

AP 23-02 Appellant's response for the record of June 20, 2023 appeal hearing

After claiming ignorance about pre-application site disturbance in Fields Bridge Park for nearly a year, the City of West Linn has now issued a memorandum June 13, 2023 (Applicant's submittal) wherein the City disclosed that it "Mistakenly authorized the removal of approximately 15-20 trees (we are still working to identify the exact number)."

A letter from WLWV in the record of the Planning Manager's decision, pages 376 -387 indicates that the WLWV removed the trees. This occurred possibly both before and after West Linn City Council approved an IGA with WLWV on July 11, 2022, despite multiple comments made that even though City Engineer Eric Lais signed off on the design as 100 % complete, West Linn's proposed roundabout and WFD road improvements next to Fields Bridge Park still needed to apply for several water resource area permits.

According written record of the July 11th meeting states that "City Engineer Lance Calvert noted the IGA was not a vote for or against the school or the roundabout, as **both projects had already been approved in separate land use decisions** and would move forward as part of the land use process regardless of whether the IGA was approved.

The statement; "both projects were approved" is inaccurate because requisite water resource area permits had not been approved for the proposed roundabout design. Thus later claims made that WFD improvements next to Fields Bridge Park were approved with the school are also false.

Therefore since the permit application was predicated on erroneous assumptions, the application itself is fundamentally flawed.

Regarding retaining walls, Mr. Calvert said, "*The retaining walls would be located at the very edge of the floodplain but did not significantly impact the floodplain in the way mentioned and would be designed to accommodate any kind of flood event through the engineering plans process. The walls near the roundabout had a maximum height of approximately 8 ft, exposed above grade. The retaining wall near the nature trail farther to the east of the park was approximately 9 ft.*"

Although West Linn's City Engineer Erich Lais Engineered stamped the design plans as 100 % complete on May 31, 2022, Mr. Lais stated at the June 6, 2023 appeal hearing, that the east retaining wall might be upwards of 15-20 feet tall, we are still working that, and balancing the cut and fill. The City subsequently submitted an undated "Plan Sheet 4" on June 13, 2023 that indicates retaining wall "C" on the east end will be 19.43 feet tall. The only thing for sure at this point is that the "100% complete design" is actually a work in progress and requires reconsideration.

Therefore, the Planning Manager's Decision , which was based on incomplete information, is invalid.

Regarding the proposed on-street parallel parking on WFD, Mr. Calvert said, "*The parking shown and proposed on Willamette Falls Dr was in the Willamette Falls Drive Concept Plan approved by Council. While he had heard testimony about not having parking on arterial roads, which was generally true; the adoption of the Concept Plan, which clearly showed the on-street parking in the area, would override that general Transportation Systems Plan (TSP) statement.*"

On September 27, 2023, Karie Oakes sent a written complaint to City Engineer Erich Lais, alleging illicit tree and shrub removal in Fields Bridge Park prior to the permit application.

Upon receiving no response from Mr. Lais, Ms. Oakes notified City Manager John Williams of her complaint September 29, 2022.

Upon receiving no reply from Mr. Williams, Ms. Oakes submitted a complaint to the City Council October 10, 2022, ***“Staff allowed the contractor for the school district to remove trees and scrubs within Fields Bridge Park and the protected wetlands before applying for the required land use permits to protect the wetland and habitat area and to manage the floodplain. I believe Mr. Williams is avoiding answering my questions because this construction activity is illicit. It is your duty to uphold our Community Development Codes and to hold the City Manager accountable.”***

On October 14, 2022 Mr. Williams denied Ms. Oakes’ complaint as follows: ***“First, I would like to state clearly that I have not been able to identify any “illicit” work. Everything that has happened to date, to the best of my knowledge, has permits or did not require permits. Everything requiring additional permits has not happened yet. The Community Development Code is being upheld as far as I can tell.”***

Regarding Oakes’ question about where to find the ESC and tree removal plan for Fields Bridge Park, Mr. Williams wrote: ***“I visited the site just this morning and still cannot identify any areas where trees have been removed within environmentally sensitive lands. The trees and shrubs that have been cut are above the floodplain and immediately adjacent to Willamette Falls Drive. All tree and shrub removal to date has been conducted following city regulations. The silt fencing that was installed is in response to the previous flooding problem and does not require a permit that I could identify.”***

Despite Mr. Williams’ denial of her complaint, Ms. Oakes persisted by sending multiple inquiries over the next eight months, including whether there would be any enforcement.

After the City filed its application for WAP/WRA/FMA permits, several people asked how many of the approximately 48 trees marked with an “X- proposed to be removed” on the site maps, were already removed and why the application did not include an arborist report or tree replacement plan for those trees?

Whenever questions of that nature came up, Planning Manager Darren Wyss, Mr. Lais and Mr. Williams routinely replied, **“Alleged tree removal is a Municipal Code matter that is not subject to this land use application.”**

We submit that CDC Chapter 32.060 B.2.b. applies to every single tree and vegetated area that WLWV’s contractor removed and disturbed on the premises before the City applied for WAP/WRA/FMA permits. In fairness, since an unknown number of the 41 trees identified for removal on project site plans (but not identified by an arborist per Chapt 32 criteria) , were then removed prior to permit application, all 41 trees should be classified and fully mitigated as healthy mature significant trees.

CDC 32.060 APPROVAL CRITERIA (STANDARD PROCESS)

No application for development on property containing a WRA shall be approved unless the approval authority finds that the proposed development is consistent with the following approval criteria, or can satisfy the criteria by conditions of approval:

A. WRA protection/minimizing impacts.

1. Development shall be conducted in a manner that will avoid or, if avoidance is not possible, minimize adverse impact on WRAs.

The City's act of allowing pre-application tree removal and site disturbance failed to meet Chapter 32 Approval criteria for avoidance of adverse impacts on WRAs.

2. Mitigation and re-vegetation of disturbed WRAs shall be completed per CDC 32.090 and 32.100, respectively.

At the June 6, 2023 appeal hearing, the City's attorney argued that Oregon's "Fixed goal post rule" allows the City to base its application on the existing condition of the site at the time the application was filed. Therefore, the City did not find it necessary to mitigate any trees and vegetation removed before the application was filed.

We find the attorney's argument to be in error because CDC Chapter 106 prohibits pre-application site alteration.

B. Storm water and storm water facilities.

1. Proposed developments shall be designed to maintain the existing WRAs and utilize them as the primary method of storm water conveyance through the project site unless:

a. The surface water management plan calls for alternate configurations (culverts, piping, etc.); or

b. Under CDC 32.070, the applicant demonstrates that the relocation of the water resource will not adversely impact the function of the WRA including, but not limited to, circumstances where the WRA is poorly defined or not clearly channelized.

Re-vegetation, enhancement and/or mitigation of the re-aligned water resource shall be required as applicable.

2. Public and private storm water detention, storm water treatment facilities and storm water outfall or energy dissipaters (e.g., rip rap) may encroach into the WRA if:

a. Accepted engineering practice requires it;

b. Encroachment on significant trees shall be avoided when possible, and any tree loss shall be consistent with the City's Tree Technical Manual and mitigated per CDC 32.090;

City Planning Manager Wyss stated in his report that alleged tree removal prior to the application is a Muni-code matter and not applicable to CDC criteria, and that the City is only required to mitigate seven existing trees proposed to be removed in the application.

We find Wyss' statement is in error due to CDC Chapter 106 criteria and Chapter 32 criteria which prohibits pre-ap site alteration plus Chapter 32. B. 2. b. criteria requires mitigation for site disturbance.

Furthermore, CDC Chapter 32.060 Approval Criteria was not met when City:

1. Failed to have an arborist identify the species, size and health of significant trees on Fields Bridge Park site
2. Failed to document each tree and cluster of trees that were removed.
3. Failed to develop a mitigation plan to replace the trees and revegetate disturbed areas. proposed claiming that trees previously identified to be removed on application site maps that were "accidentally removed" prior to filing the application, are not applicable CDC criteria , so it was only necessary to mitigate the seven existing trees that are proposed to be removed.

CDC 106.020 VIOLATION OF CODE PROHIBITED

No person shall: A. Erect, construct, establish, occupy, alter, maintain, enlarge, use or cause to be used, any building, structure, improvement, or premises, in violation of this code.

106.030 COMPLAINTS REGARDING VIOLATIONS

Whenever a violation of this code occurs, or is alleged to have occurred, any person may file a signed, written complaint. Such complaints, stating fully the causes and basis thereof, shall be filed with the Planning Director or their designee. They shall record properly such complaints, investigate and take action thereon as provided by this code.

West Linn's City Manager summarily denied Ms. Oakes' complaint and feigned ignorance about whether illicit tree removal happened or by whom while continuing to delay completion of an investigation. Evidence that West Linn allowed WLWV to remove the trees was available nine days before the Planning Manager deemed the application complete. The application should have been revised to account for and mitigate all trees and tree clusters removed.

106.050 ABATEMENT OF VIOLATIONS

A. All violations of this code, any development contrary to a permit approval, and any failure to comply with approval conditions arising out of this code are Class A violations and shall be enforced pursuant to Sections 1.205 through 1.260 of the West Linn Municipal Code:

We hereby request the City Council to call for and hire an outside investigation firm regarding potential violations.

1. *Knowing or intentional violation. The maximum forfeiture for a knowing or intentional violation shall be \$1,000.*

Evidence in the record indicates West Linn knew that WLWV's contractor cut multiple trees in Fields Bridge Park, removed shrubs and disturbed vegetation without installing protective fencing prior to permit application. We hereby request the City Council to request outside investigation firm to determine how many trees and tree clusters and areas of disturbance apply to the fine, and for what period of time for proper enforcement of this matter.

2. *Other violations. The maximum forfeiture for all violations other than knowing or intentional violations shall be the standard forfeiture for Class A violations set out in West Linn Municipal Code Section 1.255.*

3. *Increased maximum penalty for subsequent violations. The maximum forfeiture otherwise applicable shall be increased by 50 percent over the previous violation if a judgment of violation of this code has been issued against the violator within five years prior to the violation.*

We hereby request City Council to have outside firm investigate potential additional violations.

B. *The commission, continuance, or maintenance of a violation on more than one day shall constitute a separate violation for each and every day during any portion of which the violation is committed, continued, or maintained.*

Site disturbance occurred multiple times. We hereby request City Council to have investigative firm obtain evidence of the date and other relevant information.

C. *All violations of this code, any development contrary to a permit approval, and any failure to comply with approval conditions imposed under this code are public nuisances and may be abated pursuant to Sections 5.400 through 5.530 of the West Linn Municipal Code.*

D. *The City's remedies are cumulative. The City may enforce any violations under the violation procedure, under the nuisance procedure, or under both procedures, either simultaneously or concurrently. The City's remedies listed in this section are in addition to any other remedy or claim the City may have against the violator. (Ord. 1604 § 74, 2011; Ord. 1621 § 25, 2014)*

West Linn Municipal Code 1.120 Acts by Agents.

When an act is required by an ordinance, the same being such that it may be done as well by an agent as by the principal, such requirement shall be construed to include all such acts performed by an authorized agent.

We hereby issue this official complaint to City Council that John Williams, acting as West Linn's Chief Executive Officer, failed to perform his duty, per City Charter Chapter V. Section 23. (c).(1): "The City

Manager shall...keep the Council advised at all times of the affairs and needs of the City, make reports annually, or more frequently if requested by the Council, of all the affairs and departments of the City. (2) The City Manager shall see that all ordinances are enforced and that provisions of all franchises, leases, contracts, permits and privileges granted by the City are observed.”

West Linn Municipal Code 1.125 Prohibited Acts Include Causing and Permitting.

Whenever in the ordinances of the City of West Linn, any act or omission is made unlawful, it shall include causing, allowing, permitting, aiding, abetting, suffering, or concealing the fact of such act or omission.

Evidence in the record indicates that City Manager Williams knew or should have known that WLWV’s contractor cut multiple trees in Fields Bridge Park, removed shrubs and disturbed vegetation without installing protective fencing prior to permit application. We hereby issue an official complaint to City Council that City Manager John Williams failed to uphold West Linn’s codes, ordinances and City Charter.

West Linn Municipal Code: 1.205 Penalty Designated.

(1) Unclassified Violation. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of any code or ordinance of the City, where a specific penalty is not specified in the code or ordinance for the violation, shall be guilty of a Class B violation.

(2) Unclassified Misdemeanor. An offense described in the code that is designated as a misdemeanor, but does not specify the classification of the misdemeanor, is an unclassified misdemeanor punishable by a fine not to exceed \$500.00 or by imprisonment, not to exceed 30 days, or by both such fine or imprisonment.

We hereby request City Council to hold City Manager John Williams responsible for failure to uphold the codes and ordinances of the City of West Linn.

Appellant responses to Applicant’s June 13, 2023 Memorandum

The applicant acknowledges that the “updated mitigation plan” is still being worked on. The decision should be continued to a date yet to be determined in order to insure that all CDC 32 criteria and City’s Tree Technical Manual criteria is met and to provide notice and involve members of the public who were previously misinformed by erroneous information presented.

The proposal to mitigate 20,400 sq. feet or approximately a half acre, is insufficient. Since trees removed and existing trees on site have yet to be identified and classified by an arborist, it is too soon to know how much mitigation is needed or where. In any case, proposed mitigation should first focus on restoring the entire wetland and WRA per CDC criteria. Mowed grass in

Fields Bridge Park natural and riparian areas should be replaced with native vegetation everywhere possible throughout the park

Plan sheets produced since June 6, 2023 reflect a work in progress. The decision should be continued to a date yet to be determined in order to insure that all CDC criteria has been met and to provide Notice to members of the public previously misinformed by erroneous information presented.

CDC 28.110 requires road construction in HCA areas to be built to the minimum dimensional standards and fully mitigated per CDC Chapter 32. Portions of the road are within designated HCA areas. Widening the WFD roadway for on-street parking does not meet minimal dimensional criteria.

We are not opposed to the concept of a roundabout as an intersection. Assessing the environmental and public safety impacts of locating the roundabout and Brandon Place within designated Tualatin River Greenway Habitat Conservation Area should have involved an alternative location for an access route to the school site from WFD. The fact that two separate types of intersection were considered, failed to address CDC criteria to protect HCAs to the greatest extent possible.

When asked why his proposed WFD Conceptual Plan, former City Engineer Lance Calvert explained that Concept Plans are preliminary designs that will be refined later as a result of public input.

City Engineer Lais said on June 6, 2023 that the Cut/Fill balance was still being worked on. Prior figures from the application are not valid.

It is not clear whether the proposed trail from Brandon Place to the park meets CDC 32 criteria for adequate distance away from the Tualatin River.

In view of the fact that Notice of the application was predicated on false information that proposed roundabout and WFD road improvements next to Fields Bridge Park were approved when school application was approved and that trees removed prior to the application did not apply, and that the design is still a work in progress, and that members of the public deserve to participate in the decision making process, we hereby recommend AP 23-02 to be continued to a date yet-to-be-determined when all pertinent information and completed proposed designs are available.

Respectfully submitted on June 20, 2023 before noon by Appellants

Karie Oakes and Teri Cummings

Re: AP-23-02 Additional Information Submitted

From: Karie Oakes (karieokee@aol.com)

To: teric518@gmail.com

Date: Wednesday, June 14, 2023 at 11:35 AM PDT

Darren,

Thank you for this. I thought anyone may comment until June 20 at noon. I would appreciate clarification.

Karie

On Tuesday, June 13, 2023 at 07:23:07 PM PDT, Teri Cummings <teric518@gmail.com> wrote:

Mr. Wyss, thank you for the courtesy of sending this to us. It is much appreciated, considering the volume of information to wade through.

I could not see a date on Peter Watt's memo. If it was sent via email, could you please include the email and all responses associated with it?

Thank you again,

I hope this process will help us arrive at a better outcome.

Teri Cummings

On Tue, Jun 13, 2023 at 6:20 PM Wyss, Darren <dwyss@westlinnoregon.gov> wrote:

Kari and Teri,

The continued public hearing for AP-23-02 permitted the submission of additional information until 5:00pm today (June 13th). Below are links to all of the information staff received prior to the deadline. The Applicant and Appellant will have until noon on June 20th to submit rebuttal to any new information. Any rebuttal will be sent shortly after noon on the 20th. Please let us know if you have questions.

[AP-23-02 Additional Public Comments submitted for continued public hearing](#)

[AP-23-02 Additional Appellant Submittal for continued public hearing](#)

[AP-23-02 Additional Applicant Submittal for continued public hearing](#)

Darren Wyss
Planning Manager
Planning

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Karie Oakes and Teri Cummings
Appellants, Project AP-23-02

William Monihan, Attorney
City of West Linn
June 20, 2023

Re: Corrupted continuation of the hearing

Attachment: Email from Planning Manager Darren Wyss to Appellants, dated 06/13/2023

Cc: Darren Wyss, John Williams, City Council

Dear Mr. Monihan,

We are writing to inform you that the continuance of the hearing for the appeal of the Planning Manger Decision WRG-23-01, WAP-23-01, FMA-23-01 is not in accordance with Council's decision to continue the hearing under Community Development Code 99.170.E.2.

The Planning Manager erroneously limited responses to new written information submitted June 6, 2023 after the hearing through June 13, 2023 at 5:00 pm to the applicant and the appellant and thereby deprived members of the public equal opportunity to submit responses.

On June 13, 2023, soon after close of the window to submit new written information, the Planning Manager sent us an email with the new information submitted and stated, "The Applicant and Appellant will have until noon on June 20th to submit rebuttal to any new information." "Let us know if you have any questions." The Planning Manager did not respond to Karie Oakes' request for clarification of his statement.

Little to our knowledge, the Planning Manger had promoted his limitation of rebuttal to the applicant and appellant on the project page for the appeal that the City references in the public notice of the appeal and the staff report by the Planning Manager. The continuance as stated on the project page misleads members of the public to believe that they did not have the right to submit rebuttal to the new written information and thereby, prejudices this appeal.

This is stated on the project page <https://westlinnoregon.gov/planning/821-willamette-falls-drive-appeal-willamette-river-greenway-water-resource-area-protection>:

City Council Hearing - June 6, 2023

Anyone wishing to present written testimony for consideration shall submit all material before 12:00 pm on June 6, 2023. Written comments may be submitted to dwys@westlinnoregon.gov or mailed to City Hall.

City Council continued the public hearing to a date certain of June 20, 2023 with:

Additional evidence submitted in written form until June 13, 2023 at 5:00pm

Rebuttal to new information in written form by the Applicant and Appellant by noon on June 20, 2023

No additional oral testimony at the continued hearing

Applicant has opportunity for final oral rebuttal at the continued hearing

Furthermore, the City Council Agenda for June 20, 2023 provides the link to the project page for the appeal with the misinformation about rebuttals limited to the applicant and the appellant.

This is extremely disappointing coming from the Planning Manager who the City and members of the public rely upon to abide by Council decisions and to properly administer our City Community Development Code in all aspects, including those for community involvement. It is also extremely surprising because the Planning Manager knew that anyone had the right to rebut the new written evidence.

You advised City Council as it crafted its motion and the Planning Manager and the City Manager assisted you. Great care was taken to get it right and to clarify the continuation process. You gave final clarification to Mayor Bialostosky, before he made the motion and it was seconded, that clearly explained the continuation process. (see video recording time stamp 4:11:12 to 4:14:32, City Council Meeting, June 6, 2023)

You stated, "anyone who wants to rebut those submittals (received by June 13), namely the applicant or the appellant or someone else has the ability to do that and submit those by 5 pm on Tuesday the 20." Planning Manger Darren Wyss interrupted you to correct the deadline on June 20, 2023 to noon to allow time for Council consideration of the rebuttals before the hearing. City Manager John Williams listened and took notes, nodding his head affirmatively.

Planning Manager Wyss acted contrary to his clear understanding that anyone may submit written rebuttal by June 20, 2023 at noon, quite possibly because it would limit public rebuttal in support of the appeal and or opposition to his decision approving permits for WRG-23-01, WAP-23-01 and FMA-23-01, subject of the appeal.

We believe that the City Council cannot close the record at the hearing on June 20, 2023 and proceed with applicant final rebuttal because members of the public have been excluded from

offering rebuttal. We request that you address this unfortunate circumstance and offer City Council any and all options allowed under the law to remedy Planning Manager Wyss' apparent obstruction of public involvement first thing upon continuance of the hearing on June 20, 2023.

Wyss, Darren

From: Teri Cummings <teric518@gmail.com>
Sent: Tuesday, June 20, 2023 11:54 AM
To: City Council; Mollusky, Kathy; Wyss, Darren; Karie Oakes
Subject: Fwd: Urgent- please fix posting error

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Please add this email to the record for June 20, 2023 AP 23-02 hearing.

Thank you,
Teri Cummings

----- Forwarded message -----

From: Mollusky, Kathy <kmollusky@westlinnoregon.gov>
Date: Tue, Jun 20, 2023 at 11:04 AM
Subject: RE: Urgent- please fix posting error
To: Teri Cummings <teric518@gmail.com>, City Council <citycouncil@westlinnoregon.gov>, Digby, Dylan <ddigby@westlinnoregon.gov>, City Records <CWL_Records@westlinnoregon.gov>, Wyss, Darren <dwyss@westlinnoregon.gov>, Karie Oakes <kariookee@aol.com>

There is now a link to the Planning page so when updated information is sent in to the City, it will be current and there won't be duplicate information on different websites.

From: Teri Cummings <teric518@gmail.com>
Sent: Monday, June 19, 2023 11:22 AM
To: City Council <citycouncil@westlinnoregon.gov>; Mollusky, Kathy <kmollusky@westlinnoregon.gov>; Digby, Dylan <ddigby@westlinnoregon.gov>; City Records <CWL_Records@westlinnoregon.gov>; Wyss, Darren <dwyss@westlinnoregon.gov>; Karie Oakes <kariookee@aol.com>
Subject: Urgent- please fix posting error

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Dear City Council and City staff, please correct the posting error on the June 20,2023 agenda.

The link to the [June 13, 2023 "Additional Appellant Submittal"](#) currently posted on the June 20, 2023 meeting agenda, provides an altered version of our submission to the record. Areas of text in the altered version are redacted in yellow on pages 9-17. There are no redactions in our submission. Here is an example;

From: Karie Oakes <karieokee@aol.com>
Sent: Thursday, February 2, 2023 1:51 PM
To: Williams, John <JWilliams@westlinnoregon.gov>
Cc: City Council <citycouncil@westlinnoregon.gov>; Calvert, Lance <lcalvert@westlinnoregon.gov>; Lais, Erich <elais@westlinnoregon.gov>
Subject: Re: Update for PI-21-01 Athey Creek MS WFD Improvements

John,

"I have not been able to identify any "illicit" work. Everything that has happened to date, to the best of my knowledge, has permits or did not require permits. Everything requiring additional permits has not happened yet. The Community Development Code is being upheld as far as I can tell." " (My) conclusion was reached by visiting the site with a current floodplain elevation map and observing that the trees that were cut are clearly above that line." See emails dated October 14 and 26, 2022 highlighted below.

Tree removal is governed by City ordinance, [Municipal Code Chapter 8](#). A Tree Removal Permit is required for the removal of any tree as defined in [Municipal Code 8.510](#) within the City on both public and private land with exceptions for fruit trees and orchards. A tree removal permit is authorized by the city manager or designee (city arborist). In this case, authorization for tree removal would be determined through the development review process, governed by the Community Development Code. Details and specifications for tree protection and removal can be found in the [West Linn Tree Technical Manual](#) pursuant to [CDC 8.570 Development Review and Building Permit Process](#).

A development review (land-use) application for permits to improve Willamette Falls DR along the park and reconstruct the park trail has not been approved, however, the trees that were removed are part of the proposed project. These trees were not part of permits for development of the new Athey Creek MS at Dollar Street.

on the tree removal plan in the Natural Resources Review of the Dollar Street School Project by Pacific Habitat Services (PHS), March 16, 2021, Figures 8A and 8B, pages 44-45 (attached). The tree removal plan was approved by the City Council final decision and order for development of the school and the required half street improvements adjacent to it.

We discovered that the correct version of our unaltered original 6/13/'23 submittal is posted on the [City project page: \[https://westlinnoregon.gov/sites/default/files/fileattachments/planning/project/55558/ap-23-02_appellant_submittal_06.13.2023.pdf\]\(https://westlinnoregon.gov/sites/default/files/fileattachments/planning/project/55558/ap-23-02_appellant_submittal_06.13.2023.pdf\)](#)

The altered version posted on the agenda is illegible and confusing.

Please put the correct version of our 6/13/23 appellant submittal on the 6/20/2023 agenda along with an explanation and/or apology for any confusion or misunderstandings the erroneous version might have caused.

Thank you,

Teri Cummings and Karie Oakes, AP-23-02 Appellants

Kathy Mollusky
City Recorder
Administration

2250 Salamo Rd
West Linn, Oregon 97068
kmollusky@westlinnoregon.gov
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