

Christie Teets

From: Dan Huff
Sent: Wednesday, September 23, 2026 12:57 PM
To: Christie Teets
Subject: FW: Molalla UGB Amendments

Can you make copies of this for the balance of Council please?

From: Chad Jacobs <chad.jacobs@behlaw.com>
Sent: Wednesday, September 23, 2026 12:14 PM
To: Scott Keyser <skeyser@cityofmolalla.com>; Leota Childress <lchildress@cityofmolalla.com>
Cc: Dan Huff <dhuff@cityofmolalla.com>; Mac Corthell <mcorthell@cityofmolalla.com>; Dan Zinder <dzinder@cityofmolalla.com>
Subject: Molalla UGB Amendments

Mayor Keyser and Councilor Childress,

Thank you for reaching out regarding the City's proposed UGB expansion, which is on the council's agenda this evening. Our office has reviewed the materials in the agenda packet and the supporting documents. These materials demonstrate two important issues for the Council to keep in mind as they consider this agenda item.

First, the data clearly demonstrates that there is a need for a UGB expansion. There currently exists a deficiency in the City's UGB to provide sufficient residential development to accommodate expected growth over the next 20 years. In addition, there is a shortage of needed industrial and commercial lands. A UGB amendment will address these needs and ensure that the City remains in compliance with state land use and planning laws.

Second, there is a need for the City to act as quickly as possible to address these issues. As explained in your agenda packet, the basis for and evidence supporting a UGB amendment is based on multiple documents, including the City's adopted and acknowledged Economic Opportunity Analysis (EOA) and the City's Housing Needs Analysis (HNA). These documents are a required precursor to any UGB amendment. Due to changes in state law, these documents may be used to support a UGB amendment only if that amendment is in place by January 1, 2027. After that date, the City may be required to start the analysis over or otherwise make major updates to work already completed to ensure it meets current planning obligations and requirements, which can be a lengthy and costly process. Therefore, in order complete this process prior to the January 1, 2027 deadline, the City should adopt the proposed UGB amendments as soon as possible. In addition to this pending deadline, the legislature is expected to make additional changes to state land use laws next year, which could affect the City's future UGB work. As such, a delay in the process could impose even further additional time and expense on the City depending on what action the legislature takes.

Finally, although nothing can be guaranteed, if an appeal is filed related to the UGB, it appears that City staff and consultants have provided sufficient evidence in the record to support the proposed UGB amendments.

As always, please do not hesitate to call or email with any follow-up questions.

Best,

Chad

Chad A. Jacobs ([he/him](#))

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