



WOODSIDE RANCH HOMEOWNERS ASSOCIATION
BOARD OF DIRECTORS • BEND, OREGON

September 1, 2026

Bend City Council
City of Bend
710 NW Wall Street
Bend, OR 97703

Re: Caldera Ranch Comprehensive Plan and UGB Amendments (SB 1537 Section 57) — Hearing of September 2, 2026

Dear Mayor Kebler and Members of the Council:

We are writing on behalf of the Woodside Ranch Homeowners Association regarding the Comprehensive Plan Map Amendment and UGB expansion for Caldera Ranch to urge the Council to lock in binding metrics for the development. Under SB 1537 Section 57, this action is insulated from standard land-use appeals. The numbers and policies you adopt on September 2 will make it difficult to correct later in the process.

We know that soft numbers at the conceptual stage inevitably lead to compromises during buildout. We see the consequences of development that outpaces infrastructure. We ask the Council to condition this expansion on the following priorities:

1. Wildfire, Egress, and the WUI Regulatory Gap

Pushing the infrastructure footprint into undeveloped land triggers a reassessment under Statewide Planning Goal 7. We are assuming this project is advancing ahead of the Greater Bend Community Wildfire Protection Plan's (CWPP) site-specific evaluation. If so, then this is putting the cart before the horse. Following the repeal of the state's overarching hazard maps via SB 83, there may have been a regulatory vacuum resulting in the most lenient "moderate hazard" standards being cited for this project. Relying on a repealed map to bypass strict defensible-space codes is an unacceptable risk. Egress compounds this threat: i.e. if a major fire approaches from the south while the proposed egress runs north to a single minor arterial—directly toward Caldera High School. In any emergency, but especially during school evacuation, traffic will collide with a counter-flow of parents rushing to retrieve 1,200 students. Additionally, expanding the UGB should trigger a change in the WUI and we should defer until the WUI is re-evaluated.

2. Fire Service Response Capacity

Bend Fire is already having trouble meeting a relaxed NFPA response time standard, and its “Standards of Cover” study will not be complete until mid-2027. Approving a master plan ahead of that study commits this corridor to thousands of new residents before the City can prove it has the capacity to protect them. Occupancy must be tied to demonstrated response capabilities that meet the NFPA standards, not to mention those outside of Bend proper suffer even longer response time than a relaxed standard won’t even cover.

3. Transportation, Level of Service Failures, and the Discounted Traffic Study

The traffic impact analysis currently on record is the developer’s consulting study, relying on highly favorable “internal-capture” assumptions that artificially shrink the 6,078 weekday daily trips reported. The Transportation System Plan already projects failing intersections in this corridor by 2040. Furthermore, the plan relies on SDC fees to address Level of Service (LOS) failure points, which ultimately leaves these critical infrastructure failures unmitigated and unaddressed. The Council must commission an independent, cumulative City transportation study covering Easton, Caldera Ranch, Stevens Ranch, and all other future developments, and the high school at full capacity before finalizing this UGB expansion.

4. Locking in the Housing Unit Mix

SB 1537 sets minimums for affordable density but imposes no floor on single-unit detached housing. The developer's conceptual plan is stamped “non-binding.” We have already seen the result of this loophole at the Easton conversion, where commercial-designated land seamlessly shifted into a 128-unit apartment project because the baselines were never formalized. The Comprehensive Plan must establish definitive floors for single-family lots and ceilings for high-density multi-unit housing. Any future deviation must require a formal Comprehensive Plan amendment.

5. Commercial Acreage

The proposal designates a mere 1.5 acres of commercial space for 716 households (1.6% of the site)—enough for a convenience store, but entirely incapable of supporting a neighborhood grocery. Consider ORS 197A.445(4)(c), which allows exemption from commercial conversion provisions upon a finding of inadequate street service or natural hazard. Both conditions clearly exist here.

6. Conflict with Bend's Long-Term Plan

This proposal contradicts the “complete communities” pillar of Bend's 20-year Comprehensive Plan. Bend’s long-range vision of walkable, complete communities is in direct conflict with the car-dependent, fire-vulnerable reality planned for Caldera Ranch. We respectfully ask that the binding policies adopted on September 2 reflect the infrastructure and safety conditions of this specific site, as these are the baselines our community will have to live with.

Respectfully,

The Woodside Ranch Homeowners Association Board of Directors

Carl Natalizia - Ray Miao - Eric Decker - Jim Anthony - Mark Marshall