

Unmaking the rules that hold back urban sprawl.

A community briefing on LCDC's
"Housing in Unincorporated Communities" rule making.

Robert Liberty
September 24, 2026

Presented during Harvest at the Hut



The Bottom Line

In a few months, the Oregon Land Conservation and Development Commission may grant counties new powers to rezone land in hundreds of rural communities across Oregon, to allow urban types of housing, light industrial manufacturing and commercial development.

Those communities include Mt. Hood, Oak Grove, Odell, Parkdale, Pine Grove, Rockford, Van Horn and Windmaster Corner.

Your help is needed now to stop this mistake.

Acronyms & Terminology



LCDC

is the Oregon Land Conservation and Development Commission.



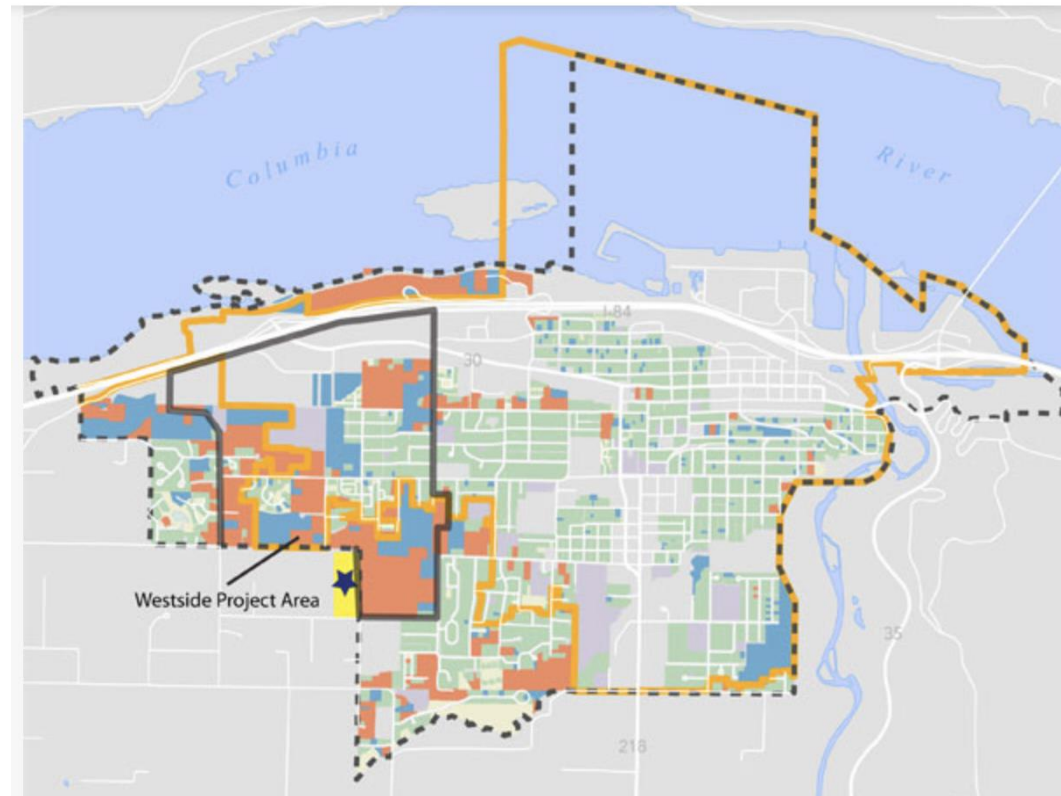
DLCD

is the Oregon Department of Land Conservation and Development, which is the staff for LCDC.



UGB

stands for urban growth boundaries.



OAR or Rules

means Oregon Administrative Rules, adopted by LCDRC, which refine and implement statewide land use planning goals and state statutes.

DIVISION 22

UNINCORPORATED COMMUNITIES

660-022-0000	Purpose
660-022-0010	Definitions
660-022-0020	Designation of Community Areas
660-022-0030	Planning and Zoning of Unincorporated Communities
660-022-0040	Urban Unincorporated Communities
660-022-0050	Community Public Facility Plans
660-022-0060	Coordination and Citizen Involvement
660-022-0070	Applicability

RAC

is the Rules Advisory Committee, appointed by LCDC to advise it on amendments to the OARs for Housing in Unincorporated Communities.



City

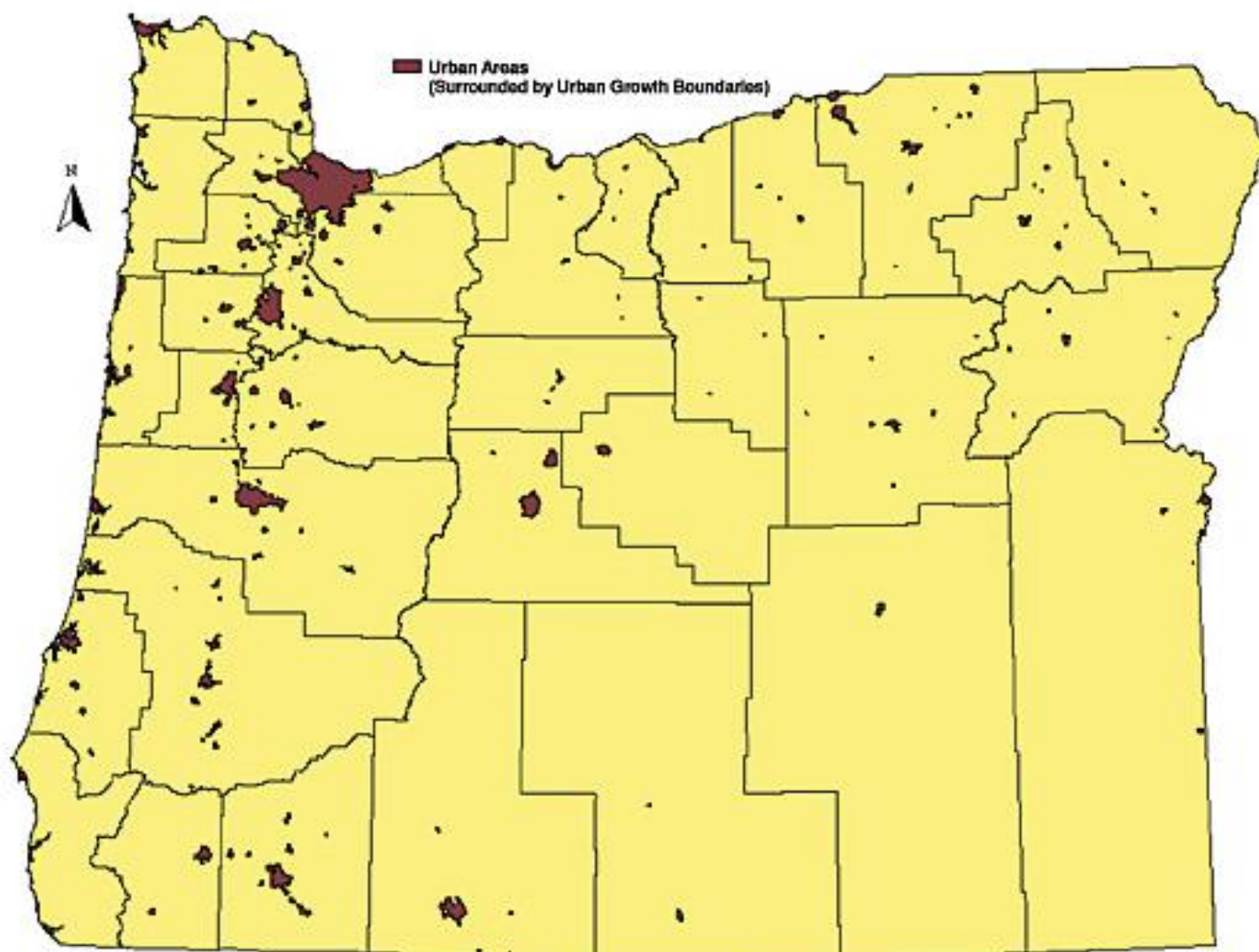
is a technical term. It means an incorporated community, that has its own elected government, regardless of size. Oregon has 241 cities.



The Oregon Way



Oregon Urban Growth Boundaries



Data are from the DLCD zoning and land use coverage based on County comprehensive plans from 1986 to 1987. This coverage generalizes zoning categories so some area may not appear with the expected classification. Zoning changes since the creation of this coverage are not included.

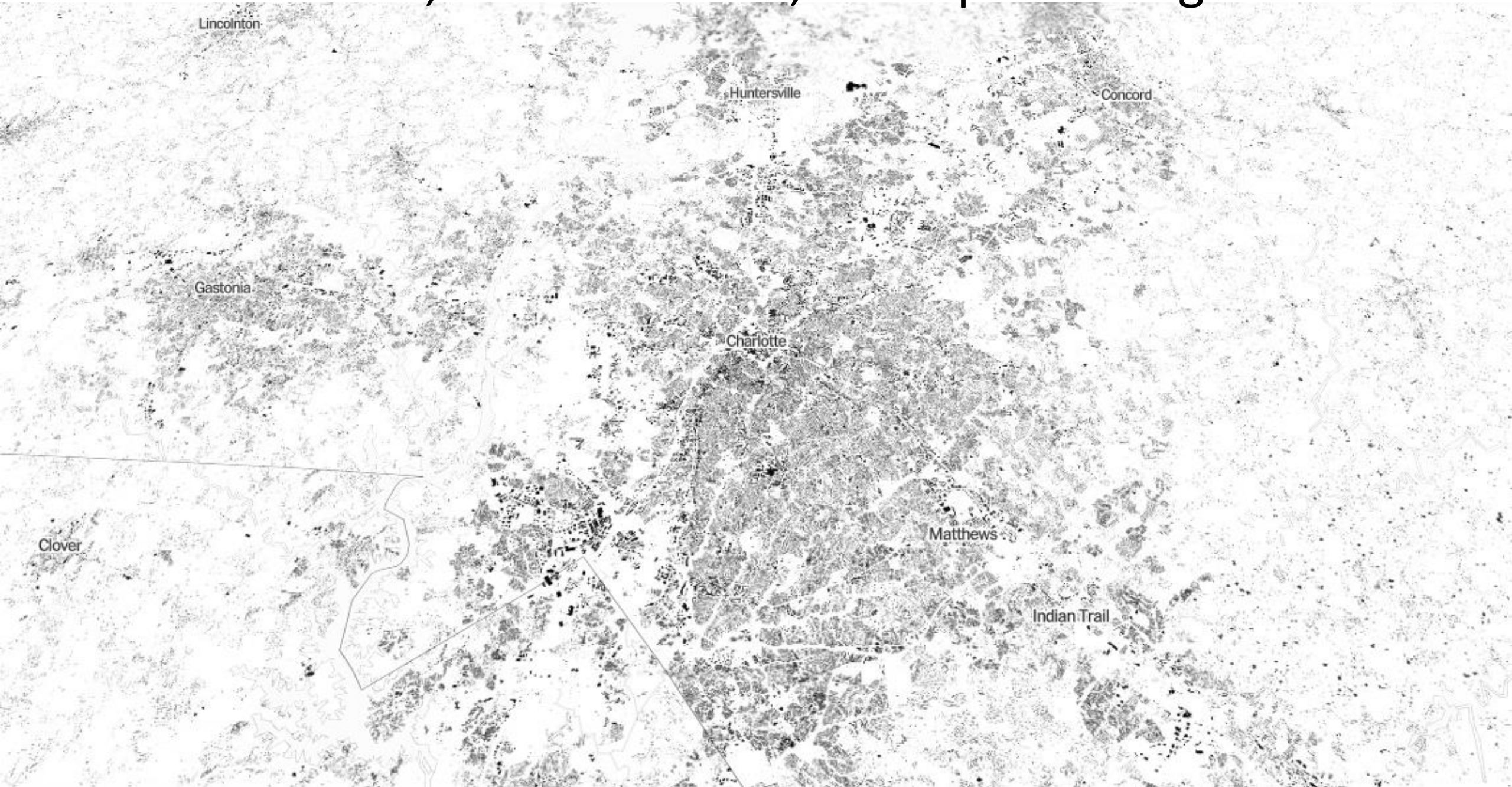


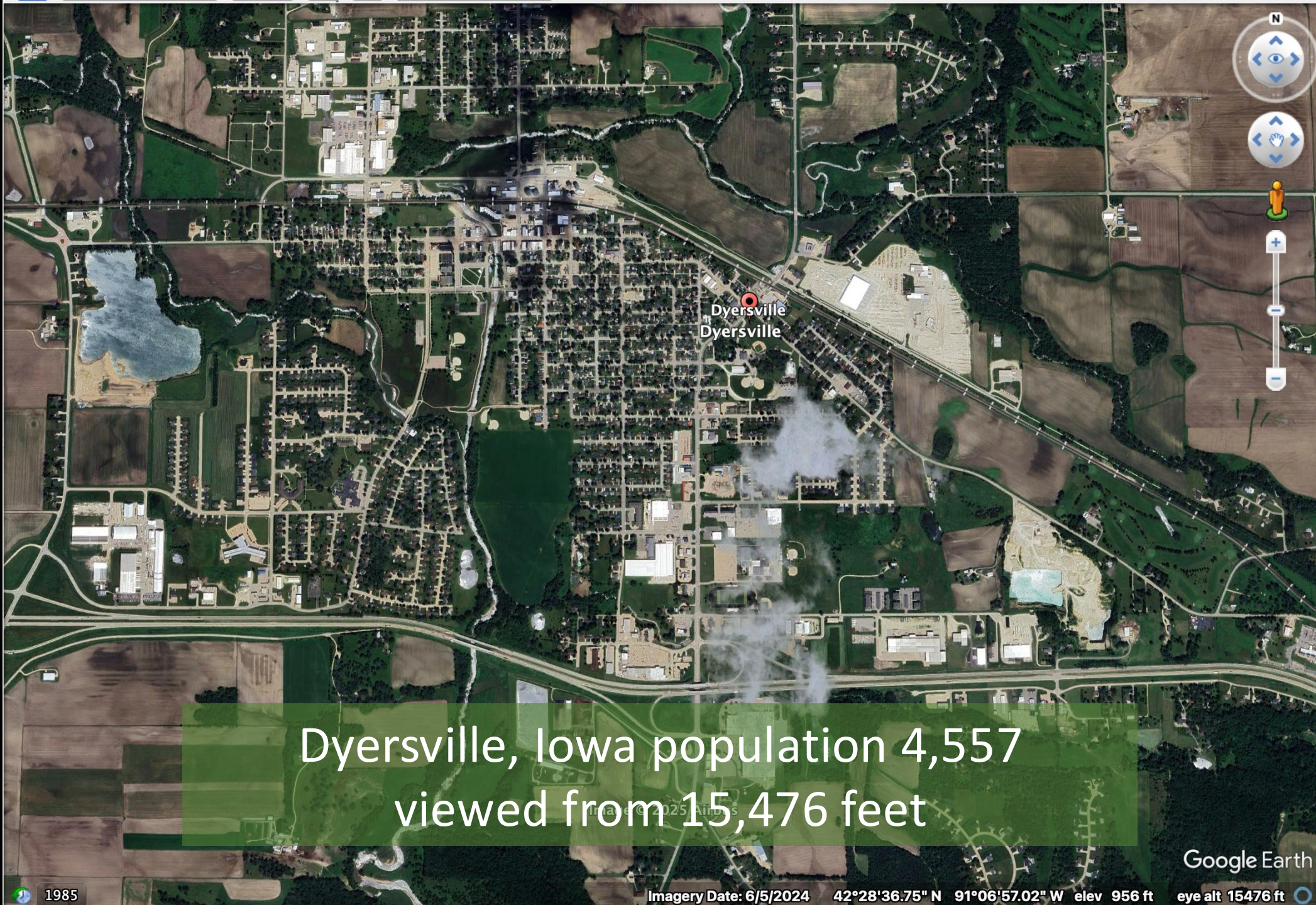
Portland, Oregon metropolitan region.



NY Times published this “figure ground+ a– map showing buildings, without respect to zoning: Oregon UGBs visible/

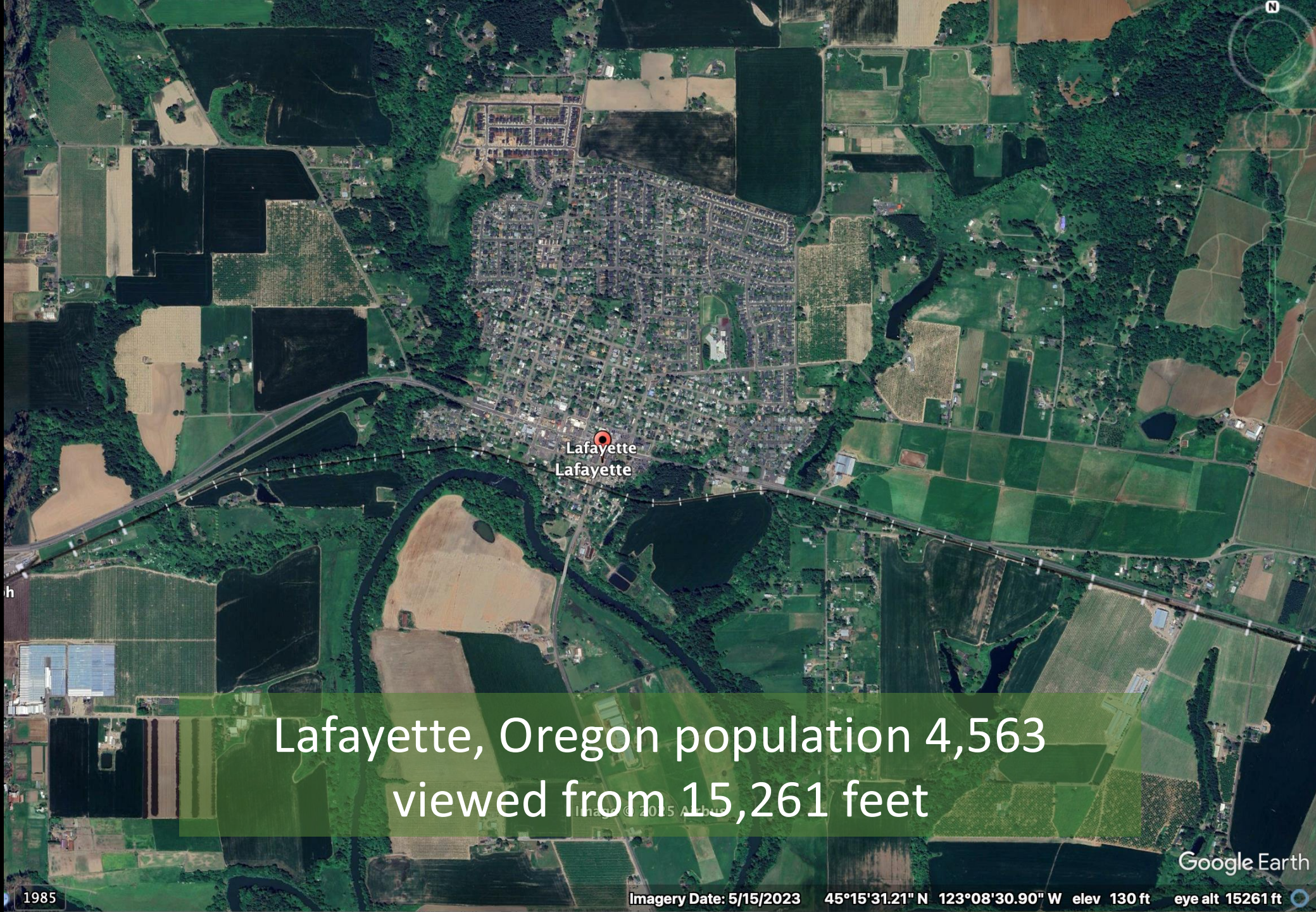
Charlotte, North Carolina, metropolitan region.





Dyersville, Iowa population 4,557
viewed from 15,476 feet

Google Earth



Lafayette, Oregon population 4,563
viewed from 15,261 feet

1985

Imagery Date: 5/15/2023

45°15'31.21" N 123°08'30.90" W elev 130 ft

eye alt 15261 ft

Google Earth

**LCDC's Proposal for Changing the Land Use Rules to
Give Counties the Power to Allow Urban Sprawl In
Hundreds of Rural Communities Across Oregon**



Oregon

Tina Kotek, Governor

Department of Land Conservation and Development

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: 503-373-0050

www.oregon.gov/LCD

April 9, 2026

To: Land Conservation and Development Commission

From: Brenda Ortigoza Bateman, Ph.D., Director
Palmer Mason, Interagency Policy Coordinator
Jon Jinings, Community Services Specialist



Subject: **Agenda Item 5, April 23-24, 2026, LCDC Meeting**

Rulemaking: Housing in Unincorporated Areas Initiation

Excerpt from April 9, 2026 DLCD Staff Report to LCDC

I. Agenda Item Summary

Department of Land Conservation and Development . . . staff requests that the Land Conservation and Development Commission . . . initiate a rulemaking **focused on housing opportunities in unincorporated communities..**

Excerpt from April 9, 2026 DLCD Staff Report to LCDC

II. Background

a. Policy Framework

Over the next 20 years, **Oregon needs to produce almost half a million homes to meet housing needs across the state.**

State agencies are looking over every possible pathway to meet that need.

Excerpt from April 9, 2026 DLCD Staff Report to LCDC

RAC members are charged with advising DLCD staff on revisions to Oregon Administrative Rules for LCDC consideration that:

- Provide a voluntary option whereby **counties may increase housing opportunities within existing urban** unincorporated **communities and other unincorporated communities** with appropriate characteristics

Excerpt from April 9, 2026 DLCD Staff Report to LCDC

- **Require** participating counties to plan and zone for community needs to support these areas, including *but not limited to*, appropriate **commercial and light industrial uses**, transportation, public safety, **public facilities and urban services**, which may also be provided by special districts

What might be “appropriate” commercial uses for rural communities in Hood River County?

- STRs
- Motels
- Hotels
- Restaurants
- Gift shops
- Convenience stores
- Strip commercial development.

What might be “appropriate” light industrial uses for rural communities in Hood River County?

- Amazon warehouse distribution centers
- Data centers
- Sheet metal fabrication
- Construction equipment storage and staging areas

The Rules Advisory Committee

Samantha Bayer, Oregon Homebuilders Association

McRae Carmichael, Mid-Willamette Valley Council of Governments

Matt Cyrus, Oregon Farm Bureau

Tabitha Eck, McKenzie Community Land Trust

Briece Edwards, Confederated Tribes of Grand Ronde

Kim Gammond, Habitat for Humanity of La Pine/Sunriver

Dave Hunnicutt, Oregon Property Owners Association

Gail Henrikson, Clatsop County

Mark Landauer, Special Districts Association of Oregon

Michael Martin, League of Oregon Cities

Marcus Luke, Confederated Tribes of Umatilla Indian Reservation

Mary Kyle McCurdy, 1000 Friends of Oregon

Daryn Murphy, North Development Group

Brock Nation, Oregon REALTORS®

Kevin Porter, Polk Soil and Water Conservation District

Branden Pursinger, Association of Oregon Counties

Brandon Reich, Marion County

Megan Tuck, Central Oregon Intergovernmental Council

Eric Walker, Hood River County

What does
Odell have to
do with this
RAC?



Presentation by Hood River County Planning Director Eric Walker on September 11, 2026

You can watch on DLCD YouTube Channel: <https://www.youtube.com/watch?v=TnL5iWbEukk>

Timeline for LCDC Action

- October 12 release of draft rule amendments & RAC meeting.
- October 22-23 LCDC meeting (this item not on their agenda, but you can testify during the general testimony agenda item)
- Single public hearing before LCDC at its December 3-4 meeting.
- Final RAC meeting in December.
- LCDC adoption at its February 2027 meeting.

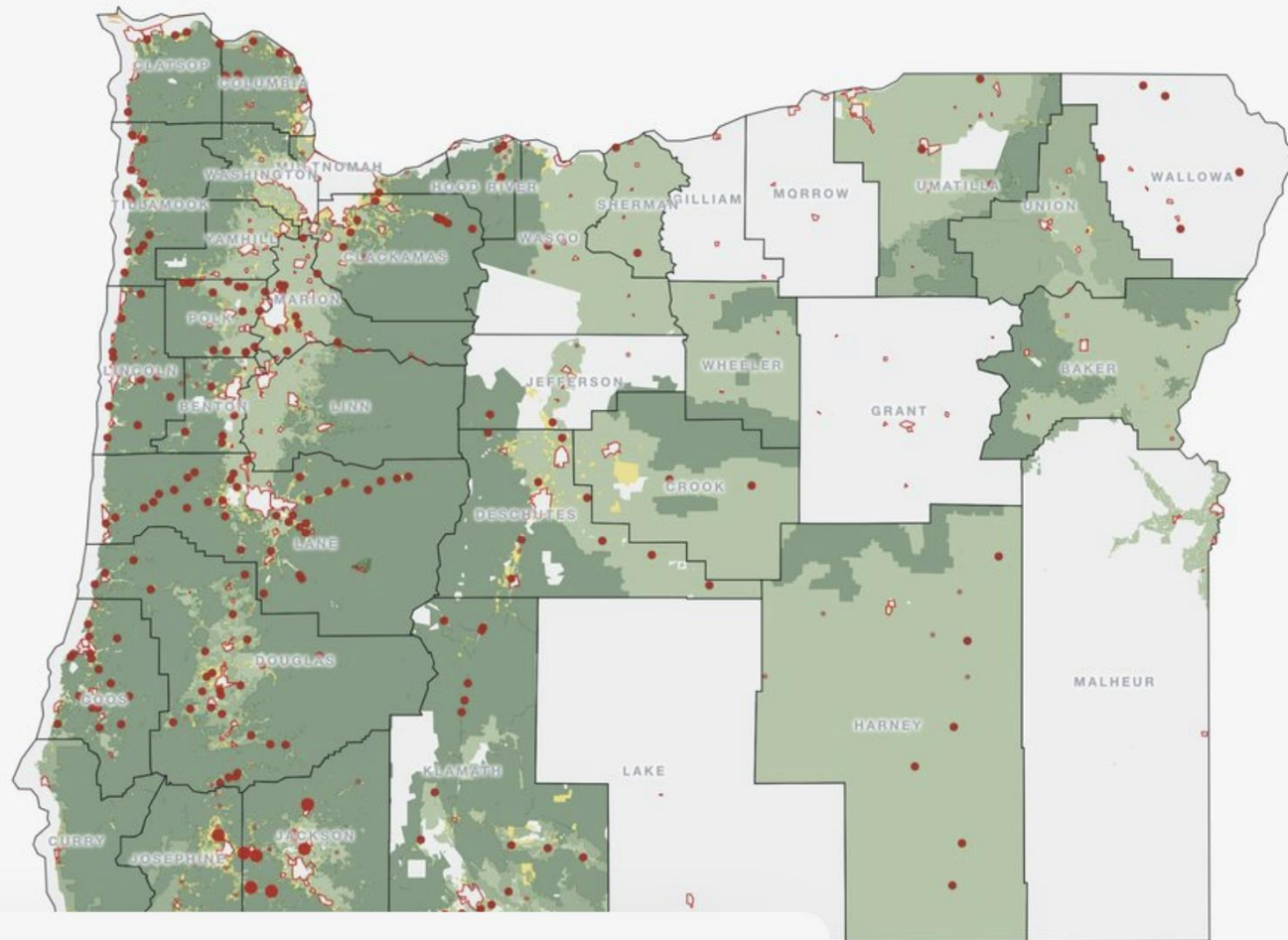
Some basic questions.

How many “unincorporated communities” are there and where are they?

Good question.

DLCD can't answer that question.

DLCD *2014* inventory of **269** unincorporated communities from only 24 out of 36 counties. There are probably more than 300...



STATEWIDE · ACT BEFORE THE RULES ARE WRITTEN

Oregon's Unincorporated Communities

Map produced for
Protect Rural
Oregon –
representing a best
guess of the
location of
communities that
could be affected by
the rule-making.

The Fundamental Question:

What evidence is there that rezoning rural communities is needed in order to have sites for 500,000 new homes over the next 20 years?

By law there must be a rolling 14–20 year supply of land, combined with the capacity for redevelopment, to meet the need for new housing (and jobs) inside UGBs.

2019 legislation allowed at least 2 houses on every single-family lot inside urban growth boundaries of cities with populations of more than 2,500.

Multiplexes, townhomes, and cottage clusters on single-family lots in cities with populations over 25,000. LCDC was charged with overseeing its implementation.

That is the zoning capacity for **more than 1 million new homes, on existing lots.**

So....what is the capacity for additional housing in urban growth boundaries now?

Good question.

DLCD has no answer, even though it has the statutory responsibility for assuring that cities meet the requirements of those laws and has 16 staff members working on housing matters and another working on UGBs.

In 2024 the **city of Portland** determined it **has the capacity for 237,000 new homes**, 47% of the state's total need even though Portland is only 16% of Oregon's population.

Are you a bit skeptical this is possible?

Two four-plexes being built on two 4,800 square foot lots, quadrupling the number of homes on the same already developed land area. This is 12 blocks from our home.

2020 SE 34th Street, Portland
Photo: August 21, 2026





Meadowlark Place affordable housing redevelopment replacing 70 affordable units with 166 units in a single-family neighborhood, ten blocks from our home.



Hazel Ying Lee Apartments; 204 income-restricted affordable apartments on two acres, eight blocks from our home.

What is the capacity for additional housing in the hundreds of “unincorporated communities” under current zoning and infrastructure?

Good question.

DLCD has no answer.

What about Odell?

- Sewer Capacity = ~1,000 Additional Equivalent Dwelling Units
- Water Capacity = ~800 Additional Equivalent Dwelling Units

Presentation to HUC RAC by Hood River County Planning Director Eric Walker on September 11, 2026

How much additional housing can be built
outside UGBs under existing zoning, to help
meet the state's 500,000 homes goal?

Good question.

DLCD didn't check.

- Approximately 700,000 acres (1,100 square miles) of Rural Residential zoned land.
- ADUs allowed in rural residential zones.
- Urban housing is already allowed in “Urban unincorporated communities.”
- Farmworker housing already authorized in Exclusive Farm Use zones.
- New homes built in Exclusive Farm Use and Forest Zones.

Deschutes County

2024 Rural Housing Profile



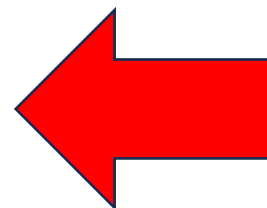
Rendering: Simpson Community



Prepared by:
Deschutes County
Community Development Department
www.deschutes.org/cd

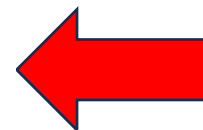
December 2024

Table 8, Resort Areas	Vacant Lots in 2024
Destination Resorts	
Caldera Springs (*includes Phase 2)	* 198
Eagle Crest	70
Pronghorn/Juniper Preserve	261
Tetherow	74
Resort Communities	
Black Butte	16
Inn of the 7th Mountain/Widgi Creek	3
Urban Unincorporated Area	
Sunriver	92
Total Vacancies, Resort Areas	714



approximately 8,600 prop
gible for an ADU utilizin
seline criteria,..."

Table 9, Rural Residential Areas		Vacant Lots in 2024
Rural Residential Zones		
Rural Residential		2121
Multiple Use Agriculture		433
Suburban Low Density Rural Residential		23
Urban Area Reserve		131
West Side Transect		90
Rural Communities ¹⁰		
Tumalo (TUR/TUR5)		27
Terrebonne (TER/TER5)		119
Total Vacancies, Rural Residential Areas		2944



ential additional rural houses: 12,258

Deschutes County
2024 Rural Housing Profile



Rendering: Simpson Community



Prepared by:
Deschutes County
Community Development Department
www.deschutes.org/cd

December 2024

“Approximately 8,600 properties are potentially eligible for an ADU utilizing the required baseline criteria,...”

Potential additional rural houses under existing zoning:
12,258

Between 1983 and 2021 more than **33,918 new houses** were approved in Farm, mixed Farm/Forest & Forest Zones.



11011 NE Finn Hill Loop photo by Nathan Labunski



Will new housing built in rural communities be affordable by ordinary Oregonians?

Median household income in Oregon is \$83,000, which means the most an average family could pay for rent or for house payments is about \$2,100 a month, maybe enough for a \$300,000 home

Good question.

DLCD hasn't considered it, even though they have 16 people on staff working on housing issues.

Table 11, 12-Month Average Sale Prices in Rural Residential Areas

Bend Unincorporated	Average price
392 Homes	\$1,259,299
34 Manufactured Homes	\$500,135
Redmond Unincorporated	Average price
233 Homes	\$744,715
14 Manufactured Homes	\$480,571
Sisters Unincorporated	Average price
84 Homes	\$1,126,216
8 Manufactured Homes	\$447,688
La Pine Unincorporated	Average price
124 Homes	\$508,405
111 Manufactured Homes	\$345,790
Between Tumalo & Sisters	Average price
47 Homes	\$1,553,516
3 Manufactured Homes	\$681,333
Three Rivers South	Average price
138 Homes	\$1,060,348
30 Manufactured Homes	\$406,298

Washington County



1,960 square foot home on 50 acres in exclusive farm use zone acquired for \$1,035,000.

Demolished in 2022 to make way for a replacement dwelling

Washington County



The replacement dwelling of 7,300 square feet listed for sale at \$5,275,000.

“Offers a rare opportunity to experience the pinnacle of refined living amidst the beauty of nature.”

Washington County



2,200 square foot home on 72 acres in exclusive forest conservation use zone.

Sold for \$790,000.

Washington County



Listed for sale for \$4,500,000

“This estate is a dream come true – custom home will take your breath away – 6,200 square foot blimp hangar with a workshop and full bar!

Deschutes County



Former owner's manufactured home on 123 acres in an Exclusive Farm Use zone was replaced with 8,358 square foot home =with 10 car garage and 65,000 square foot indoor arena and sold for \$12,000,000 in 2020.

Wallowa County



235 acres in Exclusive Farm Use Zone sold for \$788,183 in 2006.

New replacement dwelling of 17,088 square feet was listed for sale at \$13.8 million.

Yamhill County Exclusive Farm Use Zone



26,000 square foot Italian-style villa
approved as a “farm dwelling” by Yamhill County.
Now used as a boutique hotel as a “home occupation” by
someone who doesn’t live in the home.

DelMar Villa “Home Occupation”

- Vacation rental rates vary from \$1,995-\$5,595+ per night
- Accommodates 30 overnight guests for 3-day minimum stay

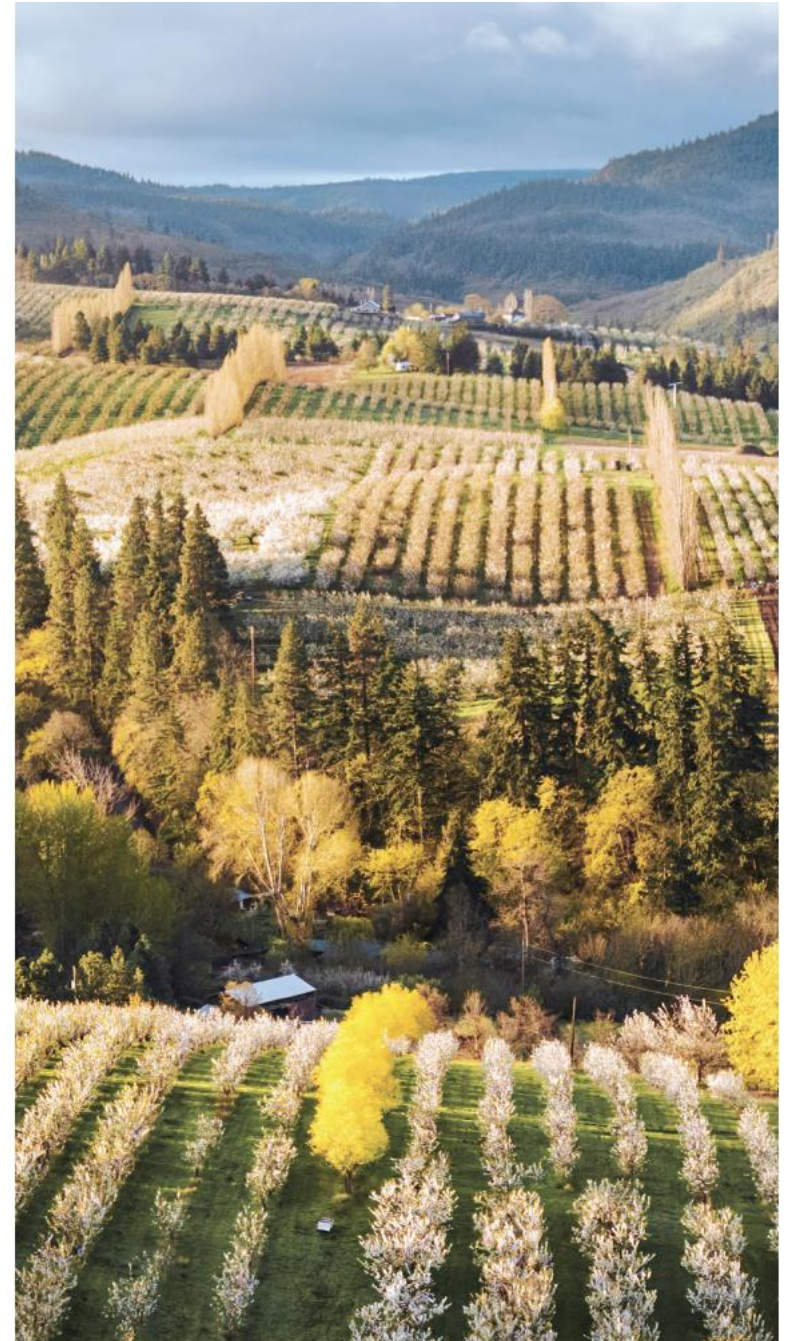


So what is the evidence counties need to rezone rural communities in order to provide housing Oregonians need and can afford?

There is no evidence of need, just greed.

Some other basic questions.

LCDC is likely to change the rules to allow unincorporated communities to expand, so before making that change, it would be good to know whether the surrounding lands are productive farm, ranch or forestlands.



Good question.

DLCD has those maps but never checked them.

How many
unincorporated
communities are
at high risk for
coastal erosion,
wildfires or
flooding?



Good question.

DLCD has 5 staff members on natural hazards, plus GIS specialists, and has some of those maps, but apparently never consulted them.

7/1/22 TO 6/30/23 REAL PROPERTY TAX STATEMENT

Washington County Dept. of Assessment & Taxation * 155 N 1st Ave, Ste 130, MS8 * Hillsboro, OR 97124

Phone: (503) 846-8801

PROPERTY DESCRIPTION

1

MAP: 1S999AA9999

CODE AREA: 099.99

ACCOUNT NO: R999999

SITUS: 123 NE MAIN ST
LEGAL: BLOCK 53, LOT 6, ACRES 0.80

2

123 NE MAIN ST
ANYWHERE USA

VALUES LAST YEAR THIS YEAR

MARKET VALUES:

LAND	234,420	222,980
STRUCTURE	75,010	80,020
NET RMV	309,430	303,000

TAXABLE VALUES:

NET ASSESSED VALUE	190,670	196,390
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3

PROPERTY TAXES: \$3,346.03 \$3,495.70

Washington County's payment address has changed.
Please send payments to: 155 N. 1st Ave Ste 130 MS8
Hillsboro, OR 97124

Please do not staple or paper-clip payment to stub.

TAX PAYMENT OPTIONS

(See Insert For Additional Information)

	Pay By	Discount	Net Amount Due
In Full	Nov 15, 2022	104.87	\$3,390.83
2/3	Nov 15, 2022	46.61	\$2,283.86
1/3	Nov 15, 2022	NONE	\$1,165.24

4

PLEASE INCLUDE STUB TO AVOID DELAYED PROCESSING

2022-23 CURRENT TAX BY DISTRICT:

SCH-TIGARD/TUALATIN	960.50
COLL-PORTLAND	54.66
SCH-TIGARD/TUALATIN-AFTER	196.39
ESD-NW REGIONAL	29.73

EDUCATION TAXES: \$1,241.28

CNTY-WASHINGTON	434.36
REG-METRO SERVICE-AFTER 1/1/2013	18.85
FIRE-TV FIRE & RESCUE-AFTER 1/1/2013	88.38
CNTY-WASHINGTON-AFTER 1/1/2013	125.69
SWC-TUALATIN	16.52
REG-METRO SERVICE	18.68
PORT-PORTLAND	13.55
FIRE-TV FIRE & RESCUE	294.64
CITY-TIGARD	485.48
UR-TIGARD-DOT	41.95
CITY-TIGARD-AFTER	56.95
AQUATIC-TIGARD TUALATIN	17.34
LID-METZGER PARK	26.39

5

GENERAL GOVERNMENT TAXES: \$1,638.78

SCH-TIGARD/TUALATIN-AFTER	353.66
FIRE-TV FIRE & RESCUE-AFTER	27.79
CNTY-WASHINGTON-AFTER	13.24
CITY-TIGARD-AFTER	64.93
REG-METRO SERVICE-AFTER	78.05
COLL-PORTLAND-AFTER	77.97

BONDS AND MISC TAXES: \$615.64

2022-23 LEVIED TAX: \$3,495.70
(Before Discount)

DELINQUENT TAXES: \$0.00

6

TOTAL DUE: \$3,390.83
(After Discount)

7

↑ Tear Here

PLEASE DETACH STUB AND RETURN WITH PAYMENT. RETAIN TOP PORTION FOR YOUR RECORDS. SEE BACK OF STATEMENT FOR INSTRUCTIONS.

Tear Here ↑

WASHINGTON COUNTY, OREGON

2022-2023 Property Tax Payment Stub

ACCOUNT NO: R999999

Good question.

DLCD is not considering it.

How much will the additional roads and road repairs, sewers, water lines, school buses, emergency services and for the maintenance and operations of that new infrastructure and services cost and who will pay for them?

Hood River County Oregon



BUDGET 2026/2027

Good question.

DLCDC has not asked or answered it.

My conclusion:

It's a bad idea.

You can do something about it!

- Testify for just 1 minute before LCDC at its next meeting, October 22 or 23.
- Ask LCDC and Governor Kotek to terminate the rule-making, not fix it, end it, and copy your communication to your state legislators.
- Post information about what is happening on your social media.
- Send a letter to the editor.
- Let Protect Rural Oregon know about potential allies (organizations and people) around Oregon who can join the fight.

Governor Tina Kotek, Governor.Kotek@Oregon.gov

Geoff Huntington, Senior Natural Resources, Climate and Energy
Advisor to Gov. Kotek geoff.huntington@Oregon.gov

Allan Lazo LCDC Chair and Metro area rep. retired housing
advocate allan.lazo@dlcd.oregon.gov

Mark Bennett LCDC member liaison and Eastern Oregon rep
rancher mark.bennett@dlcd.oregon.gov

State Rep. Jeff Helfrich Rep.JeffHelfrich@oregonlegislature.gov

State Sen. Christine Drazan Sen.ChristineDrazan@oregonlegislature.gov

*Heroes are not statues
framed against a red sky.
They are people who say,
“This is my community”
and it’s my responsibility
to make it better.”*

Tom McCall



Unmaking the rules that hold back urban sprawl.

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