



Oregon

Tina Kotek, Governor

Department of Land Conservation and Development

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: 503-373-0050

Fax: 503-378-5518

www.oregon.gov/LCD

April 7, 2026

Eric King, City Manager
City of Bend
710 NW Wall Street
Bend, Oregon 97703



Nick Lelack, County Administrator
Deschutes County
1300 NW Wall Street
Bend, Oregon 97703

By email: eking@bendoregon.gov
admin@deschutes.org

RE: Approval of Request to Initiate Sequential UGB Process

Dear Mr. King and Mr. Lelack,

I am pleased to inform you that the Department of Land Conservation and Development (DLCD) has received and approved the City of Bend's notice of election to use the sequential UGB process. As cited in your letter, OAR 660-025-0185 is applicable. It states:

A city and a county or counties may elect to submit a component of an urban growth boundary amendment...when the city and county determine that the final urban growth boundary amendment is likely to exceed 50 acres. The local governments must submit written notice of election to use the sequential review process contained in this rule to the department prior to submittal of a component for review. The notice of election shall propose the planning period for the amendment and include a draft work program. Upon joint written notice pursuant to section (2), the department will prepare a work program consisting of tasks to complete one or more of: land need analyses, land inventories, and responses to deficiency.

The City's notice indicates that a future urban growth boundary amendment to accommodate housing and employment land needs is likely to exceed 50 acres and proposes a planning period of 2029 to 2049. DLCD has reviewed your submittal and finds that it contains the statement of local circumstances and identification of a draft work program as required by this rule. It has also been signed by Deschutes County, as required in OAR 660-025-0185.

Since receiving your notice, DLCD staff have worked with city staff to finalize a work program for the city (Attachment A). The department hereby authorizes the City of Bend to utilize the sequential UGB work program as provided in Attachment A of this letter. We look forward to working with you over the coming years to provide land for Bend's growing population in keeping with the statewide planning goals.

Please contact your regional representative, Angie Brewer, at (541) 306-8530 or angie.brewer@dlcd.oregon.gov if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Brenda D Bateman". The signature is written in a cursive style with a large, stylized 'B'.

Brenda Bateman, Ph.D.
Director

Attachments:

A. City of Bend Approved Sequential UGB Work Program

cc: Kirstin Greene, Deputy Director, DLCD
Brian T. Rankin, Senior Strategist, City of Bend
Damian Syrnyk, Senior Planner, City of Bend
Nicole Mardell, Principal Planner, Deschutes County
Angie Brewer, DLCD Regional Representative

Attachment A: City of Bend Sequential UGB Work Program – Planning Period 2029-2049

Task #	Task Name and Description	Proposed Completion dates*	Adoption/Review Body and Method
1	Land Need Analyses - Housing Capacity Analysis (HCA) and Economic Opportunities Analysis (EOA) The HCA and EOA will include buildable land inventories (BLIs) to assess the current availability of buildable lands for housing and employment uses. The HCA will determine housing needs over the 20 year planning period and housing capacity within the existing UGB in accordance with ORS 197A.270. Similarly, the EOA will determine employment land needs over the same planning period, along with the capacity for employment land needs within the existing UGB in accordance with OAR 660-009. Update appropriate comprehensive plan text, policies, and technical appendices related to adoption products.	September 30, 2027 The city plans to adopt the HCA and EOA concurrently.	For HNA, EOA, and comprehensive plan amendments: 1. Post Acknowledgement Plan Amendment to Comprehensive Plan, adoption by Bend City Council 2. Notice to DLCD and persons who participated at the local level pursuant to OAR 660-025-0140 3. DLCD Director review, along with any filed objections, within 90 days pursuant to OAR-660-025-0150 (appealable to LCDC)
2	Addressing Identified Land Needs - Land Efficiency Measures and UGB Amendment Land use efficiency measures are changes the city makes to its zoning map or development code, or other measures that increase land use efficiency within the existing UGB in order to reduce the overall UGB expansion needs. A city must consider land use efficiency measures prior to UGB expansion, per OAR 660-024-0050(3). Efficiency measures may address measures to make more efficient use of both employment and residential lands. The city will adjust identified land needs for housing and employment based on land use efficiency measures to determine the necessary size of the Urban Growth Boundary (UGB) expansion. The city will evaluate the UGB study area and utilize the land prioritization hierarchy to arrive at the appropriate location for the UGB expansion in compliance with applicable	March 31, 2029 The city will designate climate-friendly areas and implement other land use efficiency measures prior to, or concurrent with, UGB expansion.	1. Bend to file Post Acknowledgement Plan Amendment (Form 4) following implementation of efficiency measures and approval of UGB expansion by Bend City Council and Deschutes County Board of Commissioners. 2. Notice to DLCD and persons who participated at the local level pursuant to OAR 660-025-0140. 3. DLCD Director review, along with any filed objections, within 90 days pursuant to OAR-660-025-0150 (appealable to LCDC).

Attachment A: City of Bend Sequential UGB Work Program – Planning Period 2029-2049

	statewide goals, statutes, and rules, including OAR 660-024 and ORS 197A.270. Update appropriate comprehensive plan text, policies, and technical appendices related to adoption products.		
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*None of the proposed completion dates in this program are binding; they are preliminary estimates. However, For the purposes of an urban growth boundary amendment, a task approval is valid for four years. This means that if the city does not complete the UGB expansion within that time period, the expired work task would need to be updated, readopted, then acknowledged. The director may extend this period for up to one year if the local governments show good cause for the extension. The four-year period begins on the later date of:

- (a) Director approval order;
- (b) Commission final approval order; or
- (c) Completion of judicial review of the final approval order.