



**CITY OF STAYTON**  
**M E M O R A N D U M**

**TO: Planning Commission**  
**FROM: Jennifer Siciliano, Community and Economic Development**  
**DATE: April 16, 2026**  
**SUBJECT: Virtual Meeting with DLCD March 26, 2026**

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**Summary of Virtual Meeting with DLCD – March 26, 2026**

I participated in a virtual meeting with staff from the Oregon Department of Land Conservation and Development, including Sean Edging, Jena Hughes, Ethan Stuckmayer, Josh LeBombard, and Melissa Ahrens to discuss how the City should approach housing need and zoning decisions in light of multiple pending annexation applications. The primary focus was the relationship between the City's Comprehensive Plan and the State's Housing Needs Analysis. DLCD confirmed the City may rely on its Comprehensive Plan as the legal basis for decisions, but emphasized that the State's housing needs allocations (based on income levels/AMI) reflect current law and should be incorporated into findings to strengthen the record. They noted that all residential zoning designations (LD, MD, and HD) are generally consistent with the Comprehensive Plan when the plan states Residential as a zone, and that the greatest legal risk is reducing density without clear, well-supported justification, particularly when relying on outdated data.

We also discussed the challenge of aligning housing types with affordability. DLCD acknowledged that zoning alone does not ensure affordability, but emphasized that allowing a broader mix of housing types, including higher-density and middle housing, supports overall housing availability and aligns with state policy. Staff raised concerns about the cumulative scale of proposed development and whether there is a point at which the City may limit growth. DLCD clarified that cities may not impose a cap on housing production and are expected to plan for at least the identified need, as housing development is considered a shared responsibility between the State, local governments, and the private market. With respect to infrastructure, DLCD indicated that if adopted master plans demonstrate the ability to serve growth, this generally supports approval, even if upgrades are required.

The discussion also included the role of the Housing Accountability and Production Office (HAPO), which was established under recent state legislation to support housing production and ensure compliance with state housing laws.