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Subject: Comment Submission: Housing in Unincorporated Communities
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Name: Joseph Ross
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Rule: Housing in Unincorporated Communities
Organization or affiliation (optional): Friends of Douglas County, Oregon
Comment: Provide stronger safeguards & more precise implementation requirements. I have questions about infrastructure capacity, public costs, housing affordability, natural hazards, & local decision-making. The rules could provide greater flexibility for counties to accommodate housing where local demand exists & adequate infrastructure can be provided, as well as a broader mix of housing types. Preserve county discretion rather than requiring communities to expand. My concerns: 1. Infrastructure capacity & financial responsibility Before approving community boundary expansions, require counties to demonstrate adequate & financially sustainable water, sewer, transportation, & emergency service capacity. A public facilities plan should include realistic capital cost estimates, operating & maintenance costs, identified funding sources, & an assessment of financial impacts on existing residents & utility customers. Clearly distinguish between anticipated future infrastructure improvements & improvements for which funding & service capacity are reasonably assured. 2. Protection of agricultural & forestlands Oregon's agricultural & forestland protections have served an important public purpose for decades. Expansion onto productive resource lands should be considered only after a documented evaluation of existing vacant land, opportunities for infill, redevelopment, & suitable non-resource land. Proposed priorities for avoiding important soils & wildlife habitats are constructive, but also clarify how counties will evaluate cumulative impacts on surrounding farm & forest operations. 3. Wildfire, flooding, & public safety More housing may increase exposure to wildfire, flooding, & other natural hazards. Require assessment of evacuation routes, road capacity, firefighting water availability, & emergency response capabilities before expansion is approved. Building hardening & defensible space requirements are important, but they should supplement rather than substitute for a comprehensive community hazard assessment. 4. Housing affordability & actual demand Although greater housing density can create opportunities for lower-cost homes, more development doesn’t necessarily result in affordable housing. Require counties to demonstrate the relation between proposed housing development & the documented needs & incomes of residents & workers in the area. LCDC should retain flexibility in the proposed housing mix standards so that rural communities are not required to adopt uniform development patterns that may be inappropriate in local circumstances. 5. Local involvement & accountability I support more transparency, public meetings & notification requirements. However, meaningful public participation should include more than limited opportunities to testify. Require counties to prepare written findings explaining how public comments, service-provider concerns, & alternatives were considered before making final decisions. 6. Fiscal impacts on counties & districts Strengthen your assessment of the costs that more housing could impose on counties, schools, utilities, & emergency service districts. New development may increase property tax revenues, but those revenues won’t necessarily cover costs of providing additional services. Provide greater clarity about responsibility for infrastructure improvements & whether adequate financing must be demonstrated before approving expansion. The rules provide for legitimate rural housing needs while preserving local

discretion. Their practical consequences, however, will depend on adequacy of infrastructure, protection of natural resources, public safety, & financial sustainability of new development. Carefully consider benefits & concerns, strengthen proposed safeguards & provide clearer implementation standards before final adoption. Oregon can increase rural housing opportunities without compromising long-term viability of existing communities, working lands or services.