



Oregon

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Jennifer Siciliano, City Planner
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Subject: Comments on:

(1) PAPA DLCD File No. 001-25 Annexation of three (3) parcels 1) 9164 Golf Club Rd SE, Aumsville, OR, 2) 9384 Golf Club Rd SE, Aumsville, OR (part of parcel to be partitioned), 3) 9474 Golf Club Rd SE, Aumsville, OR (part of parcel to be partitioned) and change zoning from Urban Transitional (UT) to Medium Density (MD) Residential zone - change is consistent with the Comprehensive Plan.

(2) PAPA DLCD File No. 001-26 Annexation with zoning change to Medium Density (MD) Residential from Marion Co. Urban Transitional (UT) consistent with Comprehensive Plan for one parcel Map Tax Lot 091W03B001500; and

(3) PAPA DLCD File No. 002-26 for a Zoning change from Marion Co. Urban Transitional (UT) to City of Stayton High Density (HD) Residential consistent with Comprehensive Plan for one parcel Map Tax Lot 091W04C001901;

Dear Ms. Siciliano,

Thank you for the opportunity to comment on the above-referenced applications. We have reviewed the materials submitted and would like to submit the following comments for the record:

The above-referenced Post-acknowledgment Plan Amendments (PAPAs) all concern the application of urban zoning to properties that will be zoned for residential development. As such, we have consolidated our general comments that are applicable to all three PAPAs that are similar in nature. Specifically, none of the above-referenced PAPAs have staff reports uploaded to the record; however, for PAPA No. 001-26, Department of Land Conservation and Development (DLCD) staff were able to find a Planning Commission staff recommendation on the city's website dated November 13, 2025, that contained the following findings and condition:

*“**Analysis:** The City has a limited number of residential units needed based on the Buildable Lands Inventory (BLI), which assumes a growth rate higher than what has actually occurred. Under these projections, the number of multifamily units allowed in the MD zone would exceed the number needed in the City. If the property were*

*annexed with a Low Density (LD) Residential zoning designation, it would be less likely to exceed the projected need for single-family homes identified in the BLI. **Condition:** The annexation application should be approved with a Low Density (LD) Residential zoning designation to better meet the housing needs of the community.”*

We want to highlight a few concerns regarding the staff recommendation to reduce the residential density zoning designation for the urbanizing lands associated with these PAPAs.

In the 2023 legislative session, [House Bills 2001](#) and [2889](#) codified the Oregon Housing Needs Analysis (OHNA), a statewide methodology for allocating housing need to each local government in the state. Pursuant to Oregon Revised Statute (ORS) 184.453, Oregon’s Department of Administrative Services (DAS) updates the methodology publishes the allocation of housing need for each local government annually. According to [DAS’ January 1, 2026 publication](#) (the most current), the city of Stayton received the following allocation of housing need (refer to page 67):

Willamette Valley UGBs	Results	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Stayton UGB	1 year	68	22	14	7	10	15
	20 year	1,070	278	208	115	174	295

With the codification of the OHNA into state housing law, the Oregon Legislature updated the definition of “Needed Housing” under ORS 197A.018. The amended statute includes clear requirement for local governments to utilize the state allocation of housing need from the OHNA rather than using local population estimates. ORS 197A.018 states:

(1)(a) “Needed housing” means housing by affordability level, as described in ORS 184.453 (4), type, characteristics and location that is necessary to accommodate the city’s allocated housing need over the 20-year planning period in effect when the city’s housing capacity is determined.

In the Department’s understanding, the city is relying on a population projection that was adopted for the 2010-2030 planning horizon in developing findings related to the proposal. The department encourages the city to recognize and incorporate the most up to date information available about the city’s housing needs published by DAS in their recommendation on the proposal. This not only provides a more accurate description of the city’s housing needs but also better aligns with the expressed housing planning policies of the state.

Additionally, the department notes that the findings included in the staff recommendation also appear to contradict the city’s comprehensive plan, particularly as it relates to the city’s housing goal within Chapter 6 and the residential purpose within the Land Use Chapter 8:

Chapter 6: “EXISTING AND FUTURE RESIDENTS WILL BE PROVIDED A CHOICE OF HOUSING TYPES IN SAFE AND HEALTHFUL HOUSING”

Chapter 8: “To provide areas for residential development. The Residential area may be further divided into zones that provide for single family residences only, allow mix of single family, duplex and triplex development, and provide adequate opportunities for higher density multifamily development. The overall goal for residential development shall be to provide a mix of housing opportunities in the City and provide an overall gross density of residential development of approximately 6 units per acre.”

Despite this language, and the city having received an application that would allow medium and high-density residential development (which would provide a needed mix of housing as specified in the Stayton comprehensive plan), the city’s recommendation appears to propose low density residential zoning. The acknowledged comprehensive plan housing goals outlined in Chapter 6 require existing and future residents be provided a choice of housing types in safe and healthful housing. The comprehensive plan language also includes a definition of the residential land use designation to “provide for single family residences only, allow mix of single family, duplex and triplex development, and provide adequate opportunities for higher density multifamily development”.

For each of these PAPAs we recommend that the city address the zone change’s consistency with applicable sections of the Comprehensive Plan that call for a mix of housing types and opportunities for higher density housing, as well as consider the application of needed housing as required by ORS 197.018.

Please feel free to contact me at 503-930-9739 or melissa.ahrens@dlcd.oregon.gov if you have any questions.

Sincerely,



Melissa Ahrens
Regional Representative
DLCD

cc: Gordon Howard
Ethan Stuckmayer