

Wyss, Darren

From: Katie Zabrocki [REDACTED]
Sent: Wednesday, November 19, 2025 11:59 AM
To: Wyss, Darren
Subject: 1553 11th St - Conditional Use Permit and Design Review for a Food Cart Pod - Public Comment

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City of West Linn Planning Commission and Planning Director,

On November 17th, parents received an email from the West Linn-Wilsonville School District superintendent, Kathy Ludwig, that she is recommending the board close two elementary schools (Bolton and Stafford) next year in West Linn and further eliminate teacher positions due to low enrollment and budget constraints. This WLWV school closure path is not new. One of the consistently stated reasons for the decline in enrollment is the high cost of homes in the area and the lack of housing opportunity for young families. This should be a “house on fire” emergency situation for the City of West Linn. Enrollment declines leading to school closures jeopardize West Linn as a destination school district. Low enrollment leads to more budget cuts (because the funding formula from the state is driven on student population) which lead to staff cuts and school closures. All this contributes to further enrollment decline as parents flee to private schools when they can or avoid a costly suburb all together. There is risk of a precipitous downward spiral in education and reputation in West Linn if we are not willing to consider all opportunities big and small to address housing.

The proposed food cart pod on 11th St. sits on land zoned Mixed Use Transitional. The staff report for this application does not make mention of CDC Section 59.010 PURPOSE, but it defines this zoning as,

*“...a transitional area between commercial and residential zones with a **desirable mix of residential land uses with limited commercial land uses**. The limited commercial uses allowed in this district are selected for their compatibility with residential uses and their **ability to meet the needs of the neighborhood**. Uses in this district are intended to be compatible with the design and aesthetic qualities of the adjacent neighborhood. This zone is intended to implement the Willamette neighborhood plan as authorized by the policies set forth in the Comprehensive Plan. (Ord. [1515](#), 2005; Ord. [1547](#), 2007; Ord. [1745](#) § 1 (Exh. A), 2023)”*

The current mix of land use in this MU zone at the east end of Willamette Falls Drive is primarily commercial and underutilized in areas. Based on current conditions, I would argue a desirable mix in this area should include more residential. There is an opportunity for the City and Planning Commission to make middle housing a priority, especially in infill areas like this that are already developed, as opposed to contaminating our wetlands through greenfield developments in our few open spaces. Let’s build where we’ve already built and keep our natural areas natural.

Eating and drinking establishments in this zone are not permitted outright and will cause a significant increase in the commercial use “intensity” of the site as compared with its use today. Eating and drinking establishments, per Chapter 59 section 59.060 require a conditional use approval process. For better or worse, part of that process as defined in the CDC section 60.70.A.3 is that it allows the Planning Commission wide berth in using their discretion on projects by requiring, “The granting of the proposal will produce a facility that provides an overall benefit to the City.” What is the overall community benefit of this project given the existing services already in place in Willamette? Does this development meet the spirit of the Mixed-Use Transitional Zone purpose?

Adding another food cart pod to our small downtown may offer a small incremental community benefit at the risk of cannibalizing businesses that already exist in our neighborhood and undermining an opportunity for housing. Additionally, the project’s Traffic Impact Analysis contains little detail about traffic impacts based on today’s congested conditions at the 10th St. roundabout or pedestrian safety at a location near a major intersection and Safe Routes to School. While consistently prioritizing in-fill middle housing may have downsides it also comes with clear public benefits in a time of affordable housing scarcity.

Do we need more food carts or do we need more housing? What is the opportunity cost of placing yet more food carts on limited Willamette Neighborhood real estate that could be developed for housing?

If the Planning Commission proceeds with approval, please consider the following:

- The Traffic Impact Analysis provided did not analyze a time frame that accounted for the new 10th St. roundabout, post-Covid traffic increases, and **made no acknowledgement of pedestrian facilities or pedestrian safety impacts**. An expanded analysis should be required given the mixed use zone, proximity to a school, proximity to a major intersection and pedestrian safety concerns as stated in the [Willamette Neighborhood Association meeting minutes](#).
- Compliance with noise standards was not shown in the project application. Issues were to be dealt with after the fact if complaints arise after opening. Noise concerns were a specific comment in the [Willamette Neighborhood Association meeting minutes](#) as part of the conditional use requirements for this application. This zoning was designed, in part by the WNA, as a defined buffer between the commercial district and residential. It's reasonable to ask the applicant to include acoustic analysis to show compliance prior to any potential conditional use approval, especially given the outdoor nature of most of the intended establishments.
- The 20mph speed limit sign for west-bound traffic on Willamette Falls Drive isn't located until after 12th St. As a pedestrian, I frequently observe cars from the 10th St. exit speeding out of the roundabout heading west-bound. With potentially increased pedestrian traffic in the area near 11th and increased left hand turn queuing, please consider requiring the speed limit sign to be located closer to 10th St. Additionally, consider adding a flashing pedestrian cross walk sign. The left hand turn queue on to 11th can visually obstruct sightlines for through-traffic at the cross walk.

Thank you for your time and consideration,

Katie Zabrocki

