, than the UUC, is that sufficient? Because cities have already invested in the full array of infrastructure, schools, roads to stores, etc…, the land and housing is likely to be less expensive.
    - If the nearby city is making it hard to locate affordable housing for those who work in that city, is that a sufficient reason to locate regulated housing for lower income people in a UC, where it will be out of sight to those living in the city?

Recommendation**:** We recommend that the criteria should be something like "The County will adopt planning, zoning, and other housing and financial related tools in the expansion area to make it reasonably likely the housing will be affordable to those who live and work in the UUC or in the nearby rural area." The County's housing needs analysis for any UC must be based on the DAS projections of housing needs, by income level, in the rural area.

-0050(2): Section is about how to demonstrate "long-range growth capacity for housing and employment."

- Again, why is the rule focused on "growth capacity"? This should be about rural needs.
- (2)(a)(B): Allows use of a "safe harbor" growth rate for UUCs and RCs. We object to this, because it assumes growth, whether there is any projected or not. Again, it is also not tied to housing needs by income level in the rural area.
- It builds in an uneven playing field of competition with nearby towns and cities, many of whom actually need that growth and investment, and this will just enable stealing it from them. These are rural towns that need infrastructure investment, and who have done the work to provide the zoned land, and provide services, schools, and stores, and they have aging infrastructure that needs upgrades, etc… This is nonsensical.
- (2)(b),(c): Requires "consideration" of "plans to extend facilities & services to existing community land" and of the "infill potential" of the existing community. The term "consideration" is not acceptable.
    - "Consideration" is an empty term. It means "think about it" and then carry on without integrating it into any decision.
    - This is a far lesser requirement than cities must follow to expand UGBs. Cities have to demonstrate that they are already making efficient use of residential lands, that the expansion won't harm existing ability to serve the existing areas, that they have adopted land use efficiency measures, etc… . The rule as proposed will encourage sprawl out of UUCs.

- The reference in -0050(4)(a) to (3) does not make sense, based on the (3) immediately above it.

- -0050(4)(d)(A)-(F) (on pdf p. 38): We have many objections:

    (A) Why require 40% (or any percentage) of the added lands to be zoned for multi-family housing but not require the same inside the existing UC? This illustrates another place in the proposed rules where counties, in the UUCs and RCs, do not have to follow Goal 10 and ensure that the *existing*

community has adopted land use measures to provide housing opportunities to meet the needs of the rural area prior to expanding the boundaries that cities have to meet. This allows skipping both Goal 10 and a Goal 14 need analysis. It does not meet housing needs or protect farm and forest lands or natural areas from unneeded expansion of development.
(C) Why provide for a "conditional" approval of manufactured home parks and 2- and 3- plexes? Allow them outright.
(F) This does not make sense to us - how does a county determine and enforce that a "new lot or parcel" is "created for and dedicated to multigenerational households"?

- -0050(7): Repeats the 20 year allowance for UUCs, which we do not support.

- -0050(8) and -0055(2): Is there a definition of "lands subject to identified natural hazards"?
    - Because there is no wildfire hazard map, how would (8)(a) about defensible space and home hardening be enforced. Does any county now have "wildfire" identified and mapped as a "natural hazard"? Or any other natural hazard map adopted under Goal 7?

Recommendations: The following language should be incorporated into appropriate subsections of proposed -0050.

(1) Changes in zoning and the addition of land added to an unincorporated community, with the characteristics in subsection (4), are allowed to help meet the housing needs of those employed or projected to be employed in or near the unincorporated community, such as in agriculture or forestry industries in the surrounding area.

(2) The housing needs of those employed or projected to be employed in or near the unincorporated community are based on the income categories and targets for the county's rural area as published in the most recent Department of Administrative Services' Oregon Housing Needs Analysis, as well as household size, age, and other relevant factors.

(3) Counties must demonstrate that the housing needs to be met in the unincorporated community are not already addressed or accounted for in the housing needs analysis and housing production strategies for the urban growth boundaries of cities in the county.

Section 660-022-0055: Expanding Unincorporated Community Boundaries. Accommodating a Specific Use (pp. 39-41 of pdf)

- -0055(1)(b)(A): This language is open-ended enough to allow data centers and other large, possibly unwanted, overwhelming users in UCs. It allows an expansion for a specific industrial use if the use would have a "significant comparative advance due to its location such as, for example, that it must be near a rural energy facility…."
    - For example, because a large part of the electric grid is in rural areas, especially the high capacity transmission lines, which are attractive to data centers, this could provide a "significant comparative advantage." Is that what is intended here? What about a large user who simply needs access to large quantities of water? These are current examples in rural Oregon, many of which are being met with opposition.

- -0050(2)(a), (b): Same comments as above regarding wildfire and other natural hazards. Without a wildfire hazard map, and other natural hazard maps adopted pursuant to Goal 7, at the state or county level, this seems impractical and unenforceable.

Section 660-022-0060: Land Priorities for UUC 10-year long-range growth potential and all UCs responding to a specific rural use (pp. 41-42 of pdf)

- Throughout, this just raises the question of why "growth potential" rather than "rural need"?
- All the deletions from existing rules simply negate a showing of "need." That's less than cities must show to expand their UGBs. These rules must incorporate the same requirements for need, and the ability to provide services within the existing boundary as well as the expansion area prior to expansion that cities must show.

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Friday, October 30, 2026 8:50 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Tom Creswell

Follow Up Flag: Follow up
Flag Status: Completed

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
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I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Monday, October 26, 2026 12:50 PM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: creswell@pacifier.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Tom Creswell

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,

I would like to add my opposition to proposed rule HUC. I live @5 miles from Rickreall, OR one of the unincorporated cities that would be effected by this rule change. I see no reason to open up more farmland/timberland to housing that will surely not be of a low cost nature. No need to use up valuable farm land for more Mc-Mansions.

Sincerely,
Tom Creswell
97338-9637

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Friday, October 30, 2026 8:50 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Elizabeth Fertig

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
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-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, October 27, 2026 11:37 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: kandbfertig@outlook.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Elizabeth Fertig

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,

Having lived in Oregon for my whole life, and in rural Oregon for most of my life, I have always experienced the benefits of Oregon's cities, towns, farmland, and recreational lands, without necessarily understanding the processes which have created the deep thought and planning which maintains a healthy balance amongst the places I love.
Part of the uniqueness of Oregon is in its progressive land use laws. They provide for controlled growth, prevent urban sprawl (which increases our dependence on fossil fuels for commuting and removes infrastructure, like grocery stores, from where people actually live), and preserve our precious farm land (i.e., prevent covering it up with residential suburbs or industrial complexes and allow small farms to thrive). "Changing the rules" of those land use laws, behind the backs of Oregon's citizens, is wrong. Sneaking in new rules allowing for unlimited development in unincorporated towns serves out-of-state developers and does not serve any of Oregon's citizens.
Thank you for your consideration as you are asked to consider changing and compromising the real Oregon.

Sincerely,
Elizabeth Fertig
97351

WILLIAMSON Angela * DLCD

From: MASON Palmer * DLCD
Sent: Friday, October 30, 2026 8:50 AM
To: WILLIAMSON Angela * DLCD
Subject: FW: Public Comment: Opposing Unincorporated Rural Housing Densities - from Kurt Fertig

Palmer Mason
Inter-Agency Coordinator, J.D. | Director's Office Oregon Department of Land Conservation and Development
Cell: 503-269-2040 | Main: 503-373-0050
palmer.mason@dlcd.oregon.gov |
https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.oregon.gov%2FLCD&data=05%7C02%7CAngela.WILLIAMSON%40dlcd.oregon.gov%7Caa6edd5917f446e199d308df369d67ae%7Caa3f6932fa7c47b4a0cea598cad161cf%7C0%7C0%7C639289721830202169%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=gg8WR8gBL2PDihT%2BmUn%2F3Nqh2h6LU6XPuk24BZMfyt8%3D&reserved=0

I support DLCD's efforts to coordinate with other agencies to improve housing production and general collaboration.

-----Original Message-----
From: hello@protectruraloregon.com <hello@protectruraloregon.com>
Sent: Tuesday, October 27, 2026 11:54 AM
To: MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
Cc: kandbfertig@outlook.com
Subject: Public Comment: Opposing Unincorporated Rural Housing Densities - from Kurt Fertig

Land Conservation and Development Commission c/o Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150
Salem, OR 97301

RE: Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

Dear Commissioners,
I've lived in Oregon for 42 years and in the rural town of Independence for 26 of those years. My passion has always been preservation of farmland for future generations, which is why I love Oregon's current land use laws. Once farm land has been destroyed to make room for housing developments, it is lost as long as our civilization exists. Will future generations thank us for destroying farmland or will they ask, "Why didn't you think of us?
This is why I oppose the change in law (HUC) to have rural non-incorporated communities develop housing. If there are developers who are passionate about building, please let them do it on non-farmable land, preferably out of state, or do it within the current Oregon system of within the urban growth boundaries. Thank you.
Yours for future generations,
Kurt Robert Fertig

Sincerely,
Kurt Fertig
INDEPENDENCE

From: JOHNSON Denise * DLCD
To: WILLIAMSON Angela * DLCD
Subject: FW: HUC comments and written testimony
Date: Thursday, November 5, 2026 9:31:58 AM

Here you go!

Denise Johnson
Commission Assistant | Director's Office
Pronouns: She/Her
Oregon Department of Land Conservation and Development
635 Capitol Street NE, Suite 150 | Salem, OR 97301-2540
Cell: (971) 375-1864 | Main: 503-373-0050
denise.johnson@dlcd.oregon.gov | www.oregon.gov/LCD

From: Karynn Fish <karynn@karynn.org>
Sent: Thursday, October 29, 2026 10:00 AM
To: JOHNSON Denise * DLCD <Denise.JOHNSON@dlcd.oregon.gov>
Subject: HUC comments and written testimony

Good morning Denise,

I have noticed that the comments related to the HCOR rulemaking are being published regularly on DLCD's comment page. What would be the process for getting the HUC comments posted timely as well?

Alternatively, I would like to request a copy of all of the HUC-related written comments and testimony that LCDC & DLCD have received to date, along with any associated files like tracking spreadsheets, summaries of testimony etc. that have been created thus far.

Happy to discuss my request and modify it if need be. Thank you so much!

Karynn Fish
Cove Beach
(503) 917-9067