



COMMUNITY DEVELOPMENT

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July 27, 2026

Land Conservation and Development Commission
635 Capitol St NE, Ste 150
Salem, OR 97301-2540

Sent via: denise.johnson@dlcd.oregon.gov; cc: housing.dlcd@dlcd.oregon.gov

Re: MHOR Homes Rulemaking

Dear Chair Lazo, and Esteemed Commissioners;

Thank you for the opportunity to provide written comment on the MHOR Homes Rulemaking (Phase One).

Wasco County appreciates the legislature's efforts to look for solutions to housing Oregonians. However, as drafted, the MHOR Homes Phase One rules represent a failure to reconcile rules with local standards. Local standards are part of a comprehensive and strategic vision for a community by that community that also consider life, health, safety, and welfare, and are therefore critical for citizens. There is also a lack of acknowledgement for the high costs the new rules represent to local government.

Property Development Standards

Property development standards, like setbacks or fire access, are not arbitrary regulations intended to impede development. Instead, they integrate various regulations, like fire safety requirements and visual clearance, into land use and development and building codes. Communities work with outside agencies, community members, and other stakeholders to design property development standards considering local conditions that can also ensure for public health and safety. What is proposed, is instead a unified standard. A unified standard assumes unified conditions across our great state.

Yet one size does not fit all. Where snow load may be a bigger concern for some jurisdictions, others focus on heavy winds or rain. Similarly, some home designs work better for some communities, lifestyles, or diverse experiences and collapsing into one standard negates any pretense at equity. Quite simply, local jurisdictions have spent considerable time and consequently honed local expertise at developing property development standards that work for their community and safeguard the many resources, including built and human environment, our citizen's value. Superseding those carefully crafted standards invalidates the idea that as Oregonians we value diversity, equity, and inclusion. It also ignores that local expertise, which has the capacity to work quickly through local code, by establishing a new set of regulations for jurisdictions to implement. New regulations come with many costs.

Increased Costs and Inefficiency

Although the fiscal analysis suggests that impacts to local governments is marginal, it is hard to understand how that conclusion was reached beyond a heavy reliance on use of existing permitting and tracking software, staff, and equipment. As members on the RAC pointed out, local governments will need to develop a separate analysis to determine whether individual properties qualify for this fast tract. They will have to learn this new standard, and potentially codify it. This increases staff workload and presents potential liability. In other words, these rules are an unfunded mandate that seek to pre-empt local regulation while, necessarily for compliance with Statewide Land Use Planning Goals like Goal 7, will require an additional layer of analysis and regulation.

The housing impact statement suggests that there will be a substantive impact on the cost of housing and pace of construction. This conclusion is reached through the suggestion that developers will achieve efficiency in permitting that will necessarily reduce cost. In a simulation, that certainly could be the case, however the realities of land use and building are such that every project has some variation that require discretion. This section of analysis is filled with a lot of hypothetical scenarios without data to support. Rather than an impact statement, it can be more accurately categorized as goals.

I understand that RAC members were very clear with some of the significant administrative burdens represented by implementing these new rules, including examples and real life data. That clear feedback is not reflected in the statement of need and fiscal impact or in the rules as presented.

I would encourage the Commission to consider the testimony of RAC members and the comments from jurisdictions seriously, and to refrain from making a decision until some of these serious concerns have been addressed.

With my thanks,

A handwritten signature in dark ink, appearing to read 'Kelly Howsley Glover', written in a cursive style.

Kelly Howsley Glover, PhD
Wasco County Community Development Director