

From: [CARPENTER Sean * DLCD](#)
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Subject: Comment Submission: MHOR Homes Phase One
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Rule: MHOR Homes Phase One

Organization or affiliation (optional): City of Newport

Comment: Submitted by: Jan Kaplan, Mayor, City of Newport I support the League of Oregon Cities' position. Newport is committed to increasing housing production and improving the development process, but successful reforms must be practical, properly funded, and responsive to local conditions. Some of the proposed changes may result in unintended consequences. Robust local city/county representation is necessary to foresee them. I note that there does not appear to be representation from the Oregon coast. Cities are partners and must be treated as such: Top-down policies can unintentionally work against the goal of producing more housing when they do not account for the realities of implementation. Oregon communities differ significantly in staffing, infrastructure, geography, natural hazards, transportation systems, and access to technical expertise. A requirement that may be manageable for a large metropolitan government can overwhelm a smaller city with limited planning, engineering, and legal capacity. Analyze the potential burden on local resources prior to implementation: Frequent or overly prescriptive state mandates also require cities to repeatedly revise codes, retrain employees, establish new procedures, and explain changing requirements to builders. That work consumes the same limited staff time needed to review applications, resolve problems with developers, and move housing projects forward. Uniform standards may also conflict with local utility, emergency-access, transportation, or environmental requirements, creating uncertainty and additional review rather than genuine streamlining. Identify the support needed locally prior to implementation: I support strong collaboration between the state, cities, developers, and housing advocates to identify the actual causes of delay and design reforms that can be translated into effective local action. The state's housing goals are more likely to succeed when cities receive clear guidance, adequate funding and technical assistance, reasonable implementation time, and sufficient flexibility to address local conditions. The objective should be not simply to adopt statewide policies, but to ensure those policies result in housing that can be approved, serviced, financed, and built.