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: Gene Griffith
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Rule: Housing in Unincorporated Communities
Organization or affiliation (optional):
Comment: I am writing to strongly oppose the draft “Housing in Unincorporated Communities” (HUC) rules. As a resident of Gold Beach, I urge the Commission to pause this rulemaking. The current draft does not address the real housing challenges facing the South Coast and instead threatens the rural lands and communities that define this region. Gold Beach and Curry County Are Directly in the Crosshairs While Gold Beach is an incorporated city, we are surrounded by working farm and forest land and by unincorporated communities like Harbor, Nesika Beach, and Wedderburn that give this area its character. Curry County has a significant amount of land in farm and forest use. The draft rules would make it easier for the county to expand the boundaries of these nearby unincorporated communities onto that surrounding land, inviting the kind of sprawl that would permanently alter the South Coast. The Rules Fail the People Who Actually Live Here The housing crisis on the coast is real, but it is defined by high construction costs, a limited local workforce, and a small pool of developers. These are the barriers we face. The draft rules do nothing to address them. Instead, by allowing expanded development without requiring an assessment of local income levels or needs, the market will likely produce vacation homes and short-term rentals. That will price out the families, workers, and seniors who already live in and around Gold Beach, not house them. Curry County Lacks the Data to Justify This Gamble A fundamental problem is that the state’s own tracking of unincorporated communities is incomplete. DLCD’s tracking table does not even cover Curry County. The Commission is moving forward with a sweeping rewrite of rural land-use rules without basic, reliable data about the communities it claims to help. Pausing the rulemaking to gather that data is the responsible path. My Request Oregon should focus on building the housing people need, where they need it—within existing city limits and urban growth boundaries where infrastructure and services exist. This rulemaking, as drafted, is not that. It risks sacrificing our working lands and the viability of our rural communities for development that will not serve local residents. I respectfully ask LCDC to pause this rulemaking until it has the data to understand its impact on places like Curry County and a process that genuinely prioritizes the housing needs of rural Oregonians.