

Date: February 27, 2026
To: City of West Linn
From: Scott Edwards Architecture
File Number: CUP-25-02 / DR-25-02 / WAP-25-01
Project: City of West Linn Public Works Operations Complex
Purpose: Applicant's Response to Final Written Public Comments

The Applicant appreciates the time and effort of community members who submitted written comments. The following responses address the substantive issues raised and clarify how the proposal complies with applicable approval criteria, adopted codes, and governing plans.

1. Public Participation Opportunities

Comment:

Commenters allege that there were not sufficient opportunities for the public to participate in the process of developing this project.

Response:

Please see below the list of public hearings and participation opportunities that were available to the public for this project:

July 12, 2021 (Council ODOT Property Acquisition)
February 13, 2023 (Council Preliminary Design Contract – Scott Edwards Architecture)
September 5, 2023 (Council Preliminary Design Update)
July 18, 2024 (Council Final Design Contract Award)
January 13, 2025 (Council Owners Representative Contract – Klosh Group)
April 22, 2025 (Council/SAB Design Update: Sustainability)
September 15 2025 (Council Value Engineering Update)
June 16, 2025 (Council Preconstruction Contract Award – Skanska)
November 4 2025 (Council final design concept and budget discussion)
November 18 2025 (Council final design concept approved by Council)
December 2, 2025 (Council funding discussion work session)
December 9, 2025 (Council approval of resolution to issue FFCO funding of the Ops Complex)
February 4, 2026 (Planning Commission - Land Use Application)
February 18, 2026 (Planning Commission - Land Use Application Continuance)
March 4, 2026 Planning Commission - (Land Use Continue/Deliberation)

2. Seismic Risk and Historic Landslide Conditions

Comment:

Several commenters assert that the site is unsafe due to historic landslide activity, seismic risk associated with the Cascadia Subduction Zone, and uncertainty referenced in historic ODOT documents.

Response:

The Applicant acknowledges the regional seismic risk present throughout West Linn and the broader Willamette Valley. However, land use approval decisions are based on compliance with adopted codes and standards, not generalized seismic risk applicable to the entire region.

The proposed Operations Center is supported by site-specific geotechnical investigations conducted in accordance with current engineering standards. The project has been designed to meet or exceed applicable seismic design requirements under the Oregon Structural Specialty Code and related standards. Historic landslide activity associated with construction in the late 1960s has been evaluated in the context of present site conditions and modern mitigation measures.

The City's Natural Hazard Mitigation Plan does not prohibit development in areas with mapped hazards; rather, it emphasizes risk reduction through appropriate siting, design, and engineering. The proposed development implements those principles through engineered solutions intended to address both static and seismic conditions. Compliance with adopted engineering standards satisfies the applicable approval criteria.

To summarize our response:

- The site-specific geotechnical and geological study spanned over a period of 2 years.
- The geotechnical team included three Professional Geotechnical Engineers (PEs) and one Certified Engineering Geologist (CEG) in the state of Oregon with combined experience of over 85 years.
- The proposed buildings will sit on a flat bench comprised of stable basalt bedrock.
- The access road fill acts as a buttress, increasing the overall stability of the hillside north of the site.
- The fill slopes created for the access road will be internally reinforced to meet code-based factors of safety under both static and design-level earthquake/seismic conditions.
- Design-level earthquake-induced seismic forces are being used for site seismic design.

3. Traffic Impact Analysis (TIA)

Comment:

Commenters contend that a full Traffic Impact Analysis (TIA) must be submitted with the application and that deferring traffic mitigation to a condition of approval is improper.

Response:

The City's Community Development Code establishes when a Traffic Impact Analysis is required. The Applicant has submitted traffic information consistent with City requirements for this application type and scale. Trip generation was evaluated based on the nature of the proposed use and operational characteristics of the facility. Conditions of approval are a standard and legally permissible mechanism to address transportation mitigation when additional detail or timing coordination is required. The use of conditions does not circumvent review requirements; rather, it ensures compliance prior to occupancy while allowing the Planning Commission to rely on enforceable commitments. Applicant will perform TIA prior to issuance of Building Permit.

4. Noise Impacts and Acoustical Analysis

Comment:

Several commenters argue that a statement from a licensed acoustical engineer or a noise study must be included with the application and cannot be deferred as a condition of approval.

Response:

The Applicant recognizes the Comprehensive Plan policies addressing noise. Whether a proposed use requires submission of an acoustical study at application depends on whether the use is expected to generate noise exceeding DEQ standards, as determined by the reviewing authority.

The proposed Operations Center is designed to meet applicable DEQ and City noise standards through building orientation, operational controls, and site design. Where appropriate, conditions of approval may require additional verification to ensure ongoing compliance. Conditions of approval are an accepted and enforceable means to ensure compliance with noise standards and do not relieve the Applicant of the obligation to meet those standards. Applicant will perform an Acoustical analysis and submit to the City prior to issuance of a building permit.

5. Zoning Status of the Property

Comment:

Commenters assert that the property was not properly zoned following acquisition from ODOT and that required public processes were not followed.

Response:

The zoning designation applicable to the property is established by the City's adopted zoning map and ordinances. The Planning Commission is authorized to rely on the current zoning designation in effect at the time of application. Any prior property ownership by ODOT does not invalidate the zoning designation or preclude the City from processing the application under the applicable zone standards.

The Applicant is not requesting a zoning change and is applying for approval under the existing zoning framework.

6. Stormwater, Drainage, and Flooding Concerns

Comment:

Commenters cite historic flooding events and express concern that engineered stormwater systems may be insufficient.

Response:

The stormwater system for the proposed development is designed to comply with current City, State, and DEQ standards. Historic flooding events cited by commenters occurred under different conditions and regulatory frameworks and do not reflect the performance of systems designed to current standards.

Compliance with adopted stormwater design criteria ensures that runoff will be managed to protect downstream properties and water resources. The City's engineering review process provides further oversight to confirm compliance prior to construction.

7. Water Resource Area (WRA) and Environmental Impacts

Comment:

Concerns were raised regarding impacts to Water Resource Areas, wildlife habitat, and tree removal.

Response:

The application demonstrates compliance with CDC Chapter 32 governing Water Resource Areas. No impacts

are proposed to the wetland or stream, and impacts to the buffer have been avoided and minimized to the extent practicable. Required mitigation measures are incorporated into the project design.

Tree removal and habitat impacts are addressed consistent with City code provisions. The approval criteria do not require the Applicant to prove that no alternative location exists; rather, they require compliance with applicable standards, which the proposal meets.

The project does not impact the wetland or stream resource. The stream's WRA buffer impacted by this project consists of existing woodchip storage and does not provide any significant benefit to the resource. The wetland's WRA buffer impacted by this project consists of invasive species, and is mitigated with new, native plantings. The notes provided by Dr. Mishaga show there are no currently listed federally threatened or endangered species. The WRA mitigation provided with this project is designed to accommodate the species of concern and is an improvement from the existing invasive species that exist today. The segment of creek adjacent to this property is non-fish bearing according to the Oregon Department of Forestry. This is supported by the fact that it is located upstream of the long culvert passing beneath Interstate 205.

8. Parking, Landscaping, and Site Design

Comment:

Commenters allege noncompliance with parking lot landscaping requirements and improper use of "in-lieu" measures.

Response:

Parking areas are designed to meet the functional needs of a public works operations facility, including fleet maneuvering and staging. The Community Development Code allows flexibility where strict application of landscaping standards would interfere with essential operational functions.

Tree preservation and site design measures provide canopy and visual mitigation consistent with code intent. Required bicycle parking and circulation standards are met as demonstrated in the submitted plans.

9. Solid Waste and Recycling Facilities

Comment:

Commenters assert that solid waste and recycling areas do not meet code requirements regarding pads and covers.

Response:

Final construction drawings will ensure that solid waste and recycling facilities comply with applicable code requirements, including pad construction and enclosure standards. Any necessary refinements will be addressed prior to occupancy through standard permitting and inspection processes.

10. Indoor Air Quality

Comment:

Commenter has questions regarding management of indoor air quality with the fleet shop on the ground floor and office above.

Response:

The arrangement of a vehicular parking garage with office use above is a common arrangement for many projects. The fleet service portion of the building will have an internal vehicular exhaust system with filtration that will maintain a healthy indoor air quality while vehicles are running. This is a separate and independent system from the office HVAC system. The office system will have a HEPA filtration system for intaking outside air to

create a healthy indoor air quality for the office portion.

11. Undergrounding Electrical Lines

Comment:

Commenter alleges the City did not complete the requirement for underground utilities as part of the City's Minor Partition after the purchase of the ODOT property.

Response:

At the February 18th Planning Commission Meeting, there was testimony presented in reference to MIP-21-03 condition of approval 2) – Undergrounding of Utility Lines. The City property has approximately 635' of frontage along Salamo. During a recent street improvement project on Salamo that made several bike and pedestrian improvements, approximately 400' of the overhead utilities were undergrounded. The remaining 235' of frontage, due to steep topography, was deemed unfeasible by PGE. In addition, there was an extra 350' of undergrounding done to the north of the property. This extra underground work leaves Salamo Road with no overhead utilities from Greene Street all the way to Rosemont Road. The remaining overhead utilities on Salamo south of the project have street lights on them and there is a significant crossing of 205. In summary, the applicant believes the conditions have been met as the underground completed was above and beyond what was required.

12. Overall Site Suitability and Public Benefit

Comment:

Commenters argue that the site is unsuitable for a critical public facility and that the application should be denied in favor of an alternative location.

Response:

The Planning Commission's role is to determine whether the proposal meets the applicable approval criteria, not to select among alternative sites. The application demonstrates compliance with CDC Chapter 60 and related provisions.

The proposed Operations Center provides an overall benefit to the city by consolidating essential services in a purpose-built facility designed to meet current standards. Suitability is established through compliance with adopted regulations, which the proposal satisfies.

13. Conditions of Approval and Enforcement

Comment:

Several commenters express concern that conditions of approval may not be enforced.

Response:

Conditions of approval are legally binding and enforceable requirements. The City has authority to enforce compliance through inspections, permits, and enforcement actions. The existence of conditions does not diminish their effectiveness; rather, they provide a clear regulatory mechanism to ensure compliance.

We look forward to your deliberation and decision at the next Planning Commission Hearing on March 4, 2026.