



# Oregon

Tina Kotek, Governor

## Department of Land Conservation and Development

Director's Office

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April 3, 2025

Dan Huff, City Manager  
City of Molalla  
117 N. Molalla Ave  
Molalla, Oregon 97038



By email: [dhuff@cityofmolalla.com](mailto:dhuff@cityofmolalla.com)

**RE:** Revision to City of Molalla Sequential UGB Work Program

Dear Mr. Huff,

In April 2023, the Department of Land Conservation and Development (DLCD) approved the City of Molalla's initiation of the sequential UGB process.

The proposed sequential UGB work program at the time of initial notice indicated that the City intended to adopt the Housing Capacity Analysis and the Housing Production Strategy at the same time; the City proposed Task 1 of the work program to include both documents. In 2024, DLCD accepted the city's Housing Capacity Analysis, understanding that the Housing Production Strategy was still in process and would be adopted at a later date.

OAR 660-025-0185(5) requires that "The product of each task on the work program shall be a change to a comprehensive plan or land use regulation or a new land use regulation adopted by the city and adopted by the county or counties if required." However, per ORS 197A.110, the Housing Production Strategy is not a plan amendment. Therefore, DLCD has removed the Housing Production Strategy from the sequential UGB work program.

Removal of the Housing Production Strategy from the work program does not relieve the city of compliance with ORS 197A.100 and OAR 660-008, which require adoption of a Housing Production Strategy every eight years for cities outside of the Metro urban

growth boundary with a population of 10,000 or higher. The City of Molalla recently adopted its first Housing Production Strategy before the deadline of May 1, 2025.

Please contact your regional representative, Kelly Reid, at (971) 345-1987 or [kelly.reid@dlcd.oregon.gov](mailto:kelly.reid@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, flowing style.

Brenda Bateman, Ph.D.  
Director

Attachments:

- A. City of Molalla Revised Sequential UGB Work Program

cc: Jennifer Hughes, Clackamas County Planning Director  
Mac Corthell, City of Molalla Assistant City Manager  
Kelly Reid, DLCD Regional Representative