From: TAYLOR Casaria * DLCD
To: Jefff Slemaker
Subject: RE: Public Comment – Housing in Unincorporated Areas – Arch Cape, Oregon
Date: Tuesday, November 10, 2026 6:52:16 PM
Attachments: image003.png

Good evening, Mr. Slemaker. Thank you for taking the time to provide comments on the rulemaking project. I will forward these comments to the commission, staff, and include them in the record.

Best,
Casaria

Casaria Taylor Hear my name
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From: Jefff Slemaker <jslemakersr@hotmail.com>
Sent: Tuesday, November 10, 2026 3:47 PM
To: TAYLOR Casaria * DLCD <casaria.taylor@dlcd.oregon.gov>
Subject: Public Comment – Housing in Unincorporated Areas – Arch Cape, Oregon

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Casaria Taylor, Rulemaking Contact
Oregon Department of Land Conservation and Development (DLCD)

I am submitting these comments as an Arch Cape resident, homeowner, water and sanitation ratepayer, and individual member of the Arch Cape Domestic Water Supply District Board of Directors. I am speaking in my personal capacity and not on behalf of the District or its Board.

My perspective comes from both living in this community and having firsthand experience with the financial, operational, and infrastructure challenges facing a small coastal utility.

I appreciate the State's efforts to address Oregon's housing needs and understand the importance of providing additional housing opportunities. However, I am concerned that the proposed rules may place additional demands on small coastal communities without adequately addressing the capacity, condition, and financial limitations of the infrastructure required to support that growth.

Arch Cape is a small, unincorporated coastal community served by two small, independent special districts responsible for providing essential water and wastewater services. These are not large municipal systems with substantial staffing, financial resources, or the ability to

readily absorb additional demand.

Our community already faces significant infrastructure challenges. Our water resources are limited and seasonal. Our wastewater collection system is aging and experiences substantial infiltration and inflow during the winter storm season. Winter flows can reach approximately four times normal levels, placing additional strain on an already challenged system. We also face ongoing maintenance, repair, replacement, staffing, and debt obligations.

Perhaps most importantly, Arch Cape residents are already paying among the highest water and sanitation rates on the North Coast. These rates reflect the financial reality of maintaining essential services in a small coastal community with aging infrastructure and a limited customer base.

As both a ratepayer and a member of the District's Board of Directors, I am concerned about any state or county policy that could increase development density and infrastructure demand without first establishing how the additional costs will be addressed. Existing homeowners should not be expected to shoulder the financial burden of accommodating growth that benefits new development.

The proposed rules discuss public facilities, infrastructure planning, and the costs associated with expansion. I believe these issues deserve much greater attention, particularly for small unincorporated communities served by independent water and wastewater districts.

I respectfully ask DLCD to consider the following:

1. Require a meaningful infrastructure capacity assessment before expansion or increased density.

Before allowing additional development or expansion of unincorporated communities, there should be a realistic assessment of available water supply, wastewater collection capacity, treatment capacity, storage, and the condition of existing infrastructure. This assessment should account for seasonal demand, winter storm conditions, existing deficiencies, and the cumulative impact of additional development.

2. Protect existing ratepayers from disproportionate infrastructure costs.

New development should pay its fair and proportional share of the infrastructure improvements necessary to serve it. This should include not only the cost of extending pipes and connecting properties, but also the additional system capacity, treatment improvements, and related facilities required to accommodate increased demand.

Existing residents should not be left paying higher monthly rates to subsidize the infrastructure needs of new development.

3. Require meaningful coordination with the special districts responsible for providing services.

County land-use decisions should not move forward on the assumption that water and wastewater services can simply be expanded to accommodate additional housing. The special districts responsible for those services must have an opportunity to evaluate the actual capacity and financial consequences before expansion decisions are made.

Their input should be meaningful and occur early in the planning process, not after development expectations have already been established.

4. Recognize the financial limitations of small coastal communities.

A statewide housing policy must account for the very different financial realities between larger cities and small rural communities. Small districts have limited ratepayer bases, aging facilities, staffing challenges, and significant capital replacement needs. Even relatively modest increases in demand can create substantial financial consequences.

The availability of grants and outside funding should be considered, but communities should not be expected to approve growth based on the assumption that future grants will cover infrastructure deficiencies.

5. Consider cumulative impacts, not just individual development proposals.

The impact of additional housing must be considered alongside existing development, approved projects, future infill, seasonal population changes, and the long-term replacement needs of existing systems. Looking at individual projects in isolation can underestimate the overall burden placed on small public-service systems.

I want to be clear that I am not opposed to responsible housing opportunities. I am opposed to policies that encourage growth without first establishing whether the community can sustainably support it and who will ultimately pay for the necessary infrastructure.

Water and wastewater systems are essential public services. They are not unlimited resources, and they cannot be expanded without significant financial investment. In a small coastal community such as Arch Cape, those costs have a direct and immediate impact on the people who already live here and pay for these services.

Responsible housing policy must also be responsible infrastructure policy.

I respectfully ask DLCD to strengthen the proposed rules so that infrastructure capacity, special district coordination, and protection of existing ratepayers are fundamental considerations in any decision to expand or increase housing density in unincorporated communities.

Thank you for considering my comments and for recognizing the unique challenges facing small coastal communities such as Arch Cape.

Sincerely,

Jeffrey Slemaker
Arch Cape Resident and Homeowner
Water and Sanitation Ratepayer
Individual Member, Arch Cape Domestic Water Supply District Board of Directors

These comments represent my personal views and are not an official statement or position of the District or its Board.