Land Conservation and Development Commission

c/o Oregon Department of Land Conservation and Development

635 Capitol Street NE, Suite 150

Salem, OR 97301

By email to: palmer.mason@dlcd.oregon.gov and jon.jinings@dlcd.oregon.gov

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

Dear Commissioners,

My name is Lorie Hancock. I live in Camp Sherman and I am a rural resident. I am writing about the Housing in Unincorporated Communities rulemaking. I ask the Commission to keep urban development inside cities, where it belongs, and not to adopt rules that would let counties expand and upzone unincorporated communities onto the farm, forest and ranch land around them.

Camp Sherman is a small rural unincorporated community of approximately 150 dwelling units. The community does not have a community septic system or community water system. It is surrounded by the Deschutes National Forest. There is a store, post office, and some tourist lodging so there are very limited local employment opportunities. Camp Sherman is located on the banks of the Metolius River. The Metolius Basin is one of the most protected landscapes in Oregon. The river is a Federally designated Wild and Scenic River and an Oregon Scenic Waterway. In 1990, the Deschutes National Forest established the 86,000-acre Metolius Conservation Area to ensure that the Basin is managed to maintain a more natural condition in the future.

In 2009, in response to enormous public outcry for protection of the Metolius River, the Oregon legislature passed the Metolius Protection Act, prohibiting resort development in the area and providing a management plan for the region. ORS. § 197.416. See also OAR § 660-043-0100 (detailing management plan for the Metolius Area of Critical State Concern). The act also designated the Metolius and its surrounding basin as an Area of Critical State Concern(“ACSC”) in Oregon, the only such designation in the state.

The ACSC management plan is a wide-ranging plan that is, among other things, designed to protect the Metolius Basin from large-scale and other development that would be inconsistent with the outstanding and unique environmental, cultural and scenic values and resources described in the plan. Any new development within the ACSC boundary is strictly limited so that it will not result in negative impact to the Metolius River, its springs or its tributaries; negative impact on fish resources in the area of critical state concern; or negative impact on the wildlife resources in the area of critical state concern.

Cognizant of the sensitivity of the Metolius Basin and the need to limit housing density, the State has recognized the importance of the Metolius Protection Act and the ACSC designation is subsequently legislation. As an example, see ORS 215.495(2)(i), which prohibits all accessory dwelling units in a designated area of state concern (i.e., the Metolius ACSC). That means that ADUs are prohibited in Camp Sherman.

The RAC is apparently unaware of the prohibitions in ORS 215.295(2)(i) because the proposed rule amendments that are being considered in the present Rulemaking, at OAR 660- 022-0050 (3)(A) include the following:

(A) Accessory dwelling units as defined at ORS 197A.425(1)(b)(A) are allowed as an outright permitted use in all residential zoning districts.

The language quoted above is in direct conflict with the prohibitions contained in ORS 215.495(2)(i). If the DLCD decides to keep that language, it should be modified as follows so that it complies with state law:

(A) Except as provided in ORS 215.495, accessory dwelling units as defined at ORS 197A.425(1)(b)(A) are allowed as an outright permitted use in all residential zoning districts.

Jefferson County has similarly recognized the need to limit housing density in the ACSC: See Jefferson County Code 17.434.C.2.h (prohibiting “habitable accessory structures” in the ACSC). Allowing increased housing density in the Metolius Basin would be inconsistent with established management plans and State law and county zoning ordinances because it would negatively impact the fragile ecology of the basin. At a minimum, the RAC should exclude unincorporated rural communities in an ACSC from the rulemaking provisions.

In much of Oregon, water supplies are already stretched. Urban-scale development on rural land would draw down the same groundwater that farms, ranches and existing homes depend on. For this reason among others, Rural UCs should be excluded from the Rulemaking and the Rulemaking should be strictly limited to Urban UCs. Rural UCs do not have community water or community septic systems. This means new dwellings will need to drill a well and install a septic system for each unit. As such, in Rural UCs the cost of constructing a new units will be higher than in an urban area and higher than an Urban UC. This will not provide affordable housing in

UCs, it will result in expensive second homes being added to rural areas. More expensive new housing is certainly not what Oregon needs.

Boundary expansion would mean adjacent farmland and forestland lost to urban development, likely for good. Rezoning raises land prices past what farm and forest operations can carry, and the economics would push toward selling out.

Putting more homes, businesses and infrastructure into fire-prone rural landscapes would mean more ignitions, more people in harm's way, and more to lose when fire comes. Increased housing densities in such areas put the entire community at unnecessary risk.

Oregon chose a different path from the sprawl you see in other states, and it has worked for fifty years. Please don't weaken it now. Please retain the strict Rural/Urban Growth Boundary lines that have served Oregon so well for decades. Reject the proposed changes proposed by this Rulemaking that would allow urban sprawl with increased densities in rural areas and safeguard our water, our resource lands, and our communities for future generations.

Thank you for considering these comments.

Lorie Hancock

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| **From:** | TAYLOR Casaria * DLCD |
| **To:** | WILLIAMSON Angela * DLCD; JOHNSON Denise * DLCD |
| **Subject:** | FW: Comments - Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22 |
| **Date:** | Monday, November 16, 2026 7:46:15 AM |
| **Attachments:** | comments- Land Conservation and Development Commission_Lorie_Hancock.pdf<br>image003.png |

Public comment for the HUC item. I have acknowledged receipt with the sender.

**Casaria Taylor** Hear my name
Senior Rules Coordinator/Records Officer | Policy Office
Pronouns: She/Her
Cell: 971-600-7699 | Main: 503-373-0050
casaria.taylor@dlcd.oregon.gov | www.oregon.gov/LCD

**From:** Lorie Hancock <lorie_hancock@hotmail.com>
**Sent:** Sunday, November 15, 2026 11:16 AM
**To:** TAYLOR Casaria * DLCD <casaria.taylor@dlcd.oregon.gov>
**Cc:** MASON Palmer * DLCD <palmer.mason@dlcd.oregon.gov>; JININGS Jon * DLCD <jon.jinings@dlcd.oregon.gov>
**Subject:** RE: Comments - Housing in Unincorporated Communities — OAR chapter 660, divisions 4, 11, 14 and 22

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Please see my comments in the attached letter in pdf format.
Lorie Hancock