



10/2/2026

Oregon Department of Land Conservation and Development
635 Capitol St. Ste 150
Salem, OR 97301

Re: Comments on the Oregon Homes Rulemaking

Dear DLCD Rulemaking Staff:

Thank you for the opportunity to comment on the proposed Oregon Homes rules. We appreciate the progress made since the last public comment period. The rules have addressed some of the serious concerns raised by local governments, including addressing the lack of alignment with the fire code. However, we remain concerned that the proposed standards will add complexity to the housing review process without providing sufficient flexibility to address the needs of diverse communities and development contexts.

The proposal would add another set of standards applicable to a distinct subset of housing applications. This would increase the complexity and difficulty of housing review and design and could make the permitting process more difficult, not easier. Applicants and local jurisdictions may face substantial confusion and repeated back-and-forth over which standards apply and under what circumstances. This is not a trivial concern. It would create a real burden for already overworked local jurisdiction staff who must help applicants navigate the interaction among the Oregon Homes standards, underlying zoning requirements, the HB 1537 mandatory adjustments, the SB 974 design-standard exemptions, and other applicable regulations.

We are also concerned that the proposal does not include provisions addressing regional centers, town centers, commercial and mixed-use areas, or transit-oriented development. Without such provisions, jurisdictions may be unable to apply design and siting standards that are essential to creating pedestrian-friendly areas, supporting thriving retail districts, developing walkable neighborhoods, and increasing transit use. For example, development along a retail main street could be permitted with completely blank walls at the ground-floor level, undermining the active, inviting storefront environment that supports a successful commercial area.

In addition, the proposed standards do not appear to include requirements for adequate pedestrian access between the street and building entrances. Nor do they provide standards to ensure that parking lots are laid out to support safe and functional vehicle maneuvering. These omissions could result in developments that technically meet the



applicable housing standards but fail to provide safe, convenient, or cohesive connections for pedestrians and drivers. It's been mentioned that the parking lot issue will be addressed in a traffic impact analysis. However, a traffic analysis is intended to address traffic flow to, from, and around a proposed development; it does not address parking capacity or design requirements on site. The traffic analysis may show increased capacity in the area due to the development, but the proposed design standards will not allow the parking lot to accommodate that capacity.

We respectfully request that DLCD revise the proposal to reduce regulatory overlap and clarify how the Oregon Homes standards interact with existing state and local requirements. The rules should also preserve local flexibility to apply context-sensitive design and siting standards in regional centers, town centers, commercial and mixed-use areas, and transit-oriented developments. At a minimum, the rules should address pedestrian connections between public streets and building entrances, active ground-floor frontages in appropriate commercial contexts, and safe parking-lot circulation and maneuvering.

Thank you for considering these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Elizabeth Coffey". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Elizabeth Coffey

Interim City Manager

City of Beaverton