From: CARPENTER Mina * DLCD
To: JININGS Jon * DLCD; MASON Palmer * DLCD; WILLIAMSON Angela * DLCD
Subject: Comment Submission: Housing in Unincorporated Communities
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Name: Ed Bollet
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Rule: Housing in Unincorporated Communities
Organization or affiliation (optional): Rural Land Owner affiliated with Stafford-Tualatin Valley CPO
Comment: I am objecting to Expansion by Cities and Unincorporated Communities onto Rural Lands outside the current UGBs within the Portland Metro Area. No justification has been provided for why this rulemaking is needed. No facts have been provided about the existing conditions of any of the unincorporated communities (UCs). We have no information about the current uses, housing, rural businesses, buildable lands, water and sewage disposal systems, income ranges or ages of residents, proximity of natural areas, whether they are in or near areas of groundwater scarcity or wildfire hazard, and so much more. There are not even any maps showing the size and locations of these communities. How can LCDC make informed decisions about over 200 highly diverse UCs without this most basic of information? The draft rules are not focused on the housing needs of those who live and work in rural Oregon. Instead, they will make it easier for outside people and businesses who want to build second homes and vacation rentals and develop commercial uses that take advantage of access to nearby water or energy, but could overrun these rural areas. The draft rules also create unfair competition between unincorporated communities and nearby rural towns and cities for scarce public funding for infrastructure and economic investment. Rural cities across Oregon need funding to upgrade existing water and sewer systems and to repair roads, so they can provide for more housing and economic development—inside their urban growth boundaries (UGBs). These are the places that have stores, schools, and jobs. Oregon should support and reinforce these cities and towns, not set up an uneven playing field. LCDC should pause this rulemaking until basic data is gathered about the status of existing UCs. It should re-focus its attention on the housing rural workers actually need and how to increase housing opportunities for those who live and work in these rural areas.