

**City of Bend, Oregon
Deschutes County, Oregon
Written Notice to Use the Sequential UGB Components Review Process
Under ORS 197.626(3) and OAR 660-025-0185**

Introduction

ORS 197.626(3) and OAR 660-025-0185(1) & (2) provide the framework for "sequential review" relevant to Urban Growth Boundary (UGB) amendment components. These provisions allow the City of Bend to submit the necessary deliverables for a UGB amendment separately to the Department of Land Conservation and Development (DLCD) for their review and approval one at a time and undertake a UGB amendment at the end, based on the approved deliverables.

This document is the Joint Notice of Election from the City of Bend and Deschutes County and proposes a planning period and work program as required by OAR 660-025-0185.

Findings to Support City's and County's Decision to Use Sequential Review.

A city and a county that desire to use the sequential review process must show that the following conditions under OAR 660-025-0185 have been met.

1. The City and County must concur that the final UGB amendment is likely to exceed 50 acres.

FINDING: The City of Bend, working with ECO Northwest, completed a [draft Housing Capacity Analysis](#) in 2023¹. This analysis concluded that the City would have a deficit of 240 to 700 acres of land to accommodate the 20,218 units of needed housing identified at the time of the study, based on scenarios with different proportions of middle and multi-unit housing. This land need estimate for housing could be greater given the Oregon Housing Needs Analysis (OHNA) updated projection identifies 33,763 units of housing needed in Bend over the next 20 years which accounts for growth, underproduction, second homes, and units needed for the unhoused population.

¹ The draft report can be found online here - <https://www.bendoregon.gov/home/showpublisheddocument/56418/638252019592070000>. City staff presented the results to the City Council at their July 19, 2023, meeting. The Power Point Slides can be found here: https://bend.granicus.com/MetaViewer.php?view_id=9&clip_id=758&meta_id=69013. The presentation recording can be found here: https://bend.granicus.com/player/clip/758?meta_id=69011.

In addition, the City has adopted changes to its Comprehensive Plan and Zoning Map that have reduced the number of acres planned and zoned for industrial and other employment uses in the Southeast Expansion Area. In 2021, the City Council approved the Southeast Area Plan, which resulted in 38 acres of industrial land and 28.5 acres of commercial land being re-designated for other uses. The City committed through Policy 6-23 in Chapter 6, Economy, and Policies 11-103 and 11-104 of Chapter 11, Growth Management, of the Bend Comprehensive Plan to re-evaluate whether these acres of industrial and commercial land are still needed and must be replaced during an update to the City's Economic Opportunities Analysis. The City and the County find that the final UGB amendment supported by this sequential process will likely exceed 50 acres.

2. The City and County must submit written notice of election to use the sequential process in OAR 660-025-0185 to DLCD prior to submitting any component for review.

FINDING: The City of Bend adopted Resolution 3454 to use the Sequential Approval process on November 19, 2025. Deschutes County adopted Order 2025-057 on December 3, 2025, supporting use of Sequential Review. No component has yet been submitted to DLCD for review. By the signature of their authorized representatives below, the City and County jointly elect to use the sequential process in OAR 660-025-0185 to obtain approval of components needed to support an amendment to the Bend UGB.

3. The Notice of Election must propose the planning period for the amendment and include a draft work program.

FINDING: The City understands that, based on OAR 660-025-0185, DLCD will prepare a final work program following submission of this joint written notice of election. The City proposes 2029-2049 as the planning period for the potential UGB amendment. A draft work program is included as Exhibit A.

Authorized City Representative

A handwritten signature in blue ink, appearing to read "Eric King", is written over a horizontal blue line.

Eric King, City Manager
City of Bend

Authorized County Representative

A handwritten signature in blue ink, appearing to read "Nick Lelack", is written over a horizontal blue line.

Nick Lelack, County Administrator
Deschutes County