



CITY OF West Linn

Memorandum

Date: March 18, 2026

To: West Linn Planning Commission

From: Darren Wyss, Principal Planner

Subject: Public Comments Received for CUP-25-03/DR-25-03/VAR-25-02 (New Drive-Through Car Wash at 18850 Willamette Drive)

Between 4:00pm on March 13, 2026, and today at noon (deadline to submit written comments to staff), the City received eight additional written comments. The comments are attached.

Previous public comments were either included as Exhibit PC-5 with the Planning Commission Packet on March 5, 2026, or with the Additional Public Comment Memo dated and distributed March 13, 2026.

As always, please contact me with any questions at dwyss@westlinnoregon.gov or 503-742-6064.



March 17, 2026

ODOT # 13588

ODOT Formal Response

Project Name: Kaady Car Wash	Applicant: Eric Li, TBA Architects
Jurisdiction: City of West Linn	Jurisdiction Case #: CUP-25-03/DR-25-03/VAR-25-02
Site Address: 18850 Willamette Drive	State Highway: Willamette Drive (OR 43)

The site of this proposed land use action is adjacent to Willamette Drive (OR 43). ODOT has permitting authority for this facility and an interest in ensuring that this proposed land use is compatible with its safe and efficient operation.

All ODOT permits and approvals must reach 100% plans before the District Contact signs off on a local jurisdiction building permit or other necessary requirements before construction. **The applicant should contact the District Contact indicated below to determine permit requirements and to obtain application information.**

These comments, standards, and requirements are current as of the date of this letter. If the project scope and/or timeline is modified, the applicant should contact the ODOT Region 1 Development Review program (ODOT_R1_DevRev@odot.oregon.gov). Updated comments may be necessary.

LAND USE PROPOSAL

ODOT was notified of a land use application submitted to City of West Linn for the proposed demolition of an existing fast-food restaurant building and the construction of a new drive thru car wash within tax lot 6900. The proposal includes a one-story, 3,190 square-foot building. No changes to the existing OR 43 access are proposed.

COMMENTS/FINDINGS

Traffic Impacts

ODOT received a copy of the Traffic Impact Analysis (TIA) prepared by Ard Engineering and dated February 12, 2026. ODOT reviewed the TIA and has determined there will be no significant impacts to State highway facilities and **no additional State review is required.**

State Highway Frontage Improvements

ODOT understands City of West Linn will not be requiring frontage improvements or donation of right of way along Willamette Drive.

ODOT's GIS data shows the existing ramps at the NE corner of Willamette Drive and Walling Way as non-compliant with current Americans with Disabilities Act (ADA) standards. ODOT recommends City of West Linn require the applicant upgrade the existing infrastructure to meeting meet current standards.

If required by the City, permitting with ODOT will be required.

ODOT Technical Review Requirements

If applicable, all alterations within the State highway right of way are subject to ODOT standards. Alterations along the State highway but outside of the ODOT right of way may also be subject to ODOT review pending its potential impact on the safe operation of the State highway.

The following ODOT manuals may apply:

- ODOT Traffic Manual
- ODOT Highway Design Manual
- ODOT Hydraulics Design Manual

The ODOT Traffic Manual (TM) identifies items that require ODOT Region Traffic Engineer (RTE) approval. Items requiring RTE approval must be prepared by an Oregon-registered Professional Engineer (P.E.) and will be reviewed by the ODOT Region 1 Technical Center. See the TM for information on authorities and required approvals. Some approvals require a unique request form (Traffic Approval).

Deviations from ODOT Standards

Proposed alterations that deviate from ODOT standards will require a Design Exception/Deviation prepared by an Oregon-registered Professional Engineer (P.E.) for review by the ODOT Region 1 Technical Center. ODOT can only determine if design elements will require a Design Exception/Deviation or RTE approval once detailed plans have been reviewed.

Note: A Design Exception/Deviation or RTE approval items may take **6 months or longer to process**. The preparation of a Design Exception or RTE approval does not guarantee its ultimate approval.

ODOT RECOMMENDED CONDITIONS OF APPROVAL FOR LOCAL JURISDICTION

State Highway Frontage Improvements

- The applicant shall verify the existing Americans with Disabilities Act (ADA) infrastructure at the NE corner of Willamette Drive and Walling Way is consistent with current ADA standards. Verification should be completed by a professional with an ODOT ADA Curb Ramp Certification and submitted to the District Contact identified below.

If the existing ADA infrastructure is not up to current standards, the applicant shall construct required improvements.

Permits and Agreements to Work in State Highway Right of Way

- An ODOT Miscellaneous Permit must be obtained for all work in the State highway right of way. When the total value of improvements within the State highway is estimated to be \$100,000 or more, a Cooperative Improvement Agreement (CIA) with ODOT is required. A CIA will address the transfer of the improvements to ODOT and any associated technical and administrative costs for projects that meet this improvement threshold. Agreements shall address the work standards that must be followed, maintenance responsibilities, and compliance with ORS 276.071, which includes State of Oregon prevailing wage requirements.

Note: If a CIA is required, it may take **6 months or longer** to process.

ADVISORY INFORMATION

Signs in the State Highway Right of Way

- Outdoor Advertising signs require a permit through the ODOT Outdoor Advertising Sign Program (ORS 377.725). To determine permitting requirements, contact the Outdoor Advertising Sign Program (outdooradvertising@odot.oregon.gov).

Note: Private signs are not permitted in the State highway right of way (ORS 377.715). Only ODOT approved signs, including traffic control devices, are allowed on the State highway right of way.

Contact the ODOT Development Review Planner identified below for further coordination or questions regarding ODOT comments and requirements during the land use process.

Please send a copy of the Notice of Decision/Staff Report with conditions of approval to:

ODOT_R1_DevRev@odot.oregon.gov

Development Review Planner: Melissa Gonzalez	Melissa.GONZALEZ-GABRIEL2@odot.oregon.gov
District Contact: District 2B	d2bup@odot.oregon.gov

Andrew Mulkey

Attorney at Law

PO Box 66562, Portland, OR 97290 • (503) 334-9899 • andrew@mulkeylegal.com

March 18, 2026

Via Email

West Linn Planning Commission
c/o Darren Wyss
dwyss@westlinnoregon.gov
22500 Salamo Rd.
West Linn, Oregon 97068

Re: Planning Commission Hearing Comments for CUP-25-03/DR-25-02/VAR-25-02

Members of the West Linn Planning Commission,

On behalf of Ms. Elizabeth Dietz, please accept the following letter for the record in the Kaady application for a car wash on Willamette Drive. Ms. Dietz is submitting these comments in her personal capacity. Please notify me of the Planning Commission's decision.

The Planning Commission has the authority and discretion to deny the applicant's request to build a second car wash on Willamette Drive within the Robinwood Neighborhood Main Street Area. The applicant applied for a conditional use and a variance on what the City has described as a limited amount of commercially zoned land. The Comprehensive Plan ("the Plan") explains that "the amount of land dedicated for commercial and business development in West Linn is small (approximately 144 acres...)." Unlike a drive-through restaurant or other retail stores that are permitted outright in this commercial zone, the Planning Commission has broad discretion whether to approve or deny the applicant's proposal for a second car wash.

This second facility would be located a little over half a mile from an existing car wash at Willamette Drive and Hidden Springs Road. To put that in perspective, the two facilities would be separated by a single stop light. Again, this would be the second car wash located within the Robinwood Neighborhood Main Street Area. This is not the best or most efficient use of the City's limited commercially zoned land.

The Planning Commission must understand that conditional uses are just that, conditional. They are not allowed outright, and for that reason, their approval or denial is subject to the City's discretion. Therefore, the Planning Commission has the authority to deny the car wash for failing to meet the needs of the community and the neighborhood. For other types of automotive uses, the Planning Commission has done just that—deny applications for conditional uses within the Robinwood Neighborhood Main Street that have failed to meet the applicable criteria for the location. It is my understanding that most recently, the Planning Commission denied an

application for a Les Schwabe tire center. Ms. Dietz, the City's Robinwood Neighborhood Association, and many members of the community are asking you to take a similar action to deny the application before you.

The Proposal Does not Meet the Requirements for a Conditional Commercial Use in the Zone: Therefore the Planning Commission Has the Authority to Deny the Application.

Based on the applicable criteria—which provide the Planning Commission with broad discretion when making a decision to allow this type of use—the Planning Commission has ample evidence to determine that the proposed use does not comply with CDC 60.070(3) and 60.070(7). Those two criteria allow the Planning Commission to determine (for a variety of reasons) that the proposed car wash would not “provide[] an overall benefit to the City” and that the use does not “comply with the applicable policies of the Comprehensive Plan.” *Id.* The City already has two car washes, one of which is already located in the Robinwood Neighborhood's Main Street Area. Locating a third car wash in the same area does not provide an overall benefit to the City, and would not be consistent with a number of the City's planning goals, which encourage efficient use of the City's limited commercially zoned land.

To obtain approval for a conditional use, the applicant must ensure, (1) the proposed use “will comply with the applicable policies of the Comprehensive Plan,” (CDC 60.070(7)) and (2) that a decision to allow the car wash “will produce a facility that provides an overall benefit to the City” (CDC 60.070(3)). Here, the applicant has not met its burden. The Planning Commission can determine that constructing a second car wash on limited commercially zoned land in the Robinwood Neighborhood fails to comply with numerous comprehensive plan policies, including the policies of the Robinwood Neighborhood Plan (the Neighborhood Plan). CDC 60.070(7).

As stated in the City's Plan (the Plan's “goals and policies... have the force of law and the City is obligated to adhere to them...”). The Neighborhood Plan makes up part of the City's comprehensive plan, and “the City is committed to follow it.” As applied to the Robinwood Neighborhood, the “goals and policies of the Robinwood Neighborhood Plan will have the same effect as goals and policies of the West Linn Comprehensive Plan[.]”

For context, Plan's goals for the commercial zones within Robinwood Neighborhood's Main Street area include developing and redeveloping “commercial areas as mixed use/commercial districts that blend housing and commercial uses to” among other objectives “enhance the community's identity” and “encourage strong neighborhoods.” Plan, Land Use Planning, Section 3, Goal 1. Other Goals include “consider[ing] the development of commercial... facilities” that will “promote energy-efficient travel and land use patterns” while recognizing the limits imposed by the City's “limited available land.” *Id.*, Goal 2.

To that end, CDC 60.070(7) requires the City to consider the policies of the Neighborhood Plan. The Plan's Goal 4, Policy 3 requires that “[t]he neighborhood plan for Robinwood shall guide future changes to this area.” In addition, the Plan policies “requires that any redevelopment of existing land or buildings be completed in a manner which conforms to the adopted neighborhood plan.” Plan, Land Use Planning, Section 3, Policy 4.

The Plan's Policy 4 for this area and zone requires the City to "design and locate... proposed commercial uses in a manner that" accomplishes the following objectives:

- "encourages creation of meaningful public gathering places that incorporate... unique shopping opportunities to increase activity in surrounding areas." Policy 4(b).

In addition, the Planning Commission may consider aesthetic and other functional considerations. Decisions to locate proposed commercial uses must be done in a manner that

- "integrates aesthetically pleasing commercial development with residential uses." Policy 4(f).

The Neighborhood Plan policies include the following:

- Policy 2.3 "Keep the scale of commercial development consistent with the neighborhood setting."
- Policy 2.5 "Allow only commercial uses that are compatible with the main street concept."
- Policy 3.5 "Protect existing single-family neighborhoods from * * * neighboring commercial development."
- Policy 3.8 "Ensure that commercial development along Willamette Drive does not negatively impact nearby single-family residential neighborhoods."

In this case, the Planning Commission can determine that the location of the applicant's proposed car wash does not provide a "unique shopping opportunity" that serves the purpose of "increas[ing] activity in surrounding areas." The applicant's proposal is redundant, not unique, and would serve as a poor use of the City's limited commercially zoned land. The Planning Commission can determine that the applicant's proposal to locate a second car wash within the Robinwood Neighborhood Main Street, fails to meet the requirements of the Comprehensive Plan, Policy 4.

The Planning Commission can also determine that the car wash does not maintain the scale of commercial development consistent with the neighborhood. Neighborhood Plan, Policy 2.3. As mentioned, the neighborhood already has an existing car wash. At the neighborhood scale, the neighborhood setting does not require a second car wash. That is true for the neighborhood's residents, as well as commercial customers passing through the Robinwood Neighborhood Main Street.

The Planning Commission can determine that locating a second car wash would also violate Neighborhood Plan, Policy 2.5. An additional car wash would result in commercial uses that are incompatible with the main street concept. The Main Street concept, and many of the City's design requirements, seek to redevelop existing commercially zoned land to promote walkable and window shopping retail experiences. The plans' goals and policies demonstrate that the City seeks to encourage variety and the efficient location of commercial uses on a limited amount of commercially zoned land. Allowing an over-abundance of one type of commercial business

within the Robinwood Neighborhood Main Street would undermine the purpose of promoting “energy efficient travel and land use patterns” with the goal of “increasing activity in surrounding areas” by providing “unique shopping opportunities.”

The fact that the applicant is seeking a variance to the amount of windows required for a commercial use demonstrates that the applicant’s business was not the type of business intended for the Robinwood Neighborhood Main Street Area. The Plan’s policies, goals, and other implementation measures are directed at promoting walkable commercial areas that among other things, are aesthetically pleasing, facilitate window shopping, and provide a unique draw to the area. Here the fact that the applicant has sought a variance to the city’s requirements demonstrates that the proposal does not comply with the applicable plan policies, including Policy 4(b) and 4(f) listed above. The planning commission can determine that the applicant’s proposed commercial use does not comply with Neighborhood Plan Policy 2.5: a second car wash in this location is not compatible with the neighborhood plan’s main street concept.

The noise generated by the applicant’s proposal and directed at other commercial establishments and residences provides yet another reason why the applicant’s proposal does not fit with the neighborhood’s main street concept. The Planning Commission also has ample evidence and reason to deny the application for failure to comply with Neighborhood Plan policies 3.5 and 3.8. The legitimate concerns about about noise and the need for neighbors to potentially need to police the facilities noise levels demonstrates that this type of use fails to “Protect existing single-family neighborhoods from * * * neighboring commercial development,” and fails to “Ensure that commercial development along Willamette Drive does not negatively impact nearby single-family residential neighborhoods.”

For many of those same reasons, the Planning Commission can also determine that the applicant has failed to comply with CDC 60.070(3). The Planning Commission has ample evidence to conclude that locating a second car wash within the Robinwood Neighborhood Main Street will not result in a facility that provides an overall benefit to the City. The City has limited commercial land available for redevelopment. The City’s planning goals include the goal of efficiently utilizing that limited amount of land to attract customers in a way that increases the overall benefit to nearby areas. In this case, and at this location, the applicant’s proposed car wash does none of those things. Rather than provide a unique draw for residents and passers-by to the Robinwood Neighborhood, the applicant’s proposal would locate a second car wash within the neighborhood’s Main Street Area and would deprive the neighborhood of limited commercially zoned land. The applicant’s proposal does not result in an efficient location of services for the City or for the Robinwood Neighborhood. By failing to efficiently re-develop the limited commercial land within the Robinwood Neighborhood’s Main Street area, the Planning Commission can conclude that the applicant’s car wash does not provide an overall benefit to the City.

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Conclusion:

For the reasons stated above, I request that the Planning Commission vote to deny the application for the conditional use as well as the variance. The applicant's proposal is not consistent with the comprehensive plan policies and would not provide an overall benefit to the City. The Planning Commission has the authority, the discretion, and ample evidence in the record to make these findings and deny the application. The Planning Commission can conclude that the applicant has failed to comply with CDC 60.070(3) and CDC 60.070(7) and deny the applications on that basis.

Respectfully,



Andrew Mulkey (OSB No. 171237)
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Portland, OR 97290
(503) 334-9989
andrew@mulkeylegal.com

Wyss, Darren

From: Ann Breyne <breynea.18@gmail.com>
Sent: Wednesday, March 18, 2026 11:25 AM
To: Wyss, Darren
Subject: Kaady Car Wash proposal

You don't often get email from breynea.18@gmail.com. [Learn why this is important](#)

CAUTION: External Email – Confirm legitimacy before clicking, opening attachments, or following instructions.

I am writing in opposition to the proposed Kaady Car Wash. As a neighbor to the west of the property, I have several concerns with the proposed siting of the car wash:

Traffic- Cars exiting Walling Circle and turning north already experience a dangerous situation during many times of the day. We are often forced to use the center lane to wait until the northbound lane is clear to merge. Adding a potential backup to enter the car wash and cars exiting the car wash (especially making left-hand turns) increases what is already a dangerous traffic area and traffic flow. I see nothing in the proposal to address these issues.

Noise- My husband and I have visited two of the quieter car washes suggested by the owner in the initial Robinwood meeting. The noise was acceptable in a non-residential area. This proposal sites it in a largely residential area. With sound traveling upward, our neighborhood will be strongly impacted. Although the noise has been described in the study as a whoosh sound, it is a loud whooshing sound that is inconsistent and creates a jarring effect. The same is true of the vacuums.

Light- Already light from the parking lot of the proposed car wash, can be blinding. Although the report shows hooded lighting because we are above the site, the light will add to the already sometimes blinding light saturation.

Thank you,

Ann Breyne
18891 Walling Circle

March 16, 2026

Darren Wyss, Principal Planner
City of West Linn
22500 Salamo Road
West Linn, OR 97068

Re: Conditional Use Permit CUP-25-03/DR-25-03/VAR-25-02 — Kaady Car Wash, 18850
Willamette Drive

Mr. Wyss:

Please accept the attached comments, photos and video as public testimony on this development application. Please also submit to the commission my request to show the attached, 14-second-long "Walling Way congestion video-20260220.mov" during my oral testimony at the commission's March 18th hearing.

Sincerely,

Brent Hunsberger

Dear Members of the Planning Commission,

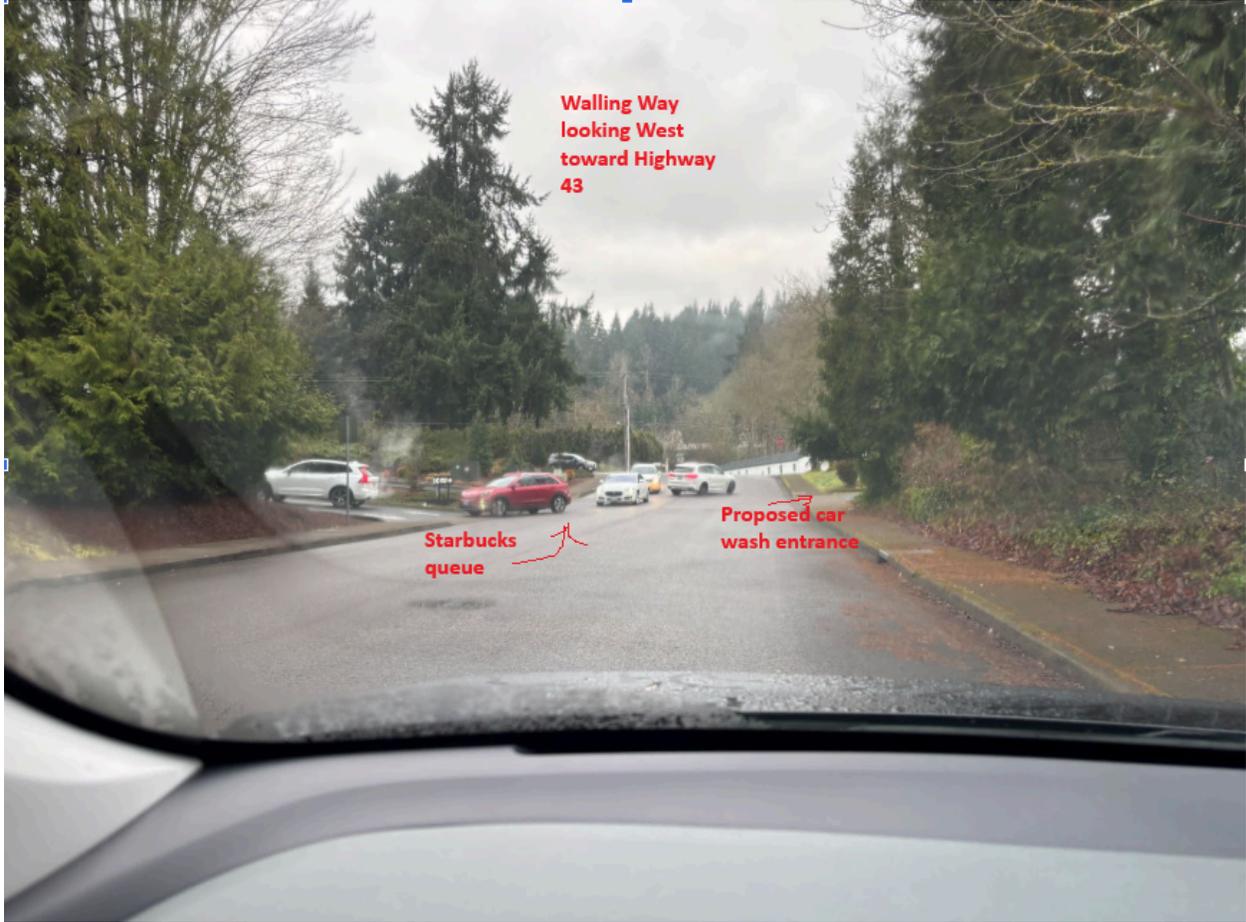
My wife and I reside at 3536 Walling Way, downhill and east of this proposed car wash. We oppose the application (CUP-25-03/DR-25-03/VAR-25-02) as currently submitted and conditioned because it fails to meet city code standards for public facility adequacy, traffic safety and noise mitigation. The proposed use threatens to make a key entrance and exit out of the Robinwood neighborhood more inadequate and precarious for drivers, pedestrians and transit users than it already is. I ask that the commission reject the application or take the following steps to address its failure to meet West Linn's development code:

1. Require a targeted traffic-impact analysis of the proposal's effects on Walling Way and its potentially failing intersection with Highway 43, per CDC 60.070(a)(4).
2. Require closure of the property's Walling Way entrance/exit to comply with access control standards in CDC 48.025.
3. Require improvements to transit stops that abut the property to protect pedestrians from increased traffic and automobile turns generated by the proposal, per the city's Transportation System Plan and CDC 55.100(H)(1).
4. If approved, require professional noise studies during Kaady's first year of operation to monitor compliance with City standards and permit requirements, per CDC 55.100(D)(4). The studies should be done at the direction and oversight of city staff, per CDC 60.070(C)(2).

Applicant has not shown that the Walling Way/Highway 43 intersection is adequate to accommodate traffic from a new car wash. The applicant says it plans to allow egress and possibly ingress at the property's entrance on Walling Way. According to a May 2015 report for the city's [Transportation System Plan](#), the Level of Service of the nearby intersection of Walling Way and Highway 43 was rated as an E, just short of failing, meaning vehicles waited more than 40 seconds during peak evening traffic to turn left from Walling Way onto Highway 43 (TSP, p. 84). This LOS analysis was completed BEFORE the city approved the 2016 [application](#) to site a busy drive-through Starbucks at this corner. Conditions have only worsened since then, as accompanying photos and video show. Unfortunately, the applicant's traffic analysis ignored the extent to which this intersection has degraded, even though the applicant plans to take advantage of Walling Way for traffic flow. There is no stop light at this intersection, yet it supports two transit stops on either side of Highway 43 and attracts many turns from 43 east onto Walling Way. Many residents, including ourselves, avoid this intersection due to this congestion and dangers. They instead exit the neighborhood at Fairview Way and Highway 43, which funnels traffic in front of homes on Rose and Fairview ways.

CDC 60.070(A)(4) requires that "adequate public facilities will be available to provide service to the property at the time of occupancy." The adequacy must be assessed based on current, actual conditions. This standard has not been met. The functionality of the intersection of Walling Way and Highway 43 – already rated 'E' in 2015 *before* the Starbucks approval – was not addressed by the applicant, and there's no evidence the city has assessed it in more than a decade. The city's Transportation System Plan projected the intersection's level of service would reach F by 2040 (p. 88). It might already be there.

The applicant's traffic analysis ignored existing queuing on Walling Way. The application and city staff addressed possible queuing on Highway 43 but ignored those existing and arguably worse conditions on Walling Way. Queuing already occurs on Walling Way next to the applicant's site, as cars line up to place orders at the Starbucks drive-through or exit onto Highway 43. At times the line even spills onto Highway 43. The accompanying photos and video – taken [Friday, February 20th, at 8:02 a.m.](#) – is just one example of this queuing at morning peak-hour traffic. These tie-ups cause near accidents as autos trying to drive east on Walling Way swerve into the westbound lane of traffic to avoid autos queuing into Starbucks. Vehicles entering or exiting the car wash onto Walling Way will make matters worse, especially if they try turning left onto Walling Way or cross Walling Way to enter Starbucks. Neither the applicant nor city staff addressed these existing safety hazards and how the applicant's proposal will affect them.



Walling Way
looking West
toward Highway
43

Starbucks
queue

Proposed car
wash entrance



To further illustrate safety issues that arise here, [the accompanying Walling Way congestion video-20260220.MOV shows](#) a vehicle on Highway 43 abandoning the Starbucks queue, nearly swerving into northbound traffic on 43 and then pausing and blocking the westbound lane and pedestrian crosswalk on Walling Way. This is a typical unorthodox maneuver that motorists engage in when this congestion develops. The queuing at Starbucks often is at its worst on Saturdays mornings,, the same day that Kaady expects its traffic volume to peak. Having autos exit and enter from the proposed car wash into this congested area on Walling Way will only increase the risk of accidents and endanger pedestrians. We're also concerned that car-wash customers, faced with this congestion on Walling Way, will instead turn left down Walling Way, past our house to Old River Road to access the stoplight at Cedar Oak, increasing neighborhood traffic on a two-lane, unstriped road with no sidewalks.



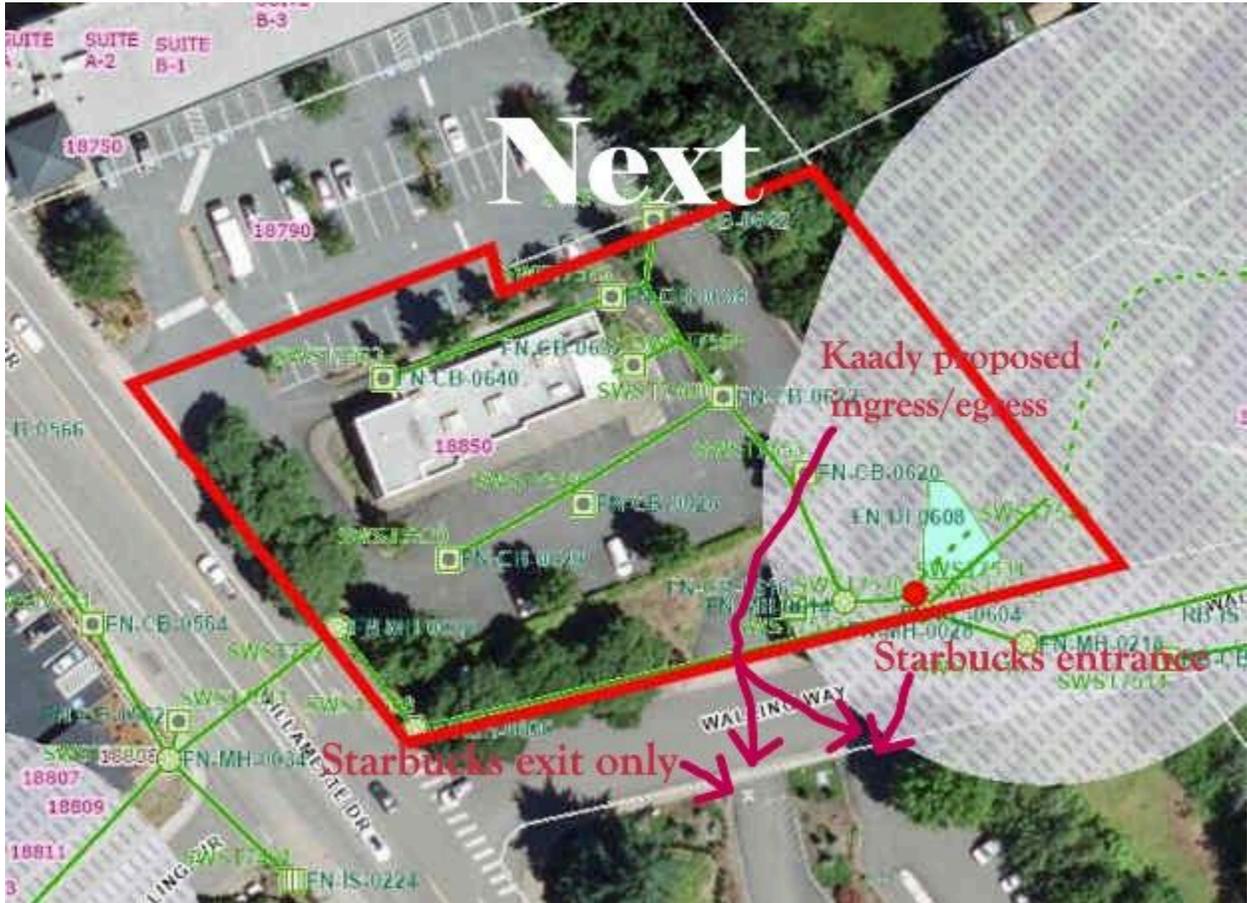
These photos and video call into question city staff finding 140 that no additional street improvements are required based on a decrease in peak hour trips compared to the McDonald's, which closed in 2018, more than seven years ago. These photos and video show that the previous use is irrelevant to current congestion levels on Walling Way.

The applicant has failed to meet CDC standards for access control and traffic-impact analysis. CDC 85.170(B)(2)(c)(1)(C) requires a traffic impact analysis when the “location of the access driveway does not meet minimum intersection sight distance requirements, or is located where vehicles entering or leaving the property are restricted or such vehicles queue or hesitate on the State highway, creating a safety hazard.” Kaady plans to use its Walling Way driveway as an access point, but no analysis of existing conditions on Walling Way was performed. CDC 85.170(B)(2)(c)(1)(C) also requires a traffic impact analysis when a non-dwelling application involves “a change in internal traffic patterns that may cause safety problems, such as a backup onto the highway or traffic crashes in the approach area.” Given evidence that this is already occurring, the city must require a traffic impact analysis on Walling Way and not just Highway 43.

The application poses access conflicts & safety concerns. The city's Transportation System Plan (p. 71) states that “Access driveways should align with opposing driveways.” CDC 48.060(F) prefers the "consolidation of driveways" to protect the safety of all users. The existing Walling Way driveway of the proposed Kaady Car Wash does not align with Starbuck's entrance on Walling Way. Instead, it aligns with Starbuck's exit-only driveway. If egress or ingress is

allowed here, it will increase the risk of car-wash customers colliding with autos exiting Starbucks onto Walling Way in either direction, not to mention autos turning from Highway 43 onto Walling Way and swerving to avoid the Starbucks queueing.

Furthermore, autos leaving the car wash will inevitably try to exit across Walling Way into Starbucks' misaligned drive-up entrance, creating yet another hazard.



The city's Transportation System Plan says: "As part of every land use action, the City should evaluate the potential need for conditioning a given development proposal" with this standard regarding access driveways aligning with opposing driveways. The goal: "maintain and/or improve traffic operations and safety along the arterial and collector roadways." (P. 71) This application and the city's conditions fail to meet this goal.

The Commission should require closure of the property's Walling Way access. CDC 48.025 requires that property access be managed to "maintain an adequate level of service" and to "maintain the functional classification of roadways as required by the West Linn Transportation System Plan." The plan classifies streets (pp. 78-79) as arterials, collectors, neighborhood routes and local streets. The plan classifies Walling Way as a "local street." It is

an unstriped, two-lane street with no sidewalks. We argue that Walling Way is currently functioning more as a “neighborhood route” than as a “local street” due to the congestion around Starbucks, with no commensurate safety. Motorists use Walling Way to get to Cedar Oak Elementary School and Cedar Oak Boat Ramp, perhaps before or after they stop for a mocha. Commercial trucks also use it to get to home construction sites. The applicant’s stated desire to use access on Walling Way will only exacerbate this undesirable change in the street’s functional classification. We worry that car-wash customers, faced with congestion at Walling Way and Highway 43, will instead turn left into our neighborhood to access the stoplight at Cedar Oak. This would indeed change the functionality of the street. As such, CDC 48.025 allows the city to require “the closing or consolidation of existing curb cuts or other vehicle access points ... installation of traffic control devices, and/or other mitigation as a condition of granting an access permit.” We ask that the Planning Commission address these safety concerns and change in roadway function or run afoul of its own transportation plan and development code.

The Commission should require pedestrian & transit improvements. A goal of the Transportation System Plan is to “Improve Pedestrian Connections to Transit Facilities.” CDC 55.100(H)(1) allows the city to require public transit improvements along a transit route. There are two TriMet bus stops on either side of Highway 43 in front of the proposed car wash. Yet there is no stoplight, crosswalk or median on Highway 43 to serve pedestrians accessing these bus stops. Our family members sometimes wait 5 minutes or more to cross Highway 43 safely after getting off the southbound bus at Walling Circle on the West side of Highway 43. The stops are poorly marked with no shelters or lighting. The additional traffic congestion generated by this proposal will only make crossing Highway 43 more precarious for pedestrians. City staff finding 136 suggests that “maintaining” the existing transit stop is roughly proportional to the impact of a car-oriented use.” This ignores the fact that the car-oriented use will increase auto turns and congestion, endangering pedestrians trying to cross the street to either transit stop. As a condition of approval, the city should require the applicant to install waiting shelters and benches at these stops and contribute toward measures that help pedestrians access these stops and make them clearly visible to drivers.

In summary, this application fails to meet West Linn Community Development Code (CDC) standards governing public facility adequacy, traffic safety, transit improvements and noise mitigation. I ask that the Commission reject it. At minimum, its approval should be conditioned on permanent closure of the Walling Way access point, post-occupancy noise audits and improvements to nearby transit stops. Thank you for your public service and attention to this important neighborhood concern.

Attachments:

- [Walling Way congestion video-20260220.MOV](#)
- [Walling Way video timestamp-20260220.PNG](#)
- [Walling Way queue1-20260220.jpeg](#) and [Walling Way queue2-20260220.jpeg](#)







Add a Caption

Friday • Feb 20, 2026 • 8:02 AM [Adjust](#)

 IMG_4735

Apple iPhone 15

H.264 

Main Camera — 26 mm $f1.6$
720p • 1280 × 720 • 15.1 MB

29.99 FPS

00:14

[Add a location...](#)







Add a Caption

Wednesday • Mar 18, 2026 • [Adjust](#)
8:33 AM

 IMG_4820

Apple iPhone 15

JPEG

Main Camera — 26 mm $f1.6$
24 MP • 5712 × 4284 • 8.2 MB

ISO50 | 26mm | 0ev | $f1.6$ | 1/347s



[Show in All Photos](#)

March 18, 2026

Dear members of the West Linn Planning Commission,

I am writing to oppose Conditional Use Permit CUP-25-03/DR-25-03/VAR-25-02 — Kaady Car Wash, 18850 Willamette Drive. I live at 3536 Walling Way, downhill and about a block east of the side entrance to the property.

I have been a customer of Kaady Car Wash's other locations for decades and have always had positive experiences; in fact, it is my car wash of choice as I like to support locally-owned businesses. I'm sure it's very difficult to find a place to open a new car wash because no one really wants to live or work near a facility that creates the noise pollution, traffic, and other impacts a car wash brings. However, a property that abuts a residential neighborhood, a few blocks from another car wash, is a particularly poor location. In the context of CDC 60.070(A)(2) CDC 60.070(A)(4), the characteristics of the site are not suitable for the proposed conditional use: it adjoins residential areas, is too close to significant riparian corridors, is too different from the commercial uses normally allowed in this zoning, and does not produce a facility that provides an overall benefit to the city.

My understanding of a conditional use is that it allows a pathway for the city to make exceptions to zoning rules that would otherwise prevent a use from being sited at a particular location. The applicant and city staff both seem to assert that the car wash won't be much different from the drive-through restaurant that previously operated at the site. I disagree. Even if traffic patterns resemble the restaurant's, the fact that the city code does not allow car washes outright in this zone and requires a conditional use process for them to be carefully reviewed shows that by definition, a car wash is not the same as most commercial uses. The noise it will produce, the use of chemicals, and the operation of heavy equipment make the car wash significantly different from just about every other possible commercial use. An industrial-type use should not be allowed in a residential neighborhood. In addition to abutting residential property, it is next to two creeks. I assert that the location is not suitable for this use.

I have lived in West Linn for 16 years and love the Robinwood neighborhood. Our modest ranch house is nothing fancy, but our family chose to move to this spot in 2020 because of the peaceful, quiet wooded setting where the most dramatic noises are the Pacific tree frogs singing, the coyotes yipping and the owls hooting. It is a special place that is representative of what makes West Linn, well, West Linn, and we treasure it. Therefore, my main reason for asking you to deny this conditional use is noise. Car wash blowers and industrial vacuums running seven days a week will permanently mar the neighborhood. There is no buffer of nonresidential property separating the site from residences. Common sense tells us that pleasant, sunny days and weekends will be the busiest for the car wash, making the noise at its worst at the same times and days when neighbors will be most negatively affected -- days when we open our windows or are outdoors trying to enjoy our yards or walk our dogs. The blower decibel levels reported in the applicant's noise study (at some distance from the blowers themselves) are similar to the average leaf blower. In other words, loud. Would you be content to accept noise equivalent to a leaf blower running throughout the day every day on your block? Even with the applicant's noise study, which is based on measurements at other sites, we won't really know how the sound behaves at this site until the car wash is built and operating, and by then it will be permanent.

The priority that should be placed on the quiet characteristic of the neighborhood is spelled out in West Linn City Code Chapter 5.487: "The City Council of the City of West Linn finds that low and moderate ambient noise levels are a significant City amenity. They find further that the level of noise that exists in a community directly affects the livability of the community and the health, comfort and welfare of its residents." Additionally, it is "the express intent and purpose of this ordinance to establish noise level

standards that protect and improve the quality of life of West Linn's residents at work, rest and play." Please keep these stated priorities to protect quality of life in mind when making your decision.

We also love where we live because we have the opportunity to improve our property for wildlife. Our family is working with the [Backyard Habitat Certification Program](#), removing ivy and invasive plants and enhancing the property for animals, birds and insects. We even surrender and let the neighborhood deer have their share of our shrubs. We also do our part by not using pesticides on our property, largely because there is a creek across Walling Way (Fern Creek) and another that runs through the back of our property (Robin Creek), both shown on the city's [Significant Riparian Corridors](#) map. I applaud Kaady for trying to use environmentally friendly practices, but realistically, this car wash would mean that large quantities of chemicals and wastewater will be used at and transported to and from a site right between these two creeks. This logically increases the risk that they could end up in these significant riparian corridors. Just about any other use avoids this risk. Why allow one of the few possible uses that will bring potential pollutants at this sensitive spot?

Perhaps the most discouraging and disappointing aspect of this proposal is that the noise pollution, traffic, and potential for environmental contamination that would diminish the area's quality of life would only serve to duplicate a service that's already right here in the neighborhood. As you know, a car wash operates at the corner of Highway 43 and Hidden Springs, which you can literally see when looking to the south from Highway 43 and Walling Way. The city's conditional use code states that allowed uses should provide an overall benefit to the city, and this proposal simply does not. If it were proposed for a different part of town that lacks a car wash, I could see how that would provide the overall benefit of saving residents from driving farther to access this service. But to me the noise and other impacts are not a fair sacrifice for a redundant service that already exists just a couple blocks down the road along the same commuter route.

Aside from the fact that a car wash already exists here, a car wash is one of the businesses most likely to target non-West Linn residents just passing through on their way to somewhere else. It's also one of the uses least likely to benefit the immediate neighborhood, because a car wash is the one business that neighbors will never walk to or ride their bikes to in order to patronize. By definition, it's catering to drivers, not neighborhood pedestrians, cyclists, or transit users. If this were a proposal for a school, a bank, a church, a doctor's office, a gym, a restaurant, affordable apartments, a convenience store, or just about anything else, there would be a benefit to both the neighborhood and the city. But a duplicate car wash? No.

I humbly acknowledge that I am taking the stereotypical NIMBY position here. Still, it just doesn't make sense to me to allow a noisy business that will permanently harm what makes our home and community so special, all in the name of duplicating a service that already exists here. It's just not worth it.

Thank you for your service to our community, and thank you for listening.

Sarah Hunsberger
3536 Walling Way
West Linn, OR 97068
sarahhuns@gmail.com
503-312-3488

Received @ 11:59 AM
on 3/18/20.

March 17, 2026
19625 Old River DR
West Linn, OR 97068

Planning Commission
Planning Department
22500 Salamo RD
West Linn, OR 97068

Dear Planning Commission,

I am a resident of the Robinwood Neighborhood, whose property lies within 500 feet of the proposed car wash which Mr. Kaady would like to build at the McDonald's site, 18850 Willamette DR. I am also a former employee of Kaady Car Wash. I worked at two Kaady Car Wash locations in the Beaverton area. I have been reviewing their applications for a Conditional Use Permit and Variance. I would like to express my concerns to the Commission, as someone who knows this neighborhood well, and also is familiar with the daily workings, noises, smells, traffic concerns, and operations of a car wash.

I love the Robinwood Neighborhood, the beautiful landscapes, scenery, wildlife, deer, songbirds, and the friendly people who call this our home. It is a riparian area, with two creeks, Fern Creek and Robin Creek, with protections for our water and wildlife. I was surprised to receive a letter from Mr. Kaady. I believe that the McDonald's site is an inappropriate location for a car wash. I would like to clarify that I do not have a problem with the product of a car wash, or with Mr. Kaady having business opportunities in West Linn. However, I believe that a car wash at the McDonald's site could be devastating for the residents of West Linn, and even have a negative impact on our neighboring Lake Oswego.

While reviewing the application, I noted several inaccuracies, which I will bring to your attention in the appropriate categories. As I write this, I am keeping in mind the following questions:

1. Is the McDonald's site an appropriate location for a car wash?
2. Would a car wash at that site provide an overall benefit to the City of West Linn, according to the criteria in the West Linn Community Development Code, 60.070, A(3)?
"The granting of the proposal will produce a facility that will provide an overall benefit to the city."

The answer to both questions is an astounding "No." Each category I address will link back to these questions, and the Code.

Noise and Sound:

The car wash was very loud, so loud that—when I worked there, it hurt my ears, unless I was wearing earplugs. In the application, Kaady Car Wash states that it produces a “whooshing,” but not a “banging” sound, and that the sound is “intermittent.” I would disagree with this assessment, as sounds from the car wash are noisy, loud, and recurrent. **When it is busy, sound from the car wash can be constant, or nearly constant, even if noise is coming from a routine and repetitive pattern of sounds generated by washing a high volume of cars within a short period of time.** If 60 cars are being run through the wash per hour, on a busy day, one per minute, and the whole procedure is repeated quickly, there would be no significant break in the noise for people to rest, study, work, or enjoy their homes and yards. There are some sounds that are intermittent, especially when it is slow; but, defining the total sound produced as intermittent falls short of reality. The neighborhood would be subject to constant sound, even if it were patterns of sound, repeated over and over, when the car wash is busy.

This is an important distinction, as the West Linn Municipal Code 5.487 (3)(e) states: “The standard for judging loud, disturbing and unnecessary noises . . . after taking into consideration whether the noise is recurrent, intermittent, or constant.” Kaady Car Wash is only acknowledging one type of noise—whooshing—and calling it intermittent.

Also, the proposed car wash would be in a close proximity to a residential neighborhood, where people sleep; the land use and zoning are not outright approved for a car wash, which is why they are applying for a conditional use permit; the duration of sound generated by the procedure of a vehicle being run through the wash, and multiple vehicles run in rapid succession through the wash, must be considered. Running one car through the wash would generate a different duration of sound from running car after car after car through the wash, in rapid succession, on a busy day. This raises concerns that the car wash would not be compliant with West Linn Municipal Code 5.487(a),(b),(d).

The entrance and exit to the wash bay will be open during operation, which will not shield the neighborhood from noise. Sound will carry easily, through the open entrance and exit. There is no effective sound buffer at the entrance and exit, to protect our neighborhood from the noise.

The application references an eight foot wall at the back of the McDonald’s lot, and it claims that it will provide a sound buffer. It will not provide sufficient buffering. The wall, parts of which are crumbling and covered with English ivy, has segments which are different heights. Perhaps it is eight feet tall at its highest, but the segments are in gradations, becoming shorter,

until it is much shorter than an average person. It is not sufficient to protect the neighborhood from the sound.

The McDonald's building is at a higher elevation than the ground on which the wall is built.

The base of the McDonald's building is higher than the base of the wall. Thus, the measurement for eight feet in height is not starting from the same elevation as the McDonald's building. It is starting from a lower elevation, which makes it buffer even less sound. The wall is not eight feet tall straight across, and it gradually becomes shorter. It is not tall enough to effectively buffer the sound.

The McDonald's lot sits above a hill, which slopes down Walling Way toward Old River DR. Sound would broadcast in multiple directions, through the open entrance and exit bay, annoy the neighborhood and be disruptive to surrounding businesses.

I would like to provide an accurate description of the types of sounds I remember from working at Kaady Car Wash:

Shouting of Directional Commands:

Employees shouted directional commands to the customers, e.g. "Forward please!" "No Steering!" "Neutral, No Brakes!"

These commands were shouted over and over, throughout the course of the day, along with directional commands to guide customers to the right or to the left. At the main location where I worked, on a busy day, we would run well over 60 cars through the car wash in a busy hour. These commands were shouted for each car that went through the wash. This is a **recurrent** noise, when the wash is busy.

Even if Kaady Car Wash automates the verbal cues, with recordings of spoken voices, it would be repetitive, recurrent, disruptive, distracting, and annoying to the neighborhood very quickly.

Mechanical Noises:

The machinery of the car wash generates a high volume of mechanical noise, thumping, grinding, groaning, whirring, whooshing, some banging (such as when a customer jumps a pusher), and there is a bell-like noise each time the customer exits the wash. The wash machinery has rollers that spin around the cars, soft cloth curtains that slap against the car, and a mechanized track with pushers that push the cars through the wash. The blow dryers are notoriously loud, but the rest of the machinery is loud, too. I know this well, from standing at

the entrance to the wash. With the open entrance and exit, the neighborhood residents and surrounding businesses will be subject to the sounds.

Many sounds are recurrent, and when it is busy and the wash process is repeated over and over, the car wash is generating constant, or virtually constant, noise. Mr. Kaady indicated that he could run 60 cars per hour, a car per minute, through the wash. This would provide no reasonable breaks in the sound for residents or patrons of nearby businesses, during an hour on a busy day. Examples of sounds which would be occasional or intermittent are: Noises from jumped pushers (when a car is not in neutral or the brakes are applied), or the opening and closing of the heavy doors to the entrance and exit of the wash bay (which would occur at opening and closing), the opening and closing of the trap door to the "pit," and noises generated during the night when the maintenance crews work; and noises when trucks come with chemical deliveries and to transport chemical waste.

A jumped pusher occurs when a customer does not have the car in neutral or is not applying the brakes. The pusher goes under the car tire instead of staying behind the tire to "push" the vehicle through the wash. It is loud and generates banging and thumping noises. Although employees try hard to avoid this, it does occur, and it is extremely loud and jarring. It can repeat several times, until the issue causing it is resolved.

Vacuums:

The vacuums generate noise, especially with multiple vacuums running at once. This noise would be in addition to the other noises generated by the wash.

Concerns About the Sound Study:

As a former employee, I have significant concerns about the sound study commissioned by Kaady Car Wash:

The volume and intensity of the blow dryers can be adjusted. The blow dryers can be turned up for peak performance. Mr. Kaady would order that the blow dryers be turned up for peak performance, at times when it was busy. I heard co-workers who had received a phone call conveying this order announce: "Mr. Kaady ordered that the blow dryers be turned up for peak performance." Sure enough, the blow dryers became louder.

The machinery of the car wash also became louder when it was busy, "warmed up" and in high use. I noticed that Mr. Kaady's decibel meter reading, taken at the Burnside location, was

taken around 8:00 a.m., when it was not busy, and the machinery would not be warmed up from high use for the day.

As Kaady Car Wash commissioned the sound study, it would be easy for them to be aware of which locations were being included, and to keep these locations at the softest of the settings, to gain favorable results for the study. Mr. Kaady could also “cherry pick” the locations where he could get the best results.

When I was an employee there, the General Manager asked me to wear a decibel meter. He handed me the decibel meter, which I wore as a pendant around my neck. He said, “This is a decibel meter,” and he instructed me to wear it and operate the car wash (during a moment when it was slow and there were no customers). He went into the back room. He did not tell me what he was doing, but I knew that he was adjusting the settings, because the car wash became quieter (less loud) than it normally was during normal operations. I thought, “He is testing to see how quiet he can make it, to pass an inspection.”

I was surprised that the sound study used data from Sonny’s Car Washes in Phoenix, Arizona, rather than more local data. Kaady Car Wash owns locations in Oregon, Washington, and California. Why is data being taken from Phoenix?

Will the car wash be so loud that we hear it in our homes (many homes in the area are older, built in the 1950s, without sufficient soundproofing to keep out the noise generated by a car wash). Will it silence the songbirds, disturbing them and causing them to move further away?

Environmental Concerns—Can the Chemicals Be Contained?:

The McDonald’s lot sits above a major riparian zone. Fern Creek, which is culverted in a pipe under Highway 43 and the McDonald’s lot, emerges above ground on the property just below McDonald’s. It is imperative that we protect our creeks and waterways.

I am concerned that placing a car wash right above Fern Creek, with Robin Creek also in a close vicinity (it runs through properties on Walling Way) is a bad idea. It is sheer madness to place a car wash, with a high volume of water, chemicals, and an increased concentration of contaminants, right above two protected creeks.

I showed the maps to a friend who was a geographer, who had taught Geography at San Francisco State University. He said, “I am surprised that the city is even considering allowing a car wash to be placed there.”

A question that anyone reviewing the application must ask is: “Can the chemicals and contaminants be appropriately contained?” Mr. Kaady has given his presentation, claiming that they can, and even marketing his business as “environmentally friendly.” As a former employee of Kaady Car Wash, I do not believe that the chemicals would be contained sufficiently to warrant placing the car wash above a major riparian zone. Here are my concerns:

Spray and the Hose Out Process:

1. The car wash generates a large amount of spray, which goes airborne. The spray contains cleaning chemicals and contaminants that are being washed from the cars. The contaminants are being introduced to the environment in a greater concentration, through the airborne spray from mechanized, heavy car washing all in one location. The spray is not all contained inside the wash, and it does not all go into the reclaim chamber. The wind blows it into the lot, into the air, and some of it could even settle on the building, including the roof. It could contaminate the stormwater and also disperse and settle into our neighborhood (from the air)—contaminating our riparian protected trees, creeks, wildlife, and landing on our roses, our organic gardens, and floating into our homes through open windows. I remember how strong the smell was, when I would drive by the Kaady Car Wash at its former location at the base of Hidden Springs. I would roll up my window, as I did not want to smell the cleaning chemicals, and the muck and grime from contaminants being washed from cars, generated from the car wash, that went airborne. (That location was not on and above a riparian zone, like the McDonald’s lot. The McDonald’s lot is a more sensitive location, due to the riparian creeks.) I am concerned about how chemicals from the car wash process (including liquid polymers—some liquid polymers can be hormone disrupters and negatively impact people’s health) and contaminants washed from vehicles could negatively impact our environment and neighborhood.
2. During nightly cleaning duties, employees hose out the car wash. They hose off the blue soft cloth rollers and mitts, soap the walls and spray them, as well as soap and wash the windows and spray them, and they spray the ground and exit area. Contaminants from the car wash are being dislodged from the cloths, the walls, the windows, etc. There is some spray generated from this process. Some of the contaminated water that contains contaminants which were washed off of the cars ends up in the exit area and flows into the lot. Although employees make their best effort to “aim” the hose to push water into the water reclaim chamber (the “pit”), some contaminated water always ends up in the lot. Contaminated water is not all contained in the water reclaim chamber (the “pit”) during the hose out process and nightly cleaning duties. I drove by the Lake

Oswego location (at the base of Terwilliger) and noticed the water from the hose out process, flowing down the driveway. Water from the hose out process includes contaminants that were washed off of the cars.

Traffic Concerns/ Traffic Study:

Like many residents, I am concerned about how traffic patterns from a car wash could negatively impact our neighborhood.

The traffic study uses outdated data from February 2012, taken from multiple car washes in Minnesota. Climate conditions in Minnesota, in the winter, are nothing like West Linn. Minnesota would have ice and snow, and snow drifts. Moreover, February in Oregon is not “peak season,” where the car wash would be busiest. Summertime and December can be busy, but there are slow seasons.

Many of the sources listed as comparable to a drive-thru car wash, such as banks in Kansas with drive-thru tellers, are not comparable, and it is absurd to compare them to a car wash in West Linn. Many people go inside of banks for services. When people do use drive-thru bank teller services, they remain in control of their vehicles. The patterns are different from a car wash. Why doesn't the study focus primarily on car washes, and more relevant comparisons? Not all drive-thrus are the same!

The study observed no more than 10 cars waiting in queue at a local Kaady Car Wash location. This would indicate to me that the study was likely done at a location that was slow, when it was not peak season. I personally observed more than 10 cars waiting in line, when I worked at the location on Canyon Road, and it was busy. There were times when traffic was backed up to the road, even though we set up cones and multiple lanes for vehicles in queue. There were times when we ran over 80 cars through the wash in an hour, when it was busy.

The McDonald's lot is not designed to sustain a high-speed traffic flow from an express car wash. A car wash is different from a McDonald's or fast food establishment. For one thing, while waiting in line for fast food, the driver is in control of the vehicle at all times. (Fast food customers also dine in the restaurant.) At the car wash, the driver places the car in neutral, with no brakes, and takes her hands off of the steering wheel. The vehicles enter the building and are pushed through the wash, in a mechanized system, with the goal being speed, and as many cars sent through the wash as possible.

This brings up safety issues in the McDonald's lot, which shares the entrance and exit points to HWY 43 (Willamette DR) and Walling Way with multiple businesses. It would not take much to create a backlog inside the lot or at either exit. Even if space has been designated for cars to remain in queue, it does not resolve the issue of cars trying to enter and exit the lot, and the need to share the entrances, exits, and lot with customers from other businesses.

Also, I often see deer and other animals and that top of Walling Way. This is their home, and they are beloved by many residents. I frequently see them on Old River DR, Walling Way, and throughout our neighborhood. It is a well-known fact that deer can be startled ("deer in the headlights") and block traffic. There is also a Starbucks next door, with a drive-thru that can be busy in the morning. The intersection with Walling Way and HWY 43 is not designed to sustain a car wash.

I am concerned that a car wash at the McDonald's location would cause traffic back-ups and delays on HWY 43, that could adversely affect traffic in Lake Oswego, as well as West Linn. It could create traffic backed up onto Walling Way, down to Rose Way and Old River DR. Commuters might try to utilize Cedar Oak, Fairview, and Glenmorrie (and Old River DR) at a volume those streets are not designed to sustain, in an effort to access their homes. This could create an increased and less pedestrian friendly traffic burden for the whole area, including neighborhood areas that pedestrians, bicyclists, and dog walkers enjoy.

Application for the Variance—A Cost Cutting Measure that Should Be Denied

Kaady Car Wash is applying for a variance—an exemption to the code requirements for window glazing and transparency. They claim that it is to enhance sound buffering. However, the walls could be designed with higher quality soundproofed glass windows and proper building reinforcement, which would be more expensive, and more aesthetically pleasing. This is clearly a cost-cutting measure. The Comprehensive Plan of the City requires designs that protect aesthetic aspects of the city. By seeking a variance, it is clear that Kaady Car Wash's proposed project is not in compliance with the Comprehensive Plan.

According to the West Linn Community Development Code, 60.070 A(7), "The use will comply with the applicable policies of the Comprehensive Plan."

Comprehensive Plan, Section 3, Mixed Use/ Commercial Development, Policy 4 (f) clarifies that the city is required to "Design or locate existing or proposed commercial uses in a manner that: *** (f) integrates aesthetically pleasing commercial development with residential uses."

Kaady Car Wash's request for a variance is not in compliance with the Comprehensive Plan, Section 3, Policy 4(f). It is an attempt to cut costs and bypass the Comprehensive Plan requirements.

Moreover, there are inaccuracies in the application, including:

"There are no people working inside the wash bay during operational hours, nobody needs to see out of the wash bay as the space is unoccupied."

This is unequivocally false. Employees work in the wash bay during operational hours. Here are a few examples:

- During opening duties, including opening the trap door to the "pit" (the water reclaim chamber)
- Whenever there is a slow moment between cars, employees walk through the car wash bay, looking for and picking up parts of vehicles that have become dislodged, fallen or broken off of cars, and also car molding, decals, etc.
- When it is slow, employees are sent into the car wash bay to clean and polish the stainless steel. (Sometimes, cleaning duties inside the wash bay involve employees standing on ladders.)
- During closing duties, cleaning and polishing the exit sign area and stainless steel, and the washing and hose-out process.

Although the code contains an aesthetic provision, as a building with proper windows would be more beautiful; as a former employee, I am also concerned about how the lack of transparency could present safety issues for employees. The car wash is a wet, soapy environment, with heavy machinery and stainless steel poles and scaffolding. It is laden with trip hazards, such as wheel sprayers and a track (which holds the tires to push the vehicles through the wash; employees have to jump over this quickly and frequently). Windows provide one more line of visibility, both for employees to see out, and for people to see in. I believe that the cost cutting measure of the variance should be denied. A car wash at that location does not provide an overall benefit to the City of West Linn. There is already a car wash nearby in West Linn, and there is a Kaady Car Wash in Lake Oswego.

Here are examples of cost-cutting measures, at the Kaady Car Wash location where I worked:

- Mr. Kaady claimed "duress" regarding our federally mandated work breaks, and received an exemption where he did not have to provide us with them. Often, we were not

provided with the federally mandated breaks, even when it was slow enough to make them feasible. It was an athletic job, and we were not given the proper chance to have a moment's rest.

- In the office, there was a cabinet full of hard, stiff, expired earplugs, that did not expand properly and quickly and were not feasible for a job where we were required to remove them to speak with customers and would need to reinsert them quickly for speed and efficiency when operating the car wash. I was told by the management that I could wear earplugs as long as I removed them to speak with customers. The earplugs in the office were not effective. I have used the same brand and type (outside of the car wash, when they were fresher, soft and pliable).
- We were not being provided with proper Personal Protective Equipment. Yet, a cabinet sat in the office, full of expired, outdated ear plugs, that gave the semblance of employee protection. I was told that I could provide my own earplugs (which I did—I purchased my own, to protect my ears, because it was loud and painful without earplugs, and I was concerned about protecting employee hearing).
- I was told by the management that Mr. Kaady would like us to use only one pair of disposable gloves per day. We were expected to save and reuse the same pair of disposable gloves throughout the day, which were exposed to chemicals, including during heavy cleaning and polishing duties, and not designed to be effective with that level of reuse. I was told that Mr. Kaady wanted to conserve costs and that was why we were expected to only use one pair of disposable gloves.
- Although there was a heater inside of the wash, that would have provided heat for the employee standing point and employees operating the wash and cashiering, I was told that Mr. Kaady would not pay for heat. The only heating source was a tiny space heater in the office. I remember the cold, the wind, and the spray.
- At multiple employee safety meetings, I requested that ice packs be made available on site, for employee safety. It is a well-known fact that ice, applied to injuries, can reduce inflammation and swelling. I was told that Mr. Kaady did not want to provide ice packs and that I could provide my own. This was not feasible, as the employee mini-fridge had a tiny section of freezer, which employees used for lunches. An ice pack would have taken up the whole space. There was no ice (nor chemical cold packs) available on site, in an industrial mechanical setting, with an athletic job and multiple trip hazards.

I am concerned that, with the request for a variance, Mr. Kaady is seeking another cost-cutting measure that will not consider employee needs and safety.

If Mr. Kaady claimed duress regarding our federally mandated work breaks, refused to provide soft and pliant, properly functional earplugs for employee safety, refused to provide ice for first

aid or more than one pair of disposable gloves per employee per day, and would not heat the car wash for employee health and comfort, I am concerned regarding whether or not Mr. Kaady will protect our neighborhood appropriately—or if profits will be placed over the safety of people.

Kaady Car Wash has agreed to maintain the stormwater drainage pond, which Mr. Kaady wants to develop on a “medium priority” riparian protected area. Is he going to maintain it properly, or will it provide the semblance of maintenance, like the cabinet of expired earplugs sitting in the office?

I am concerned that Kaady Car Wash might provide the “semblance” of provision and compliance, and cut necessary corners for cost conservation. Cutting corners could have a devastating impact on the environment and the neighborhood, especially the creeks and riparian waterways.

It is my hope that the City of West Linn will deny Mr. Kaady’s application for a Conditional Use Permit and Variance. Thank you for taking the time to consider my concerns.

Sincerely,

A handwritten signature in cursive script that reads "Roxanna Khosravi".

Roxanna “Shanna” Khosravi

Encl.: Community Development Code, 60.070, A; Municipal Code, 5.487
Comprehensive Plan, Section 3, Policy 4(f)

Community Development Code

60.070 APPROVAL STANDARDS AND CONDITIONS

A. The Planning Commission shall approve, approve with conditions, or deny an application for a **conditional use**, except for a manufactured home subdivision in which case the approval standards and conditions shall be those specified in CDC 36.030, or to enlarge or alter a **conditional use** based on findings of fact with respect to each of the following criteria:

1. The site size and dimensions provide:
 - a. Adequate area for the needs of the proposed **use**; and
 - b. Adequate area for aesthetic design treatment to mitigate any possible adverse effect from the **use** on surrounding properties and **uses**.
2. The characteristics of the site are suitable for the proposed **use** considering size, shape, location, topography, and natural features.
3. The granting of the proposal will produce a facility that provides an overall benefit to the City.
4. Adequate public facilities will be available to provide service to the property at the time of occupancy. In situations where the level-of-service or volume-to-capacity performance standard for an affected City or State roadway is currently failing or projected to fail to meet the standard at a date determined within a traffic impact analysis, and an improvement project is not programmed, the development shall avoid further degradation of the affected transportation facility. Mitigation must be provided to bring the facility performance standard to existing conditions at the time of occupancy.
5. The applicable requirements of the zone are met, except as modified by this chapter.
6. The supplementary requirements set forth in Chapters 52 to 55 CDC and CDC 92.010(E) are met, if applicable.
7. The **use** will comply with the applicable policies of the Comprehensive Plan.

B. An approved **conditional use** or enlargement or alteration of an existing **conditional use** shall be subject to the development review provisions set forth in Chapter 55 CDC.

Municipal Code

5.487 Sound Levels and Noise.

(1) Purpose. The City Council of the City of West Linn finds that low and moderate ambient **noise** levels are a significant City amenity. They find further that the level of **noise** that exists in a community directly affects the livability of the community and the health, comfort and welfare of its residents. It is, therefore, the express intent and purpose of this section to establish **noise** level standards that protect and improve the quality of life of West Linn's residents at work, rest and play and that can be objectively measured and enforced.

(2) General Prohibition. No person shall make, continue, assist in making, or allow:

- (a) Any unreasonably loud, disturbing, or raucous **noise**;
- (b) Any **noise** that unreasonably annoys, disturbs, injures, or endangers the comfort, repose, health, safety, or peace of reasonable persons of ordinary sensitivity, within the jurisdictional limits of the City; or
- (c) Any **noise** which is so harsh, prolonged, unnatural, or unusual in time or place as to occasion unreasonable discomfort to any persons, or as to unreasonably interfere with the peace and comfort of neighbors or their guests, or operators or customers in places of business, or as to detrimentally or adversely affect such residences or places of business.

(3) The standard for judging loud, disturbing and unnecessary **noises** shall be that of an average, reasonable person with ordinary sensibilities after taking into consideration:

- (a) The proximity of the **sound** to sleeping facilities, whether residential or commercial;
- (b) The land use, nature, and zoning of the area from which the **sound** emanates and the area where it is received or perceived;
- (c) The time of day or night the **sound** occurs;
- (d) The duration of the **sound**; and
- (e) Whether the **sound** is recurrent, intermittent, or constant.

Comprehensive Plan, Section 3, Policy 4 (f)

POLICIES

1. A portion of the Bolton District is currently designated in Metro's 2040 Design Map as a town center. The neighborhood plan for Bolton shall guide future changes to this area. If appropriate, the City will submit a request to Metro to remove the town center designation from Bolton, and substitute another more appropriate designation.
2. A portion of the Willamette District is currently designated in Metro's 2040 Design Map as a main street. The neighborhood plan for Willamette shall guide future changes to this area. If appropriate, the City will submit a request to Metro to amend land use designations for the Willamette District.
3. A portion of the Robinwood District is currently designated in Metro's 2040 Design Map as a corridor. The neighborhood plan for Robinwood shall guide future changes to this area. If appropriate, the City will submit a request to Metro to amend land use designations for the Robinwood District.
4. Design and locate existing or proposed commercial uses in a manner that:
 - a. Protects remaining natural spaces, significant stands of trees, wildlife corridors, streams/riparian zones, and historic resources.
 - b. Encourages the use of alternative transportation.
 - c. Encourages creation of meaningful public gathering places that incorporate uses such as entertainment and recreation venues, restaurants, and unique shopping opportunities to increase activity in surrounding areas.
 - d. Encourages small businesses, retail establishments, and other employment activities.
 - e. Requires that any redevelopment of existing land or buildings be completed in a manner which conforms to the adopted neighborhood plan.
 - f. Integrates aesthetically pleasing commercial development with residential uses.
 - g. Ensures ingress and egress points do not create traffic congestion.
 - h. Improves traffic patterns within the immediate area.
 - i. Provides easier access to transportation for the physically/mentally challenged.
 - j. Provides safe and convenient pedestrian and bicycle paths and crossings.
5. Commercial rezoning that promotes strip commercial activity shall be prohibited.
6. Commercial development shall be planned at a scale that relates to its location in the district and trade area to be served.

7. Until the City adopts new code provisions consistent with adopted neighborhood plans, the City shall apply appropriate development standards consistent with the existing Community Development Code.

8. Where appropriate and necessary, the City shall incorporate provisions for individualized neighborhood design standards consistent with adopted neighborhood plans as overlay zones within the Community Development Code.

Wyss, Darren

From: kingsborpops@aol.com
Sent: Saturday, March 14, 2026 8:36 PM
To: Wyss, Darren; DONALD & SARAH KINGSBOROUGH
Subject: Kaady Car wash application, Robinwood

You don't often get email from kingsborpops@aol.com. [Learn why this is important](#)

CAUTION: External Email – Confirm legitimacy before clicking, opening attachments, or following instructions.

Planning Commission, Planning staff;

I am in favour of allowing Kaady Car Wash to use the property currently occupied by a years long closed McDonald restaurant. I live in Robinwood, have for very many years. I am well acquainted with the property and I believe that Kaady is a good fit.

The noise argument is poor because there are not any homes even close enough to hear if there was noise and Kaady opens late, 8:00 am closes early, 8:00 pm. Even if they made noise, it would be during hours of little disturbance. Very little noise and no neighbours to disturb.

I have witnessed Kaady in various locations; Sherwood, Lake Oswego, Burlingame, formerly West Linn. I have witnessed the employees keeping the grounds clean and neat. An employee regularly checks the grounds for trash and empties garbage cans, there are always employees on the grounds when they're open. The employees are friendly and helpful.

I think Kaady is a very good neighbour and their business would be a good fit with a corner property to minimize driveway traffic onto hwy #43.

I heartily support the Kaady Car Wash application and urge you to vote to approve.

Sincerely,

Don Kingsborough
PO Box 148 (Nixon Ave.)
West Linn, Ore. 97068
414 405-4251

Wyss, Darren

From: Karen & Danny Mercer <karendannymercer@gmail.com>
Sent: Sunday, March 15, 2026 2:26 PM
To: Wyss, Darren
Cc: Elizabeth Dietz
Subject: Objection Testimony Submission March 18 Hearing – Kaady Car Wash Proposal FILE CUP-25-03/DR-25-03/VAR-25-02

CAUTION: External Email – Confirm legitimacy before clicking, opening attachments, or following instructions.

Attn: Darren Wyss, Principal Planner & West Linn City Council
West Linn City Hall
22500 Salamo Rd
West Linn, OR 97068

3/15/2026

RE: Kaady Car Wash Proposal FILE CUP-25-03/DR-25-03/VAR-25-02

Dear West Linn City Council,

As residents living within 500 feet of the proposed Kaady Car Wash, we are submitting this letter in response to the City's notice inviting comments regarding the March 18 hearing. We respectfully object to the approval of this proposal on environmental, traffic, and stewardship grounds.

1. Environmental incompatibility with a riparian corridor

The proposed site sits within a riparian corridor adjacent to a creek. A car wash, by its nature, involves chemicals, wash water, oils, and sediments that can enter nearby waterways through spills, overflow events, equipment failure, or stormwater runoff. Even under well-managed operations, these facilities carry inherent risks. Placing this type of business directly next to a sensitive waterway creates unnecessary environmental exposure and is simply not an appropriate use for this location.

2. Presence of caustic chemicals within the operator's product line

While the applicant may state that their chemicals are safe, Kaady's own published Safety Data Sheets list products containing caustic or corrosive ingredients. Even if those products are not intended for use at this particular site, their presence within the company's product line illustrates why a car wash operation is not well suited to a location directly adjacent to a creek.

3. Prior treatment of this creek has already created liability

The City has previously altered the same creek at 19412 View Drive by culverting and paving over it. This appears to have occurred in a manner inconsistent with riparian protections. Even if those actions were taken many years ago by prior administrations, the City is now aware that the culvert installation has

created ongoing issues. In public discussions it has been acknowledged that the creek now periodically overflows due to the culvert the city built. This condition represents a continuing liability that has not yet been mitigated. Approving a car wash within the same riparian corridor would repeat the pattern of poor stewardship that has already affected this creek.

4. Concerns regarding code enforcement

We are also concerned about the City's ability to enforce its own regulations. As one example, an illegal Airbnb is currently operating at 19412 View Drive. When this issue has been reported, the response has been that the City does not have sufficient resources to address it. If the City cannot enforce existing code violations, residents understandably question whether environmental protections related to a car wash facility could be effectively enforced in the future.

5. Severe traffic congestion and access limitations

Traffic in this area is already difficult. There is no traffic signal controlling the exit from the plaza, and making a left turn from that location is already challenging. Many residents already avoid this intersection due to congestion. The proposed car wash includes an 18-car queue, which would significantly increase vehicle stacking and congestion in an already constrained access point.

6. Harm to neighboring businesses

The surrounding plaza contains several businesses that rely on customer access and visibility. Increased congestion and a constant queue of vehicles would make the area less accessible and less appealing for patrons. Customers are unlikely to choose outdoor dining or other services in close proximity to a car wash queue. Reduced accessibility, parking, and decreased customer comfort could significantly harm the viability of existing businesses in the plaza.

7. Economic viability concerns for the proposed business

The access challenges that exist at this location have already contributed to business failures (e.g., Mc Donalds) in the past. Poor ingress and egress make it difficult for customers to enter and exit the property. These same constraints may also make it difficult for the proposed car wash itself to operate successfully.

8. Risk of economic loss and increased liability for the City

If the City's objective in approving this development is increased commercial activity or revenue, this project risks producing the opposite outcome. The combination of an 18-car queue, an already congested intersection, and the lack of a traffic signal will further restrict access to the plaza. Customers already experience difficulty exiting the property, particularly when attempting to make a left turn.

If congestion worsens as expected, the businesses currently operating in the plaza may lose customers and eventually fail. At the same time, the proposed car wash itself may face the same access challenges that contributed to the failure of previous businesses at this location.

In this scenario, the City risks losing not only the proposed car wash but also the surrounding businesses that currently serve the community.

Additionally, placing a chemical-handling operation adjacent to a creek that has already experienced flooding due to past culvert work creates additional environmental and financial risk. Should a spill or runoff event occur, the City could face increased liability and remediation costs.

9. Opportunity to view the creek as a community asset rather than a nuisance

Finally, the City may wish to reconsider how it views this creek. Too often it appears to be treated by the city as a nuisance to be culverted, paved over, or hidden rather than as a natural asset that contributes to the character and environmental health of the community.

Other cities have demonstrated that urban waterways can enhance both community value and economic vitality when they are protected and incorporated thoughtfully into planning decisions. The City of Ashland provides a clear example, where the creek running through downtown is preserved and celebrated as a central feature of the community. Businesses, residents, and visitors benefit from that stewardship.

West Linn has the opportunity to take a similar approach. Rather than approving development that places additional environmental risk on this creek, the City could instead recognize the creek as an asset worthy of protection and thoughtful integration into the surrounding area.

For these reasons, including environmental risk, existing creek liabilities, concerns about enforcement, traffic congestion, and potential harm to surrounding businesses, we respectfully request that the City deny approval of the Kaady Car Wash proposal.

Residents should not bear the burden of defending this creek or repeatedly raising concerns about a development that is fundamentally incompatible with its location. The burden should instead be on the applicant to demonstrate that this project is appropriate for a riparian corridor and will not create additional environmental or economic risks for the community.

Residents have already made their position clear. At a recent neighborhood association meeting, community members spoke directly with Mr. Kaady and expressed strong opposition to placing a car wash at this location. The message from residents was clear and direct: this is the wrong location for a car wash.

We respectfully ask the City to take these concerns seriously and to consider the long-term environmental, economic, and community impacts before approving a development that places additional pressure on a sensitive waterway and an already constrained commercial area.

Thank you for your consideration.

Sincerely,
KD Mercer
19422 View Drive
West Linn, Oregon

cc: Robinwood Neighborhood Association, Committee Chair Liz Dietz