



CITY OF BEND

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.