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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 Turner

Comment: We strongly support the letter and findings of the League of Oregon Cities that was sent to LCDC on July 29, 2026. At a basic level, one size fits all will not work. It defies common sense that a set of land use rules would work equally well in Heppner and Beaverton. It is also highly confusing to have one homebuilder subject to City rules and another follows different State standards. Cities and Counties take development very seriously and have developed comprehensive systems over the years to ensure that residential, commercial and industrial projects are built in an orderly fashion that takes into account both short and long-term needs. This requires coordination with multiple units of the local government and also coordination with outside agencies like utility providers. Unless the people that process land use and building applications are at the table, a mess will be created that could make development more difficult. On another note, the zeal to eliminate discretion and judgement will result in fewer housing units being developed. There are always situations where strict application of rules would deny a building permit, but discretion and flexibility provide the opportunity to get to a "yes". There may be cases where "judgement" leads to a permit denial. There are also cases where judgement leads to an approved permit. Simple closing comment - don't create inflexible rules that don't make sense on the ground and could lead to the opposite of what you are trying to accomplish.