



For Recording Stamp Only

BEFORE THE BOARD OF COUNTY COMMISSIONERS OF DESCHUTES COUNTY, OREGON

An Order Consenting to the City of Bend
Sequential Urban Growth Boundary
Components Review Process

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ORDER NO. 2025-057

WHEREAS, State law requires cities to provide 20-year supplies of buildable land for needed housing and economic opportunities in their urban growth boundaries (UGB); and

WHEREAS, the evaluation of a UGB's capacity for both needed housing and economic opportunities must be based upon 20-year population forecasts per OAR 660-024-0040, and related analyses, including the Housing Capacity Analysis and Economic Opportunities Analysis, which must be approved by the Oregon Department of Land Conservation and Development (DLCD); and

WHEREAS, a city of more than 2,500 in population that estimates a UGB amendment of greater than 50 acres may request and coordinate with the Director of DLCD to schedule work tasks in a manner that allows DLCD to review those tasks sequentially and either approve or remand each, per ORS 197.626(3) and OAR 660-025-0185; and

WHEREAS, OAR 660-025-0185 requires the county to consent to the sequential review process and the department work plan and submit a written notice of election; and

WHEREAS, the City of Bend's current population exceeds 104,000 people, and a future UGB amendment is estimated to require land for both needed housing and economic opportunities that exceed 50 acres in size, based on the 2023 Draft Housing Capacity Analysis funded by a grant from DLCD; and

WHEREAS, the proposed work program for DLCD, attached as Exhibit A, outlines the recommended division of work tasks into packages to update the Buildable Lands Inventory, Economic Opportunities Analysis, and Housing Capacity Analysis, and obtain DLCD approval of

each document sequentially to build on each report and ultimately update the Bend Comprehensive Plan policies and adopt a UGB amendment to support Bend's growth from 2029-2049; and

WHEREAS, the Bend City Council adopted Resolution No. 3454 on November 19, 2025, opting to use the Sequential UGB process as provided in ORS 197.626(3) and OAR 660-025-0185, and proposes the draft work program attached as Exhibit A; and

WHEREAS, the City of Bend has requested that Deschutes County adopt an order consenting to the use of the Sequential UGB process and participation in a joint notice of election to DLCD; now therefore

THE BOARD OF COUNTY COMMISSIONERS OF DESCHUTES COUNTY, OREGON, HEREBY ORDERS as follows:

Section 1. Deschutes County consents to the Sequential UGB Process proposed by the City of Bend, as provided in ORS 197.626(3) and OAR 660-025-0185, and in the draft work program attached as Exhibit A.

Section 2. County staff are directed to undertake all steps necessary to implement this decision, including joint submittal of the notice of election, and participation in prescribed work plan tasks.

DATED this 3rd day of Dec., 2025.

BOARD OF COUNTY COMMISSIONERS



ANTHONY DeBONE, Chair

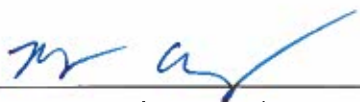


PATTI ADAIR, Vice Chair

ATTEST:



Recording Secretary



PHIL CHANG, Commissioner



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EXHIBIT A

**Proposed Work Plan and Planning Period for OAR 660-025-0185
Sequential UGB Components Review
City of Bend and Deschutes County**

Proposed Planning Period

The City is proposing 2029-2049 as the 20-year planning period for Urban Growth Boundary (UGB) assessment and amendment. The overall work program includes five Adoption Packages of which two will be electing sequential approvals. The Adoption Packages are:

- Adoption Package 1 – Contextualized Housing Needs Analysis (CHNA)
- **Adoption Package 2 – Buildable Lands Inventory (BLI), Economic Opportunities Analysis (EOA), Housing Capacity Analysis (HCA) Phase 1**
- **Adoption Package 3 – HCA Phase 2, Efficiency Measures (including designation of Climate Friendly Areas) and UGB Amendment**
- Adoption Package 4 – Housing Production Strategy (HPS)
- Adoption Package 5 – Transportation System Plan (TSP)

The items highlighted in **bold** and underlined above are detailed below in the sequential approval work program. The work to be completed under this work plan will be fully consistent with applicable rules and statutes as of January 1, 2026.

Proposed Sequential Review Work Program

1. Adoption Package 2 deliverables: BLI, OAR 660-024-0050; EOA, Oregon Revised Statute (ORS) 197.712(2); OAR Chapter 660, Division 009 and HCA Phase 1, OAR 660-008-0045, ORS 197A.270(1)-(4)

Proposed timeline (included for reference; not part of the work plan OAR 660-025-0185(2)):
Begin by 04/01/2026, adopt and submit to DLCD for approval by 09/30/27

a. City

- BLI - Complete appropriate modeling analysis to determine available land in a combined residential and employment lands inventory.
 - The residential lands BLI will include a development-ready lands inventory, as required by the forthcoming Oregon Housing Needs Analysis (OHNA) rules at OAR 660-008-0180.



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- EOA - Identify the City's need for employment land and sites in alignment with adopted 2025 Target Sector Analysis. This will include the land needs for public facilities that serve as places of employment.
- HCA Phase 1 - Determine the baseline housing capacity of the existing Urban Growth Boundary (UGB) and potential capacity shortfall consistent with ORS 197A.270(1)-(4) and OAR 660-008. This includes a housing needs projection, inventory of buildable lands (see BLI above), determination of capacity based on historical density analysis, development trends, market factors, and assumptions, and evaluation of trends, impacts and efficiency measures, and determination of housing types that are likely to be affordable to current and future households. The HCA will consider the future land needs for public facilities located in residential areas such as schools and parks.
- The work plan includes a CHNA, beginning by 04/01/2026 with local adoption by 03/30/27. The CHNA is anticipated to be reviewed by DLCD under a segmented review, prior to the adoption of a housing capacity analysis and housing production strategy, as allowed under OAR 660-008-0080(2).
- Notice to DLCD pursuant to OAR 660-025-0140 and OAR 660-025-0185(5).
- Update appropriate Comprehensive Plan text, policies, and technical appendices related to adoption products.

b. DLCD

- Review BLI, EOA and HCA phase 1 prior to Local Adoption.
- DLCD Director review within 90 days pursuant to OAR-660-025-0150.

2. Adoption Package 3 deliverables: HCA Phase 2, OAR 660-008-0045, ORS 197A.270(5-6); Efficiency Measures including Climate Friendly Area designation and UGB evaluation, ORS 197A.285, OAR 660-024.

Proposed timeline (included for reference; not part of the work program per OAR 660-025-0185(2)): Begin by 01/01/2027, adoption and submittal to DLCD for review by 03/31/2029

a. City

- HCA Phase 2 - Identify the actions needed to accommodate allocated housing need for which there is insufficient capacity.
- UGB Study - Perform land evaluation and use combined land need analysis from previous tasks to determine scope of potential UGB expansion pursuant to OAR 660-024-0067.
- UGB Scenarios - Identify efficiency measures, including designating Climate Friendly Areas, and potential UGB expansion areas to provide for needed housing,



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employment, and other urban uses such as public facilities (streets and roads, schools, parks, and open space) over the 20-year planning period.

- Notice to DLCD pursuant to OAR 660-025-0140 and OAR 660-025-0185(5)
- Complete UGB Amendment
 - Complies with Statewide Goals, Statutes, and Rules.
 - Develop Framework Plan for UGB lands with Comprehensive Plan Map designations and proposed land uses.
 - Revise and update remaining Comprehensive Plan chapters.
 - Post Acknowledgement Plan Amendment to Comprehensive Plan and development code adoption by Bend City Council via ordinance.

b. County

- Adoption of City UGB amendment into County Comprehensive Plan pursuant to ORS 197.628 to ORS 197.650 and OAR 660-025-0175.

c. DLCD

- Review HCA Phase 2 and UGB land evaluation, preferred scenario, CFA designations, Comprehensive Plan text and policies.

**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", 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", written over a horizontal blue line.

Nick Lelack, County Administrator
Deschutes County



BOARD OF COMMISSIONERS

AGENDA REQUEST & STAFF REPORT

MEETING DATE: December 3, 2025

SUBJECT: Consideration of Order 2025-057: Consent to City of Bend Sequential Review
UGB Process

RECOMMENDED MOTION:

Move to adopt Order No. 2025-057 consenting to the City of Bend Sequential Review process for Urban Growth Boundary Amendment Components.

BACKGROUND AND POLICY IMPLICATIONS:

Staff will present Order No. 2025-057 to the Board of County Commissioners for its consideration.

BUDGET IMPACTS:

None

ATTENDANCE:

Nicole Mardell, AICP, Senior Planner
Damian Syrnyk, AICP, Senior Planner – City of Bend



MEMORANDUM

TO: Deschutes County Board of Commissioners

FROM: Nicole Mardell, AICP, Senior Planner
Will Groves, Planning Manager

DATE: December 3, 2025

SUBJECT: Consideration of Order 2025-057: Consent to City of Bend Sequential Review UGB Process

On December 3, 2025, staff will present Order No. 2025-057 to the Board of County Commissioners (Board) for consideration. The City of Bend is requesting consent to elect to use Sequential Review for components of the City's Urban Growth Boundary (UGB) Amendment process.

I. BACKGROUND

The City of Bend is initiating an update to its growth plan and a UGB amendment to support the next 20 years of growth in Bend. The City is proposing a sequential review work plan to the Oregon Department of Land Conservation and Development (DLCD) for completion of the reports and analysis needed to support a UGB expansion and land uses needed to support the next 20 years of growth in Bend.

City staff presented on sequential review to a joint meeting of the City Council and the Board of County Commissioners on September 29, 2025. Attached to this memorandum is an issue summary from the City of Bend summarizing the proposed process.

Bend City Council approved Resolution No. 3454 to move forward with the notice of election on November 19, 2025. City staff is requesting Board approval of Order 2025-057, consenting to the election of sequential review and directing county staff to support submittal of the Notice and work plan to DLCD. The draft Notice to DLCD and work plan are attached. Once submitted, the Director of DLCD has 120 days within which to approve the work plan.

II. NEXT STEPS

If approved, CDD staff will work with City of Bend staff to submit the joint notice of election to DLCD to formally initiate the sequential review process.

Attachments:

City Issue Summary

Order No. 2025-057

Exhibit A – Proposed Work Plan

Draft Notice to DLCD



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City Council Issue Summary

Subject: Adopt a resolution authorizing use of Sequential Review of Urban Growth Boundary (UGB) Amendment Components by the Department of Land Conservation and Development.

Staff Member, Department: Damian Syrnyk, Community Development

Meeting Date: 11/19/2025

Action(s) Required:

- | | | |
|--|---|--|
| ☐ Consent Agenda | ☐ Ordinance First Reading | ☐ Public Hearing |
| ☐ Information/Direction | ☐ Ordinance Second Reading | ☒ Resolution |
| ☐ Motion | | |

Recommended Motion

I move to adopt a resolution authorizing the use of the Sequential Review process for certain Urban Growth Boundary Amendment Components, and authorizing City staff, in coordination with Deschutes County, to submit a notice and proposed work plan to the Oregon Department of Land Conservation and Development.

Issue/Council Decision & Discussion Points

- Cities in Oregon are required to maintain 20-year supplies of buildable land for needed housing and economic opportunities.
- Bend is preparing to complete studies needed under state law to update the Bend Comprehensive Plan and prepare for this 20-year supply of land, which will include evaluating the capacity of the urban growth boundary (UGB) for future needed housing and employment, designating Climate Friendly Areas, and making other land use changes to accommodate housing and employment within the existing UGB (aka Land Use Efficiency Measures).
- City and County staff have coordinated and presented this proposal at a joint meeting of the City Council and Board of County Commissioners on September 29, 2025.
- Using the Sequential Review process will result in the required work being completed through an adoption process that will provide more certainty to residents and policy makers by obtaining the State's approval of a land inventory and a land need analysis before spending public resources on the work involved on efficiency measures and a UGB expansion.



Background

The City Council's Housing Goal for 2025-2027 includes the strategy of "Accelerate complete neighborhoods" and the following action item:

Adopt elements of a 20-year plan for housing and jobs (Bend's growth plan) emphasizing policies that create walkable and complete neighborhoods and transition Bend to form based development codes.

This resolution is the first step toward completing this action item, by proposing a sequential review work plan to the Oregon Department of Land Conservation and Development (DLCD) for completion of the reports and analysis needed to support a UGB expansion and land uses needed to support the next 20 years of growth in Bend. Staff presented on sequential review to a joint meeting of the City Council and the Board of County Commissioners on September 29, 2025.

State law provides a process for a city and a county to request sequential review and approval from DLCD of components that would support a UGB amendment of more than 50 acres. Oregon Revised Statutes (ORS) 197.626(3) and Oregon Administrative Rules (OAR) 660-025-0185 allow a city and a county to notify DLCD of their election to use the sequential review process for a land inventory, a land need analysis, and a response to a land deficiency. This sequential review process is available in situations where a city has estimated a future UGB expansion of more than 50 acres will be needed for one or more land needs. Prior analysis of future land need, including the City's 2023 Draft Housing Capacity Analysis, in addition to new 20-year housing needs for Bend through the Oregon Housing Needs Analysis, suggest a future UGB amendment will exceed 50 acres.

A city and county proposed draft work plan through which one or more deliverables (reports or components) required to support a future UGB expansion can be submitted sequentially for Department review and approval. One of the more significant advantages to using the sequential review process is to obtain Department approval of the land need deliverables (land inventory and need analyses) prior to proceeding with work to identify how to meet these needs through Climate Friendly Areas, land use efficiency measures, and a UGB amendment.

This resolution directs City staff to submit a notice and work plan to DLCD for approval under the Sequential UGB Components review rules (See OAR 660-025-0185).

Staff presented the Growth Plan work plan to the City Council at the September 29, 2025, Joint Meeting with Deschutes County. The total work plan includes five (5) adoption packages, two of which will be submitted to DLCD for sequential review:

- Package 2 (Q2 2026 to Q3 2027) includes the following deliverables:
 - Buildable Lands Inventory
 - Housing Capacity Analysis Phase 1, primarily determining housing capacity and housing as required under ORS 197A.270(1)-(4)

- Economic Opportunities Analysis
- Package 3 (Q1 2027 to Q1 2029) includes the following deliverables:
 - Housing Capacity Analysis Phase 2, addressing the Land Use Efficiency Measures (LUEMs) and UGB expansion, as required under ORS 197A.270(5)-(6)
 - Climate Friendly Areas
 - UGB Amendment

After City Council approves the resolution, City staff will coordinate with County staff on Board of Commissioners' approval of an Order that provides similar direction to County staff and supports the submittal of the Notice and work plan to DLCD. The draft Notice to DLCD and work plan are attached. Once submitted, the Director of DLCD has 120 days within which to approve the work plan.

Budget and Financial Impacts

The City's adopted biennial budget for 2025-2027 includes funding for staff and consultant time to complete the elements of the Growth Plan scheduled for this biennium.

Community Outreach Process and Potential Impacts

The development of the Growth Plan and Comprehensive Plan update will include significant community engagement. Engagement will include, but is not limited to, a committee of representatives from the various City committees, public meetings with the Bend City Council, direct engagement with the public in their neighborhoods (e.g., at schools, parks, events), and coordinating with both stakeholders and agencies. The proposed Sequential Review work plan focuses on the Department's (DLCD) review of several work products and does not reduce the amount of engagement the City will undertake.

Department Director Review: Colin Stephens

Financial Review: Samantha Nelson

Legal Review: Elizabeth Oshel

Attachments

- Resolution
 - Exhibit A – Proposed Work Plan

- Sequential Review Draft Notice to DLCD
- Draft Housing Capacity Analysis



Language Assistance Services & Accommodation Information for People with Disabilities

You can obtain this information in alternate formats such as Braille, electronic format, etc. Free language assistance services are also available. Please contact Damian Syrnyk, Senior Planner at (541) 312-4919 or dsyrnyk@bendoregon.gov. Relay Users Dial 7-1-1.



Servicios de asistencia lingüística e información sobre alojamiento para personas con discapacidad

Puede obtener esta información en formatos alternativos como Braille, formato electrónico, etc. También disponemos de servicios gratuitos de asistencia lingüística. Póngase en contacto con Damian Syrnyk, Senior Planner en dsyrnyk@bendoregon.gov o (541) 312-4919. Los usuarios del servicio de retransmisión deben marcar el 7-1-1.