Roseburg, Oregon

November 19, 2026

To: Oregon LCDC

Dear Friends,

The state is proposing changes to Oregon Administrative Rules Chapter 660, Divisions 4, 11, 14, and 22. The general intent is to allow certain designated unincorporated communities to accommodate more housing, including different residential densities and housing types, and in qualifying cases expand their boundaries. The proposal does not require Douglas County or other counties to expand communities. Counties would decide whether to pursue the additional development opportunities. Nor does it automatically open farmland and forestland throughout rural Oregon to subdivision development.

1. Pros and cons of the proposed rules

Potential advantages	Potential disadvantages or concerns
More housing choices. Duplexes, accessory dwellings, apartments and manufactured homes could give rural workers, families and older residents more options.	**Affordability is not guaranteed.** More housing may be built at prices rural workers still cannot afford.
Local economic benefits. Construction could support employment, existing businesses and the local tax base.	**Public service costs.** Water, sewer, schools, roads, police, fire and emergency medical services could cost more than additional revenues cover.
Greater county flexibility. Counties could respond to housing needs without forcing every community to become a city.	**Reduced concentration of urban growth.** Expansion outside cities could contribute to dispersed development and longer vehicle trips.
Infill before expansion. The proposal requires consideration of available land and housing within existing community boundaries.	**Loss of rural land.** Certain expansions could convert agricultural or forestland to residential use and create conflicts with working lands.
Natural-hazard protections. New provisions address wildfire, flooding and other hazards.	**Remaining safety concerns.** Home-hardening requirements alone do not ensure adequate evacuation routes, emergency response or water for firefighting.
Expanded public participation. The rules propose community meetings and consultation with affected service providers and Tribes.	**Planning costs and complexity.** Small counties and special districts could face substantial technical, financial and administrative responsibilities.

These are potential effects, not predictions of what will happen in every community. The state's fiscal and housing impact statements acknowledge that benefits may be modest and that infrastructure costs could make certain projects impractical.

Expansion eligibility — OAR 660-022-0050

Urban unincorporated communities and qualifying rural communities with at least 75 residences could pursue boundary expansion for housing and employment growth, subject to service and distance requirements. The proposal provides a 10-year planning horizon for eligible rural communities and up to 20 years for urban unincorporated communities.

Housing mix — OAR 660-022-0050(2) and (3)

The proposal offers optional planning standards, or *safe harbors*, involving up to 70% of the area zoned for detached houses, at least 20% allowing middle housing, and at least 10% allowing multifamily housing. Another optional standard includes accessory dwelling units and a maximum 8,000-square-foot lot size for newly created single-dwelling lots.

These percentages are **not automatic zoning mandates for every rural community**. They are alternatives counties could use when qualifying for expansion.

Public facilities — OAR 660-022-0080

Public facility plans must address water and sewer conditions and anticipated development. The proposal restricts development where public facilities are inadequate unless required improvements are available. A key unresolved practical question is whether construction and long-term operating costs can be funded without shifting unreasonable expenses to existing customers.

Farm, forest and wildlife protections — OAR 660-022-0060 and 0065

Existing nonresource or exception lands receive priority before qualifying farm and forestland. New exclusions protect certain agricultural soils and important wildlife areas, with differences depending on community type and planning horizon. The adequacy of these protections is a legitimate issue for public comment.

Community engagement — OAR 660-022-0090

Counties proposing boundary expansion would hold at least two meetings in the community before a public hearing, notify affected property owners and coordinate with service providers and Tribes. This could improve local involvement, although participants may reasonably ask how county officials must address objections raised during those meetings.

Within Douglas County, the state's own inventory identifies several Douglas County communities by type:

Urban unincorporated communities	Rural communities
Glide	Tiller
Green	Camas Valley
Dillard	Lookingglass
Gardiner	Melrose
Winchester Bay	Days Creek
Shady	Azalea

Examples from the state inventory included in the April 2026 LCDC materials; not a determination that any particular community qualifies to expand. A few specific questions arise for these communities:

For **Glide**, additional housing would need to be evaluated alongside wildfire exposure, emergency evacuation and North Umpqua-area infrastructure.

For **Green and Dillard**, the issue includes how additional development would interact with nearby incorporated cities, existing service districts and urban growth boundaries.

For **Tiller, Camas Valley and Lookingglass**, an important preliminary question is whether community size, utilities and other eligibility criteria would permit expansion at all, and if so, whether those communities could realistically support additional growth.

I would hope that you receive plenty of comments from folks in these specific communities that will be directly impacted. There are no community-by-community eligibility determinations in the state rulemaking materials, and IU'm not certain if such analyses have been conducted. Consequently, it would be premature to claim that any of these communities can already expand under the proposal.

The final rules are in need of stronger safeguards & more precise implementation requirements. I recognize the need for additional housing in Oregon. I also recognize the importance of Oregon's longstanding land-use planning program in protecting agricultural & forestlands & promoting orderly, cost-effective development. The proposed rules offer potential benefits, but they also raise important questions about infrastructure capacity, public costs, housing affordability, natural hazards, & local decision-making.

Potential benefits

The proposal could provide greater flexibility for counties to accommodate housing where local demand exists & adequate infrastructure can be provided. It could encourage a broader mix of housing types, including smaller homes, accessory dwelling units, duplexes, manufactured homes, & multifamily housing. These opportunities could benefit rural workers, young families, older residents, & people seeking housing near their places of employment. Additional housing could also support local businesses, construction employment, & county tax revenues. I appreciate that the proposal preserves county discretion rather than requiring communities to expand.

Concerns & Improvements

1. Infrastructure capacity & financial responsibility — OAR 660-022-0050 & 0080

Before approving community boundary expansions, counties should be required 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 the financial impacts on existing residents & utility customers.

The rules should clearly distinguish between anticipated future infrastructure improvements & improvements for which funding & service capacity are reasonably assured.

2. Protection of agricultural & forestlands — OAR 660-022-0060 & 0065

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. The proposed priorities for avoiding important soils & wildlife habitats are constructive, but LCDC should clarify how counties will evaluate cumulative impacts on surrounding farm & forest operations.

3. Wildfire, flooding, & public safety — OAR 660-022-0050 & 0055

Additional housing in rural Oregon may increase exposure to wildfire, flooding, & other natural hazards. The rules should require an 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 — OAR 660-022-0050

Although greater housing density can create opportunities for lower-cost homes, additional development does not necessarily result in affordable housing. The rules should require counties to demonstrate the relationship between proposed housing development & the documented needs & incomes of residents & workers in the surrounding area.

I also encourage LCDC to retain flexibility in the proposed housing mix standards so that rural communities are not required to adopt uniform development patterns that may be inappropriate for local circumstances.

5. Local involvement & accountability — OAR 660-022-0090

I support the proposed additional public meetings & notification requirements. However, meaningful public participation should include more than the opportunity to testify. Counties should be required to prepare written findings explaining how public comments, service-provider concerns, & alternatives were considered before making final decisions. Federal NEPA regs call for “scoping” at the front end to identify issues, alternatives & potential mitigation of adverse impacts. Written scoping reports summarize the public comment. After a draft environmental impact statements are released, comments are numbered, tracked & responded to in the Final EISs. Your final rules should also.

6. Fiscal impacts on counties & special districts

I encourage LCDC to strengthen its assessment of the costs that additional housing could impose on counties, schools, utilities, & emergency service districts. New development may increase property tax revenues, but those revenues will not necessarily cover the costs of providing additional services.

The final rules should provide greater clarity about responsibility for infrastructure improvements & whether adequate financing must be demonstrated before approving expansion.

Conclusion

The proposed rules present opportunities to address legitimate rural housing needs while preserving local discretion. Their practical consequences, however, will depend on the adequacy of infrastructure, protection of natural resources, public safety, & the financial sustainability of new development. LCDC needs to carefully consider these benefits & concerns, strengthen the proposed safeguards where appropriate, & provide clearer implementation standards before final adoption. Oregon should be able to increase rural housing opportunities without compromising the long-term viability of its existing communities, working lands, or public services. Thank you for considering these comments.

Respectfully,

Joe Ross

Roseburg, Oregon

From:	TAYLOR Casaria * DLCD
To:	JOHNSON Denise * DLCD; WILLIAMSON Angela * DLCD; MASON Palmer * DLCD; JININGS Jon * DLCD; AMAN Leila * DLCD; GREENE Kirstin * DLCD
Subject:	FW: Comments on Proposed Rule - Housing in Unincorporated Areas
Date:	Wednesday, November 18, 2026 12:59:05 PM
Attachments:	LCDC Consolidated COMMENTS Housing in Unicorporated Areas.doc image003.png

Public comment received and acknowledged.

Casaria Taylor Hear my name
Senior Rules Coordinator/Records Officer | Policy Office
Pronouns: She/Her
Cell: 971-600-7699 | Main: 503-373-0050
casaria.taylor@dlcd.oregon.gov | www.oregon.gov/LCD

From: Joe Ross <rossjoe@hotmail.com>
Sent: Wednesday, November 18, 2026 12:05 PM
To: TAYLOR Casaria * DLCD <casaria.taylor@dlcd.oregon.gov>
Subject: Comments on Proposed Rule - Housing in Unincorporated Areas

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Hello Ms. Taylor,
Pls add these attached comments to your public record for these proposed rules. I hope that LCDC's consideration of public comments will result in some significant strengthening of the final rules.
Thank you.
Joe Ross
Friends of Douglas County
Roseburg, Oregon