CITY HALL 22500 Salamo Rd, West Linn, OR 97068 Telephone: (503) 742-6060 Fax: (503) 742-8655

City of West Linn

Memorandum

Date: March 25, 2026

To: West Linn Planning Commission

From: Darren Wyss, Principal Planner

Subject: Post-public hearing written testimony for CUP-25-03/DR-25-03/VAR-25-02 (New Drive-Through Car Wash at 18850 Willamette Drive)

At the March 18, 2026 public hearing, the Planning Commission closed the public testimony portion of the hearing and

1. left the record open for additional written testimony by 5:00pm, Wednesday, March 25, 2026
2. allow all parties to respond to previously submitted written testimony, but not submit any new evidence by 5:00pm, Wednesday, April 1, 2026
3. allow applicant to submit final written argument by 5:00pm, April 8, 2026
4. reconvene on April 15, 2026, at 6:00pm for final deliberations only.

Attached are all written testimony submitted by the public by 5:00pm on March 25th.

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

Wyss, Darren

From: Anthony Bracco <anthonymichaelbracco@gmail.com>
Sent: Tuesday, March 24, 2026 11:11 PM
To: Wyss, Darren
Subject: planning response letter

Hey Darrin,

It's Tony from the RNA. I'm emailing you a copy of my planning response letter.
My friend is delivering the written and signed version tomorrow with the attached document (which is the Traffic Study from the applicant) on which I underlined the things that they submitted in their study which they denied to having done so at the public meeting.

I quoted from it and included where in the index one of the things is located that he (Mr. Kaadys traffic Engineer Michael) said was "laughable" and that I made it up. He said this in their rebuttal. at the end of the meeting
I would like it to be known to the Planning Commision that I did not make anything up and I directly quoted him and his study.
I may have misspoken and said Wisconsin instead of Minisota about one part of the study, but what he said was not true was that there was data from Kansas city banks drive throughs included in their studies data which is not comparable.
Their own written and submitted Traffic Study shows this.
I also included other various points and hope that the Planning commission gets a chance to read my response to Mr Kaadys teams rebuttal.
Is it possible to include this email along with my submitted written testimony as well?

Thank You,

Peace

Anthony (Tony) Bracco

RECEIVED MAR 2 5 2026

To the Planning Council,

My name is Anthony (Tony) Bracco. I am the current president of the Robinwood Neighborhood Association. I am also the new president of the Neighborhood Presidents Association.

I spoke at the Planning meeting last week for the conditional use permit for the Kaady car wash that is being proposed for the old McDonalds site.

I, like many others from my neighborhood, was surprised to find out our Neighborhood presentation time was reduced from 10 minutes to 5. It was apparent that it was also news to members of the Planning Council as well. I now understand the reasons for the change in the time for a Neighborhood Association to speak. It was explained to me that this was because other presidents in the past were abusing their speaking time by using their own personal time as a citizen and combining it with the neighborhood time. I am sorry that other presidents were wasting the time of the Planning Council in this manner. I hope that we can improve upon the behavior of the Neighborhood Presidents in the future and come to an amicable solution.

I was also a little offended to hear the applicants architect stated that our neighborhood plans are "Irrelevant" because they are only "aspirational" and therefor they are not bound by anything the neighborhood might want. To refute this I would like to point out that in City Code 60.070 (7) it states that the applicant must "comply with the policies of the Comprehensive Plan". In the Comprehensive plan it does say that Neighborhood plans must also be adhered to. So, what I am hearing the applicant say is that they are required to present their plans to the Neighborhood Association as part of the application process, but are not required to follow what the citizens of West Linn neighborhoods have voted on? That they can just disregard what is in the Neighborhood plan, which is a declaration of what the neighborhood decided through a legislative process to show what the citizens want in their neighborhood? What then is the purpose of even having neighborhood associations? These neighborhood plans were created precisely for this purpose. The Robinwood Neighborhood Association has taken a stance and voted against this car wash. The neighborhood plan was crafted to be against additional automotive businesses coming into the neighborhood. It was used to stop Les Schwab from building in the location that is now Chase Bank. If it was relevant back then, then it is just as relevant now, and not "aspirational".

I also understand that the Vision Hwy 43 is not applicable (unfortunately) because it has not passed yet, and the applicant is only held to the code from the time the application was submitted. However, there is city code on this matter that does apply. West Linn City Code 60.070 A (3) States that "The granting of the proposal will produce a facility that provides an overall benefit to the City." How is having a car wash only 2 blocks away from an existing car wash be a benefit to the city? Their argument that they have given is that you can have 2 coffee shops (Starbucks) next to each other, this is not at all a valid or equal comparison.

Also, this specific car wash, "Kaady", had given up on its previous location here in West Linn, leaving an empty business. A vacancy that lasted for years until another car wash was willing to go into that location. It was told to me by a former employee that the management had stated that the West Linn

location was "slowest in the district [of Kaady Car Washes]" at the time that she worked there. Having a second "Kaady" wash, just a few miles down HWY 43 in Lake Oswego as well as the car wash in Willamette. How many car washes do we need in our city when it is also something that citizens can do in their own driveway. Is it really a benefit to have 2 car washes 2 blocks from each other? When even having just the one is a struggle to support the business? I met the owner of the new "Disco" car wash as she came to our neighborhood meeting and she was very concerned that she might not be able to stay in business if there was such close competition. So, do we want another vacancy in our neighborhood business district? How could that possibly be a benefit to the city or its citizens? Do we really need that many car washes for our citizens? Where is the demand coming from?

There are a few comments that I have about the noise issues. As I had stated at the meeting some people might think that the new "Disco" car wash is gaudy but everyone agrees at least it is much quieter than the Kaady car wash was. The #1 complaint that was brought up so many times in so many past neighborhood meetings was how noisy the Kaady car wash was and what could we do about it. I would answer to those concerned citizens that they had to file a noise complaint with the city and the city would have to take care of it. I personally agreed with them. When my kids went to Cedaroak Primary school I could hear loud noises especially the blowers during the daytime when the kids were on the playground. Also when we went to the river park at the boat ramp as well as on Cedar Island the noise was always present. This is relevant to Municipal Code 5.487, sound levels and noise. The "wall" that exists currently, is 8 ft. from the pavement in some but not all locations. It is not 8 feet tall compared to the building itself. Because of the property grade sloping down the wall itself does not reach a high that is adequate to suppress the sound coming from this proposed location. The solution for the front of the property is to build a curved wall and redirect the sound into the neighboring businesses. This is also a very poor solution and not fair to the neighboring businesses whos patrons will be subjected to this barrage of noise.

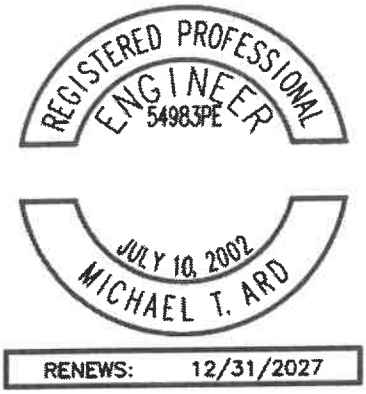
Finally in their rebuttal, the traffic study engineer said that "there were no Kansas bank studies" included in their research and that "to suggest such was laughable". I am including with this letter a copy of their "Transportation Impact Analysis Letter", where I have underlined where these studies were cited and used in their data. From the Appendix, "Drive-Through Queue Generation page 4 February 2012" at the top of the page it states "The data for Kansas banks was collected between 4:30pm and 6:00pm." Does Michael Ard not remember where he got his data from? He did say he "tried to google for research data" and "the only study he could find was the study from Minnesota" which for the month of February in 2012. This study as stated in the Letter is "a 2012 study of various drive-through queues for facilities including banks, car washes, coffee shops, fast food restaurants,and pharmacies prepared by Mike Spack". This is the only back up data besides the miniscule amount of local data that was collected

Thank you for reading this. I appreciate your time and attention to this matter

Anthony M Bruno March 24th 2012

Enclosed Transportation Impact Analysis Letter from ARD Engineering

ARD ENGINEERING
21370 SW Langer Farms Pkwy
Suite 142, Sherwood, OR 97140



February 12, 2026

Chris Myers, Associate Planner
City of West Linn
22500 Salamo Road
West Linn, OR 97068

RE: 18850 Willamette Drive Car Wash: Transportation Impact Analysis Letter

Dear Mr. Myers,

This letter is written to provide information related to the transportation impacts of a proposed car wash facility at 18850 Willamette Drive in West Linn, Oregon. The purpose of this analysis is to provide information about the proposed use, make comparisons to the prior use of the site, examine expected queue lengths within the site, and provide information related to compatibility of the proposed conditional use with the surrounding environment.

Project and Location Description

The subject property is a 1.29-acre site that was previously home to a 3,948 square foot fast food restaurant with a drive-through window. However, the restaurant is no longer operational and the site has been unoccupied for several years. The property takes access via two driveways with one on Willamette Drive (OR Highway 43) and the other on Walling Way. These access driveways serve the Cedar Oaks Shopping Center, which includes the Backyard Burger Company, Kartcade, Smile Linn Dental clinic, Melani Studios Tattooing, Body&Brain Yoga/Tai Chi studio, and Umai Teriyaki restaurant.

Under the current proposal, the building that housed the prior restaurant will be removed, and an automated car wash facility will be constructed on the site. The car wash building will have a gross floor area of 3,190 square feet and will be centered within the site. A parking area will be provided on the north side of the building, with two staff parking spaces, 14 vacuum parking stalls, and one ADA vacuum parking stall. The ticketing and entry queue area will be at the south side of the site. Drivers will typically enter via the driveway on Willamette Drive and immediately turn right to enter the car wash queue. The entry splits into two lanes, each of which feeds into a ticket attendant station. The site layout provides a total of 300 feet of storage space for queueing vehicles between the ticket attendant stations and the site access, which is sufficient space for approximately 13 vehicles without queues extending into the site access driveway on Willamette Drive. Six additional vehicles can queue in the 140 feet between the ticketing stations and the car wash entrance, providing a total queue storage of 19 vehicles entering the car wash tunnel.

A site access and circulation diagram depicting the locations of the site access driveways, the proposed car wash tunnel, the parking area, and the queueing area is provided in Figure 1 below.

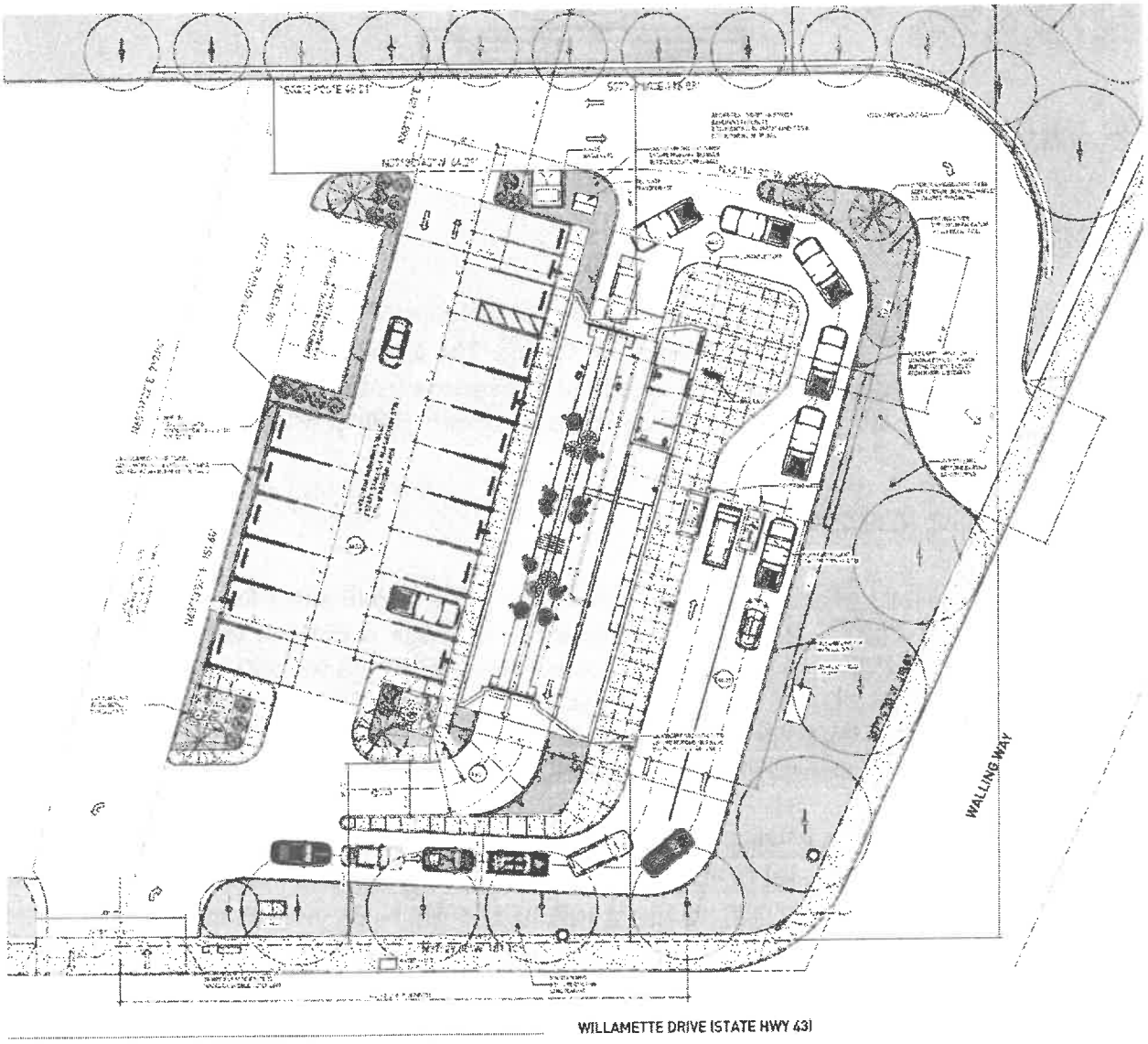


Figure 1: Site Access and Circulation Diagram

Willamette Drive (Oregon Hwy. 43) is classified by the City of West Linn as a Major Arterial roadway. It is also classified by the Oregon Department of Transportation as a Statewide Highway. It has one through lane in each direction in the immediate site vicinity, with turn lanes added at intersections. It has a posted speed limit of 35 mph. Sidewalks and bike lanes are in place on both sides of the roadway.

Walling Way is classified by the City of West Linn as a Local Street. It has a two-lane cross-section with one through lane in each direction and a posted speed limit of 25 mph. Existing sidewalks are in place on both sides of the roadway.

Trip Generation

To estimate the number of trips generated by the proposed use, data from the *ITE Trip Generation Manual, 11th Edition*, published by the Institute of Transportation Engineers was used. The data referenced was for land use code 948, Automated Car Wash. The ITE manual contains trip projections based on either the gross floor area of the facility and the number of car wash tunnels. A comparison of the two metrics revealed that using the number of car wash tunnels (i.e., one) results in a higher trip projection for the weekday evening peak hour, while using the gross floor area (i.e., 3,190 square feet) results in a higher trip projection for the Saturday peak hour. To maintain a conservative analysis, the higher trip generation estimates were used for both analysis periods.

Based on the calculations, the proposed car wash would be projected to generate 78 trips during the weekday evening peak hour and 96 trips during the Saturday peak hour. A summary of the trip generation calculations is provided in Table 1 below. Detailed trip generation calculation worksheets are also included in the attached technical appendix.

Table 1 - Trip Generation: Automated Car Wash

	PM Peak Hour			Saturday Peak Hour		
	In	Out	Total	In	Out	Total
3,190 sf or 1 tunnel	39	39	78	48	48	96

Since the proposed conditional may result in a change in operation as compared to the uses that are outright permitted within the site, one purpose of the trip generation estimate is to quantify how the trip generation characteristics of the site will change if the site is used for an automated car wash rather than other uses that are permitted outright within the underlying zone.

Uses permitted outright in the General Commercial (GC) zone include restaurants, general retail services, medical and dental offices, convenience stores, indoor recreation facilities, and community centers. Of the permitted uses, the highest traffic volumes would be generated by a convenience store or a fast-food restaurant with a drive-through window.

Re-occupancy of the existing 3,948 square-foot fast-food restaurant with a drive-through window would be projected to generate 130 trips during the weekday evening peak hour, and 218 Saturday peak hour trips. The comparison to this outright permitted land use shows that the proposed car wash would generate 47

percent fewer site trips during the evening peak hour and 60 percent fewer Saturday peak hour trips than a fast-food restaurant on the site (which also uses a drive-through window).

Alternatively, redevelopment of the site with a 3,000 square foot convenience store would be projected to generate 147 trips during the weekday evening peak hour, and 238 Saturday peak hour trips. The proposed car wash facility would generate 47 percent fewer weekday evening peak hour trips and 60 percent fewer Saturday peak hour trips than a 3,000 square foot convenience store within the site.

Based on the above comparisons, the proposed car wash facility is projected to have transportation impacts well below the levels associated with other outright permitted uses in the General Commercial zone. Notably, since the existing fast food restaurant with drive-through window on the site could be re-occupied, approval of the proposed car wash facility also represents a decrease in trip generation as compared to a use that is permitted without going through a land use approval process.

Queuing Analysis

Since the proposed car wash use requires on-site queuing, it is also appropriate to evaluate whether there is sufficient space to accommodate lines of vehicles waiting to enter the car wash tunnel. The potential site queues were analyzed using a review of prior studies of car wash facilities, direct observation of comparable Kaady Car Wash sites in the Portland Metro area, and using a mathematical model based on peak-hour service demands in conjunction with actual service times, assuming arrival of individual vehicles occurs at random times within the peak hour.

2012 study - car washes in Minnesota

A search for prior studies yielded a 2012 study of various drive-through queues for facilities including banks, car washes, coffee shops, fast food restaurants, and pharmacies prepared by Mike Spack, PE in Minnesota. That study collected data for 6 car wash facilities, with a total of 12 days of observations. The study reported the maximum queues observed over the course of each examined day. The average maximum queue length was 4.42 vehicles, with a standard deviation of 2.31 vehicles. From the study, a high estimate of the maximum queue (85th percentile) was 6.2 vehicles. The longest queue ever observed during the study was 10 vehicles. Notably, these observed car wash queue lengths were less than those reported for fast food restaurants. Fast food restaurants experienced average maximum queues of 8.5 vehicles, an 85th percentile of 12 vehicles, and a maximum observed queue of 13 vehicles.

For local data, cameras were installed to observe one mid-week day and one weekend day at two Kaady Car Wash sites in the Portland metro area. The selected sites were at 9614 SW Tualatin Sherwood Road in Tualatin, Oregon and at 1909 W Burnside Street in Portland, Oregon. However, since there was rain during part of the weekend observations at the Tualatin Sherwood Road site, a second weekend of data was collected at that location. The maximum queue observed during a midweek day was 4 vehicles at the location in Tualatin (the maximum mid-week queue at the Burnside site was 2 vehicles). During weekend

operation, the maximum observed queue was also 4 vehicles at the location in Tualatin (the maximum weekend queue at the Burnside location was 3 vehicles).

The mathematical queuing model used was a Poisson distribution queuing model that used designated hourly arrival rates and service times to calculate the projected queue length. In order to provide for a very conservative analysis, the arrival rate used for the calculations was based on the highest trip generation data point contained in the ITE Trip Generation manual rather than the average trip generation rate. This trip rate was 37.75 trips per thousand square feet during the Saturday peak hour, which equates to 120 trips for the 3,190 square foot car wash, with half entering and half exiting the site (i.e., 60 vehicles arriving and 60 vehicles departing during the peak hour.) Additionally, the service rate was conservatively assumed to be 40 seconds per vehicle. Actual observation of car wash operations at the two Kaady Car Wash sites showed service times of as little as 30 seconds between vehicles when queues were present. Based on the calculations, the projected 95th percentile queue length for the very high estimated arrival rate was 7.4 vehicles.

Overall, the calculated queue length for the proposed car wash was 7.4 vehicles, and the maximum queue length observed at any car wash location among the data sets was 10 vehicles.

The proposed site plan provides sufficient space for 19 vehicles to queue prior to entering the wash tunnel.

Based on the analysis and the proposed site plan, the projected vehicle queues waiting to enter the car wash tunnel can safely be accommodated within the project site. Since the car wash queues are not projected to extend to the driveway, they will not impede the movement of vehicles entering and exiting the Cedar Oaks Shopping Center and are not projected to impact operation of either Willamette Drive or Walling Way.

CONCLUSIONS

Based on the transportation analysis, approval of the proposed automated car wash facility at 18850 Willamette Drive in West Linn, Oregon will not result in increases in traffic or degradation of operation of area roadways and intersections as compared to either the prior use of the site or other uses which are permitted outright in the General Commercial zone. Since the existing fast food restaurant with drive-through window on the site could be re-occupied, approval of the proposed car wash facility also represents a decrease in trip generation as compared to a use that is permitted without going through a land use approval process.

Based on the queuing analysis, the proposed site plan includes adequate space to accommodate the projected maximum queues without interfering with operation of the site access driveways or the adjacent public streets.

No additional travel demand, circulation, or queueing mitigation measures are recommended in conjunction with implementation of the proposed site plan for this conditional use.

If you have any questions regarding this analysis or if you need any further assistance, please don't hesitate to contact me.

Sincerely,

Michael Ard, PE
Principal Engineer

Appendix

Trip Generation Calculation Worksheet

Land Use Description: Automated Car Wash
ITE Land Use Code: 948
Independent Variable: Gross Floor Area
Quantity: 3.19 Thousand Square Feet

Summary of ITE Trip Generation Data

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 14.20 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour of Generator
Trip Rate: 30.40 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Site Trip Generation Calculations

3.19 ksf Automated Car Wash

	Entering	Exiting	Total
PM Peak Hour	23	23	46
Saturday Hour	48	48	96

Data Source: *Trip Generation Manual, 11th Edition* , Institute of Transportation Engineers, 2021

Trip Generation Calculation Worksheet

Land Use Description: Automated Car Wash
ITE Land Use Code: 948
Independent Variable: Car Wash Tunnels
Quantity: 1 Car Wash Tunnel

Summary of ITE Trip Generation Data

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 77.50 trips per car wash tunnel
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour of Generator
Trip Rate: 41.00 trips per car wash tunnel
Directional Distribution: 50% Entering 50% Exiting

Site Trip Generation Calculations

1 Car Wash Tunnel

	Entering	Exiting	Total
PM Peak Hour	39	39	78
Saturday Hour	21	21	42

Data Source: *Trip Generation Manual, 11th Edition* , Institute of Transportation Engineers, 2021

Trip Generation Calculation Worksheet

Land Use Description: Fast-Food Restaurant with Drive-Through
ITE Land Use Code: 934
Independent Variable: Gross Floor Area
Quantity: 3.948 Thousand Square Feet

Summary of ITE Trip Generation Data

AM Peak Hour of Adjacent Street Traffic
Trip Rate: 44.61 trips per ksf
Directional Distribution: 51% Entering 49% Exiting

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 33.03 trips per ksf
Directional Distribution: 52% Entering 48% Exiting

Total Weekday Traffic
Trip Rate: 467.48 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour
Trip Rate: 55.25 trips per ksf
Directional Distribution: 51% Entering 50% Exiting

Site Trip Generation Calculations

3.9 ksf Fast-Food Restaurant w/ Drive Thru

	Entering	Exiting	Total
AM Peak Hour	90	86	176
PM Peak Hour	68	62	130
Weekday	923	923	1846
Saturday Peak	111	107	218

Data Source: *Trip Generation Manual, 11th Edition* , Institute of Transportation Engineers, 2021

Trip Generation Calculation Worksheet

Land Use Description: Convenience Store
ITE Land Use Code: 851
Independent Variable: Gross Floor Area
Quantity: 3.00 Thousand Square Feet

Summary of ITE Trip Generation Data

AM Peak Hour of Adjacent Street Traffic
Trip Rate: 62.54 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 49.11 trips per ksf
Directional Distribution: 51% Entering 49% Exiting

Total Weekday Traffic
Trip Rate: 762.28 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour Traffic
Trip Rate: 79.12 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Site Trip Generation Calculations

3.00 ksf Convenience Store

	Entering	Exiting	Total
AM Peak Hour	94	94	188
PM Peak Hour	75	72	147
Weekday	1143	1143	2286
Saturday Peak	119	119	238

Data Source: *Trip Generation Manual, 11th Edition*, Institute of Transportation Engineers, 2021

The data for Kansas banks was collected between 4:30pm and 6:00pm. While many of the maximum queues for the data collected in Minnesota were between these times, maximum queues occurred between 8:30am and 5:30pm so it is possible that some of the Kansas data does not capture the actual maximum queues for the day.

The number of available lanes at banks, not including the ATM lane, ranged from two to seven lanes (though the most open at one time was five lanes). Even though plenty of lanes were available, cars often stacked at the lane closest to the building, thus additional lanes may not result in shorter queues. With an 85th percentile maximum queue of eight vehicles, the data suggests that banks with drive-through lanes should be able to accommodate 160 feet of vehicle stacking.

3.2 Car Washes

Data collection was done at six car washes with drive-through services (including one full-service car wash) in February 2012. Twelve days of data were collected. The car washes were located in the cities of Falcon Heights, Hopkins, Minneapolis, Roseville and St. Louis Park, MN. Five of the six car washes (excluding the full-service car wash) were located at gas stations. Only the vehicles waiting in line were counted; vehicles being washed were not added to the queue.

Table 3.2 – Drive-Through Car Wash Maximum Queue Statistics

Number of Data Points	**12**
Average Maximum Queue (Vehicles)	**4.42**
Standard Deviation (Vehicles)	**2.31**
Coefficient of Variation	**52%**
Range (Vehicles)	**1 to 10**
85th Percentile (Vehicles)	**6.20**
33rd Percentile (Vehicles)	**3.00**

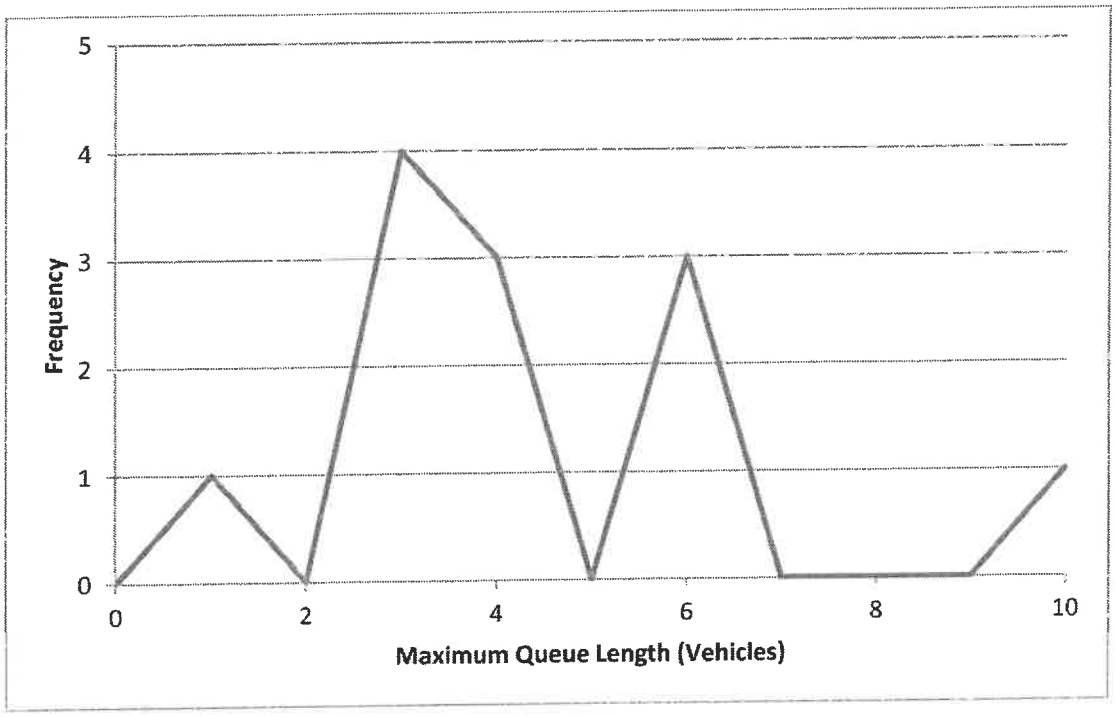


Figure 3.2 – Drive-Through Car Wash Maximum Queue Frequency

Two of the car washes had two lanes while the other four were one lane car washes. The full-service car wash had two lanes and also produced the highest maximum queue of 10 vehicles. The maximum queues for car washes were spread throughout the afternoon from 12:30pm to 8:30pm. With an 85th percentile maximum queue of more than six vehicles, the data suggests that car washes with drive-through lanes should be able to accommodate 140 feet of vehicle stacking throughout the day.

Coffee shops in Minnesota, Nov. 2010, Aug. 2011, Feb. 2012

3.3 Coffee Shops

Data collection was done at six coffee shops with drive-through services in November 2010, August 2011 and February 2012. Fourteen days of data were collected. The coffee shops were located in the cities of Edina, Hopkins, Minneapolis, Roseville and St. Louis Park, MN. Vehicles being served were counted as being in the queue. Twelve days of data from the Kansas City, Kansas area is also included.

Table 3.3 – Drive-Through Coffee Shop Maximum Queue Statistics

	Minnesota Data	Minnesota + Kansas Data
Number of Data Points	14	26
Average Maximum Queue (Vehicles)	11.00	10.23
Standard Deviation (Vehicles)	2.25	2.76
Coefficient of Variation	20%	27%
Range (Vehicles)	7 to 16	3 to 16
85th Percentile (Vehicles)	13.50	13.00
33rd Percentile (Vehicles)	10.00	9.91

Queuing Video Observations - Burnside Kaady Car Wash 11/18/2025 (Tuesday)

Time	Patrons	Max Queue
8:00 AM	14	1
9:00 AM	16	1
10:00 AM	19	2
11:00 AM	17	2
12:00 PM	8	1
1:00 PM	21	2
2:00 PM	13	2
3:00 PM	19	2
4:00 PM	7	1
5:00 PM	14	2
6:00 PM	6	2
7:00 PM	3	1

Queuing Video Observations - Burnside Kaady Car Wash 11/22/2025 (Saturday)

Time	Patrons	Max Queue
8:00 AM	8	1
9:00 AM	20	3
10:00 AM	21	2
11:00 AM	14	2
12:00 PM	14	2
1:00 PM	19	3
2:00 PM	21	2
3:00 PM	20	2
4:00 PM	15	3
5:00 PM	4	1
6:00 PM	5	1
7:00 PM	7	1

Queuing Video Observations - Tualatin Sherwood Rd Kaady Car Wash 11/15/2025-11/16/2025 (Sat/Sun)

Time	Patrons	Max Queue	Notes
11/15/025			
1:00 PM	43	4	
2:00 PM	21	3	
3:00 PM	28	3	
4:00 PM	18	2	
5:00 PM	5	1	
6:00 PM	8	2	
7:00 PM	3	1	
11/16/2025			
8:00 AM	3	1	Rain
9:00 AM	2	1	Rain
10:00 AM	3	1	Rain
11:00 AM	2	1	Rain
12:00 PM	14	2	Rain

Queuing Video Observations - Tualatin Sherwood Rd Kaady Car Wash 11/18/2025 (Tuesday)

Time	Patrons	Max Queue
8:00 AM	16	2
9:00 AM	13	2
10:00 AM	13	3
11:00 AM	15	2
12:00 PM	29	4
1:00 PM	19	4
2:00 PM	30	4
3:00 PM	28	3
4:00 PM	17	3
5:00 PM	11	2
6:00 PM	3	1
7:00 PM	3	1
Total	**197**	

Queuing Video Observations - Tualatin Sherwood Rd Kaady Car Wash 11/22/2025 (Saturday)

Time	Patrons	Max Queue
8:00 AM	11	2
9:00 AM	12	2
10:00 AM	14	3
11:00 AM	19	3
12:00 PM	28	3
1:00 PM	18	2
2:00 PM	16	2
3:00 PM	12	3
4:00 PM	7	2
5:00 PM	7	1
6:00 PM	8	1
7:00 PM	3	1

18850 Willamette Drive Car Wash

Queue Calculation Worksheet (Assumes Poisson Distrubution of Arrivals)

Average Arrival Rate (λ)	60	veh/hour
Service Time	40	seconds/vehicle
Service Rate (μ)	90	veh/hour

Utilization (ρ)
= (λ)/(μ) 0.666667

Average Queue Length*
= (ρ^2)/(1-ρ) 1.3 vehicles

95th Percentile Queue*
= (log .05) / log (ρ) 7.4 vehicles

*The queue length calculations reflect a high estimate of Saturday peak demand. Typical queue lengths are projected to be less than those calculated here.

Wyss, Darren

From: Andrew Mulkey <andrew@mulkeylegal.com>
Sent: Wednesday, March 25, 2026 3:30 PM
To: Wyss, Darren
Subject: Dietz, Open Record Comments, CUP-25-03/DR-25-02/VAR-25-02
Attachments: 20260325 FINAL Open Record Comment Ltr Kaady.pdf; 20260325 Exhibit 1 Burnside Kaady.pdf

Hello Mr. Wyss,

Please confirm receipt of the attached comments for the Open Record Period for the Kaady application for a car wash located on Willamette Drive. CUP-25-03/DR-25-02/VAR-25-02. These comments are submitted on behalf of Ms. Elizabeth Dietz who is commenting in her personal capacity as a local resident.

Please include the attached comments and this email in the record of proceedings.

Thank you, and please let me know if you have any questions of have difficultly opening the attachments.

Andrew

Andrew Mulkey, OSB 171237
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March 25, 2026

Via Email

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

Re: Planning Commission Open Record 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.

At the hearing, the Planning Commission heard from the applicant's attorney, Ms. Kellington, that the neighborhood plan does not apply. That statement is wrong and misleading. By their own terms, CDC 60.070(A)(7), the Comprehensive Plan, and the Robinwood Neighborhood plan apply. Here is what the Comprehensive Plan says:

- "The neighborhood plan for Robinwood shall guide future changes to this area." Comprehensive Plan Goal 2: Land Use Planning, Section 3, Policy 3.

- "Design and locate existing or proposed commercial uses in a manner that * * * (e) [r]equires that any redevelopment of existing land or buildings be completed in a manner which conforms to the adopted neighborhood plan" Comprehensive Plan Goal 2: Land Use Planning, Section 3, Policy 4(e)

- 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. Comprehensive Plan Goal 2, Section 3, Policy 7.

- 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. Comprehensive Plan Goal 2: Land Use Planning, Section 3, Policy 8.

To summarize, those provisions state that the neighborhood plans will guide changes to the area. They state that for any proposed commercial development any redevelopment of land must be "***completed in a manner which conforms to the adopted neighborhood plan***." Comp Plan, Land Use Planning, Section 3, Policy 4(e) (emphasis added). Again, that policy is directly applicable to the applicant's project via the requirement in CDC 60.070(A)(7) (requiring demonstration that "[t]he use will comply with the applicable policies of the Comprehensive Plan). Even if all the applicant had to do was look to the development code, that code—specifically CDC 60.070(A)(7)—still requires the applicant and planning commission to ensure compliance with the applicable Comprehensive Plan policies. The applicable plan policies in turn require compliance with the policies of the Robinwood Neighborhood Plan.

The comprehensive plan states that the City must adopt, follow, and periodically update the neighborhood plans. The Comprehensive Plan even includes a recommended action measure that the City "Adopt and periodically update neighborhood plans." *Id.* Section 3, Recommended Action Measure 1. After adopting or updating a neighborhood plan, the comprehensive plan states that the city must update its development code to "consistent with adopted neighborhood plans." *Id.* Section 3, Policy 7. But until those adoptions occur, the comprehensive plan explains that the existing development code continues to apply. Here, the existing development code (CDC 60.070(A)(7)) requires the planning commission to ensure compliance with applicable comprehensive plan policies. For the Robinwood Neighborhood, those plan policies include the policies adopted in the neighborhood plan. It is that simple.

Presumably, the City has updated its development code since 2008 to be "consistent with" the existing Robinwood Neighborhood Plan. Even if for the sake of argument, the City had not taken that step to revise its code in the intervening 17 plus years, the applicable comprehensive plan Policy 7 says that the applicant still needs to comply with existing development code. In this case, that code includes CDC 60.070(A)(7), which requires compliance with applicable plan policies.

So, what to make of Ms. Kellington's claim that the plan policies have not been adopted? Again, that is wrong. Did the City adopt the Robinwood Neighborhood Plan? "Yes." Does the Robinwood Neighborhood Plan include applicable plan policies? Also, "Yes."

The fact that the City adopted the Robinwood Neighborhood Plan is stated right on the document's cover. The Neighborhood Plan was "[a]dopted by the West Linn City Council May 12, 2008" by Ordinance 1567. The Robinwood Neighborhood Plan is listed as Exhibit A to Ordinance 1567. The Neighborhood Plan itself states that it is "a part of" the City's Comprehensive Plan:

> "The Robinwood Neighborhood Plan provides an agreed upon direction to guide the future of the Robinwood Neighborhood, and as a part of the Comprehensive Plan, the City is committed to follow it."

Robinwood Neighborhood Plan at 5. The Neighborhood Plan, goes on to state that the goals and policies of the Neighborhood Plan "have the same effect as goals and policies of [the Comprehensive Plan]":

> "The goals and policies of the Robinwood Neighborhood Plan will have the same effect as goals and policies of the West Linn Comprehensive Plan, as applied to the Robinwood Neighborhood."

Robinwood Neighborhood Plan at 5. Combined with the Comprehensive Plan, Land Use Planning, Section 3, Policy 4(e) and CDC 60.070(A)(7), there is no doubt that the policies of the Neighborhood Plan apply.

To summarize, the applicant is wrong. None of the provisions of the comprehensive plan or the development code say that the provisions of adopted neighborhood plans do not apply directly when required by the comprehensive plan policies or provisions of the CDC. The goals and policies of the Neighborhood Plan are set out on pages 8 to 9 of the plan. It may be the case that some of the action measures—what the Neighborhood Plan defines as "non-binding recommendations"—have not all been implemented or carried out. But Ms. Dietz has not argued that any of those recommended action measures apply. Here, the planning commission may absolutely rely on the policies of an adopted part of the comprehensive plan that applies directly to decisions concerning the Robinwood Neighborhood.

In this case, the City has an adopted Robinwood Neighborhood Plan. The Comprehensive Plan has policies that explain that the City must follow the Neighborhood Plan when—as in this case—it is redeveloping land for the purpose of approving a new conditional use. The policies of the comprehensive plan and the neighborhood plan all provide guidance for the planning commission in interpreting and applying CDC 60.070(A)(7) and CDC 60.070(A)(3).

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 (CDC 60.070(A)(7)) and would not provide an overall benefit to the City (CDC 60.070(A)(3)). The Planning Commission has the authority, the discretion, and ample evidence in the record to make these findings and deny the application.

Below, I have provided a summary of additional findings and reasons to deny the application:

- At the hearing neighbors raised the issue of impacts from smell, run-off, and noise. The Planning Commission can conclude that impacts from those aspects of the applicant's proposed use means that the facility will "not provide[] an overall benefit to the City" and demonstrate that the proposed use will not comply with the applicable policies of the Comprehensive Plan, including applicable Neighborhood Plan Policies.
    - Smell and the potential for airborne spray which includes wash chemicals would negatively impact nearby single-family residential neighborhoods. Therefore, the

proposal fails to comply with Neighborhood Plan Policies 3.5 ("Protect existing single-family neighborhoods from * * * neighboring commercial development.") and 3.8 ("Ensure that commercial development along Willamette Drive does not negatively impact nearby single-family residential neighborhoods.").

- Run-off from the wash could potentially go from the wash bay onto the parking lot either directly via the sprayers or as a result of wet cars leaving the bay. Given the proximity to streams downslope of the property, the nearby flooding that occurs, and the chemicals used by the car wash, the proposal does not comply with various plan policies and would not provide an overall benefit to the city. *See* Exhibit 1 (photo of similarly designed Burnside Kaady Car Wash at end of clear day with no rain, showing sheen of wet concrete outside of car wash where wet cars exit). These policies include provisions intended to "[p]reserve natural riparian corridors" and "enhance their value as wildlife habitat" (Neighborhood Plan, Policy 4.1); as well as policies intended to protect nearby residences (Neighborhood Plan Policies 3.5 and 3.8).

- The applicant plans to direct sound at nearby businesses, and there are concerns that the elevation change between the wash bay and downslope residences would allow additional sound to carry into the neighborhood. Regardless, the character and consistency of noise generated by the car wash—which commenters described as constant, and different in character during busy hours than the noise from the nearby roadways—would not be consistent with various plan policies from those that "encourage creation of meaningful public gathering spaces" (Comp Plan, Land Use Planning, Section 3, Policy 4(b), see also Neighborhood Plan Policy 2.2); require that the "scale of commercial development" be "consistent with the neighborhood setting" (Neighborhood Plan Policy 2.3); policies intended to protect nearby residences (Neighborhood Plan Policies 3.5 and 3.8); or policies intended to ensure compatibility with the main street Concept (Neighborhood Plan Policy 2.5).

- The applicant explained that wash water would be directed to the sanitary sewer system. But the applicant has not fully described what chemicals are used or could be used; the extent to which wash chemicals would be directed to the City's water treatment facilities; or the impacts of those chemicals. The applicant has not provided a chemical list of chemicals used or their effects. It is commonly known that many car wash waxes and sprays include a class of chemicals known as "forever chemicals," PFAs, PFOS, or PFOAs, etc. A quick internet search shows that these chemicals bioaccumulate and can cause health harms as they bioaccumulate in people. They are endocrine disruptors and for that reason are linked to health problems such as cancers and reproductive problems.

    - For these reasons, the applicant has failed to demonstrate compliance with the various polices described above, including the requirement that the facility provide an overall benefit to the City. CDC 60.070(A)(3)

Respectfully,

Andrew Mulkey (OSB No. 171237)
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Enclosures:
Exhibit 1, Photo of Burnside Kaady Car Wash


KANDY CAR WASH
1909
EXIT
OPEN
Join the Wash Club
Dietz, Exhibit 1

March 25, 2026

Dear West Linn Planning Commission,

I am writing with additional comments on Conditional Use Permit CUP-25-03/DR-25-03/VAR-25-02 — Kaady Car Wash, 18850 Willamette Drive. Adding a third car wash to West Linn does not provide a benefit to our city because U.S. Census data show that both West Linn and Clackamas County already have a greater number of car washes relative to our population than Multnomah County, Washington County, the State of Oregon, and the United States as a whole. Adding a third West Linn car wash would make the ratio of residents per car wash double the statewide ratio and about 85% larger than the national ratio of residents per car wash. Since our population already has more car washes than the populations of neighboring counties, the state, and the nation, allowing the property at 18850 Willamette Drive to become yet another car wash would not benefit our residents.

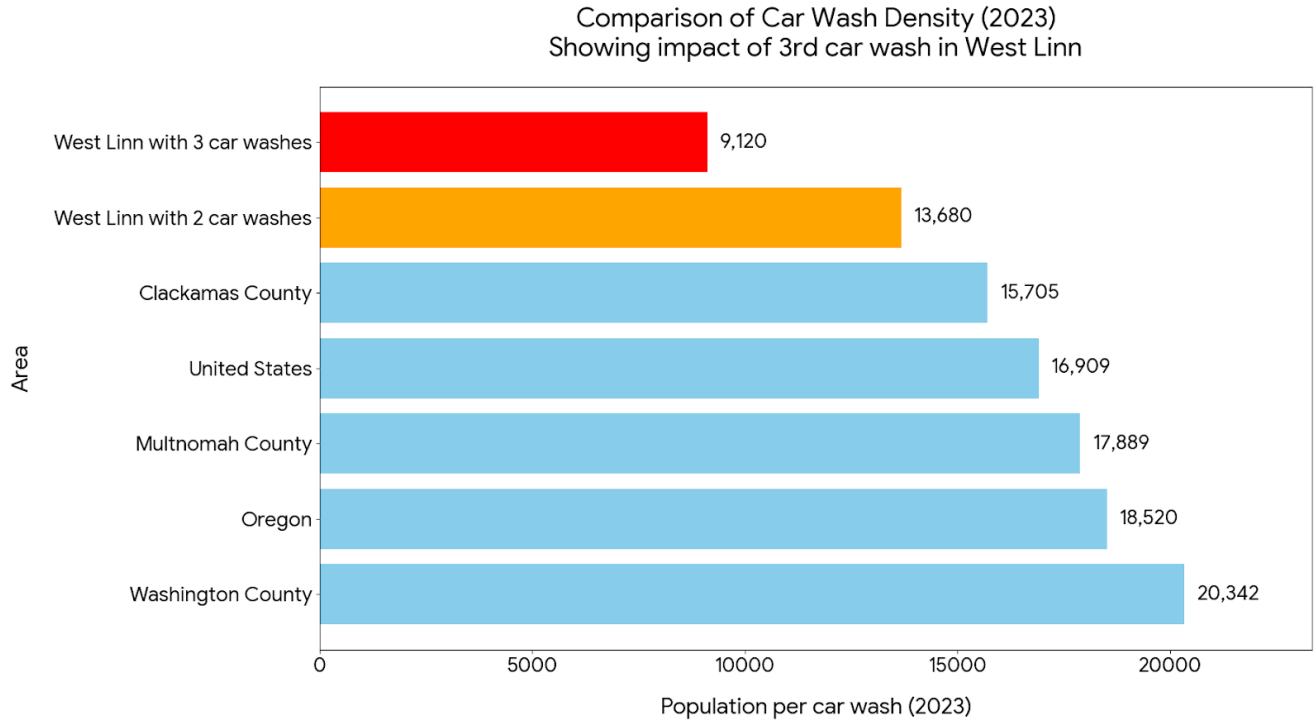
The U.S. Census Bureau County Business Patterns program provides data on the number of car washes in the U.S. In addition to national totals, this program provides state and county-by-county data. Since the most recent car wash numbers were from 2023, I compared them with 2023 population data for consistency.

Based on the 2023 population figures, we see that **with our two existing car washes, West Linn has one car wash for every 13,680 residents**. This is already about a 14% higher ratio than Clackamas County, where West Linn is located. Clackamas County has one car wash for every 15,799 residents, which itself is more car washes relative to population than other Portland Metro counties, the state, and the nation. Nationally, there is one car wash per 16,909 residents, and in the state of Oregon, there is one car wash per 18,520 residents. Multnomah and Washington Counties also have fewer car washes relative to population than both West Linn and Clackamas County. Below is a table showing the details. The ratio of West Linn's current two car washes relative to population is about 23% larger than the national ratio, about 30% larger than Multnomah County's ratio, and about 48% larger than Washington County's ratio of car washes to population:

Area	***Number of car washes, 2023**	****Population, 2023**	**Residents per car wash (2023)**
West Linn	2	27,360	13,680
Clackamas County	27	424,043	15,705
United States	19,807	334,914,895	16,909
Multnomah County	45	805,007	17,889
State of Oregon	232	4,296,626	18,520
Washington County	30	610,245	20,342

Sources:
*Number of car washes per state, county, and nationally: U.S. Census Bureau, County Business Patterns, 2023
**County, city, and state population numbers: Certified Population Estimates December 15, 2023, Population Research Center, College of Urban & Public Affairs, Portland State University.
U.S. population numbers: U.S. Census Bureau, 2023.

If a third car wash is built in West Linn, the ratio in our city would become one car wash per 9,120 residents, a 50% increase. Three facilities would make the number of West Linn's car washes more than double the statewide ratio based on population and 85% bigger than the national ratio.

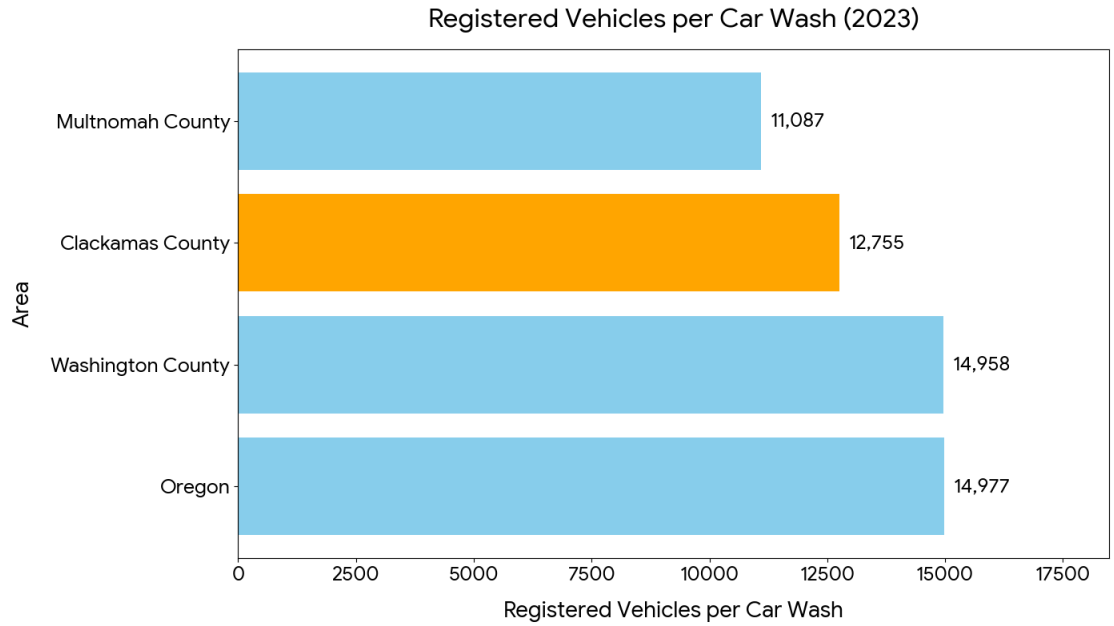


To break it down for our 2023 population of 27,360, West Linn would need only 1.477 car washes to equal the statewide ratio of car washes serving the total Oregon population and 1.618 car washes to equal the national ratio of car washes serving the total U.S. population. To serve our population at the same rate as Washington, Multnomah, and Clackamas counties, we would need between 1.345 and 1.742 car washes for our cities – all less than we currently have. Three car washes serving West Linn's population of 27,360 would be more than double the number serving the state and Washington County by population, and almost double the number serving the U.S. and Multnomah County by population.

Since these ratios rely on 2023 numbers, I'll add that West Linn's population has been stable or possibly shrinking in recent years, depending on the source of data. PSU data shows that the city has grown by a roughly 300 residents since 2023. The U.S. Census Bureau reports a 2.8% decline between 2020 and 2024, with census reporting that the city shrank from 27,373 residents in 2020 to 26,597 residents in 2024.

Our area also has more car washes relative to the number of registered passenger cars. I have not been able to find accurate data on the number of cars in West Linn, but the Oregon Department of Transportation publishes annual numbers of registered passenger cars by county. These numbers show that Clackamas County, where West Linn is located, has one car wash for every 12,755 registered passenger cars, which indicates a greater car wash saturation than at the state level – about a 37% larger ratio than the statewide ratio of one car wash per 17,539 registered passenger cars. So not only does Clackamas County have more car washes relative to population, but it also has more car washes relative to the number of cars. Multnomah County does have more car washes relative to registered cars than Clackamas County, a logical situation given Multnomah County's greater amount of public transit and

employment. However, Clackamas County has more car wash density relative to the number of cars than Washington County and the state. See bar chart below.



With two existing car washes, West Linn's population already has proportionally more car washes than the population of the surrounding Portland metro area counties, the state, and the nation. The county where West Linn is located also already has a higher density of car washes relative to both population and the number of registered vehicles compared with the state of Oregon. Adding a third car wash would push an already overserved community into outright excess and would not provide a benefit to our city.

Once the property at 18850 Willamette Drive is redeveloped as a specialized building designed for an extremely narrow use, it will be very difficult and expensive to use the structure for anything other than a car wash in the future. Unlike with offices, restaurants, housing, or retail, a drive-through car wash can't be adapted for different purposes. The site will become essentially useless for just about any other commercial purpose. Please do not allow this property to be locked into a use that West Linn does not need and that will not benefit our city.

I have provided links below to all of the data I've referenced.

Sincerely,

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

Sources:

U.S. Census Bureau, County Business Patterns, 2023 (Number of car washes per county, state, U.S.):

https://data.census.gov/table/CBP2023.CB2300CBP?g=010XX00US&codeset=naics~811192

Certified Population Estimates December 15, 2023, Population Research Center, College of Urban & Public Affairs, Portland State University (state, county and City of West Linn population):

https://www.pdx.edu/population-research/population-estimate-reports?utm_source=geniusmonkey&utm_medium=viewthrough

West Linn population 2025 Certified Population Estimates, PSU:

https://www.pdx.edu/population-research/population-estimate-reports

U.S. Census Bureau (West Linn population change 2020-2024):

https://www.census.gov/quickfacts/fact/table/westlinncityoregon/PST045224

U.S. Census Bureau, 2023 (national population):

https://www.census.gov/library/stories/2022/12/happy-new-year-2023.html

Oregon Department of Transportation (number of registered passenger cars by county, 2023):

https://www.oregon.gov/odot/DMV/docs/2023_Vehicle_County_Registration.pdf

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March 25, 2026
19625 Old River DR
West Linn, OR 97068

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

Dear Planning Commission,

Thank you for listening to our comments at the hearing. I appreciate the time that you took to ask intelligent questions. I have received an overwhelming amount of positive response from neighbors in the community, regarding the relevance of first-hand testimony, that I provided as a former employee of Kaady Car Wash. I worked at two locations in the Beaverton area, with my primary location being the one on Canyon RD, in 2013-2014. I am a resident of West Linn, whose property lies within 500 feet of the proposed car wash at the McDonald's site. I love West Linn, and the Robinwood neighborhood is my home.

The decisions we make today, about land use and water, affect generations to come. Water is necessary for life. Are we going to keep our creeks and rivers clean, for our children and grandchildren to enjoy? The McDonald's site sits above two riparian protected creeks, Fern Creek and Robin Creek, that flow downhill in a major riparian area. Fern Creek flows into Trillium Creek, and into the Willamette River. Both creeks are extremely close to the proposed car wash, and I am concerned that, if the car wash were approved, they would be contaminated from spray generated by the wash process, as well as run-off from the lot and hose-out process. Chapter 32 of the Community Development Code, Water Resource Area Protection, is listed as relevant criteria for determining whether or not the application is approved. Chapter 32.010 E(1) states: "Protect and improve the following functions and values of WRAs that enhance the value of fish and wildlife habitat: Natural stream corridors that provide habitat and habitat connectivity for terrestrial wildlife." Beloved deer and other wildlife drink from the creeks.

As Danny Mercer explained in his verbal comments at the hearing, Fern Creek is within 100 feet of the site and is protected. It is a protected water resource. I do not know whether or not Robin Creek is within 100 feet of the McDonald's lot, but I know that it flows through the lot with the home just beneath Starbuck's, which is just across Walling Way from McDonald's. Both creeks appear in riparian protected areas in the City of West Linn maps. We have two riparian protected creeks near the McDonald's site, one on each side of Walling Way.

I would like to address a comment made by Mr. Kaady's attorney in her rebuttal, when she claimed that "no car coming out" of the wash "is dripping anything but water." This is inaccurate. I spoke with another former employee of Kaady Car Wash, who worked for the company more recently than I did, and we concurred: Cars are still wet when they leave the wash. My friend uses Kaady Car Wash, and she said that her car is "still wet" when it leaves the wash.

When I worked at the Canyon RD location, customers would sometimes ask employees if we had a towel or paper towel, that they could use to finish drying off their cars.

The Kaady Car Washes website advertises its "Ultimate" wash, the upgrade from the "Advanced" wash, as providing: Liquid Polish, Wheel Guard, Underbody Rinse, and Ceramic Paint Protection. An article on the Kaady Car Washes website from 2020 states that their Ceramic Paint Protection "delivers enhanced shine and unprecedented paint protection and resistance to rain, UV rays and oxidation and is **sprayed on automatically after the final rinse"**(kaady.com, "Kaady Introduces Ceramic Paint Protection," Exhibit 1).

As the chemicals are sprayed on after the final rinse (more chemical spray that goes airborne and can contaminate the environment), vehicles drip more than "just water" when they exit the wash. They are dripping liquid polymers. These chemicals end up not just in the air, but in the lot, on the roads, and on the ground. They would drip and flow right down the serpentine driveway and Walling Way, into people's yards and contaminate high-priority protected riparian land. They would end up in Fern Creek, Robin Creek, and the water table.

The Kaady Car Washes website describes the Ceramic Paint Protection as a "revolutionary **polymer** shield" (kaady.com, "Kaady Shampoos, Cleaners and Protective Products: The Chemistry is Right," Exhibit 2). When reading beyond the advertising, it is evident that Kaady Car Wash is spraying polymers on the vehicles, after the final rinse, which remain on the wet vehicles and drip into the parking lot and roads. **Liquid polymers are known to be hormone disrupters. These chemicals would be sprayed into the air, over and over, after the final rinse, go airborne, blow into the wind, settle on the lot, the roof, the neighborhood, and end up in Fern Creek. They could even spray across Walling Way and land in Robin Creek, which flows through multiple high-priority riparian protected land, flows in the resident's lot who lives just the below Starbucks, and flows through multiple properties in the neighborhood, including my land. I do not want our neighborhood to be sprayed with liquid polymers. It could create adverse health effects for citizens of West Linn.**

Mr. Kaady's attorney indicated that she found my testimony "offensive." I would find it "offensive" to make the citizens of West Linn sick, with hormone disrupters and other chemicals, chemicals that would poison our creeks, and harm our residents as well as our beloved deer and wildlife. So, I am going to continue to speak and address my concerns, to protect our neighborhood, our city, our rivers, creeks, and streams.

"Ceramic Paint Protection is formulated by Kaady Chemical Corp" (kaady.com, Exhibit 1). There are other chemicals that Kaady Chemical Corp uses and markets as well. Karen Mercer described some of the harmful effects, with some being known to be carcinogens, during her verbal testimony at the hearing.

Traffic Impact Analysis Statement—Outdated Data from Minnesota and Kansas, from Feb. 2010-2012—Not Reflective of How a Car Wash Would Impact Our Neighborhood

During Kaady Car Wash's rebuttal, the engineer who prepared the traffic report claimed that there were **"no Kansas banks"** included in his report, and that to include them would be **"laughable."** I would like to establish that "Kansas banks" were included, along with outdated data from a study done in Minnesota in 2012. The study includes data taken from six car washes in Minnesota in Feb. 2012, as well as "six coffee shops [in Minnesota] with drive-through services in November 2010, August 2011, and February 2012" (Exhibit 3, Appendix, page 5, Drive-Through Queue Generation, February 2012) and "Twelve days of data [for coffee shops] from the Kansas City, Kansas area is also included" (Exhibit 3).

The study also includes pharmacies! **The traffic problems that would be generated by the placement of a car wash in the McDonald's lot would be no laughing matter.** It would cause major safety concerns for the lot, be unfair to the existing businesses, as customers would be less likely to use their services if it were more challenging to enter and exit the lot, and it could create traffic back-ups and safety issues on Walling Way. In her rebuttal, Mr. Kaady's attorney said, "We don't need Walling." I would disagree. The business complex with the McDonald's lot is not designed to sustain the traffic impact of a high-volume, automated car wash, even if the two driveways (one being on Walling Way) were utilized. When McDonald's was in business, they had traffic issues regarding the serpentine driveway on Walling Way.

In Mr. Ard's letter to Chris Myers, he wrote: "A search for prior studies yielded a 2012 study of various drive-through queues for facilities including banks, car washes, coffee shops, fast food restaurants, and pharmacies prepared by Mike Speck, PE in Minnesota" (Traffic Impact Analysis Letter, Ard Engineering, Exhibit 3). In page 4 of the "Drive-Through Queue Generation [from February 2012] in the Appendix, it states: "**The data for Kansas banks was collected** between

4:30 p.m. and 6:30 p.m." (Exhibit 3). I have underlined this passage, as well as several other relevant passages in Exhibit 3, for easy reference.

Data taken from Feb. 2012 from six car washes in Minnesota is not reflective of how a car wash at the McDonald's lot would impact traffic in West Linn.

- Minnesota is a different climate from the Portland area. Minnesota would have ice, snow, and snow drifts in February!
- Kansas banks and Minnesota coffee shops from 2010-2012, not to mention Kansas City coffee shops, are also in colder climates with different weather and road patterns from Oregon.
- Even in Oregon, February is not "peak season" for the car wash. Peak season would have more traffic.

Mr. Ard did provide a tiny study of Kaady Car Washes, two locations in the Portland area. His study included data from **one** weekday and **one** weekend day, at each of these two locations. Because it rained, he collected data a second day at one location. My concerns are as follows:

- Mr. Kaady owns car washes in Oregon, Washington and California. He has a car wash empire, that has been in his family for generations. Why is there a need to cite outdated studies from Feb. 2012 in Minnesota, with banks in Kansas and coffeeshops in Minnesota and Kansas?
- Why is there not a more thorough, balanced study of Kaady Car Washes in the Portland area, which would be a much more accurate indication of traffic volume?
- As a former employee, I know that Mr. Kaady kept detailed data of car counts for each location. The car count for each hour was entered into the computer. Mr. Kaady is well aware of which locations are busy, which are slow, and the days of the week and times of the year when the car washes may get a more favorable response.
- Mr. Kaady, who commissioned the traffic study, could "cherry pick" the locations that were likely to be slow. The car wash business is seasonal, and a Monday may be different from a Wednesday or Friday; Saturday would be different from Sunday, etc. He knows these patterns.
- The study is too small. Why not provide data from the Barbur BLVD location, during peak season, when it is busy? When I worked at the Canyon RD location, there were times when we ran over 80 cars through the wash in an hour. The Barbur BLVD location had even higher car counts. There were also times at Canyon RD when it was extremely slow. Mr. Kaady has data for each location; he knows the patterns well.

Although data from the outdated Feb. 2012 study involved six car washes in Minnesota, taken over a period of 12 days, Mr. Ard's study only analyzes two locations, on two days (with the

exception of an extra day at one location due to rain). It is such a small study that it does not provide an accurate pattern of traffic flow generated by the car wash.

Car Wash Customers, in My Experience, are Not "Impulse Shoppers"

Mr. Kaady's architect, Eric Li, claimed that car wash customers tend to be "impulse shoppers." As part of the sales pitch for the car wash, he suggested that this could bring customers to the surrounding businesses. I disagree with this assessment. At the two Kaady Car Wash locations where I worked, customers were there to wash, clean out and vacuum their cars. I did not see them stopping to patronize the neighboring establishments. Kaady Car Wash is an express wash, not a full-service auto detail where people drop off their cars and need a place to sit and drink coffee while other people vacuum their cars. If anything, the presence of the car wash at the McDonald's site would make it more difficult for the businesses that share the lot, as it could create excess traffic build-up, more difficulty for customers to get into and out of the lot, and generate disturbing noises and smells. People dining outdoors at the restaurants in the summer would be annoyed by the loud noise and odors.

Issues with Vacuums and Garbage

It was mentioned that there would be **one** trash receptacle provided for customers. It was not clear to me if that would be one wastebasket/ garbage can, or one dumpster? In her rebuttal, Mr. Kaady's attorney said that there were problems with drug dealers and "vandals" in the lot. When asked for clarification by the Planning Commission, she said that a business had said that the McDonald's had been vandalized. I am concerned that the presence of the car wash could bring things into the lot that may be unpleasant for the neighboring establishments, as people leave all kinds of garbage in and by the trash cans when cleaning out their cars—and that one receptacle may not be sufficient to address this problem.

While working at Kaady Car Wash, I swept the lot and emptied the garbage bins into the dumpster, on a regular basis. Some of the bins were so heavy, that I could not lift them to tip them upside down. I had to manually remove the heavier items, so that I could complete the task. Some items that I remember manually removing from the cans (so that I could tip them upside down):

- Textbooks
- Shoes
- Garbage from people's homes, e.g. kitchen garbage with Styrofoam containers that had held raw chicken and meat, with their other **stinky household garbage**, that they would dispose of at Kaady Car Wash, while vacuuming their cars

- **Bottles of urine** (this was an issue)
- Any garbage that customers wanted to clean out of their cars

People also left things by the garbage cans, that would not fit into the cans, while cleaning out their cars. The cans would fill up quickly, and we emptied them into the dumpster on a regular basis. When we found items left in the lot, near the garbage cans, we had to either carry them to Lost and Found or dispose of them, if appropriate. Here are examples of things that customers left by the vacuum areas at Kaady Car Wash:

- **Bottles of hard liquor—not safe for children!**
- **A used toilet** (which we had to carry to Lost and Found)
- 90 pound weights (which I had to get onto the dolly to remove from the lot, to keep it clean)
- Food and sandwiches, beverage containers, napkins and litter
- Cigarette butts (frequently, people would smoke while cleaning and vacuuming their cars)—I would sweep these from the lot and parking stalls near the vacuums, as well as find them by the garbage cans
- Garbage

Bottles of hard liquor, bottles of urine, and a used toilet left by the vacuums would not be ideal for the other businesses in the lot!

We also had ongoing issues with homeless people stealing the gray plastic garbage bins that were housed inside the garbage huts. They were seeking bottles and cans to recycle. Sometimes, they would steal the bins to carry the bottles and cans. The gray plastic bins were custom-sized, had to be special ordered, and were expensive to replace.

Variance

The city's code requires a certain amount of windows to be present, to follow an aesthetic provision in the Comprehensive Plan. Although Mr. Kaady's application for a variance claims that a lack of windows would create better sound buffering, sound buffering could be achieved with soundproof glass and proper reinforcement. I think that the request for a variance is likely a cost-cutting measure. It would be less beautiful than a building that followed the code. **The Kaady Car Wash application is inaccurate in its claims that employees are not in the wash bay during hours of operation.** It states: "There are no people working inside the wash bay during operational hours."

I was surprised to hear Mr. Kaady's attorney's assertion that employees no longer work in the wash bay; then, she said that it is only early in the morning or to sweep "water" with a broom. As a former employee, I find this difficult to believe.

Throughout the day, whenever it was slow, we were sent into the wash bay to:

- **Walk through the wash bay looking for decals, car molding, and car parts (wipers, mirrors, etc.) that may have fallen off of cars during the wash process.** We picked up these items and took them to Lost and Found. If customers were concerned regarding damage to their vehicles, we filed Customer Service Reports and photographed any car parts that may have broken off the cars during the wash process and ended up in the wash bay.
- **Sweep debris and muck, such as pine needles, leaves, dirt and plant matter, that had been washed from cars, along with "water" toward the reclaim chamber (the "pit") to keep the wash clean**
- **Inspect the blue soft cloths and rollers for build-up of debris and clean as necessary.** It should be noted that car paint can be scratched easily, if dirt or sand were on the cloths
- **We were frequently in the wash bay during hours of operation, whenever it was slow, to keep it clean**
- **We were sent into the wash bay, when it was slow, to clean and polish the stainless steel and interior of the wash**
- In the evening, if it was slow, before closing time, we were sent into the wash bay to clean the exit sign and polish and clean the stainless steel near the exit sign. If it was busy, this was done after closing, but it was often done during hours of operation.

Employees are in the car wash bay during opening and closing duties. Here are a few examples:

- Soaping, scrubbing and washing the walls
- Sweeping pine needles, leaves, dirt and debris (there can be water with the debris) with a push broom
- Hosing out the car wash, hosing down the blue cloths, the cloth rollers, etc. This involves going into the wash bay and hosing down everything to clean it.
- Washing the windows
- Cleaning and polishing

It should be noted that employees are sometimes alone in the car wash (including the wash bay) during opening and closing duties (and at other times). The exit to the wash bay is open

during the hose out process. It is a wet, soapy environment with heavy machinery and multiple trip hazards. I am concerned that if Mr. Kaady's request for a variance were granted, there would not be sufficient windows and visibility for employee safety.

As I mentioned previously, I spoke with a former employee of Kaady Car Wash, who worked there more recently than myself. We agreed that it would be highly unlikely that employees no longer work in the wash bay during hours of operation, as some of the basic duties would still be necessary, unless the whole procedure and wash process had changed. I would be surprised if employees did not need to enter the wash bay, when it was slow, to pick up car parts, wipers, decals, and car molding that fell off during the wash process, or to sweep plant debris, dirt, pine needles, muck and leaves from the floor of the wash bay (with excess water, toward the reclaim chamber), or to inspect the blue soft cloths to make sure that the they were free from excess debris (which is necessary to minimize the scratching of paint) and clean the blue cloths.

Ultimately, I do not believe that a car wash at the McDonald's location would provide an "overall benefit to the City," which is a requirement of Community Development Code 60.070 (3).

Thank you for taking the time to read my letter.

Sincerely,

Roxanna Khosravi

Roxanna "Shanna" Khosravi

Encl.: Exhibit 1, "Kaady Introduces Ceramic Paint Protection," www.kaady.com/news/2020-07-29-article; Exhibit 2, "Kaady Shampoos, Cleaners and Protective Products: The Chemistry is Right," www.kaady.com/cleaning.products; Exhibit 3, Letter to Chris Myers from Ard Engineering and Appendix; Exhibit 4, Community Development Code, 32.010, Community Development Code, 60.070 A

Community Development Code
Water Resource Area Protection

32.010 PURPOSES

The purposes of this chapter are to:

A. Comply with Title 13 and Title 3 of Metro's Urban Growth Management Functional Plan while balancing **resource protection** with property rights and development needs.

B. **Protect** or improve **water** quality by filtering sediment and pollutants and absorbing excess nutrients for the **protection** of public health, safety and the environment and to comply with both state and federal laws and regulations, including the Clean **Water** Act and the Endangered Species Act.

C. Moderate storm **water** impacts by slowing, storing, filtering and absorbing storm **water** and to maintain storm **water** storage and conveyance to prevent or minimize flooding and erosion for the **protection** of public health and safety.

D. Prevent erosion and minimize sedimentation of **water** bodies by **protecting** root masses along streams that resist erosion and stabilize the stream bank and by **protecting** vegetation on steep slopes to maintain their stability.

E. **Protect** and improve the following functions and values of WRAs that enhance the value of fish and wildlife habitat:

1. Natural stream corridors that provide habitat and habitat connectivity for terrestrial wildlife;

2. Microclimate habitats that support species adapted to those conditions;

3. Shade to maintain healthy stream temperatures;

4. Vegetation to absorb and filter pollution and sediment that would otherwise contaminate the **water** body;

5. Sources of organic material that support the food chain;

6. Recruitment of large wood that enhances the habitat of fish bearing streams;

7. Moderation of stream flow by storing and delaying storm **water** runoff; and

8. Vegetated **areas** surrounding wetlands that, together with the wetland, provide vital habitat for birds, amphibians, and other species.

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.

Exhibit 1

Menu

News

Kaady Introduces Ceramic Paint Protection

July 29, 2020

Kaady Car Wash customers can now receive the benefit of state-of-the-art ceramic-infusion technology.

Included in Kaady's "Ultimate" with Advanced Wash, Underbody Rinse, Liquid Polish and Wheel Guard, the new product (called Ceramic Paint Protection) delivers enhanced shine and unprecedented paint protection and resistance to rain, UV rays and oxidation and is sprayed on automatically after the final rinse.

Ceramic Paint Protection is formulated and produced by Kaady Chemical Corp (a division of Kaady).

< BACK (HTTPS://KAADY.COM/NEWS)

sprayed on automatically after the final rinse

Kaady.com/cleaning-products

Exhibit 2

Kaady Shampoos, Cleaners and Protective Products: The Chemistry is Right

Some car washes, including self-described "touchless" facilities, use harsh detergents or dangerous acids. In fact, the so-called touchless process can remove road grime only by using these substances in conjunction with jet blasts of high-pressure water. This process can strip away a molecular layer from paint and wheels with each wash, and even etch the surface of glass.

That's why Kaady has designed our own state-of-the-art equipment, and developed our own non-acidic, non-corrosive, non-caustic shampoos and cleaning agents, which we manufacture to the highest standards in a separate division of our company. So dependable are these success-proven, scientifically formulated products that several top automakers use them in the pre-delivery preparation of their new cars, pickups and SUVs.

Going the extra mile to protect your car's "showroom shine":

UV rays, leaf stains, tree sap, bug spatter and bird droppings: they can eat through the micro-thin layer of factory-applied "clearcoat" that gives new vehicles their showroom shine. To combat them, we developed two powerful protective products and integrated them into the menu at all Kaady Car Washes: Paint Guard™ with carnauba wax, and new Ceramic Paint Protection, a revolutionary polymer shield that increases the longevity of vehicle finishes.

polymer shield

Exhibit 3

RECEIVED MAR 2 5 2026

ARD ENGINEERING
21370 SW Langer Farms Pkwy
Suite 142, Sherwood, OR 97140

REGISTERED PROFESSIONAL ENGINEER 54983PE
JULY 10, 2002 MICHAEL T. ARD
RENEWS: 12/31/2027

February 12, 2026

Chris Myers, Associate Planner
City of West Linn
22500 Salamo Road
West Linn, OR 97068

RE: 18850 Willamette Drive Car Wash: Transportation Impact Analysis Letter

Dear Mr. Myers,

This letter is written to provide information related to the transportation impacts of a proposed car wash facility at 18850 Willamette Drive in West Linn, Oregon. The purpose of this analysis is to provide information about the proposed use, make comparisons to the prior use of the site, examine expected queue lengths within the site, and provide information related to compatibility of the proposed conditional use with the surrounding environment.

Project and Location Description

The subject property is a 1.29-acre site that was previously home to a 3,948 square foot fast food restaurant with a drive-through window. However, the restaurant is no longer operational and the site has been unoccupied for several years. The property takes access via two driveways with one on Willamette Drive (OR Highway 43) and the other on Walling Way. These access driveways serve the Cedar Oaks Shopping Center, which includes the Backyard Burger Company, Kartcade, Smile Linn Dental clinic, Melani Studios Tattooing, Body&Brain Yoga/Tai Chi studio, and Umai Teriyaki restaurant.

Under the current proposal, the building that housed the prior restaurant will be removed, and an automated car wash facility will be constructed on the site. The car wash building will have a gross floor area of 3,190 square feet and will be centered within the site. A parking area will be provided on the north side of the building, with two staff parking spaces, 14 vacuum parking stalls, and one ADA vacuum parking stall. The ticketing and entry queue area will be at the south side of the site. Drivers will typically enter via the driveway on Willamette Drive and immediately turn right to enter the car wash queue. The entry splits into two lanes, each of which feeds into a ticket attendant station. The site layout provides a total of 300 feet of storage space for queueing vehicles between the ticket attendant stations and the site access, which is sufficient space for approximately 13 vehicles without queues extending into the site access driveway on Willamette Drive. Six additional vehicles can queue in the 140 feet between the ticketing stations and the car wash entrance, providing a total queue storage of 19 vehicles entering the car wash tunnel.

A site access and circulation diagram depicting the locations of the site access driveways, the proposed car wash tunnel, the parking area, and the queueing area is provided in Figure 1 below.

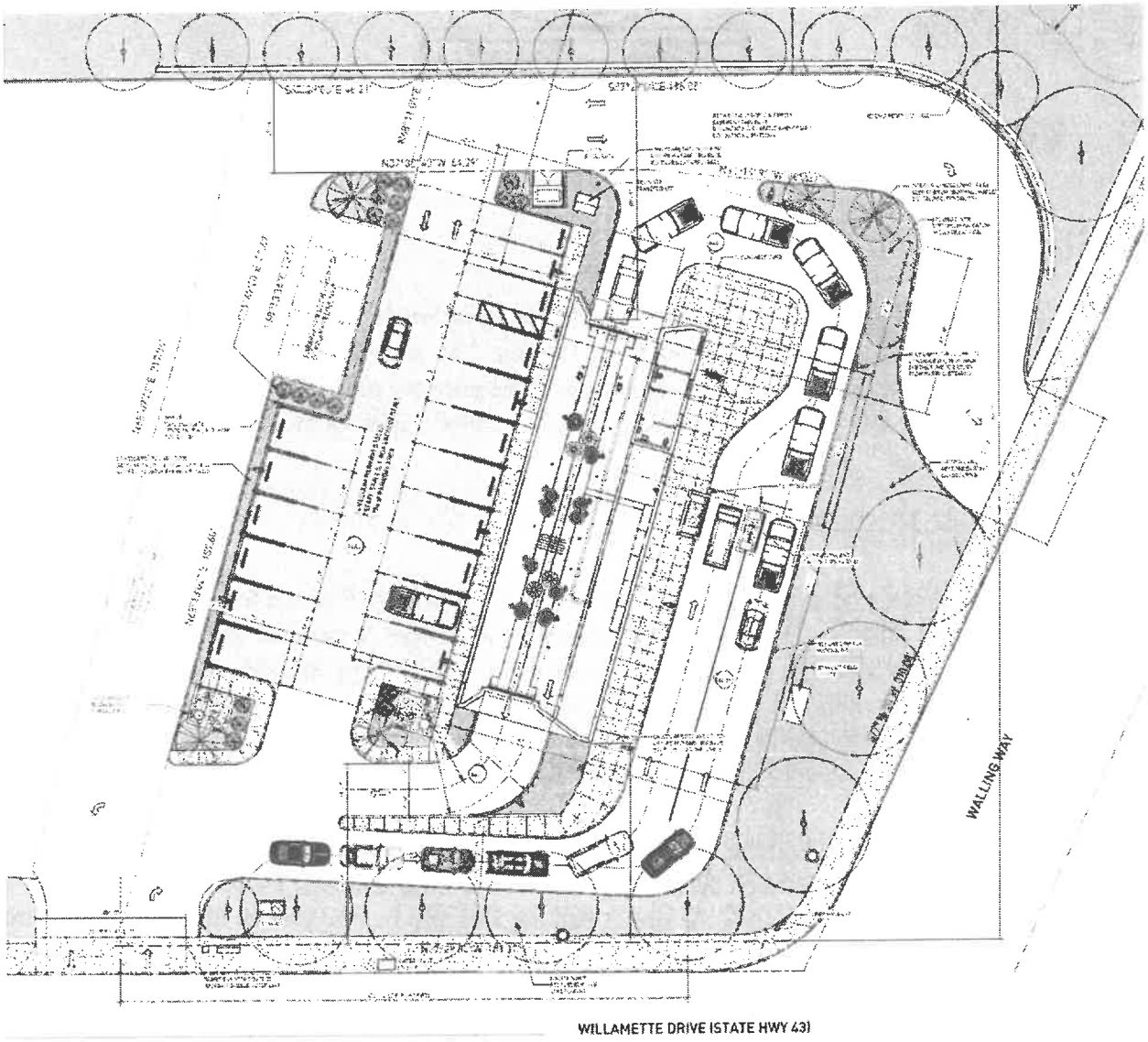


Figure 1: Site Access and Circulation Diagram

Willamette Drive (Oregon Hwy. 43) is classified by the City of West Linn as a Major Arterial roadway. It is also classified by the Oregon Department of Transportation as a Statewide Highway. It has one through lane in each direction in the immediate site vicinity, with turn lanes added at intersections. It has a posted speed limit of 35 mph. Sidewalks and bike lanes are in place on both sides of the roadway.

Walling Way is classified by the City of West Linn as a Local Street. It has a two-lane cross-section with one through lane in each direction and a posted speed limit of 25 mph. Existing sidewalks are in place on both sides of the roadway.

Trip Generation

To estimate the number of trips generated by the proposed use, data from the *ITE Trip Generation Manual, 11th Edition*, published by the Institute of Transportation Engineers was used. The data referenced was for land use code 948, Automated Car Wash. The ITE manual contains trip projections based on either the gross floor area of the facility and the number of car wash tunnels. A comparison of the two metrics revealed that using the number of car wash tunnels (i.e., one) results in a higher trip projection for the weekday evening peak hour, while using the gross floor area (i.e., 3,190 square feet) results in a higher trip projection for the Saturday peak hour. To maintain a conservative analysis, the higher trip generation estimates were used for both analysis periods.

Based on the calculations, the proposed car wash would be projected to generate 78 trips during the weekday evening peak hour and 96 trips during the Saturday peak hour. A summary of the trip generation calculations is provided in Table 1 below. Detailed trip generation calculation worksheets are also included in the attached technical appendix.

Table 1 - Trip Generation: Automated Car Wash

	PM Peak Hour			Saturday Peak Hour		
	In	Out	Total	In	Out	Total
3,190 sf or 1 tunnel	39	39	78	48	48	96

Since the proposed conditional may result in a change in operation as compared to the uses that are outright permitted within the site, one purpose of the trip generation estimate is to quantify how the trip generation characteristics of the site will change if the site is used for an automated car wash rather than other uses that are permitted outright within the underlying zone.

Uses permitted outright in the General Commercial (GC) zone include restaurants, general retail services, medical and dental offices, convenience stores, indoor recreation facilities, and community centers. Of the permitted uses, the highest traffic volumes would be generated by a convenience store or a fast-food restaurant with a drive-through window.

Re-occupancy of the existing 3,948 square-foot fast-food restaurant with a drive-through window would be projected to generate 130 trips during the weekday evening peak hour, and 218 Saturday peak hour trips. The comparison to this outright permitted land use shows that the proposed car wash would generate 47

percent fewer site trips during the evening peak hour and 60 percent fewer Saturday peak hour trips than a fast-food restaurant on the site (which also uses a drive-through window).

Alternatively, redevelopment of the site with a 3,000 square foot convenience store would be projected to generate 147 trips during the weekday evening peak hour, and 238 Saturday peak hour trips. The proposed car wash facility would generate 47 percent fewer weekday evening peak hour trips and 60 percent fewer Saturday peak hour trips than a 3,000 square foot convenience store within the site.

Based on the above comparisons, the proposed car wash facility is projected to have transportation impacts well below the levels associated with other outright permitted uses in the General Commercial zone. Notably, since the existing fast food restaurant with drive-through window on the site could be re-occupied, approval of the proposed car wash facility also represents a decrease in trip generation as compared to a use that is permitted without going through a land use approval process.

Queuing Analysis

Since the proposed car wash use requires on-site queuing, it is also appropriate to evaluate whether there is sufficient space to accommodate lines of vehicles waiting to enter the car wash tunnel. The potential site queues were analyzed using a review of prior studies of car wash facilities, direct observation of comparable Kaady Car Wash sites in the Portland Metro area, and using a mathematical model based on peak-hour service demands in conjunction with actual service times, assuming arrival of individual vehicles occurs at random times within the peak hour.

2012 study - Car Washes in Minnesota

A search for prior studies yielded a 2012 study of various drive-through queues for facilities including banks, car washes, coffee shops, fast food restaurants, and pharmacies prepared by Mike Spack, PE in Minnesota. That study collected data for 6 car wash facilities, with a total of 12 days of observations. The study reported the maximum queues observed over the course of each examined day. The average maximum queue length was 4.42 vehicles, with a standard deviation of 2.31 vehicles. From the study, a high estimate of the maximum queue (85th percentile) was 6.2 vehicles. The longest queue ever observed during the study was 10 vehicles. Notably, these observed car wash queue lengths were less than those reported for fast food restaurants. Fast food restaurants experienced average maximum queues of 8.5 vehicles, an 85th percentile of 12 vehicles, and a maximum observed queue of 13 vehicles.

For local data, cameras were installed to observe one mid-week day and one weekend day at two Kaady Car Wash sites in the Portland metro area. The selected sites were at 9614 SW Tualatin Sherwood Road in Tualatin, Oregon and at 1909 W Burnside Street in Portland, Oregon. However, since there was rain during part of the weekend observations at the Tualatin Sherwood Road site, a second weekend of data was collected at that location. The maximum queue observed during a midweek day was 4 vehicles at the location in Tualatin (the maximum mid-week queue at the Burnside site was 2 vehicles). During weekend

operation, the maximum observed queue was also 4 vehicles at the location in Tualatin (the maximum weekend queue at the Burnside location was 3 vehicles).

The mathematical queuing model used was a Poisson distribution queuing model that used designated hourly arrival rates and service times to calculate the projected queue length. In order to provide for a very conservative analysis, the arrival rate used for the calculations was based on the highest trip generation data point contained in the ITE Trip Generation manual rather than the average trip generation rate. This trip rate was 37.75 trips per thousand square feet during the Saturday peak hour, which equates to 120 trips for the 3,190 square foot car wash, with half entering and half exiting the site (i.e., 60 vehicles arriving and 60 vehicles departing during the peak hour.) Additionally, the service rate was conservatively assumed to be 40 seconds per vehicle. Actual observation of car wash operations at the two Kaady Car Wash sites showed service times of as little as 30 seconds between vehicles when queues were present. Based on the calculations, the projected 95th percentile queue length for the very high estimated arrival rate was 7.4 vehicles.

Overall, the calculated queue length for the proposed car wash was 7.4 vehicles, and the maximum queue length observed at any car wash location among the data sets was 10 vehicles.

The proposed site plan provides sufficient space for 19 vehicles to queue prior to entering the wash tunnel.

Based on the analysis and the proposed site plan, the projected vehicle queues waiting to enter the car wash tunnel can safely be accommodated within the project site. Since the car wash queues are not projected to extend to the driveway, they will not impede the movement of vehicles entering and exiting the Cedar Oaks Shopping Center and are not projected to impact operation of either Willamette Drive or Walling Way.

CONCLUSIONS

Based on the transportation analysis, approval of the proposed automated car wash facility at 18850 Willamette Drive in West Linn, Oregon will not result in increases in traffic or degradation of operation of area roadways and intersections as compared to either the prior use of the site or other uses which are permitted outright in the General Commercial zone. Since the existing fast food restaurant with drive-through window on the site could be re-occupied, approval of the proposed car wash facility also represents a decrease in trip generation as compared to a use that is permitted without going through a land use approval process.

Based on the queuing analysis, the proposed site plan includes adequate space to accommodate the projected maximum queues without interfering with operation of the site access driveways or the adjacent public streets.

No additional travel demand, circulation, or queueing mitigation measures are recommended in conjunction with implementation of the proposed site plan for this conditional use.

If you have any questions regarding this analysis or if you need any further assistance, please don't hesitate to contact me.

Sincerely,

Michael Ard, PE
Principal Engineer

Appendix

Trip Generation Calculation Worksheet

Land Use Description: Automated Car Wash
ITE Land Use Code: 948
Independent Variable: Gross Floor Area
Quantity: 3.19 Thousand Square Feet

Summary of ITE Trip Generation Data

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 14.20 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour of Generator
Trip Rate: 30.40 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Site Trip Generation Calculations

3.19 ksf Automated Car Wash

	Entering	Exiting	Total
PM Peak Hour	23	23	46
Saturday Hour	48	48	96

Data Source: *Trip Generation Manual, 11th Edition* , Institute of Transportation Engineers, 2021

Trip Generation Calculation Worksheet

Land Use Description: Automated Car Wash
ITE Land Use Code: 948
Independent Variable: Car Wash Tunnels
Quantity: 1 Car Wash Tunnel

Summary of ITE Trip Generation Data

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 77.50 trips per car wash tunnel
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour of Generator
Trip Rate: 41.00 trips per car wash tunnel
Directional Distribution: 50% Entering 50% Exiting

Site Trip Generation Calculations

1 Car Wash Tunnel

	Entering	Exiting	Total
PM Peak Hour	39	39	78
Saturday Hour	21	21	42

Data Source: *Trip Generation Manual, 11th Edition* , Institute of Transportation Engineers, 2021

Trip Generation Calculation Worksheet

Land Use Description: Fast-Food Restaurant with Drive-Through
ITE Land Use Code: 934
Independent Variable: Gross Floor Area
Quantity: 3.948 Thousand Square Feet

Summary of ITE Trip Generation Data

AM Peak Hour of Adjacent Street Traffic
Trip Rate: 44.61 trips per ksf
Directional Distribution: 51% Entering 49% Exiting

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 33.03 trips per ksf
Directional Distribution: 52% Entering 48% Exiting

Total Weekday Traffic
Trip Rate: 467.48 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour
Trip Rate: 55.25 trips per ksf
Directional Distribution: 51% Entering 50% Exiting

Site Trip Generation Calculations

3.9 ksf Fast-Food Restaurant w/ Drive Thru

	Entering	Exiting	Total
AM Peak Hour	90	86	176
PM Peak Hour	68	62	130
Weekday	923	923	1846
Saturday Peak	111	107	218

Data Source: *Trip Generation Manual, 11th Edition*, Institute of Transportation Engineers, 2021

Trip Generation Calculation Worksheet

Land Use Description: Convenience Store
ITE Land Use Code: 851
Independent Variable: Gross Floor Area
Quantity: 3.00 Thousand Square Feet

Summary of ITE Trip Generation Data

AM Peak Hour of Adjacent Street Traffic
Trip Rate: 62.54 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

PM Peak Hour of Adjacent Street Traffic
Trip Rate: 49.11 trips per ksf
Directional Distribution: 51% Entering 49% Exiting

Total Weekday Traffic
Trip Rate: 762.28 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Saturday Peak Hour Traffic
Trip Rate: 79.12 trips per ksf
Directional Distribution: 50% Entering 50% Exiting

Site Trip Generation Calculations

3.00 ksf Convenience Store

	Entering	Exiting	Total
AM Peak Hour	94	94	188
PM Peak Hour	75	72	147
Weekday	1143	1143	2286
Saturday Peak	119	119	238

Data Source: *Trip Generation Manual, 11th Edition*, Institute of Transportation Engineers, 2021

The data for Kansas banks was collected between 4:30pm and 6:00pm. While many of the maximum queues for the data collected in Minnesota were between these times, maximum queues occurred between 8:30am and 5:30pm so it is possible that some of the Kansas data does not capture the actual maximum queues for the day.

The number of available lanes at banks, not including the ATM lane, ranged from two to seven lanes (though the most open at one time was five lanes). Even though plenty of lanes were available, cars often stacked at the lane closest to the building, thus additional lanes may not result in shorter queues. With an 85th percentile maximum queue of eight vehicles, the data suggests that banks with drive-through lanes should be able to accommodate 160 feet of vehicle stacking.

3.2 Car Washes

Data collection was done at six car washes with drive-through services (including one full-service car wash) in February 2012. Twelve days of data were collected. The car washes were located in the cities of Falcon Heights, Hopkins, Minneapolis, Roseville and St. Louis Park, MN. Five of the six car washes (excluding the full-service car wash) were located at gas stations. Only the vehicles waiting in line were counted; vehicles being washed were not added to the queue.

Table 3.2 – Drive-Through Car Wash Maximum Queue Statistics

Number of Data Points	**12**
Average Maximum Queue (Vehicles)	**4.42**
Standard Deviation (Vehicles)	**2.31**
Coefficient of Variation	**52%**
Range (Vehicles)	**1 to 10**
85th Percentile (Vehicles)	**6.20**
33rd Percentile (Vehicles)	**3.00**

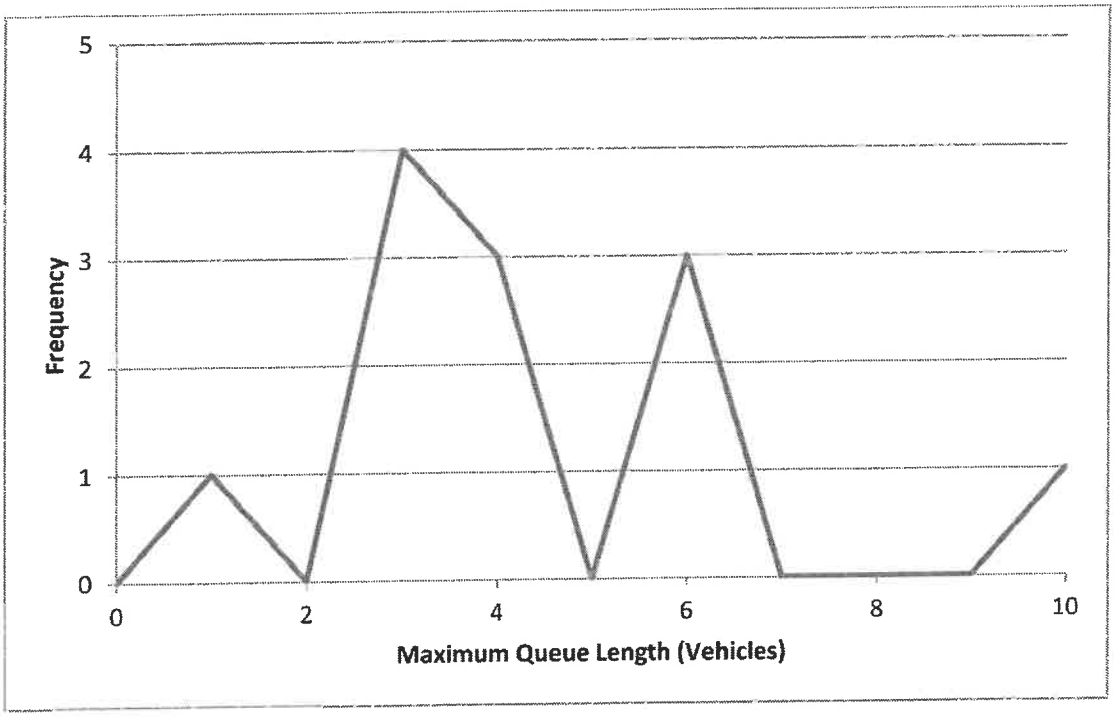


Figure 3.2 – Drive-Through Car Wash Maximum Queue Frequency

Two of the car washes had two lanes while the other four were one lane car washes. The full-service car wash had two lanes and also produced the highest maximum queue of 10 vehicles. The maximum queues for car washes were spread throughout the afternoon from 12:30pm to 8:30pm. With an 85th percentile maximum queue of more than six vehicles, the data suggests that car washes with drive-through lanes should be able to accommodate 140 feet of vehicle stacking throughout the day.

Coffee shops in Minnesota, Nov. 2010, Aug. 2011, Feb. 2012

3.3 Coffee Shops

Data collection was done at six coffee shops with drive-through services in November 2010, August 2011 and February 2012. Fourteen days of data were collected. The coffee shops were located in the cities of Edina, Hopkins, Minneapolis, Roseville and St. Louis Park, MN. Vehicles being served were counted as being in the queue. Twelve days of data from the Kansas City, Kansas area is also included.

Table 3.3 – Drive-Through Coffee Shop Maximum Queue Statistics

	Minnesota Data	Minnesota + Kansas Data
Number of Data Points	14	26
Average Maximum Queue (Vehicles)	11.00	10.23
Standard Deviation (Vehicles)	2.25	2.76
Coefficient of Variation	20%	27%
Range (Vehicles)	7 to 16	3 to 16
85th Percentile (Vehicles)	13.50	13.00
33rd Percentile (Vehicles)	10.00	9.91

Queuing Video Observations - Burnside Kaady Car Wash 11/18/2025 (Tuesday)

Time	Patrons	Max Queue
8:00 AM	14	1
9:00 AM	16	1
10:00 AM	19	2
11:00 AM	17	2
12:00 PM	8	1
1:00 PM	21	2
2:00 PM	13	2
3:00 PM	19	2
4:00 PM	7	1
5:00 PM	14	2
6:00 PM	6	2
7:00 PM	3	1

Queuing Video Observations - Burnside Kaady Car Wash 11/22/2025 (Saturday)

Time	Patrons	Max Queue
8:00 AM	8	1
9:00 AM	20	3
10:00 AM	21	2
11:00 AM	14	2
12:00 PM	14	2
1:00 PM	19	3
2:00 PM	21	2
3:00 PM	20	2
4:00 PM	15	3
5:00 PM	4	1
6:00 PM	5	1
7:00 PM	7	1

Queuing Video Observations - Tualatin Sherwood Rd Kaady Car Wash 11/15/2025-11/16/2025 (Sat/Sun)

Time	Patrons	Max Queue	Notes
11/15/025			
1:00 PM	43	4	
2:00 PM	21	3	
3:00 PM	28	3	
4:00 PM	18	2	
5:00 PM	5	1	
6:00 PM	8	2	
7:00 PM	3	1	
11/16/2025			
8:00 AM	3	1	Rain
9:00 AM	2	1	Rain
10:00 AM	3	1	Rain
11:00 AM	2	1	Rain
12:00 PM	14	2	Rain

Queuing Video Observations - Tualatin Sherwood Rd Kaady Car Wash 11/18/2025 (Tuesday)

Time	Patrons	Max Queue
8:00 AM	16	2
9:00 AM	13	2
10:00 AM	13	3
11:00 AM	15	2
12:00 PM	29	4
1:00 PM	19	4
2:00 PM	30	4
3:00 PM	28	3
4:00 PM	17	3
5:00 PM	11	2
6:00 PM	3	1
7:00 PM	3	1
Total	**197**	

Queuing Video Observations - Tualatin Sherwood Rd Kaady Car Wash 11/22/2025 (Saturday)

Time	Patrons	Max Queue
8:00 AM	11	2
9:00 AM	12	2
10:00 AM	14	3
11:00 AM	19	3
12:00 PM	28	3
1:00 PM	18	2
2:00 PM	16	2
3:00 PM	12	3
4:00 PM	7	2
5:00 PM	7	1
6:00 PM	8	1
7:00 PM	3	1

18850 Willamette Drive Car Wash

Queue Calculation Worksheet (Assumes Poisson Distrubution of Arrivals)

Average Arrival Rate (λ)	60	veh/hour
Service Time	40	seconds/vehicle
Service Rate (μ)	90	veh/hour

Utilization (ρ)

= (λ)/(μ) 0.666667

Average Queue Length*

= (ρ^2)/(1-ρ) 1.3 vehicles

95th Percentile Queue*

= (log .05) / log (ρ) 7.4 vehicles

*The queue length calculations reflect a high estimate of Saturday peak demand. Typical queue lengths are projected to be less than those calculated here.

Wyss, Darren

From: Paul Kreitzberg <paulkreitzberg@gmail.com>
Sent: Wednesday, March 25, 2026 7:56 AM
To: Wyss, Darren
Subject: Addition to the record for the Kaady Car Wash conditional use permit
Attachments: CLEACOAT-SHIELD-2026-02-19.pdf; SPLIT-EQUIPMENT-CLEANER-2022-08-22.pdf; TIRE-SHINE-WB-2022-08-22.pdf; CERAMIC-PAINT-PROTECTION-2026-02-04.pdf

Dear West Linn Planning Commission,

I am writing as a follow up to my oral testimony given on March 18th , 2026 at the conditional use permit hearing regarding the Kaady Car Wash application to build at the old McDonald's site on Willamette Drive.

I am going to keep it brief as I think you heard more than enough oral testimony that no one in the neighborhood is looking forward to the car wash being there (in fact I had to ask the person next to me at the meeting if the people speaking *for* the car wash were indeed going first because we went straight to people speaking against the car wash). I just wanted to note some things that really stuck out to me at the hearing as a first time planning commission attendee.

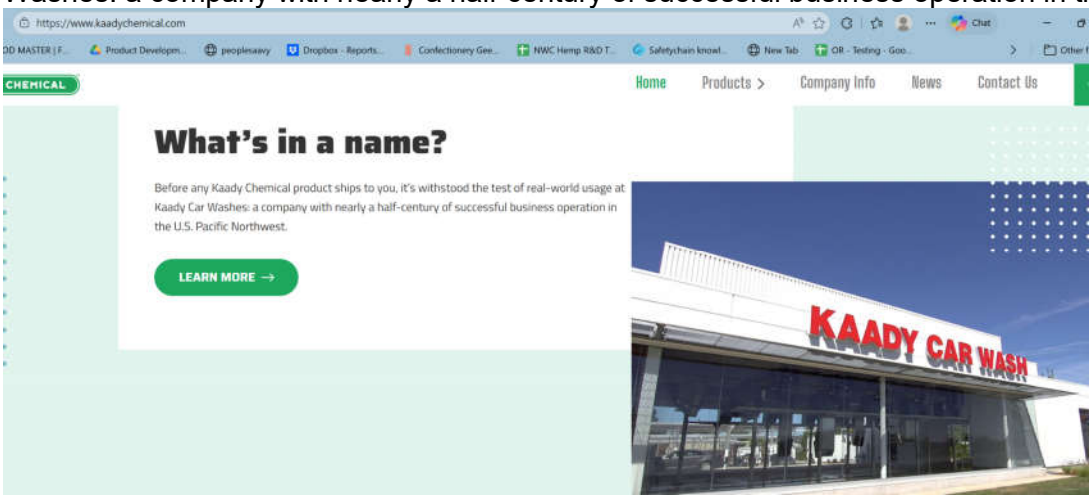
Firstly, I was a bit late so I missed a bit of the opening statements from the applicant (I was picking up my dog from surgery at my local vet surgery center MISCA whom I cannot recommend enough!). However, the thing that really stuck out to me was that they stated that the *conditional* use permit should not in any way consider need. However, nearly every single resident mentioned the same section of code which stated that the conditional use permit can be denied outright if it provided no benefit to the community. It felt extremely disingenuous from the applicant to tell the commission to outright ignore the wants and needs of the community for a conditional use permit. I am sure they had internally pinpointed that as a large weakness in their application because that criteria, is, on it's face, a quick loss; no one thinks you need a car wash 0.5 miles from another car wash in a town of 26,000 people. I have visited Shanghai, New York City, Boston, Austin, San Francisco… I don't think I have ever seen two car washes that close to one another.

Then I heard everyone talk about the local wildlife and it really made me realize what the extra chemicals in our ecosystem could mean. We are already inundated with chemicals at every turn, our environment is full of 'forever chemicals' and I think we have reached a point where every single human has plastic in their bodies due to how saturated microplastics have become in our environment. Now, I am a big fan of modern engineering, I went to China last year to help engineer a machine for my company (though I am not an engineer myself, it was me as a production expert and our mechanical engineer). So I super appreciate how engineered the car wash *appears* to be, and I really appreciated Mr. Walvatne's line of questioning about the filtration system. However, it doesn't take an engineer to know that *some* amount of chemicals are going to make it out of the car wash. These chemicals will get caught in pockets on the cars and trucks that go through the car wash, in the tires, undercarriage, that little pocket between the hood and the windshield wipers… some trace amount of chemicals is going to be caught in there and drip into the street and then get carried into the creeks by the rains and winds etc. Not to mention when a strong wind rips through the car wash tunnel itself and carries chemicals from overspray out into the environment. I really appreciated when Mr. Jones noted that he doesn't like absolutes, because the world just doesn't work that way despite what the lawyer for Kaady says.

The other moment that caught me as extremely disingenuous and what I would call an outright lie is when the lawyer for Kaady said that 1. She doesn't know what an SDS is and 2. that "Kaady only sells those chemicals,

they do not use them in their car washes." Firstly, if that lawyer represents a company that sells chemicals, they definitely know what an SDS is. The general council for my company knows darn well what an SDS and we only *use* them for cleaning, we do not produce and sell them! Secondly, their website https://www.kaadychemical.com/ directly contradicts that testimony, on the front page of the website it says:

"What's in a name?
Before any Kaady Chemical product ships to you, it's withstood the test of real-world usage at Kaady Car Washes: a company with nearly a half-century of successful business operation in the U.S. Pacific Northwest."



I would submit to the Planning Commission that the lawyer for Kaady outright lied directly to you and the members of this community, hese chemicals--per the Kaady website itself--are indeed used at their car washes. I think this deflection was made precisely because they know how bad the SDS for some of these chemicals are. For example the SDS for the Clear Coat shield states the following:

"Environmental precautions:
Dilute with plenty of water.
Do not allow to enter sewers/ surface or ground water." (emphasis mine).

This warning also adorns the SDS for the Ceramic Paint Protection, the Split Equipment Cleaner, and the Tire Shine WB (all attached to the email, if you search for the words "environmental precautions:" you will find the section). I am 37 years old, I don't think I have been through a car wash even 5 times in my life, but I am pretty sure those are chemicals that go on the car after the wash and don't get washed off and into the filtration system. There is no way these chemicals "*never*" end up in the streets after the car wash and wash into our creeks.

In summary, I find that the applicant does not respect the local community (where they already left once before) nor do they respect the planning commission, nor do they provide a benefit to the community and I urge you to deny their conditional use permit application outright for those reasons.

Thank you so much,
Paul Elliott Kreitzberg, proud resident of the Robinwood Neighborhood of West Linn.

Safety Data Sheet
acc. to OSHA HCS

Printing date 02/04/2026 Reviewed on 02/04/2026

1 Identification

· **Product identifier**

· **Trade name:** **CERAMIC PAINT PROTECTION**

· **Article number:** K-441

· **Details of the supplier of the safety data sheet**
· **Manufacturer/Supplier:**
Kaady Chemical Corp.
2545 SW SPRING GARDEN ST STE 120
PORTLAND, OR 97219
+1-510-562-9788
www.kaadychemical.com

· **Information department:** Product safety department
· **Emergency telephone number:**
chemtrec 800-424-9300
acct# 12158

*
2 Hazard(s) identification

· **Classification of the substance or mixture**
The product is not classified, according to the Globally Harmonized System (GHS).

· **Label elements**
· **GHS label elements** Void
· **Hazard pictograms** Void
· **Signal word** Void
· **Hazard statements** Void
· **Classification system:**
· **NFPA ratings (scale 0 - 4)**
Health = 1
Fire = 0
Reactivity = 0
· **HMIS-ratings (scale 0 - 4)**
Health = 1
Fire = 0
Reactivity = 0
· **Other hazards**
· **Results of PBT and vPvB assessment**

· **PBT:**	
-	PROPRIETARY

· **vPvB:**	
-	PROPRIETARY

(Contd. on page 2)

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acc. to OSHA HCS

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Trade name: CERAMIC PAINT PROTECTION

(Contd. of page 1)

*
3 Composition/information on ingredients

· **Chemical characterization: Mixtures**
· **Description:** Mixture of the substances listed below with nonhazardous additions.

· **Dangerous components:**		
-	PROPRIETARY	<15%
111-76-2	2-butoxyethanol	<15%
61789-77-3	Quaternary ammonium compounds, dicocoalkyldimethyl, chlorides	<15%

· **Additional information:**
The exact percentages of the ingredients of this mixture are considered to be proprietary and are withheld in accordance with the provisions of paragraph (i) of 1910.1200 of 29 CFR 1910.1200 Trade Secrets.

*
4 First-aid measures

· **Description of first aid measures**
· **General information:** No special measures required.
· **After inhalation:** Supply fresh air; consult doctor in case of complaints.
· **After skin contact:** Generally the product does not irritate the skin.
· **After eye contact:** Rinse opened eye for several minutes under running water.
· **After swallowing:**
Rinse out mouth and drink plenty of water or milk.
Do not induce vomiting without medical advice.
If vomiting does occur, repeat fluid administration.
If irritation or discomfort occurs, seek medical advice.
· **Information for doctor:**
· **Most important symptoms and effects, both acute and delayed** No further relevant information available.
· **Indication of any immediate medical attention and special treatment needed**
No further relevant information available.

5 Fire-fighting measures

· **Extinguishing media**
· **Suitable extinguishing agents:** Use fire fighting measures that suit the environment.
· **Special hazards arising from the substance or mixture** No further relevant information available.
· **Advice for firefighters**
· **Protective equipment:**
As in any fire, wear self-contained breathing apparatus pressure-demand (NIOSH approved or equivalent) and full protective gear to prevent contact with the skin or eyes.

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6 Accidental release measures

· **Personal precautions, protective equipment and emergency procedures**
Avoid contact with the eyes, skin and clothing.
Ensure adequate ventilation.
Wear protective equipment. Keep unprotected persons away.

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Safety Data Sheet
acc. to OSHA HCS

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Trade name: CERAMIC PAINT PROTECTION

(Contd. of page 2)

· **Environmental precautions:**
Dilute with plenty of water.
Do not allow to enter sewers/ surface or ground water.
· **Methods and material for containment and cleaning up:**
Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).
· **Reference to other sections**
See Section 7 for information on safe handling.
See Section 8 for information on personal protection equipment.
See Section 13 for disposal information.
· **Protective Action Criteria for Chemicals**

· **PAC-1:**		
111-76-2	2-butoxyethanol	20 ppm

· **PAC-2:**		
111-76-2	2-butoxyethanol	67 ppm

· **PAC-3:**		
111-76-2	2-butoxyethanol	700 ppm

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7 Handling and storage

· **Handling:**
· **Precautions for safe handling** No special measures required.
· **Information about protection against explosions and fires:** No special measures required.

· **Conditions for safe storage, including any incompatibilities**
· **Storage:**
· **Requirements to be met by storerooms and receptacles:** No special requirements.
· **Information about storage in one common storage facility:** Not required
· **Further information about storage conditions:** None.
· **Specific end use(s)** No further relevant information available.

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8 Exposure controls/personal protection

· **Additional information about design of technical systems:** No further data; see section 7.

· **Control parameters**
All ventilation should be disigned in accordance with OSHA standard (29 CFR 1910.94). Use mechanical (general) ventilation for storage areas. Use appropriate ventilation as required to keep Exposure Limits in Air below TLV & PEL limits.
· **Components with limit values that require monitoring at the workplace:**
The following constituent is the only constituent of the product which has a PEL, TLV or other recommended exposure limit.
At this time, the other constituents have no known exposure limits.

(Contd. on page 4)

Safety Data Sheet
acc. to OSHA HCS

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Trade name: CERAMIC PAINT PROTECTION

(Contd. of page 3)

111-76-2 2-butoxyethanol	
PEL	Long-term value: 240 mg/m³, 50 ppm Skin
REL	Long-term value: 24 mg/m³, 5 ppm Skin
TLV	Long-term value: 97 mg/m³, 20 ppm BEI, A3

· **Ingredients with biological limit values:**

111-76-2 2-butoxyethanol	
BEI	200 mg/g creatinine Medium: urine Time: end of shift Parameter: Butoxyacetic acid (BAA) (with hydrolysis)

· **Additional information:** The lists that were valid during the creation were used as basis.

· **Exposure controls**
· **Personal protective equipment:**
· **General protective and hygienic measures:**
The usual precautionary measures for handling chemicals should be followed.
· **Breathing equipment:** Not required
· **Protection of hands:**
The glove material has to be impermeable and resistant to the product/ the substance/ the preparation.
Due to missing tests no recommendation to the glove material can be given for the product/ the preparation/ the chemical mixture.
Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation
· **Material of gloves**
The selection of the suitable gloves does not only depend on the material, but also on further marks of quality and varies from manufacturer to manufacturer. As the product is a preparation of several substances, the resistance of the glove material can not be calculated in advance and has therefore to be checked prior to the application.
· **Penetration time of glove material**
The exact break through time has to be found out by the manufacturer of the protective gloves and has to be observed.
· **Eye protection:** Goggles recommended during refilling.

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9 Physical and chemical properties

· **Information on basic physical and chemical properties**
· **General Information**
· **Appearance:**

Form:	Liquid
Color:	Amber colored
· **Odor:**	Characteristic
· **Odor threshold:**	Not determined
· **pH-value:**	12>

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Trade name: CERAMIC PAINT PROTECTION

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· **Change in condition**	
Melting point/Melting range:	Undetermined
Boiling point/Boiling range:	100 °C (212 °F)
· **Flash point:**	150 °C (302 °F)
· **Flammability:**	Not applicable
· **Decomposition temperature:**	Not determined
· **Ignition temperature:**	Product is not selfigniting.
· **Danger of explosion:**	Product does not present an explosion hazard.
· **Explosion limits:**	
Lower:	Not determined
Upper:	Not determined
· **Vapor pressure at 20 °C (68 °F):**	23 hPa (17.3 mm Hg)
· **Density (Specific Gravity):**	Not determined
· **Relative density**	Not determined
· **Vapor density**	Not determined
· **Evaporation rate**	Not determined
· **Solubility in / Miscibility with**	
Water:	Fully miscible.
· **Partition coefficient (n-octanol/water):**	Not determined
· **Viscosity:**	
Dynamic:	Not determined
Kinematic:	Not determined
· **Solvent content:**	
Organic solvents:	<15 %
Water:	PROPRIETARY %
VOC content:	<15 %
Solids content:	- %
· **Other information**	No further relevant information available.

10 Stability and reactivity

· **Reactivity** No further relevant information available.
· **Chemical stability**
· **Thermal decomposition / conditions to be avoided:** No decomposition if used according to specifications.
· **Possibility of hazardous reactions** No dangerous reactions known.
· **Conditions to avoid** No further relevant information available.
· **Incompatible materials:** No further relevant information available.

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· **Hazardous decomposition products:** No dangerous decomposition products known.

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11 Toxicological information

· **Information on toxicological effects**
· **Acute toxicity:**

· **LD/LC50 values that are relevant for classification:**		
ATE (Acute Toxicity Estimate)		
Oral	LD50	5,367–5,871 mg/kg
Dermal	LD50	5,714 mg/kg (rab)
Inhalative	LC50/4 h	42.9 mg/l

111-76-2 2-butoxyethanol		
Oral	LD50	1,200 mg/kg (ATE)
		1,480 mg/kg (rat)
Dermal	LD50	400 mg/kg (rab)
Inhalative	LC50/4 h	3 mg/l (ATE)
67-63-0 propan-2-ol		
Oral	LD50	5,045 mg/kg (rat)
Dermal	LD50	12,800 mg/kg (rabbit)
Inhalative	LC50/4 h	30 mg/l (rat)

· **Primary irritant effect:**
· **on the skin:** No irritant effect.
· **on the eye:** No irritating effect.
· **Sensitization:** No sensitizing effects known.
· **Additional toxicological information:**
The product is not subject to classification according to internally approved calculation methods for preparations:
When used and handled according to specifications, the product does not have any harmful effects according to our experience and the information provided to us.

· **Carcinogenic categories**

· **IARC (International Agency for Research on Cancer)**		
111-76-2	2-butoxyethanol	3
67-63-0	propan-2-ol	3

· **NTP (National Toxicology Program)**
None of the ingredients is listed.

· **OSHA-Ca (Occupational Safety & Health Administration)**
None of the ingredients is listed.

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12 Ecological information

· **Toxicity**
· **Aquatic toxicity:** No further relevant information available.
· **Persistence and degradability** No further relevant information available.
· **Behavior in environmental systems:**
· **Bioaccumulative potential** No further relevant information available.
· **Mobility in soil** No further relevant information available.
· **Additional ecological information:**
· **General notes:**
Water hazard class 1 (Self-assessment): slightly hazardous for water
Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.
· **Results of PBT and vPvB assessment**

· **PBT:**	
-	PROPRIETARY

· **vPvB:**	
-	PROPRIETARY

· **Other adverse effects** No further relevant information available.

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13 Disposal considerations

· **Waste treatment methods**
· **Recommendation:**
Smaller quantities can be disposed of with household waste.
Observe all federal, state and local environmental regulations when disposing of this material.

· **Uncleaned packagings:**
· **Recommendation:** Disposal must be made according to official regulations.
· **Recommended cleansing agent:** Water, if necessary with cleansing agents.

14 Transport information

· **UN-Number**	
· **DOT, IMDG, IATA**	not regulated
· **UN proper shipping name**	
· **DOT, IMDG, IATA**	not regulated
· **Transport hazard class(es)**	
· **DOT, ADN, IMDG, IATA**	
· **Class**	not regulated
· **Packing group**	
· **DOT, IMDG, IATA**	not regulated

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Safety Data Sheet
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Trade name: CERAMIC PAINT PROTECTION

(Contd. of page 7)

· **Environmental hazards:**	Not applicable
· **Special precautions for user**	Not applicable
· **Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code**	Not applicable
· **UN "Model Regulation":**	not regulated

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15 Regulatory information

· **Safety, health and environmental regulations/legislation specific for the substance or mixture**
No further relevant information available.
· **Sara**

· **Section 355 (extremely hazardous substances):**
None of the ingredients is listed.

· **Section 313 (Specific toxic chemical listings):**

111-76-2	2-butoxyethanol

· **TSCA (Toxic Substances Control Act):**
All components have the value ACTIVE.

· **Hazardous Air Pollutants**
None of the ingredients is listed.

· **Proposition 65**

· **Chemicals known to cause cancer:**
None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for females:**
None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for males:**
None of the ingredients is listed.

· **Chemicals known to cause developmental toxicity:**
None of the ingredients is listed.

· **Carcinogenic categories**

· **EPA (Environmental Protection Agency)**

111-76-2	2-butoxyethanol	NL

· **TLV (Threshold Limit Value)**

111-76-2	2-butoxyethanol	A3

· **NIOSH-Ca (National Institute for Occupational Safety and Health)**
None of the ingredients is listed.

· **GHS label elements** Void
· **Hazard pictograms** Void

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Trade name: CERAMIC PAINT PROTECTION

(Contd. of page 8)

· **Signal word** Void
· **Hazard statements** Void
· **Chemical safety assessment:** A Chemical Safety Assessment has not been carried out.

16 Other information

The information and recommendations in this safety data sheet are, to the best of our knowledge, accurate as of the date of issue. Nothing herein shall be deemed to create warranty, expressed or implied, and shall not establish a legally valid contractual relationship. It is the responsibility of the user to determine applicability of this information and the suitability of the material or product for any particular purpose.

· **Department issuing SDS:** Environment protection department.
· **Contact:** -
· **Date of preparation / last revision** 02/04/2026 / -
· **Abbreviations and acronyms:**
IMDG: International Maritime Code for Dangerous Goods
DOT: US Department of Transportation
IATA: International Air Transport Association
EINECS: European Inventory of Existing Commercial Chemical Substances
ELINCS: European List of Notified Chemical Substances
CAS: Chemical Abstracts Service (division of the American Chemical Society)
NFPA: National Fire Protection Association (USA)
HMIS: Hazardous Materials Identification System (USA)
VOC: Volatile Organic Compounds (USA, EU)
LC50: Lethal concentration, 50 percent
LD50: Lethal dose, 50 percent
PBT: Persistent, Bioaccumulative and Toxic
vPvB: very Persistent and very Bioaccumulative
NIOSH: National Institute for Occupational Safety
OSHA: Occupational Safety & Health
TLV: Threshold Limit Value
PEL: Permissible Exposure Limit
REL: Recommended Exposure Limit
BEI: Biological Exposure Limit
· *** Data compared to the previous version altered.**

Safety Data Sheet
acc. to OSHA HCS

Printing date 02/04/2026 Reviewed on 02/04/2026

1 Identification

· **Product identifier**

· **Trade name:** **CLEARCOAT SHIELD**

· **Article number:** K-C331U

· **Details of the supplier of the safety data sheet**
· **Manufacturer/Supplier:**
Kaady Chemical Corp.
2545 SW SPRING GARDEN ST STE 120
PORTLAND, OR 97219
+1-510-562-9788
www.kaadychemical.com

· **Information department:** Product safety department
· **Emergency telephone number:**
chemtrec 800-424-9300
acct# 12158

*
2 Hazard(s) identification

· **Classification of the substance or mixture**
The product is not classified, according to the Globally Harmonized System (GHS).

· **Label elements**
· **GHS label elements** Void
· **Hazard pictograms** Void
· **Signal word** Void
· **Hazard statements** Void
· **Classification system:**
· **NFPA ratings (scale 0 - 4)**
Health = 1
Fire = 0
Reactivity = 0
· **HMIS-ratings (scale 0 - 4)**
Health = 1
Fire = 0
Reactivity = 0
· **Other hazards**
· **Results of PBT and vPvB assessment**

· **PBT:**	
-	PROPRIETARY

· **vPvB:**	
-	PROPRIETARY

(Contd. on page 2)

Safety Data Sheet
acc. to OSHA HCS

Printing date 02/04/2026 Reviewed on 02/04/2026

Trade name: CLEARCOAT SHIELD

(Contd. of page 1)

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3 Composition/information on ingredients

· **Chemical characterization: Mixtures**
· **Description:** Mixture of the substances listed below with nonhazardous additions.

· **Dangerous components:**		
-	PROPRIETARY	<15%
111-76-2	2-butoxyethanol	<15%
61789-77-3	Quaternary ammonium compounds, dicocoalkyldimethyl, chlorides	<15%

· **Additional information:**
The exact percentages of the ingredients of this mixture are considered to be proprietary and are withheld in accordance with the provisions of paragraph (i) of 1910.1200 of 29 CFR 1910.1200 Trade Secrets.

*
4 First-aid measures

· **Description of first aid measures**
· **General information:** No special measures required.
· **After inhalation:** Supply fresh air; consult doctor in case of complaints.
· **After skin contact:** Generally the product does not irritate the skin.
· **After eye contact:** Rinse opened eye for several minutes under running water.
· **After swallowing:**
Rinse out mouth and drink plenty of water or milk.
Do not induce vomiting without medical advice.
If vomiting does occur, repeat fluid administration.
If irritation or discomfort occurs, seek medical advice.
· **Information for doctor:**
· **Most important symptoms and effects, both acute and delayed** No further relevant information available.
· **Indication of any immediate medical attention and special treatment needed**
No further relevant information available.

5 Fire-fighting measures

· **Extinguishing media**
· **Suitable extinguishing agents:** Use fire fighting measures that suit the environment.
· **Special hazards arising from the substance or mixture** No further relevant information available.
· **Advice for firefighters**
· **Protective equipment:**
As in any fire, wear self-contained breathing apparatus pressure-demand (NIOSH approved or equivalent) and full protective gear to prevent contact with the skin or eyes.

*
6 Accidental release measures

· **Personal precautions, protective equipment and emergency procedures**
Avoid contact with the eyes, skin and clothing.
Ensure adequate ventilation.
Wear protective equipment. Keep unprotected persons away.

(Contd. on page 3)

Safety Data Sheet
acc. to OSHA HCS

Printing date 02/04/2026 Reviewed on 02/04/2026

Trade name: CLEARCOAT SHIELD

(Contd. of page 2)

· **Environmental precautions:**
Dilute with plenty of water.
Do not allow to enter sewers/ surface or ground water.
· **Methods and material for containment and cleaning up:**
Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).
· **Reference to other sections**
See Section 7 for information on safe handling.
See Section 8 for information on personal protection equipment.
See Section 13 for disposal information.
· **Protective Action Criteria for Chemicals**

· **PAC-1:**		
111-76-2	2-butoxyethanol	20 ppm

· **PAC-2:**		
111-76-2	2-butoxyethanol	67 ppm

· **PAC-3:**		
111-76-2	2-butoxyethanol	700 ppm

*
7 Handling and storage

· **Handling:**
· **Precautions for safe handling** No special measures required.
· **Information about protection against explosions and fires:** No special measures required.

· **Conditions for safe storage, including any incompatibilities**
· **Storage:**
· **Requirements to be met by storerooms and receptacles:** No special requirements.
· **Information about storage in one common storage facility:** Not required
· **Further information about storage conditions:** None.
· **Specific end use(s)** No further relevant information available.

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8 Exposure controls/personal protection

· **Additional information about design of technical systems:** No further data; see section 7.

· **Control parameters**
All ventilation should be disigned in accordance with OSHA standard (29 CFR 1910.94). Use mechanical (general) ventilation for storage areas. Use appropriate ventilation as required to keep Exposure Limits in Air below TLV & PEL limits.
· **Components with limit values that require monitoring at the workplace:**
The following constituent is the only constituent of the product which has a PEL, TLV or other recommended exposure limit.
At this time, the other constituents have no known exposure limits.

(Contd. on page 4)

Safety Data Sheet
acc. to OSHA HCS

Printing date 02/04/2026 Reviewed on 02/04/2026

Trade name: CLEARCOAT SHIELD

(Contd. of page 3)

111-76-2 2-butoxyethanol	
PEL	Long-term value: 240 mg/m³, 50 ppm Skin
REL	Long-term value: 24 mg/m³, 5 ppm Skin
TLV	Long-term value: 97 mg/m³, 20 ppm BEI, A3

· **Ingredients with biological limit values:**

111-76-2 2-butoxyethanol	
BEI	200 mg/g creatinine Medium: urine Time: end of shift Parameter: Butoxyacetic acid (BAA) (with hydrolysis)

· **Additional information:** The lists that were valid during the creation were used as basis.

· **Exposure controls**
· **Personal protective equipment:**
· **General protective and hygienic measures:**
The usual precautionary measures for handling chemicals should be followed.
· **Breathing equipment:** Not required
· **Protection of hands:**
The glove material has to be impermeable and resistant to the product/ the substance/ the preparation.
Due to missing tests no recommendation to the glove material can be given for the product/ the preparation/ the chemical mixture.
Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation
· **Material of gloves**
The selection of the suitable gloves does not only depend on the material, but also on further marks of quality and varies from manufacturer to manufacturer. As the product is a preparation of several substances, the resistance of the glove material can not be calculated in advance and has therefore to be checked prior to the application.
· **Penetration time of glove material**
The exact break through time has to be found out by the manufacturer of the protective gloves and has to be observed.
· **Eye protection:** Goggles recommended during refilling.

*
9 Physical and chemical properties

· **Information on basic physical and chemical properties**
· **General Information**
· **Appearance:**

Form:	Liquid
Color:	Amber colored
· **Odor:**	Characteristic
· **Odor threshold:**	Not determined
· **pH-value:**	12>

(Contd. on page 5)

Safety Data Sheet
acc. to OSHA HCS

(Contd. of page 4)

· **Change in condition**	
Melting point/Melting range:	Undetermined
Boiling point/Boiling range:	100 °C (212 °F)
· **Flash point:**	150 °C (302 °F)
· **Flammability:**	Not applicable
· **Decomposition temperature:**	Not determined
· **Ignition temperature:**	Product is not selfigniting.
· **Danger of explosion:**	Product does not present an explosion hazard.
· **Explosion limits:**	
Lower:	Not determined
Upper:	Not determined
· **Vapor pressure at 20 °C (68 °F):**	23 hPa (17.3 mm Hg)
· **Density (Specific Gravity):**	Not determined
· **Relative density**	Not determined
· **Vapor density**	Not determined
· **Evaporation rate**	Not determined
· **Solubility in / Miscibility with**	
Water:	Fully miscible.
· **Partition coefficient (n-octanol/water):**	Not determined
· **Viscosity:**	
Dynamic:	Not determined
Kinematic:	Not determined
· **Solvent content:**	
Organic solvents:	<15 %
Water:	PROPRIETARY %
VOC content:	<15 %
Solids content:	- %
· **Other information**	No further relevant information available.

10 Stability and reactivity

· **Reactivity** No further relevant information available.
· **Chemical stability**
· **Thermal decomposition / conditions to be avoided:** No decomposition if used according to specifications.
· **Possibility of hazardous reactions** No dangerous reactions known.
· **Conditions to avoid** No further relevant information available.
· **Incompatible materials:** No further relevant information available.

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Safety Data Sheet
acc. to OSHA HCS

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· **Hazardous decomposition products:** No dangerous decomposition products known.

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11 Toxicological information

· **Information on toxicological effects**
· **Acute toxicity:**

· **LD/LC50 values that are relevant for classification:**		
ATE (Acute Toxicity Estimate)		
Oral	LD50	5,367–5,871 mg/kg
Dermal	LD50	5,714 mg/kg (rab)
Inhalative	LC50/4 h	42.9 mg/l

111-76-2 2-butoxyethanol		
Oral	LD50	1,200 mg/kg (ATE)
		1,480 mg/kg (rat)
Dermal	LD50	400 mg/kg (rab)
Inhalative	LC50/4 h	3 mg/l (ATE)
67-63-0 propan-2-ol		
Oral	LD50	5,045 mg/kg (rat)
Dermal	LD50	12,800 mg/kg (rabbit)
Inhalative	LC50/4 h	30 mg/l (rat)

· **Primary irritant effect:**
· **on the skin:** No irritant effect.
· **on the eye:** No irritating effect.
· **Sensitization:** No sensitizing effects known.
· **Additional toxicological information:**
The product is not subject to classification according to internally approved calculation methods for preparations:
When used and handled according to specifications, the product does not have any harmful effects according to our experience and the information provided to us.

· **Carcinogenic categories**

· **IARC (International Agency for Research on Cancer)**		
111-76-2	2-butoxyethanol	3
67-63-0	propan-2-ol	3

· **NTP (National Toxicology Program)**
None of the ingredients is listed.

· **OSHA-Ca (Occupational Safety & Health Administration)**
None of the ingredients is listed.

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Safety Data Sheet
acc. to OSHA HCS

Printing date 02/04/2026 Reviewed on 02/04/2026

Trade name: CLEARCOAT SHIELD

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12 Ecological information

· **Toxicity**
· **Aquatic toxicity:** No further relevant information available.
· **Persistence and degradability** No further relevant information available.
· **Behavior in environmental systems:**
· **Bioaccumulative potential** No further relevant information available.
· **Mobility in soil** No further relevant information available.
· **Additional ecological information:**
· **General notes:**
Water hazard class 1 (Self-assessment): slightly hazardous for water
Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.
· **Results of PBT and vPvB assessment**

· **PBT:**	
-	PROPRIETARY

· **vPvB:**	
-	PROPRIETARY

· **Other adverse effects** No further relevant information available.

*
13 Disposal considerations

· **Waste treatment methods**
· **Recommendation:**
Smaller quantities can be disposed of with household waste.
Observe all federal, state and local environmental regulations when disposing of this material.

· **Uncleaned packagings:**
· **Recommendation:** Disposal must be made according to official regulations.
· **Recommended cleansing agent:** Water, if necessary with cleansing agents.

14 Transport information

· **UN-Number**	
· **DOT, IMDG, IATA**	not regulated
· **UN proper shipping name**	
· **DOT, IMDG, IATA**	not regulated
· **Transport hazard class(es)**	
· **DOT, ADN, IMDG, IATA**	
· **Class**	not regulated
· **Packing group**	
· **DOT, IMDG, IATA**	not regulated

(Contd. on page 8)

Safety Data Sheet
acc. to OSHA HCS

Trade name: CLEARCOAT SHIELD

(Contd. of page 7)

· **Environmental hazards:**	Not applicable
· **Special precautions for user**	Not applicable
· **Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code**	Not applicable
· **UN "Model Regulation":**	not regulated

*
15 Regulatory information

· **Safety, health and environmental regulations/legislation specific for the substance or mixture**
No further relevant information available.
· **Sara**

· **Section 355 (extremely hazardous substances):**
None of the ingredients is listed.

· **Section 313 (Specific toxic chemical listings):**

111-76-2	2-butoxyethanol

· **TSCA (Toxic Substances Control Act):**
All components have the value ACTIVE.

· **Hazardous Air Pollutants**
None of the ingredients is listed.

· **Proposition 65**

· **Chemicals known to cause cancer:**
None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for females:**
None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for males:**
None of the ingredients is listed.

· **Chemicals known to cause developmental toxicity:**
None of the ingredients is listed.

· **Carcinogenic categories**

· **EPA (Environmental Protection Agency)**

111-76-2	2-butoxyethanol	NL

· **TLV (Threshold Limit Value)**

111-76-2	2-butoxyethanol	A3

· **NIOSH-Ca (National Institute for Occupational Safety and Health)**
None of the ingredients is listed.

· **GHS label elements** Void
· **Hazard pictograms** Void

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Safety Data Sheet
acc. to OSHA HCS

Trade name: CLEARCOAT SHIELD

(Contd. of page 8)

· **Signal word** Void
· **Hazard statements** Void
· **Chemical safety assessment:** A Chemical Safety Assessment has not been carried out.

16 Other information

The information and recommendations in this safety data sheet are, to the best of our knowledge, accurate as of the date of issue. Nothing herein shall be deemed to create warranty, expressed or implied, and shall not establish a legally valid contractual relationship. It is the responsibility of the user to determine applicability of this information and the suitability of the material or product for any particular purpose.

· **Department issuing SDS:** Environment protection department.
· **Contact:** -
· **Date of preparation / last revision** 02/04/2026 / -
· **Abbreviations and acronyms:**
IMDG: International Maritime Code for Dangerous Goods
DOT: US Department of Transportation
IATA: International Air Transport Association
EINECS: European Inventory of Existing Commercial Chemical Substances
ELINCS: European List of Notified Chemical Substances
CAS: Chemical Abstracts Service (division of the American Chemical Society)
NFPA: National Fire Protection Association (USA)
HMIS: Hazardous Materials Identification System (USA)
VOC: Volatile Organic Compounds (USA, EU)
LC50: Lethal concentration, 50 percent
LD50: Lethal dose, 50 percent
PBT: Persistent, Bioaccumulative and Toxic
vPvB: very Persistent and very Bioaccumulative
NIOSH: National Institute for Occupational Safety
OSHA: Occupational Safety & Health
TLV: Threshold Limit Value
PEL: Permissible Exposure Limit
REL: Recommended Exposure Limit
BEI: Biological Exposure Limit
· *** Data compared to the previous version altered.**

Safety Data Sheet
acc. to OSHA HCS

Printing date 09/26/2019 Reviewed on 09/26/2019

1 Identification

· **Product identifier**

· **Trade name: TIRE SHINE WB**

· **Article number:** K-WB1

· **Details of the supplier of the safety data sheet**
· **Manufacturer/Supplier:**
Kaady Chemical Corp.
2545 SW SPRING GARDEN ST STE 120
PORTLAND, OR 97219
1-510-562-9788
www.kaadychemical.com
· **Information department:** Product safety department
· **Emergency telephone number:** 800-424-9300

2 Hazard(s) identification

· **Classification of the substance or mixture**

GHS07

Acute Tox. 4 H302 Harmful if swallowed.
Skin Irrit. 2 H315 Causes skin irritation.
Eye Irrit. 2A H319 Causes serious eye irritation.

· **Label elements**
· **GHS label elements** The product is classified and labeled according to the Globally Harmonized System (GHS).
· **Hazard pictograms**

GHS07

· **Signal word** Warning

· **Hazard-determining components of labeling:**
PROPRIETARY
PROPRIETARY
· **Hazard statements**
Harmful if swallowed.
Causes skin irritation.
Causes serious eye irritation.
· **Precautionary statements**
Wash thoroughly after handling.
Do not eat, drink or smoke when using this product.
Wear protective gloves / eye protection / face protection.
If swallowed: Call a poison center/doctor if you feel unwell.

(Contd. on page 2)

Safety Data Sheet
acc. to OSHA HCS

Printing date 09/26/2019 Reviewed on 09/26/2019

Trade name: TIRE SHINE WB

(Contd. of page 1)

Rinse mouth.
If on skin: Wash with plenty of water.
Specific treatment (see on this label).
If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
If skin irritation occurs: Get medical advice/attention.
Take off contaminated clothing and wash it before reuse.
If eye irritation persists: Get medical advice/attention.
Dispose of contents/container in accordance with local/regional/national/international regulations.

· **Classification system:**
· **NFPA ratings (scale 0 - 4)**

Health = 1
Fire = 1
Reactivity = 0

· **HMIS-ratings (scale 0 - 4)**

Health = 1
Fire = 1
Reactivity = 0

· **Other hazards**
· **Results of PBT and vPvB assessment**
· **PBT:** Not applicable.
· **vPvB:** Not applicable.

3 Composition/information on ingredients

· **Chemical characterization: Mixtures**
· **Description:** Mixture of the substances listed below with nonhazardous additions.

· **Dangerous components:**		
	PROPRIETARY	0-10%

· **Additional information:**
The exact percentages of the ingredients of this mixture are considered to be proprietary and are withheld in accordance with the provisions of paragraph (i) of 1910.1200 of 29 CFR 1910.1200 Trade Secrets.

4 First-aid measures

· **Description of first aid measures**
· **General information:** Immediately remove any clothing soiled by the product.
· **After inhalation:** In case of unconsciousness place patient stably in side position for transportation.
· **After skin contact:**
Immediately wash with water and soap and rinse thoroughly.

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Safety Data Sheet
acc. to OSHA HCS

Trade name: TIRE SHINE WB

(Contd. of page 2)

If skin irritation occurs, seek medical advice.
· **After eye contact:**
Rinse opened eyes for at least 15 minutes under running water.
If easy to do so, remove contact lenses if worn.
Seek immediate medical advice.
· **After swallowing:**
Rinse out mouth and drink plenty of water or milk.
Do not induce vomiting without medical advice.
If vomiting does occur, repeat fluid administration.
If irritation or discomfort occurs, seek medical advice.
· **Information for doctor:**
· **Most important symptoms and effects, both acute and delayed** No further relevant information available.
· **Indication of any immediate medical attention and special treatment needed**
No further relevant information available.

5 Fire-fighting measures

· **Extinguishing media**
· **Suitable extinguishing agents:**
CO2, extinguishing powder or water spray. Fight larger fires with water spray or alcohol resistant foam.
· **Special hazards arising from the substance or mixture** No further relevant information available.
· **Advice for firefighters**
· **Protective equipment:**
As in any fire, wear self-contained breathing apparatus pressure-demand (NIOSH approved or equivalent) and full protective gear to prevent contact with the skin or eyes.

6 Accidental release measures

· **Personal precautions, protective equipment and emergency procedures**
Avoid contact with the eyes, skin and clothing.
Ensure adequate ventilation.
Wear protective equipment. Keep unprotected persons away.
· **Environmental precautions:** Do not allow to enter sewers/ surface or ground water.
· **Methods and material for containment and cleaning up:**
Absorb with liquid-binding material (sand, diatomite, acid binders, universal binders, sawdust).
Dispose contaminated material as waste according to item 13.
· **Reference to other sections**
See Section 7 for information on safe handling.
See Section 8 for information on personal protection equipment.
See Section 13 for disposal information.
· **Protective Action Criteria for Chemicals**

· **PAC-1:**
None of the ingredients is listed.

· **PAC-2:**
None of the ingredients is listed.

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Safety Data Sheet
acc. to OSHA HCS

Printing date 09/26/2019 Reviewed on 09/26/2019

Trade name: TIRE SHINE WB

(Contd. of page 3)

· **PAC-3:**
None of the ingredients is listed.

7 Handling and storage

· **Handling:**
· **Precautions for safe handling** No special precautions are necessary if used correctly.
· **Information about protection against explosions and fires:** No special measures required.

· **Conditions for safe storage, including any incompatibilities**
· **Storage:**
· **Requirements to be met by storerooms and receptacles:** No special requirements.
· **Information about storage in one common storage facility:** Not required.
· **Further information about storage conditions:** Keep receptacle tightly sealed.
· **Specific end use(s)** No further relevant information available.

8 Exposure controls/personal protection

· **Additional information about design of technical systems:** No further data; see item 7.

· **Control parameters**
All ventilation should be disigned in accordance with OSHA standard (29 CFR 1910.94). Use mechanical (general) ventilation for storage areas. Use appropriate ventilation as required to keep Exposure Limits in Air below TLV & PEL limits.
· **Components with limit values that require monitoring at the workplace:**
The product does not contain any relevant quantities of materials with critical values that have to be monitored at the workplace.
· **Additional information:** The lists that were valid during the creation were used as basis.

· **Exposure controls**
· **Personal protective equipment:**
· **General protective and hygienic measures:**
Keep away from foodstuffs, beverages and feed.
Immediately remove all soiled and contaminated clothing.
Wash hands before breaks and at the end of work.
Avoid contact with the eyes and skin.
· **Breathing equipment:** Not required.
· **Protection of hands:**

Protective gloves

The glove material has to be impermeable and resistant to the product/ the substance/ the preparation.
Due to missing tests no recommendation to the glove material can be given for the product/ the preparation/ the chemical mixture.
Selection of the glove material on consideration of the penetration times, rates of diffusion and the degradation

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Safety Data Sheet
acc. to OSHA HCS

Printing date 09/26/2019 Reviewed on 09/26/2019

Trade name: TIRE SHINE WB

(Contd. of page 4)

· **Material of gloves**
The selection of the suitable gloves does not only depend on the material, but also on further marks of quality and varies from manufacturer to manufacturer. As the product is a preparation of several substances, the resistance of the glove material can not be calculated in advance and has therefore to be checked prior to the application.
· **Penetration time of glove material**
The exact break through time has to be found out by the manufacturer of the protective gloves and has to be observed.
· **Eye protection:**

Tightly sealed goggles

9 Physical and chemical properties

· **Information on basic physical and chemical properties**	
· **General Information**	
· **Appearance:**	
Form:	Fluid
Color:	According to product specification
· **Odor:**	Characteristic
· **Odor threshold:**	Not determined.
· **Change in condition**	
Melting point/Melting range:	Undetermined.
Boiling point/Boiling range:	100 °C (212 °F)
· **Flash point:**	>55 °C (>131 °F)
· **Flammability (solid, gaseous):**	Not applicable.
· **Ignition temperature:**	210 °C (410 °F)
· **Decomposition temperature:**	Not determined.
· **Auto igniting:**	Product is not selfigniting.
· **Danger of explosion:**	Product does not present an explosion hazard.
· **Explosion limits:**	
Lower:	0.5 Vol %
Upper:	6.5 Vol %
· **Vapor pressure at 20 °C (68 °F):**	23 hPa (17.3 mm Hg)
· **Density (Specific Gravity) at 20 °C (68 °F):**	(8.34542 lbs/gal)
· **Bulk density:**	971 kg/m³
· **Relative density**	Not determined.
· **Vapor density**	Not determined.
· **Evaporation rate**	Not determined.

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Safety Data Sheet
acc. to OSHA HCS

Printing date 09/26/2019 Reviewed on 09/26/2019

Trade name: TIRE SHINE WB

(Contd. of page 5)

· **Solubility in / Miscibility with Water:**	Not miscible or difficult to mix.
· **Partition coefficient (n-octanol/water):**	Not determined.
· **Viscosity:**	
Dynamic:	Not determined.
Kinematic:	Not determined.
· **Solvent content:**	
Water:	PROPRIETARY %
VOC content:	0.00 % 0.0 g/l / 0.00 lb/gal
Solids content:	0 %
· **Other information**	No further relevant information available.

10 Stability and reactivity

· **Reactivity** No further relevant information available.
· **Chemical stability**
· **Thermal decomposition / conditions to be avoided:** No decomposition if used according to specifications.
· **Possibility of hazardous reactions** No dangerous reactions known.
· **Conditions to avoid** No further relevant information available.
· **Incompatible materials:** No further relevant information available.
· **Hazardous decomposition products:** No dangerous decomposition products known.

11 Toxicological information

· **Information on toxicological effects**
· **Acute toxicity:**

· **LD/LC50 values that are relevant for classification:**		
ATE (Acute Toxicity Estimate)		
Oral	LD50	4,386 mg/kg

· **Primary irritant effect:**
· **on the skin:** Irritant to skin and mucous membranes.
· **on the eye:** Irritating effect.
· **Sensitization:** No sensitizing effects known.
· **Additional toxicological information:**
The product shows the following dangers according to internally approved calculation methods for preparations:
Harmful
Irritant

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Safety Data Sheet
acc. to OSHA HCS

(Contd. of page 6)

· **Carcinogenic categories**

· **IARC (International Agency for Research on Cancer)**
None of the ingredients is listed.

· **NTP (National Toxicology Program)**
None of the ingredients is listed.

· **OSHA-Ca (Occupational Safety & Health Administration)**
None of the ingredients is listed.

12 Ecological information

· **Toxicity**
· **Aquatic toxicity:** No further relevant information available.
· **Persistence and degradability** No further relevant information available.
· **Behavior in environmental systems:**
· **Bioaccumulative potential** No further relevant information available.
· **Mobility in soil** No further relevant information available.
· **Additional ecological information:**
· **General notes:**
Water hazard class 1 (Self-assessment): slightly hazardous for water
Do not allow undiluted product or large quantities of it to reach ground water, water course or sewage system.
· **Results of PBT and vPvB assessment**
· **PBT:** Not applicable.
· **vPvB:** Not applicable.
· **Other adverse effects** No further relevant information available.

13 Disposal considerations

· **Waste treatment methods**
· **Recommendation:**
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.
Observe all federal, state and local environmental regulations when disposing of this material.

· **Uncleaned packagings:**
· **Recommendation:** Disposal must be made according to official regulations.

14 Transport information

· **UN-Number**
· **DOT, ADN, IMDG, IATA** not regulated

· **UN proper shipping name**
· **DOT, ADN, IMDG, IATA** not regulated

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Safety Data Sheet
acc. to OSHA HCS

Printing date 09/26/2019 Reviewed on 09/26/2019

Trade name: TIRE SHINE WB

(Contd. of page 7)

· **Transport hazard class(es)**	
· **DOT, ADN, IMDG, IATA**	
· **Class**	not regulated
· **Packing group**	
· **DOT, IMDG, IATA**	not regulated
· **Environmental hazards:**	Not applicable.
· **Special precautions for user**	Not applicable.
· **Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code**	Not applicable.
· **UN "Model Regulation":**	not regulated

15 Regulatory information

· **Safety, health and environmental regulations/legislation specific for the substance or mixture**
· **Sara**

· **Section 355 (extremely hazardous substances):**
None of the ingredients is listed.

· **Section 313 (Specific toxic chemical listings):**
None of the ingredients is listed.

· **TSCA (Toxic Substances Control Act):**

7732-18-5	water, distilled, conductivity or of similar purity	ACTIVE

· **Hazardous Air Pollutants**
None of the ingredients is listed.

· **Proposition 65**

· **Chemicals known to cause cancer:**
None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for females:**
None of the ingredients is listed.

· **Chemicals known to cause reproductive toxicity for males:**
None of the ingredients is listed.

· **Chemicals known to cause developmental toxicity:**
None of the ingredients is listed.

· **Carcinogenic categories**

· **EPA (Environmental Protection Agency)**
None of the ingredients is listed.

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Safety Data Sheet
acc. to OSHA HCS

Printing date 09/26/2019 Reviewed on 09/26/2019

Trade name: TIRE SHINE WB

(Contd. of page 8)

· **TLV (Threshold Limit Value established by ACGIH)**
None of the ingredients is listed.

· **NIOSH-Ca (National Institute for Occupational Safety and Health)**
None of the ingredients is listed.

· **GHS label elements** The product is classified and labeled according to the Globally Harmonized System (GHS).
· **Hazard pictograms**

GHS07

· **Signal word** Warning

· **Hazard-determining components of labeling:**
PROPRIETARY
PROPRIETARY
· **Hazard statements**
Harmful if swallowed.
Causes skin irritation.
Causes serious eye irritation.
· **Precautionary statements**
Wash thoroughly after handling.
Do not eat, drink or smoke when using this product.
Wear protective gloves / eye protection / face protection.
If swallowed: Call a poison center/doctor if you feel unwell.
Rinse mouth.
If on skin: Wash with plenty of water.
Specific treatment (see on this label).
If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
If skin irritation occurs: Get medical advice/attention.
Take off contaminated clothing and wash it before reuse.
If eye irritation persists: Get medical advice/attention.
Dispose of contents/container in accordance with local/regional/national/international regulations.
· **Chemical safety assessment:** A Chemical Safety Assessment has not been carried out.

16 Other information

The information and recommendations in this safety data sheet are, to the best of our knowledge, accurate as of the date of issue. Nothing herein shall be deemed to create warranty, expressed or implied, and shall not establish a legally valid contractual relationship. It is the responsibility of the user to determine applicability of this information and the suitability of the material or product for any particular purpose.

· **Department issuing SDS:** Environment protection department.
· **Contact:** -
· **Date of preparation / last revision** 09/26/2019 / -

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Safety Data Sheet
acc. to OSHA HCS

Trade name: TIRE SHINE WB

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· **Abbreviations and acronyms:**
IMDG: International Maritime Code for Dangerous Goods
DOT: US Department of Transportation
IATA: International Air Transport Association
ACGIH: American Conference of Governmental Industrial Hygienists
EINECS: European Inventory of Existing Commercial Chemical Substances
ELINCS: European List of Notified Chemical Substances
CAS: Chemical Abstracts Service (division of the American Chemical Society)
NFPA: National Fire Protection Association (USA)
HMIS: Hazardous Materials Identification System (USA)
VOC: Volatile Organic Compounds (USA, EU)
LC50: Lethal concentration, 50 percent
LD50: Lethal dose, 50 percent
PBT: Persistent, Bioaccumulative and Toxic
vPvB: very Persistent and very Bioaccumulative
NIOSH: National Institute for Occupational Safety
OSHA: Occupational Safety & Health
TLV: Threshold Limit Value
PEL: Permissible Exposure Limit
REL: Recommended Exposure Limit
Acute Tox. 4: Acute toxicity – Category 4
Skin Irrit. 2: Skin corrosion/irritation – Category 2
Eye Irrit. 2A: Serious eye damage/eye irritation – Category 2A

Safety Data Sheet (SDS)

OSHA HazCom Standard 29 CFR 1910.1200(g) and GHS Rev 03.

Issue date 04/14/2018 Reviewed on 04/14/2018

1 Identification

· **Product Identifier**

· **Trade Name: SPLIT EQUIPMENT CLEANER**
· **Product Number:** K-199
· **Relevant identified uses of the substance or mixture and uses advised against:**
· **Product Description:** Mild Alkaline Cleaner
· **Application of the substance / the mixture:** Industrial Cleaning Compound

· **Details of the Supplier of the Safety Data Sheet:**
· **Manufacturer/Supplier:**
Kaady Chemical Corp.
2545 SW SPRING GARDEN ST STE 120
PORTLAND, OR 97219
1-510-562-9788
www.kaadychemical.com
· **Emergency telephone number:** +1-800-424-9300

2 Hazard(s) Identification

· **Classification of the substance or mixture:**

GHS07

STOT SE 3 H335 May cause respiratory irritation.

Eye Irrit. 2B H320 Causes eye irritation.

· **Label elements:**
· **GHS label elements**
The product is classified and labeled according to the Globally Harmonized System (GHS).
· **Hazard pictograms:**

GHS07

· **Signal word:** Warning

· **Hazard-determining components of labeling:**
Silicic acid, sodium salt
· **Hazard statements:**
H320 Causes eye irritation.
H335 May cause respiratory irritation.
· **Precautionary statements:**

P261	Avoid breathing dust/fume/gas/mist/vapors/spray.
P262	Do not get in eyes, on skin, or on clothing.
P264	Wash thoroughly after handling.
P270	Do not eat, drink or smoke when using this product.
P271	Use only outdoors or in a well-ventilated area.
P280	Wear protective gloves / eye protection / face protection.
P281	Wear personal protective equipment/face protection.

(Contd. on page 2)

Safety Data Sheet (SDS)

OSHA HazCom Standard 29 CFR 1910.1200(g) and GHS Rev 03.

Issue date 04/14/2018 Reviewed on 04/14/2018

Trade Name: SPLIT EQUIPMENT CLEANER

P301+P330+P331	If swallowed: Rinse mouth. Do NOT induce vomiting.
P302+P350	IF ON SKIN: Gently wash with plenty of soap and water.
P304+P340	IF INHALED: Remove person to fresh air and keep comfortable for breathing.
P305+P351+P338	If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
P312	Call a poison center/doctor if you feel unwell.
P321	Specific treatment (see supplementary first aid instructions on this Safety Data Sheet).
P363	Wash contaminated clothing before reuse.
P403+P235	Store in a well-ventilated place. Keep cool.
P405	Store locked up.
P501	Dispose of contents/container in accordance with local/regional/national/international regulations.

· **Unknown acute toxicity:**
This value refers to knowledge of known, established toxicological or ecotoxicological values.
1.8 % of the mixture consists of component(s) of unknown toxicity.

· **Classification system:** NFPA/HMIS Definitions: 0-Least, 1-Slight, 2-Moderate, 3-High, 4-Extreme

· **NFPA ratings (scale 0 - 4)**

Health = 1
Fire = 1
Reactivity = 0

· **HMIS-ratings (scale 0 - 4)**

Health = 1
Fire = 1
Physical Hazard = 0

· **Hazard(s) not otherwise classified (HNOC):** None known

3 Composition/Information on Ingredients

· **Non-hazardous components:**

Non-Hazardous Components	>85%

· **Chemical characterization: Mixtures**
· **Description:** Mixture of substances listed below with non-hazardous additions.

· **Dangerous Components:**

CAS: 34590-94-8 RTECS: JM 1575000	Dipropylene glycol monomethyl ether Flam. Liq. 4, H227	<5%
CAS: 1344-09-8	Silicic acid, sodium salt Acute Tox. 4, H302; Skin Irrit. 2, H315; Eye Irrit. 2A, H319; STOT SE 3, H335	<5%
CAS: 68439-46-3	Alcohol C9-11 Eye Dam. 1, H318; Skin Irrit. 2, H315	<5%
CAS: 1310-73-2	Sodium Hydroxide Skin Corr. 1A, H314; Acute Tox. 4, H302	<5%

(Contd. on page 3)

Safety Data Sheet (SDS)
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Trade Name: SPLIT EQUIPMENT CLEANER

· **Additional information:**
The exact percentages of the ingredients of this mixture are considered to be proprietary and are withheld in accordance with the provisions of paragraph (i) of §1910.1200 of 29 CFR 1910.1200 Trade Secrets.

4 First-Aid Measures

· **Description of first aid measures:**
· **After inhalation:**
Give oxygen or artificial respiration if needed. If symptoms develop, move victim to fresh air. If symptoms persist, obtain medical attention.
· **After skin contact:**
Promptly flush skin with water for at least 15 minutes to ensure all chemical is removed. Remove contaminated clothing and wash before reuse. If reddening develops and/or persists, see a physician.
· **After eye contact:**
Flush with large amounts of water for at least 15 minutes, lifting upper and lower lids occasionally. Remove contact lenses if present and easy to do so. Get immediate medical attention.
· **After swallowing:**
Rinse mouth with water. Give 3-4 glasses of water or milk to dilute stomach contents. Do NOT induce vomiting. Seek immediate medical attention.
· **Information for doctor:**
· **Most important symptoms and effects, both acute and delayed:**
No further relevant information available.
· **Indication of any immediate medical attention and special treatment needed:**
No further relevant information available.

* 5 Fire-Fighting Measures

· **Extinguishing media:**
· **Suitable extinguishing agents:**
CO2, sand, dry chemical, water mist or alcohol resistant foam.
Use fire fighting measures that suit the environment.
· **For safety reasons unsuitable extinguishing agents:** No further relevant information.
· **Special hazards arising from the substance or mixture:**
Carbon oxides
Nitrogen oxides (NOx)
Sodium oxides
Silicon oxides
Aldehydes
· **Advice for firefighters:**
· **Protective equipment:**
As in any fire, wear self-contained breathing apparatus pressure-demand (NIOSH approved or equivalent) and full protective gear to prevent contact with skin and eyes.

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Safety Data Sheet (SDS)

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Issue date 04/14/2018 Reviewed on 04/14/2018

Trade Name: SPLIT EQUIPMENT CLEANER

6 Accidental Release Measures

· **Personal precautions, protective equipment and emergency procedures:**
Use personal protective equipment.
Keep from contacting skin or eyes.
Avoid breathing vapors, mist or gas.
Ensure adequate ventilation.
Evacuate personnel to safe areas.
· **Environmental precautions:** Do not allow to enter sewers/surface or ground water.
· **Methods and material for containment and cleaning up:**
Absorb with liquid-binding material (i.e. sand, diatomite, acid binders, universal binders, sawdust).
Dispose of the collected material according to regulations.
· **Reference to other sections:**
See Section 7 for information on safe handling.
See Section 8 for information on personal protection equipment.
See Section 13 for disposal information.
· **Protective Action Criteria for Chemicals**

· **PAC-1:**		
34590-94-8	Dipropylene glycol monomethyl ether	150 ppm
1344-09-8	Silicic acid, sodium salt	5.9 mg/m³
1310-73-2	Sodium Hydroxide	0.5 mg/m³
64-02-8	Tetrasodium ethylenediaminetetraacetate	75 mg/m³
67-63-0	Isopropyl alcohol	400 ppm

· **PAC-2:**		
34590-94-8	Dipropylene glycol monomethyl ether	1700* ppm
1344-09-8	Silicic acid, sodium salt	65 mg/m³
1310-73-2	Sodium Hydroxide	5 mg/m³
64-02-8	Tetrasodium ethylenediaminetetraacetate	830 mg/m³
67-63-0	Isopropyl alcohol	2000* ppm

· **PAC-3:**		
34590-94-8	Dipropylene glycol monomethyl ether	9900** ppm
1344-09-8	Silicic acid, sodium salt	390 mg/m³
1310-73-2	Sodium Hydroxide	50 mg/m³
64-02-8	Tetrasodium ethylenediaminetetraacetate	5,000 mg/m³
67-63-0	Isopropyl alcohol	12000** ppm

7 Handling and Storage

· **Handling**
· **Precautions for safe handling:**
Avoid breathing vapors or mist.
Avoid contact with eyes, skin, or clothing.
Keep containers closed when not in use.
Do not expose containers to open flame, excessive heat, or direct sunlight.
Do not puncture or drop containers.

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Trade Name: SPLIT EQUIPMENT CLEANER

Handle with care and avoid spillage on the floor (slippage).
Avoid release into the environment.
Keep material out of reach of children.
Keep material away from incompatible materials.
Wash thoroughly after handling.
· **Information about protection against explosions and fires:** No special measures required.

· **Conditions for safe storage, including any incompatibilities:**
· **Storage**
· **Requirements to be met by storerooms and receptacles:** No special requirements.
· **Information about storage in one common storage facility:**
Keep containers tightly closed.
Do not store in direct sunlight.
Keep away from heat, sparks and flames.
Store away from strong acids.
Store away from strong oxidizers.
Store away from chlorinated solvents.
Do not store in Aluminum, Iron, Brass, Copper, Copper Alloys, Galvalized Containers, Nickel, Zinc, Carbon Steel, Phosphorous, Lead, Tin or Tin Oxides..
Do not store at temperatures exceeding 50 °C/122 °F.
· **Further information about storage conditions:** None.
· **Specific end use(s):** No further relevant information available.

* 8 Exposure Controls/Personal Protection

· **Additional information about design of technical systems:** No further data; see section 7.

· **Control parameters:**
· **Components with occupational exposure limits:**
The following constituents are the only constituents of the product which have a PEL, TLV or other recommended exposure limit.
At this time, the other constituents have no known exposure limits.

34590-94-8 Dipropylene glycol monomethyl ether	
PEL	Long-term value: 600 mg/m³, 100 ppm Skin
REL	Short-term value: 900 mg/m³, 150 ppm Long-term value: 600 mg/m³, 100 ppm Skin
TLV	Short-term value: 909 mg/m³, 150 ppm Long-term value: 606 mg/m³, 100 ppm Skin
1310-73-2 Sodium Hydroxide	
PEL	Long-term value: 2 mg/m³
REL	Ceiling limit value: 2 mg/m³
TLV	Ceiling limit value: 2 mg/m³

· **Additional information:** The lists that were valid during the creation of this SDS were used as basis.

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Safety Data Sheet (SDS)
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Issue date 04/14/2018 Reviewed on 04/14/2018

Trade Name: SPLIT EQUIPMENT CLEANER

· **Exposure controls:**
· **Personal protective equipment:**
· **General protective and hygienic measures:**
The usual precautionary measures for handling chemicals should be followed.
Wash hands before breaks and at the end of work.
· **Breathing equipment:**
Have self-contained breathing apparatus, positive pressure, MSHA/NIOSH (approved or equivalent) available in case of spillage or equipment failure.
· **Protection of hands:**

Protective gloves

· **Material of gloves:** Neoprene, Nitrile or Buna Rubber.
· **Penetration time of glove material:** Not applicable.
· **Eye protection:**

Safety glasses

9 Physical and Chemical Properties

· **Information on basic physical and chemical properties**	
· **General Information**	
· **Appearance:**	
Form:	Liquid
Color:	Clear amber
· **Odour:**	Slight
· **Odor threshold:**	Not determined.
· **pH-value @ 20 °C (68 °F):**	11.8-12.0
· **Change in condition**	
Melting point/Melting range:	Not determined.
Boiling point/Boiling range:	≥100 °C (≥212 °F)
· **Flash point:**	>100 °C (>212 °F)
· **Flammability (solid, gaseous):**	Not applicable.
· **Ignition temperature:**	Not applicable
· **Decomposition temperature:**	Not determined.
· **Auto igniting:**	Product is not self-igniting.
· **Danger of explosion:**	Product does not present an explosion hazard.
· **Explosion limits:**	
Lower:	Not determined.

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Trade Name: SPLIT EQUIPMENT CLEANER

Upper:	Not determined.
· **Vapor pressure:**	Not determined.
· **Density @ 20 °C (68 °F):**	1.031 g/cm³ (8.604 lbs/gal)
· **Relative density:**	Not determined.
· **Vapor density:**	Not determined.
· **Evaporation rate:**	Not determined.
· **Solubility in / Miscibility with:**	
Water:	Fully Soluble
· **Partition coefficient (n-octanol/water):**	Not determined.
· **Viscosity:**	
Dynamic:	Not determined.
Kinematic:	Not determined.
· **Solvent content:**	
VOC content:	26 g/L
Solids content:	2.2 %
· **Other information:**	No further relevant information available.

*
10 Stability and Reactivity

· **Reactivity:** No further relevant information available.
· **Chemical stability:** Stable under normal conditions.
· **Thermal decomposition / conditions to be avoided:**
No decomposition if used according to specifications.
· **Possibility of hazardous reactions:** No dangerous reactions known.
· **Conditions to avoid:** Incompatibilities, flames, ignition sources.
· **Incompatible materials:**
Peroxides, Nitric Acid, Reactive Metals (Zinc, Aluminum, Tin, Lead & Brass), Strong Acids, Strong Oxidizing Agents, Chlorinated Solvents, Phosphorous, Tin Oxides.
Extended contact: Iron, Brass, Copper, Copper Alloys, Galvalized Containers, Nickel or Carbon Steel.
· **Hazardous decomposition products:**
Carbon Oxides, Nitrogen Oxides (NOx), Sodium Oxides, Silicon Oxides, Aldehydes.

*
11 Toxicological Information

· **Information on toxicological effects:**
· **Acute toxicity:**

· **LD/LC50 values that are relevant for classification:**		
34590-94-8 Dipropylene glycol monomethyl ether		
Oral	LD50	5,135 mg/kg (Rat)
Dermal	LD50	>19,000 mg/kg (rab)
Inhalative	LC50/96 hours	>10,000 mg/l (Pimephales)

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Issue date 04/14/2018 Reviewed on 04/14/2018

Trade Name: SPLIT EQUIPMENT CLEANER

1344-09-8 Silicic acid, sodium salt		
Oral	LD50	>2,000 mg/kg (Rat)
Dermal	LD50	>4,640 mg/kg (Rabbit)
1310-73-2 Sodium Hydroxide		
Oral	LD50	2,000 mg/kg (Rat)

· **Primary irritant effect:**
· **On the skin:** No irritating effect.
· **On the eye:** Irritating effect.
· **Additional toxicological information:**

· **Carcinogenic categories:**
· **IARC (International Agency for Research on Cancer):**
Group 1 - Carcinogenic to humans
Group 2A - Probably carcinogenic to humans
Group 2B - Possibly carcinogenic to humans
Group 3 - Not classifiable as to its carcinogenicity to humans
Group 4 - Probably not carcinogenic to humans

67-63-0	Isopropyl alcohol	3

· **NTP (National Toxicology Program):**
None of the ingredients are listed.

· **OSHA-Ca (Occupational Safety & Health Administration):**
None of the ingredients are listed.

* 12 Ecological Information

· **Toxicity:**

· **Aquatic toxicity:**

34590-94-8 Dipropylene glycol monomethyl ether	
EC50	1.919 mg/l (Daphnia)
1310-73-2 Sodium Hydroxide	
EC50	40 mg/l (Daphnia)

· **Persistence and degradability:** No further relevant information available.
· **Behavior in environmental systems:**
· **Bioaccumulative potential:** No further relevant information available.
· **Mobility in soil:** No further relevant information available.
· **Additional ecological information:**
· **General notes:**
Do not allow product to reach ground water, water course or sewage system.
Danger to drinking water if even small quantities leak into the ground.
Rinse off of bigger amounts into drains or the aquatic environment may lead to increased pH-values. A high pH-value harms aquatic organisms. In the dilution of the use-level the pH-value is considerably reduced, so that after the use of the product the aqueous waste, emptied into drains, is only low water-dangerous.
· **Results of PBT and vPvB assessment:**
· **PBT:** Not applicable.

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OSHA HazCom Standard 29 CFR 1910.1200(g) and GHS Rev 03.

Issue date 04/14/2018 Reviewed on 04/14/2018

Trade Name: SPLIT EQUIPMENT CLEANER

· **vPvB:** Not applicable.
· **Other adverse effects:** No further relevant information available.

13 Disposal Considerations

· **Waste treatment methods:**
· **Recommendation:**
Observe all federal, state and local environmental regulations when disposing of this material.

· **Uncleaned packagings**
· **Recommendation:** Disposal must be made according to official regulations.

14 Transport Information

· **UN-Number:**	
· **DOT, ADR/ADN, ADN, IMDG, IATA**	Non-Regulated Material
· **UN proper shipping name:**	
· **DOT, ADR/ADN, ADN, IMDG, IATA**	Non-Regulated Material
· **Transport hazard class(es):**	
· **DOT, ADR/ADN, ADN, IMDG, IATA**	
· **Class:**	Non-Regulated Material
· **Packing group:**	
· **DOT, ADR/ADN, IMDG, IATA**	Non-Regulated Material
· **Environmental hazards:**	Not applicable.
· **Special precautions for user:**	Not applicable.
· **Transport in bulk according to Annex II of MARPOL73/78 and the IBC Code:**	Not applicable.
· **UN "Model Regulation":**	Non-Regulated Material

15 Regulatory Information

· **Safety, health and environmental regulations/legislation specific for the substance or mixture:**
· **SARA (Superfund Amendments and Reauthorization):**

· **Section 355 (extremely hazardous substances):**
None of the ingredients are listed.

· **Section 313 (Specific toxic chemical listings):**
67-63-0 Isopropyl alcohol

· **TSCA (Toxic Substances Control Act):**
All ingredients are listed or exempt from listing.

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Safety Data Sheet (SDS)

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Trade Name: SPLIT EQUIPMENT CLEANER

· **California Proposition 65:**

· **Chemicals known to cause cancer:**

None of the ingredients are listed.

· **Chemicals known to cause reproductive toxicity for females:**

None of the ingredients are listed.

· **Chemicals known to cause reproductive toxicity for males:**

None of the ingredients are listed.

· **Chemicals known to cause developmental toxicity:**

None of the ingredients are listed.

· **New Jersey Right-to-Know List:**

34590-94-8	Dipropylene glycol monomethyl ether
1310-73-2	Sodium Hydroxide
67-63-0	Isopropyl alcohol

· **New Jersey Special Hazardous Substance List:**

1310-73-2	Sodium Hydroxide	CO, R1
67-63-0	Isopropyl alcohol	F3

· **Pennsylvania Right-to-Know List:**

34590-94-8	Dipropylene glycol monomethyl ether
1310-73-2	Sodium Hydroxide
67-63-0	Isopropyl alcohol

· **Pennsylvania Special Hazardous Substance List:**

1310-73-2	Sodium Hydroxide	E
67-63-0	Isopropyl alcohol	E

· **Carcinogenic categories:**

· **EPA (Environmental Protection Agency):**

None of the ingredients are listed.

· **TLV (Threshold Limit Value established by ACGIH):**

67-63-0	Isopropyl alcohol	A4

· **NIOSH-Ca (National Institute for Occupational Safety and Health):**

None of the ingredients are listed.

· **GHS label elements**

The product is classified and labeled according to the Globally Harmonized System (GHS).

· **Hazard pictograms:**

GHS07

· **Signal word:** Warning

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Trade Name: SPLIT EQUIPMENT CLEANER

· **Hazard-determining components of labeling:**
Silicic acid, sodium salt
· **Hazard statements:**
H320 Causes eye irritation.
H335 May cause respiratory irritation.
· **Precautionary statements:**

P261	Avoid breathing dust/fume/gas/mist/vapors/spray.
P262	Do not get in eyes, on skin, or on clothing.
P264	Wash thoroughly after handling.
P270	Do not eat, drink or smoke when using this product.
P271	Use only outdoors or in a well-ventilated area.
P280	Wear protective gloves / eye protection / face protection.
P281	Wear personal protective equipment/face protection.
P301+P330+P331	If swallowed: Rinse mouth. Do NOT induce vomiting.
P302+P350	IF ON SKIN: Gently wash with plenty of soap and water.
P304+P340	IF INHALED: Remove person to fresh air and keep comfortable for breathing.
P305+P351+P338	If in eyes: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
P312	Call a poison center/doctor if you feel unwell.
P321	Specific treatment (see supplementary first aid instructions on this Safety Data Sheet).
P363	Wash contaminated clothing before reuse.
P403+P235	Store in a well-ventilated place. Keep cool.
P405	Store locked up.
P501	Dispose of contents/container in accordance with local/regional/national/international regulations.

· **National regulations:**
None of the ingredients are listed.
· **Chemical safety assessment:** A Chemical Safety Assessment has not been carried out.

16 Other Information

The information and recommendations in this safety data sheet are, to the best of our knowledge, accurate as of the date of issue. Nothing herein shall be deemed to create warranty, expressed or implied, and shall not establish a legally valid contractual relationship. It is the responsibility of the user to determine applicability of this information and the suitability of the material or product for any particular purpose.

· **Date of preparation / last revision:** 04/14/2018 / 18
· **Abbreviations and acronyms:**
ADR: The European Agreement concerning the International Carriage of Dangerous Goods by Road
ADN: The European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways
IMDG: International Maritime Code for Dangerous Goods
DOT: US Department of Transportation
IATA: International Air Transport Association
ACGIH: American Conference of Governmental Industrial Hygienists
EINECS: European Inventory of Existing Commercial Chemical Substances
ELINCS: European List of Notified Chemical Substances
CAS: Chemical Abstracts Service (division of the American Chemical Society)
NFPA: National Fire Protection Association (USA)
HMIS: Hazardous Materials Identification System (USA)

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Safety Data Sheet (SDS)

OSHA HazCom Standard 29 CFR 1910.1200(g) and GHS Rev 03.

Issue date 04/14/2018 Reviewed on 04/14/2018

Trade Name: SPLIT EQUIPMENT CLEANER

VOC: Volatile Organic Compounds (USA, EU)
LC50: Lethal concentration, 50 percent
LD50: Lethal dose, 50 percent
PBT: Persistent, Bioaccumulative and Toxic
vPvB: very Persistent and very Bioaccumulative
NIOSH: National Institute for Occupational Safety and Health
OSHA: Occupational Safety & Health Administration
TLV: Threshold Limit Value
PEL: Permissible Exposure Limit
REL: Recommended Exposure Limit
Flam. Liq. 4: Flammable liquids – Category 4
Acute Tox. 4: Acute toxicity – Category 4
Skin Corr. 1A: Skin corrosion/irritation – Category 1A
Skin Irrit. 2: Skin corrosion/irritation – Category 2
Eye Dam. 1: Serious eye damage/eye irritation – Category 1
Eye Irrit. 2A: Serious eye damage/eye irritation – Category 2A
Eye Irrit. 2B: Serious eye damage/eye irritation – Category 2B
STOT SE 3: Specific target organ toxicity (single exposure) – Category 3

· *** Data compared to the previous version altered.**

SDS created by MSDS Authoring Services www.msdsauthoring.com +1-877-204-9106

March 24, 2026
18645 Midhill Cir.
West Linn, OR 97068

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

Dear Members of the Planning Commission,

My name is Lyra Harbour. I am a Robinwood resident, a local veteran, and a former Kaady Car Wash employee. I worked at Kaady for approximately two months in 2018, during which time I received full operational training and gained firsthand knowledge of standard practices. I submit this statement in formal opposition to the proposed Kaady Car Wash development and respectfully urge the Commission to deny the application.

I. Noise Levels and Municipal Code Compliance

Average car wash noise levels are comparable to those of an active construction site, frequently falling at or near OSHA's threshold for its eight-hour permissible noise exposure limit. During my employment, ambient noise levels were so elevated that employees were required to shout commands to one another in order to communicate. I personally chose not to wear hearing protection so that I could hear my coworkers—a decision driven by safety rather than preference, and one that highlights the inadequacy of the working conditions. I find it interesting that no relevant data from any number of Kaady car washes located in Oregon are included in the sound study as far as comparable locations and peak operation time are concerned.

This safety concern is compounded by the physical hazards of the environment: employees are regularly incentivized to move quickly on wet, slick flooring, increasing the risk of slip-and-fall injuries in an already loud and disorienting setting. These conditions, taken together, indicate that car wash operations generate **continuous or recurrent** noise at levels consistent with active construction activity. As such, the proposed facility would, in my assessment, **constitute a violation of Sections 2(a), 2(c), 4(c), and 4(e) of West Linn Municipal Code 5.487 — Sound Levels and Noise.**

II. Employee Safety and the Proposed Sound-Proofing Exception

The applicant has represented to this Commission that employees do not enter the wash tunnel during normal operations. That representation is inconsistent with my direct experience. During slower periods, employees were routinely directed to perform interior maintenance tasks within the tunnel, including sweeping standing water, hosing down mechanical brushes, and clearing debris left by vehicles.

I am further opposed to the exception being proposed that would allow the facility to forego the installation of sound-proofing windows. The absence of such windows would meaningfully impair employees' ability to detect whether debris or an individual is blocking or incapacitated on the wash line—a scenario with serious safety implications. **Granting an exception to reduce construction costs at the expense of worker safety is not a trade-off this Commission should sanction.**

III. Water Runoff and Environmental Contamination

Based on training and firsthand observation, I have significant concerns regarding water and chemical runoff from the proposed facility. While the applicant has indicated that a collection tank will be installed, such systems do not reliably capture the full volume of water and chemical solution generated during wash operations. Excess runoff will inevitably flow downhill onto adjacent properties in quantities that are likely to exceed acceptable thresholds. All of this does not even take into account the aerosolized spray of water and chemicals generated by the sprayers and hoses carried by the wind to settle on the surrounding lots.

Of particular concern is the chemical composition of the wash solutions used by Kaady Car Wash, which are known to contain compounds identified as carcinogens. Uncaptured runoff containing these substances poses a credible risk of contaminating the local water table. Given the proximity of this site to the Fern Creek and the river, **such contamination would not remain contained and could have far-reaching environmental consequences for the broader West Linn community.**

IV. Conclusion

For the foregoing reasons—rooted in personal professional experience, safety concerns, and applicable municipal code—I respectfully urge the West Linn Planning Commission to deny the application for the proposed Kaady Car Wash facility.

Sincerely,

Lyra Harbour

Subject: Rebuttal Submission – Kaady Car Wash Proposal (March 18 Hearing)
FILE CUP-25-03/DR-25-03/VAR-25-02

March 21, 2026

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

Transmitted via email:dwyss@westlinnoregon.gov
Cc: citycouncil@westlinnoregon.gov City Council
Cc: rbialostosky@westlinnoregon.gov Mayor
Cc: lizd71@gmail.com (Robinwood Neighborhood Association Committee Chair)

Dear Mr. Wyss and West Linn City Council,

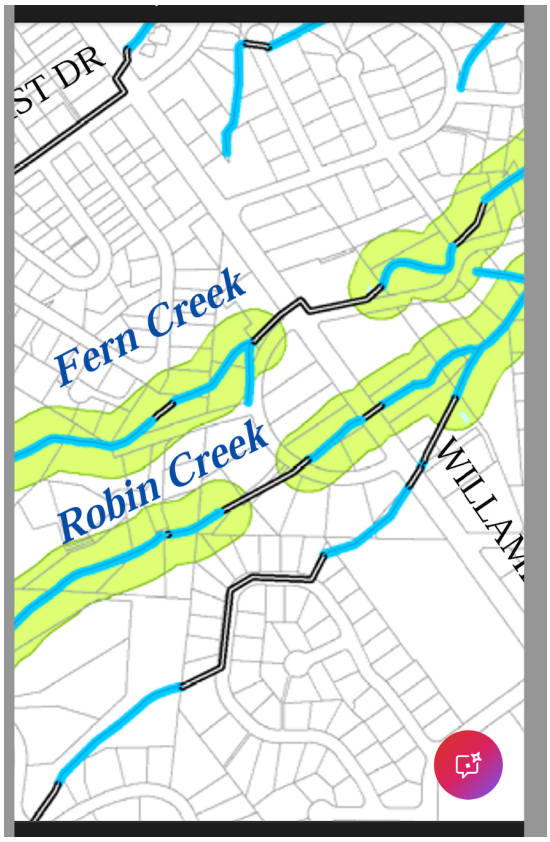
We appreciate the opportunity to submit this rebuttal following the March 18 hearing. Per direction provided at the hearing, I am submitting the attached rebuttal for inclusion in the official record.

During the hearing, I provided testimony regarding the site's location within a designated Water Resource Area (WRA) and Significant Riparian Corridor, the applicable local, state, and federal regulatory framework, and the absence of required documentation and environmental protections in the application. I also referenced publicly available Safety Data Sheets demonstrating the presence of hazardous chemicals associated with the applicant's operations.

Based on the testimony presented and subsequent review of publicly available information, we submit the following facts and concerns for the record.

1. Site designation as a Water Resource Area (WRA) and Significant Riparian Corridor

> **1A. FACT:** The subject property is designated by the City of West Linn as a **Significant Riparian Corridor with Water Resource Area (WRA).** This designation is clearly shown on the City's own published maps.
>
> **Proof:** City of West Linn GIS mapping:
> https://westlinnoregon.gov/sites/default/files/fileattachments/maps_gis/page/9641/sig riparian_wetlands_20140606v6_final_added_special_disclaimer_201503.pdf



1B. FACT: As a designated WRA, the site is subject to **local, state, and federal protections,** including:

- Metro Urban Growth Management Functional Plan
- West Linn Code Chapter 32 (Natural resources)
- West Linn Code Chapter 28 (Willamette River protections)
- US Army Corp Riparian
- Clean Water Act

1C. FACT: Development within a WRA must comply with **West Linn Code Chapter 32**, including requirements for protection of riparian corridors and downstream fish and wildlife habitats connected to the Willamette River.

1D. FACT: WRA Survey / Delineation Required (CHP 32.020)
West Linn Code Chapter 32.020 provides:

"In cases where the location of the WRA is unclear or disputed, the Planning Director may require a survey, delineation, or sworn statement prepared by a natural resource professional… at the applicant's sole expense."

The applicant denied the existence of riparian and environmentally sensitive conditions; therefore, the presence of a WRA is disputed. No WRA survey, delineation, or qualified statement has been provided.

1E. FACT: Required WRA documentation has not been provided
The application record does not include required natural resource documentation for development within a WRA, including:

- WRA boundary delineation (**CHP 32.055**)
- Riparian corridor impact analysis
- Environmental report addressing impacts to the Significant Riparian Corridor

These materials are necessary to evaluate development within a mapped WRA and are not present in the record.

1F. FACT: Required approval criteria under Chapter 32 have not been demonstrated (CHP 32.060)
West Linn Code Chapter 32.060 provides:

"No application for development on property containing a WRA shall be approved unless the approval authority finds that the proposed development is consistent with the following approval criteria…"

The application record does not demonstrate the required findings, including:

- Protection of WRA resources
- Stormwater management and detention
- Drainage and runoff control
- Minimization of impacts to riparian areas
- Protection of downstream resources

No stormwater detention plan, drainage plan, or riparian impact mitigation plan has been provided.

1G. FACT: State and federal environmental compliance has not been demonstrated
The application record does not include evidence of required or applicable environmental review or permitting for development affecting a riparian corridor and WRA, including:

- Oregon DEQ permits (**1700-A NPDES / 1700-B WPCF**)
- Stormwater permits (**1200-C / 1200-Z**)
- Oregon Department of State Lands (DSL) review or delineation
- U.S. Army Corps of Engineers (**401/404 certification**)

STATEMENT: The application record does not demonstrate compliance with **West Linn Code Chapter 32**, **Chapter 28**, or applicable environmental review requirements for development within a Water Resource Area. As submitted, the application is incomplete with respect to required natural resource review and approval criteria.

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2. Contradictory statements regarding site conditions

2A. FACT: The applicant stated in their application: "This site has no wetlands, riparian areas, or environmentally sensitive conditions."

This is false. This statement is **demonstrably false**, based on the City's own WRA and riparian corridor mapping.

2B. FACT: During the hearing, the City planner stated that the site was not within a WRA.

This statement is also **incorrect**, as evidenced by the City's published mapping referenced above.

STATEMENT: These contradictory statements further undermine confidence that the application has been reviewed in accordance with the City's mapped WRA designation and applicable code requirements

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3. Chemical handling and lack of disclosure

3A. FACT: Kaady Chemical (https://www.kaadychemical.com/) manufactures and distributes products classified as hazardous under OSHA/GHS standards.

Example Safety Data Sheet (SDS) identifies:

- Sodium Hydroxide (strong caustic; Skin Corr. 1A; Acute Tox. 4)
- Nitrilotriacetamine (Carc. 2; Acute Tox. 4)
- Hazard classification: "Danger"
- H302: Harmful if swallowed
- H314: Causes severe skin burns and eye damage
- H351: Suspected of causing cancer
- Instruction: "Avoid release to the environment"

PROOF:
https://www.kaadychemical.com/products/sds/
https://www.kaadychemical.com/wp-content/uploads/2022/08/HD-SUPER-CLEANER-2022-08-22.pdf

For the record, Kaady Chemical Corp., which manufactures these products, is a separate

legal entity under the same ownership (Charles Kaady) as Kaady Car Wash, as reflected in Oregon business registry records. Kaady Chemical's website states that it produces "high performance products for the car wash industry," indicating a direct relationship between chemical manufacturing and car wash operations.

At the conclusion of the hearing, the applicant's counsel stated that the referenced SDS was not relevant to car wash operations. However, SDS documents are the standard regulatory mechanism for identifying chemical hazards and environmental handling requirements, and therefore are directly relevant to evaluating risk.

(Website and SDS chemical screen shots are appended to this document for convenience.)

3B. FACT: The same SDS states product must not reach groundwater or waterways.

- "Do not allow to enter sewers/surface or ground water."
- "Danger to drinking water if even small quantities leak into the ground."

3C FACT: The applicant has not provided a list of chemicals that will be used, stored, or handled at the proposed site.

STATEMENT: Without full chemical disclosure and corresponding Safety Data Sheets, the City cannot reasonably evaluate environmental risk. This is particularly critical given the site's designation within a Water Resource Area (WRA) riparian corridor. As such, the application is incomplete with respect to environmental review requirements.

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4. Absence of spill response and drainage planning

4A. FACT: The application does not include a spill prevention or response plan for chemicals stored and handled on site.

4B. FACT: The application does not include a plan addressing system failure, overflow events, or containment measures for wash water or chemical releases.

4C. FACT: The application does not include a maintenance or monitoring plan for filtration systems, drainage infrastructure, or environmental protection measures.

4E. FDCT: West Linn Code Chapter 32.060 requires that development within a WRA demonstrate protection of water resources, stormwater management, and minimization of impacts prior to approval.

STATEMENT: The absence of spill response planning and drainage controls prevents the City from making the findings required under Chapter 32.060. Given the site's location within a WRA-designated riparian corridor, these deficiencies are significant and preclude approval until

addressed. The application does not demonstrate that wash water, chemicals, or system failures can be contained without risk to the riparian corridor.

---

5. Enforcement concerns

5A. FACT: The City has previously acknowledged limited resources for code enforcement.

STATEMENT: No assurance exists for effective response to environmental incidents.
Given the absence of a defined spill response plan and the City's own stated resource constraints, there is insufficient assurance that environmental protections could be effectively enforced or that a timely response would occur in the event of an incident.

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6. Post-hearing conduct

6A. FACT: During and following the hearing, multiple residents who provided testimony were approached by Mr. Kaady and members of his team. At least three individuals experienced this directly.

STATEMENT: While community engagement is important, these interactions were unexpected in that setting and were perceived as uncomfortable by those involved. This is noted as context for the level of community concern and the need for a clear and structured process.

CONCLUSION:
The record reflects:

- Verified WRA and Significant Riparian Corridor designation
- Materially inaccurate statements regarding site conditions
- Failure to demonstrate compliance with West Linn Code Chapter 32 and Chapter 28
- Absence of required natural resource documentation and approval criteria findings
- No chemical disclosure for materials to be used, stored, or handled onsite
- No defined environmental protection or spill mitigation planning

The burden rests with the applicant to demonstrate compliance with applicable code and environmental requirements. That burden has not been met.

Accordingly, the application is incomplete and does not satisfy the criteria required for approval.

We respectfully request that the City deny the proposal.

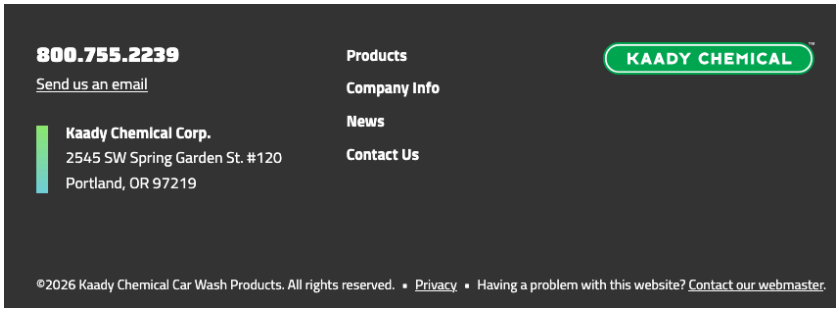
Sincerely,

KD Mercer karendannymercer@gmail.com
West Linn, Oregon

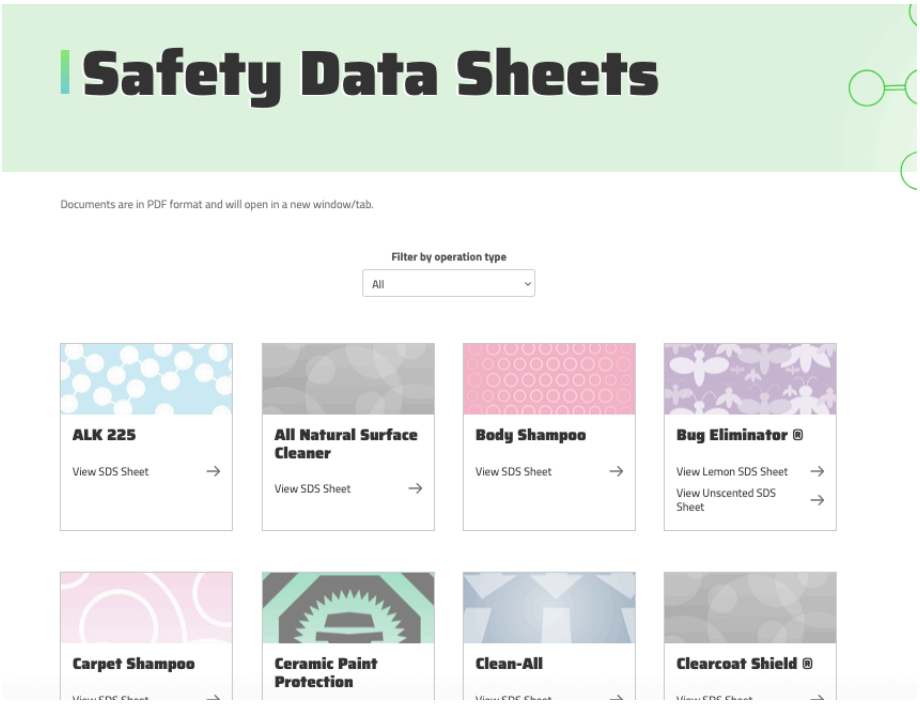
Supporting Evidence Screenshots

Screenshots from www. Kaadychemical.com:
Site states chemicals are for car washing industry:

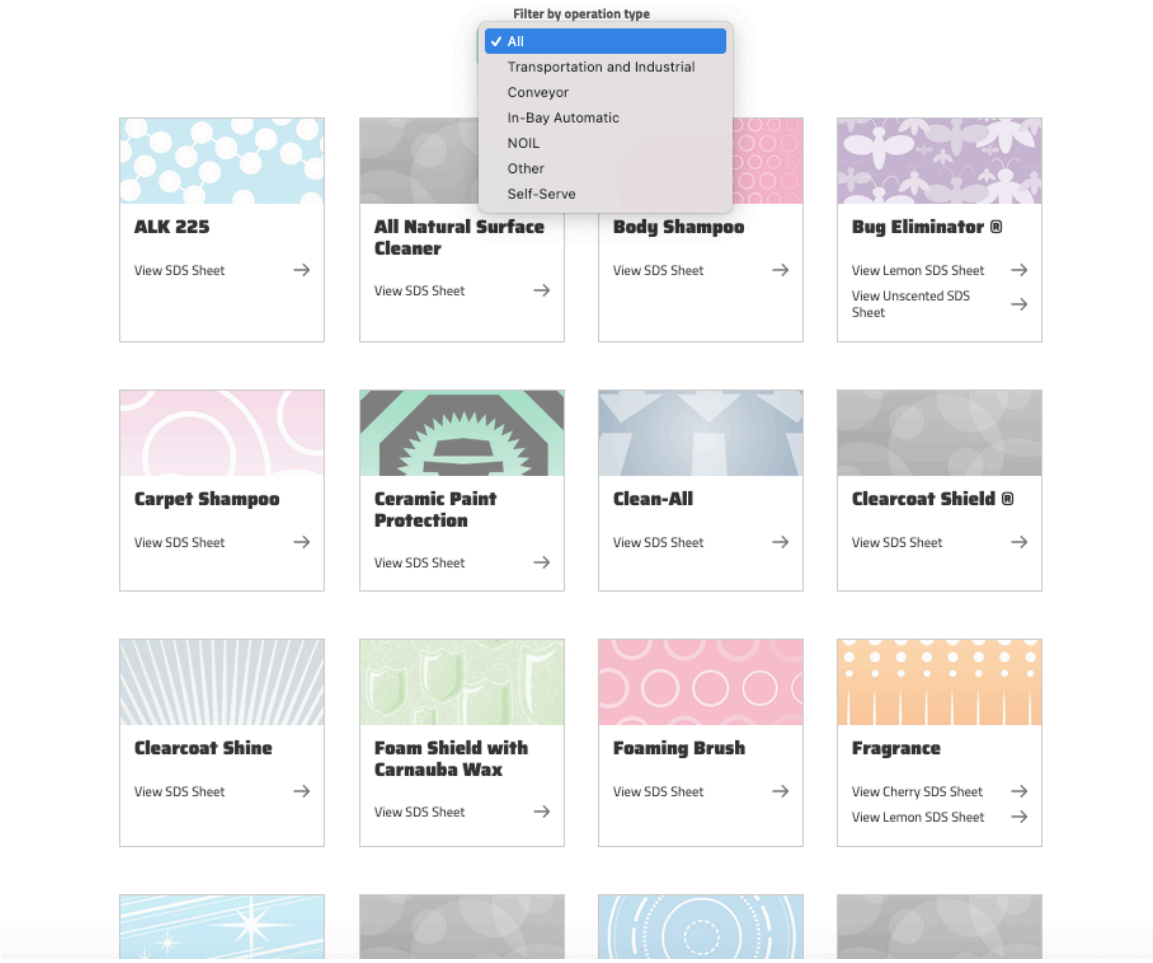
Kaady Chemical Corp Address:



32Products are listed with Safety Data Sheets (legally required rating and disclosure):



Chemicals are clearly used for car wash:



Screenshot

*

1 Identification

· **Product Identifier**

· **Trade Name: HD SUPER CLEANER**
· **Product Number:** K-150A
· **Relevant identified uses of the substance or mixture and uses advised against:**
· **Product Description:** Alkaline Degreaser
· **Application of the substance / the mixture:** Dirt Remover & Degreaser

· **Details of the Supplier of the Safety Data Sheet:**
· **Manufacturer/Supplier:**
Kaady Chemical Corp.
2545 SW SPRING GARDEN ST STE 120
PORTLAND, OR 97219
1-510-562-9788
www.kaadychemical.com
· **Emergency telephone number:** +1-800-424-9300

2 Hazard(s) Identification

· **Classification of the substance or mixture:**

GHS08 Health hazard

Carc. 2 H351 Suspected of causing cancer.

GHS05 Corrosion

Met. Corr.1 H290 May be corrosive to metals.
Skin Corr. 1A H314 Causes severe skin burns and eye damage.

GHS07

Acute Tox. 4 H302 Harmful if swallowed.

· **Label elements:**
· **GHS label elements**
The product is classified and labeled according to the Globally Harmonized System (GHS).
· **Hazard pictograms:**

GHS05 GHS07 GHS08

· **Signal word:** Danger

· **Hazard-determining components of labeling:**
Sodium Hydroxide
Nitrilotriacetamine

(Contd. on page 2)

4 First-Aid Measures

· **Description of first aid measures:**
· **After inhalation:**
Give oxygen or artificial respiration if needed. If symptoms develop, move victim to fresh air. If symptoms persist, obtain medical attention.
· **After skin contact:**
Take off contaminated clothing and shoes immediately. Promptly flush skin with water for at least 15 minutes to ensure all chemical is removed. Wash contaminated clothing before reuse. If symptoms persist, obtain medical attention.
· **After eye contact:**
Flush with large amounts of water for at least 15 minutes, lifting upper and lower lids occasionally. Get immediate medical attention. Continue rinsing eyes during transport to hospital.
· **After swallowing:**
Rinse mouth with water. Give 3-4 glasses of water or milk to dilute stomach contents. Do NOT induce vomiting. Seek immediate medical attention.
· **Information for doctor:**
· **Most important symptoms and effects, both acute and delayed:**
No further relevant information available.
· **Indication of any immediate medical attention and special treatment needed:**
No further relevant information available.

6 Accidental Release Measures

· **Personal precautions, protective equipment and emergency procedures:**
Use personal protective equipment.
Keep from contacting skin or eyes.
Avoid breathing vapors, mist or gas.
Ensure adequate ventilation.
Evacuate personnel to safe areas.
· **Environmental precautions:** Do not allow to enter sewers/surface or ground water.
· **Methods and material for containment and cleaning up:**
Absorb with liquid-binding material (i.e. sand, diatomite, acid binders, universal binders, sawdust).
Dispose of the collected material according to regulations.
· **Reference to other sections:**
See Section 7 for information on safe handling.
See Section 8 for information on personal protection equipment.
See Section 13 for disposal information.
· **Protective Action Criteria for Chemicals**

· **PAC-1:**		
1310-73-2	Sodium Hydroxide	0.5 mg/m³
139-13-9	Nitrilotriacetamine	4.4 mg/m³

· **PAC-2:**		
1310-73-2	Sodium Hydroxide	5 mg/m³
139-13-9	Nitrilotriacetamine	49 mg/m³

· **PAC-3:**		
1310-73-2	Sodium Hydroxide	50 mg/m³
139-13-9	Nitrilotriacetamine	290 mg/m³

7 Handling and Storage

· **Handling**
· **Precautions for safe handling:**
Avoid breathing vapors or mist.
Avoid contact with eyes, skin, or clothing.
Keep containers closed when not in use.
Do not expose containers to open flame, excessive heat, sparks or direct sunlight.
Do not puncture or drop containers.
Handle with care and avoid spillage on the floor (slippage).
Keep material out of reach of children.
Keep material away from incompatible materials.
Wash thoroughly after handling.
· **Information about protection against explosions and fires:** No special measures required.

· **Conditions for safe storage, including any incompatibilities:**
· **Storage**
· **Requirements to be met by storerooms and receptacles:** No special requirements.
· **Information about storage in one common storage facility:**
Store away from strong acids.
Store away from strong oxidizers.

(Contd. on page 5)
US

12 Ecological Information

· **Toxicity:**

· **Aquatic toxicity:**	
1310-73-2 Sodium Hydroxide	
EC50	40 mg/l (Daphnia)

· **Persistence and degradability:** No further relevant information available.
· **Behavior in environmental systems:**
· **Bioaccumulative potential:** No further relevant information available.
· **Mobility in soil:** No further relevant information available.
· **Additional ecological information:**
· **General notes:**
Do not allow product to reach ground water, water course or sewage system.
Danger to drinking water if even small quantities leak into the ground.
Rinse off of bigger amounts into drains or the aquatic environment may lead to increased pH-values. A high pH-value harms aquatic organisms. In the dilution of the use-level the pH-value is considerably reduced, so that after the use of the product the aqueous waste, emptied into drains, is only low water-dangerous.
· **Results of PBT and vPvB assessment:**
· **PBT:** Not applicable.
· **vPvB:** Not applicable.
· **Other adverse effects:** No further relevant information available.

13 Disposal Considerations

· **Waste treatment methods:**
· **Recommendation:**
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.
Observe all federal, state and local environmental regulations when disposing of this material.

· **Uncleaned packagings**
· **Recommendation:** Disposal must be made according to official regulations.

Kaady Car wash legal registry confirms same ownership and address (Kaady Car Wash, Kaady Chemical Corp, Kaady Equipment Co.):

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Corporation Division

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Business Name Search

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Business Entity Data

Registry Nbr	Entity Type	Entity Status	Jurisdiction	Registry Date	Next Renewal Date
319993-52	ABN	ACT		01-22-1985	01-22-2028

Entity Name	KAADY CAR WASH
Foreign Name	
Affidavit?	N

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Associated Names

Type	PPB	PRINCIPAL PLACE OF BUSINESS				
Addr 1	2545 SW SPRING GARDEN ST					
Addr 2	STE 200					
CSZ	PORTLAND	OR	97219		Country	UNITED STATES OF AMERICA

The Authorized Representative address is the mailing address for this business.

Type	REP	AUTHORIZED REPRESENTATIVE			Start Date		Resig
Name	CHARLES			KAADY			
Addr 1	2545 SW SPRING GARDEN ST						
Addr 2	STE 200						
CSZ	PORTLAND	OR	97219		Country	UNITED STATES OF AMERICA	

Type	REG	REGISTRANT					
Name	CHARLES			KAADY			
Addr 1	2545 SW SPRING GARDEN ST						
Addr 2	STE 200						
CSZ	PORTLAND	OR	97219		Country	UNITED STATES OF AMERICA	

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Business Entity Data

Registry Nbr	Entity Type	Entity Status	Jurisdiction	Registry Date	Next Renewal Date
1398606-96	FBC	ACT	CALIFORNIA	01-17-2018	01-17-2027

Entity Name	KAADY CHEMICAL CORP.
Foreign Name	

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Associated Names

Type	PPB	PRINCIPAL PLACE OF BUSINESS				
Addr 1	2545 SW SPRING GARDEN ST SUITE 200					
Addr 2						
CSZ	PORTLAND	OR	97219	Country	UNITED STATES OF AMERICA	

Please click here for general information about registered agents and service of process.

Type	AGT	REGISTERED AGENT			Start Date	05-22-2019	Resign Date
Name	SCOTT		L	JENSEN			
Addr 1	1 SW COLUMBIA STREET SUITE 900						
Addr 2							
CSZ	PORTLAND	OR	97204	Country	UNITED STATES OF AMERICA		

Type	MAL	MAILING ADDRESS			
Addr 1	1 SW COLUMBIA STREET SUITE 900				
Addr 2					
CSZ	PORTLAND	OR	97204	Country	UNITED STATES OF AMERICA

Type	PRE	PRESIDENT				Resign Date
Name	DANIEL		HANNA	JR		
Addr 1	2545 SW SPRING GARDEN ST SUITE 200					
Addr 2						
CSZ	PORTLAND	OR	97219	Country	UNITED STATES OF AMERICA	

Type	SEC	SECRETARY				Resign Date
Name	CHARLES			KAADY		
Addr 1	2545 SW SPRING GARDEN ST SUITE 200					
Addr 2						
CSZ	PORTLAND	OR	97219	Country	UNITED STATES OF AMERICA	

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Name History

Business Entity Name	Name Type	Name Status	Start Date
KAADY CHEMICAL CORP.	EN	CUR	01-17-2018

Business Name Search

New Search | Printer Friendly

Business Entity Data

Registry Nbr	Entity Type	Entity Status	Jurisdiction	Registry Date	Next Renew
1399058-97	ABN	ACT		01-18-2018	01-18-2

Entity Name	KAADY EQUIPMENT CO.
Foreign Name	
Affidavit?	N

New Search | Printer Friendly

Associated Names

Type	PPB	PRINCIPAL PLACE OF BUSINESS				
Addr 1	2545 SW SPRING GARDEN ST SUITE 200					
Addr 2						
CSZ	PORTLAND	OR	97219		Country	UNITED STATES OF AMERICA

The Authorized Representative address is the mailing address for this business.

Type	REP	AUTHORIZED REPRESENTATIVE			Start Date	05-13-2019
Name	SCOTT		L	JENSEN		
Addr 1	1 SW COLUMBIA STREET SUITE 900					
Addr 2						
CSZ	PORTLAND	OR	97204		Country	UNITED STATES OF AMERICA

Type	REG	REGISTRANT				
Of Record	1398606-96	KAADY CHEMICAL CORP.				
Addr 1	2545 SW SPRING GARDEN ST SUITE 200					
Addr 2						
CSZ	PORTLAND	OR	97219		Country	UNITED STATES OF AMERICA

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Name History

Business Entity Name	Name Type	Name Status
KAADY EQUIPMENT CO.	EN	CUR

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Supplemental Information in Opposition – Kaady Car Wash Application

City of West Linn – CDC Compliance Review - Post 3/18/26 Public Hearing

Daniel Mercer, P.E., West Linn Resident

March 21, 2026

Opening Statement

Following the public hearing and review of the application materials, testimony, and supporting documentation, I respectfully submit this follow-up testimony in opposition to the proposed Kaady Car Wash development.

The record continues to demonstrate that the proposal does not meet multiple mandatory provisions of the City of West Linn Community Development Code (CDC), and the information presented does not support the findings required for approval.

This is not a matter of preference or opinion - it is a matter of **code compliance, environmental protection, and measurable public impact**.

Executive Summary of Non-Compliance

Based on the current record, including materials and testimony presented at the hearing, the application fails to meet City code requirements in the following areas:

- **CDC Chapter 32 – Water Resource Area (WRA):**
  The proposed site is partially located within a designated WRA. No WRA permit has been filed, and the proposed development includes activities that appear restricted or prohibited within this protected area.
- **CDC Chapter 32 – Environmental Protection:**
  Hazardous chemicals are proposed for use on-site, yet no project-specific chemical inventory has been provided, and full containment of pollutants has not been demonstrated.
- **CDC Chapter 32 – Stormwater:**
  The stormwater treatment plan has not been demonstrated to be designed for the pollutant profile or flow conditions associated with this use, and its adequacy remains unverified.
- **CDC Chapter 55 – Traffic Impact Analysis:**
  The traffic study does not evaluate actual traffic generated by the proposed use under real-world conditions and instead relies on comparisons to prior uses based on outdated data and unsupported assumptions.
- **CDC Chapter 60 – Conditional Use Criteria (Site Suitability):**
  The physical and operational characteristics of the site are not suitable for the proposed use, particularly given environmental constraints and existing traffic conditions.
- **CDC Chapter 60 – Conditional Use Criteria (Public Benefit):**
  The application does not demonstrate a clear or meaningful public benefit to the City and does not align with the broader vision for the area.

1. Water Resource Area (WRA) Compliance

Per Staff Finding 16, a portion of the property is located within a Significant Riparian Corridor. Per Staff Finding 17, the City notes that the property is exempt from a WRA permit because the development is located at a right angle from a piped stream segment. However, that conclusion is based on a misinterpretation of the City code.

The adopted West Linn Water Resource Area Map, referenced in the Staff Report and published by the City, already accounts for piped stream segments. In other words, the map itself already excludes areas at right angles from underground piping where those exclusions apply. The remaining mapped WRA areas therefore represent the City's adopted regulated area.

The map clearly outlines areas located within 100 feet in all directions of the open channel sections of Fern Creek, consistent with requirements in Table 32-2 in West Linn CDC Section 32.060.D.

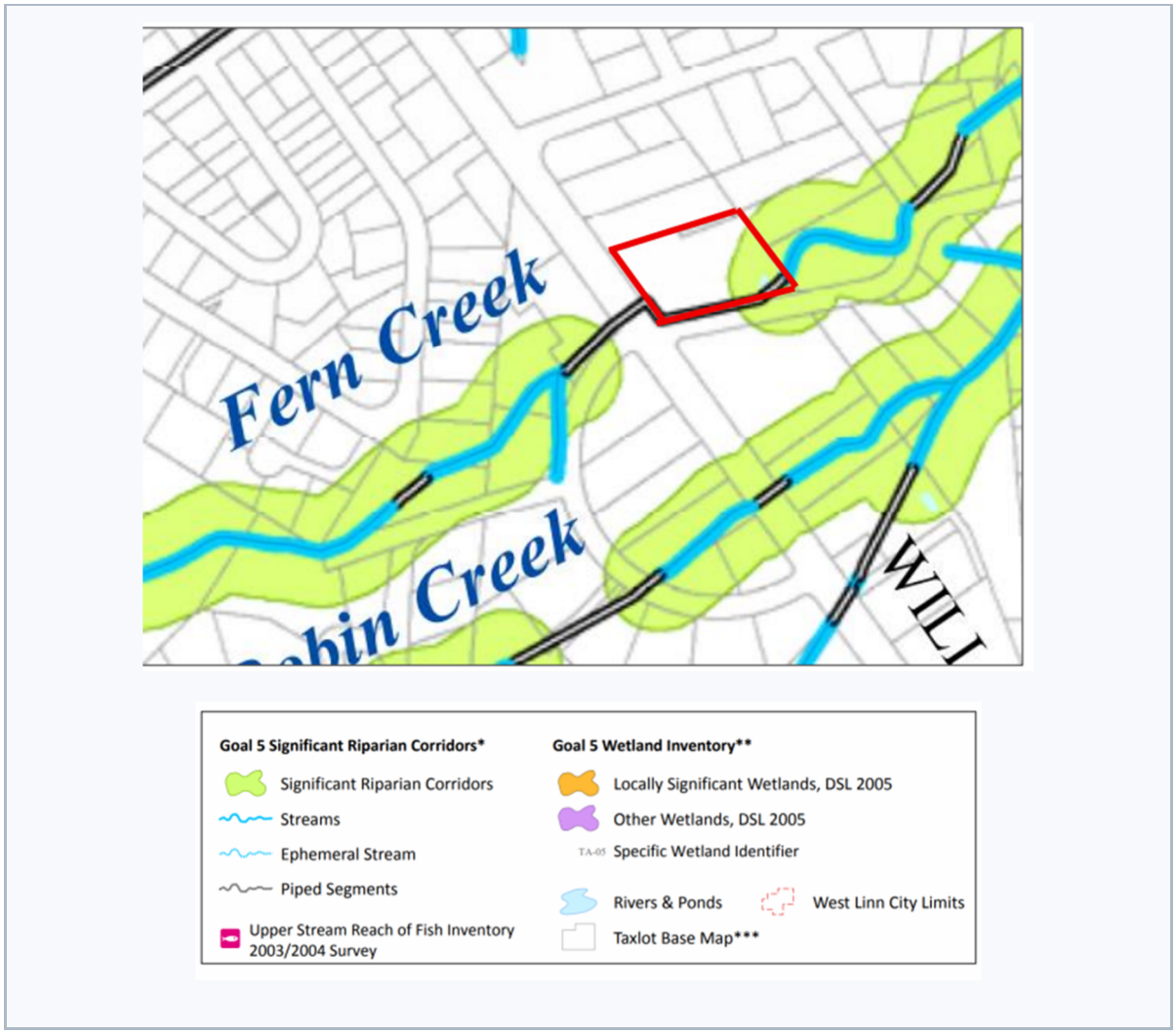


Figure 1 – WRA Map

Based on the City's adopted WRA mapping and the applicant's utility plans, approximately 25 percent of the property appears to lie within the WRA, excluding only those sections associated with underground piping. The WRA is therefore plainly applicable to this site.

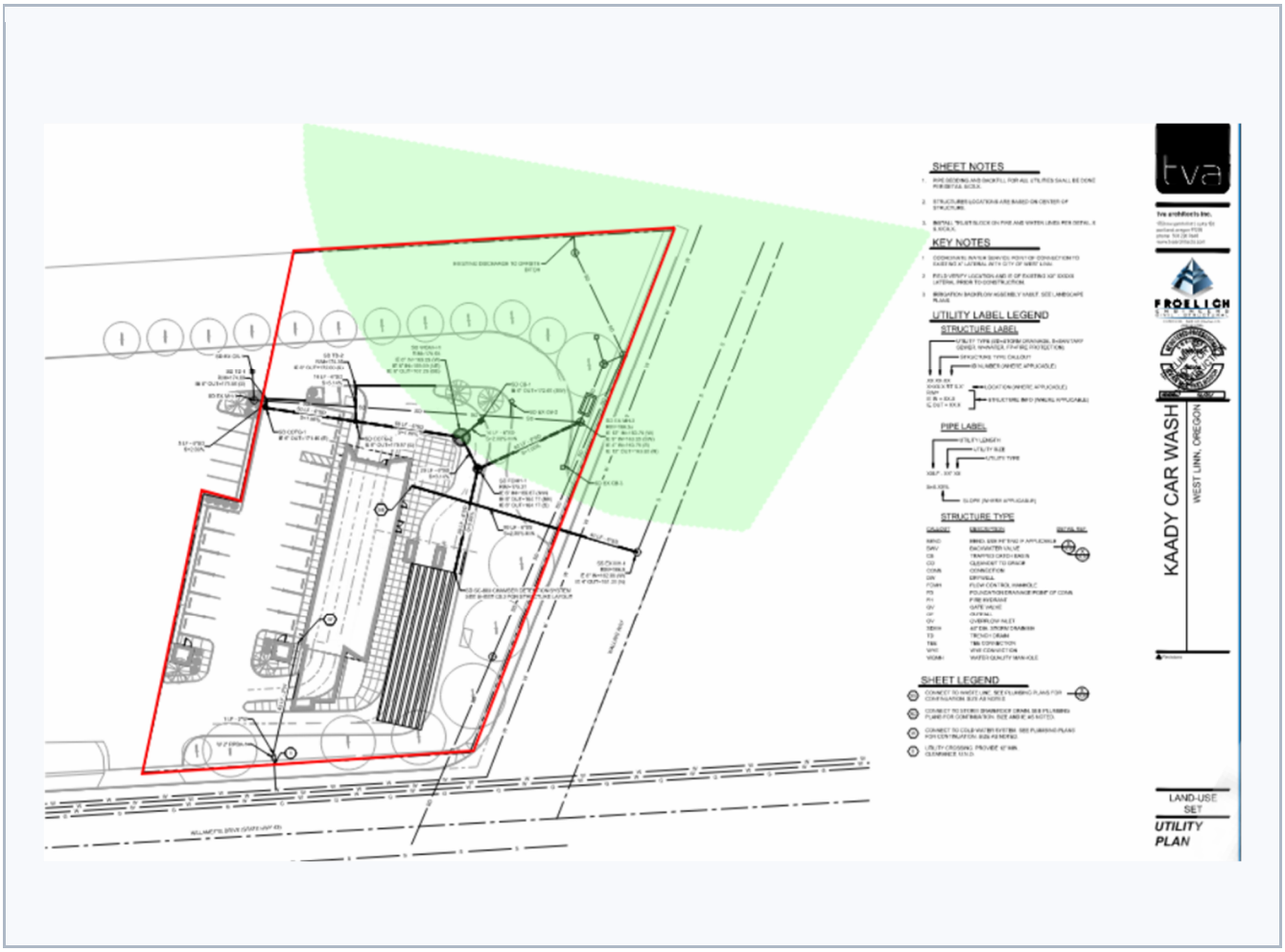


Figure 2 – WRA Boundaries Overlain onto Applicant's Utility Plans

This is significant because the proposal includes substantial site work within or immediately adjacent to the protected area, including underground stormwater construction, excavation, paving, subgrade preparation, demolition, and landscaping.

That work not only triggers the need for a WRA permit under Table 32-1, but excavation and associated disturbance within a WRA are generally not allowed in the City of West Linn, whether permitted or otherwise. No WRA permit has been filed with this application.

This is not a minor procedural matter—it is central to determining whether the proposal meets applicable code requirements. The presence of regulated WRA on the site is a key constraint that must be evaluated under Chapter 32. If the site is within the WRA, as indicated by the City's adopted map, then compliance with Chapter 32 must be demonstrated.

Absent that demonstration, the proposal does not satisfy the applicable requirements of Chapter 32, and the necessary findings for approval cannot be made.

2. Chemical Exposure and Environmental Risk

Even apart from construction impacts, the proposed use creates ongoing pollution risks within a protected environmental corridor. The proposed car wash is oriented approximately east-west, with the entrance to the east and the exit to the west. There are several realistic, recurring ways chemical pollutants can leave the wash structure and migrate toward Fern Creek.

- Wind-driven drift. A strong west-to-east wind can carry spray or mist beyond the intended chemical containment area.
- Routine operational carryover. Day-to-day car wash use will result in drips from vehicles, residual wash water, and tire tread carry-out that track chemicals beyond the wash tunnel.

These are not speculative cases. They are ordinary operational realities of a car wash. Once those pollutants leave the building and reach the parking lot, they can be tracked or conveyed into the storm drain system and ultimately to Fern Creek.

The application does not include a project-specific list of chemicals to be stored or used on-site. That omission is critical. Publicly available information associated with the Kaady Car Wash business identifies numerous chemicals and corresponding Safety Data Sheets. Many of these materials may present risks to public health, water quality, and wildlife if released.

CDC Chapter 32 exists specifically to protect those interests. Without a defined list of chemicals, neither the City nor the public can evaluate whether the proposed stormwater treatment system is capable of treating the pollutants that will predictably escape the wash system during normal operations.

At a minimum, the applicant should be required to disclose the complete chemical inventory, identify the likely pollutant profile, and demonstrate that any proposed containment and treatment system can reliably address those pollutants. The current application does none of that.

Without a defined chemical inventory and corresponding treatment design, the City cannot determine whether the proposed system is capable of protecting water quality, as required by Chapter 32.

3. Stormwater System Deficiencies

The proposed stormwater approach for the parking lot appears to rely on a single 8-foot diameter water quality manhole (WQMH) to treat runoff from the site. The submitted drawings do not provide enough information to verify whether that design is adequate for the pollutant risk created by this use.

The available plans also do not clearly show how the proposed system ties into the existing stormwater infrastructure serving adjacent businesses to the north. That makes it difficult to understand the complete hydraulic path, treatment sequence, or operational limitations of the system.

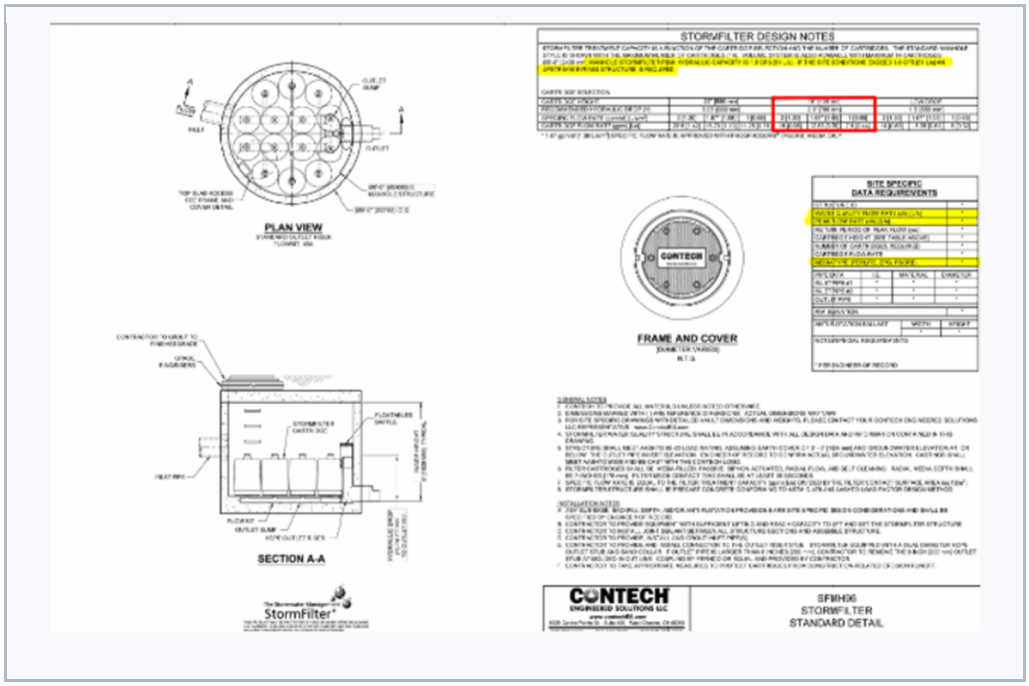


Figure 3 – Applicant's Drawing C5.1 Contech WQIA Detail – Showing Key Information Missing in Yellow

The product literature for the Contech WQMH identifies multiple filter media options designed for different pollutant targets. These systems are not one-size-fits-all. The treatment effectiveness depends on the selected media, design flow rates, and expected pollutant loading.

Drawing C5.1 in the application includes only a generic detail for the Contech vault. It does not specify the anticipated stormwater flow rates, the selected filter media, or the pollutant basis for design. Those are core design criteria, not minor details

The applicant must also demonstrate that flow through the treatment manhole will not exceed 1.8 CFS, which appears to be the maximum treatment capacity of the WQMH. The bypass or flow-control manhole is shown downstream of the treatment structure. As a result, if inflow to the WQMH exceeds 1.8 CFS, water could pass through the structure untreated and continue toward Fern Creek.

In short, the proposed stormwater system has not been proven sufficient for the pollutants associated with the use, has not been tied to a disclosed chemical inventory, and has not been shown to remain within its treatment capacity during operation. That is not adequate for a site with direct environmental sensitivity.

4. Traffic Study Deficiencies – CDC Chapter 55

The traffic analysis submitted with the application does not meaningfully evaluate the traffic conditions the proposed car wash will create. Instead, it relies heavily on a comparison to the prior McDonald's use and suggests that because the new use may generate fewer trips than that former business, the traffic impacts are acceptable.

That is not an adequate basis for approval.

First, the prior McDonald's use was itself a conditional use and created significant traffic problems when it operated. Second, the site context has changed since that time. Additional nearby businesses, including Starbucks, now contribute to traffic demand in the immediate area. Comparing the proposed use to an older and already problematic traffic condition does not establish compliance with current City standards.

A useful analogy is this: being slightly better than a bad condition does not make a proposal good, safe, or compliant.

The prior McDonald's reportedly pushed ODOT Level of Service toward an F rating, meaning demand approached or exceeded roadway capacity and traffic backed up. Yet the current traffic report does not provide a robust analysis of expected real-world operational conditions for the proposed car wash.

Specifically, the study does not adequately address:

- Any traffic to or from Walling Way
- Actual expected traffic generated by the car wash under peak operating conditions
- The operational effects of vehicles exiting the site, especially left-turn movements toward Highway 43
- Afternoon congestion conditions that can make left turns from this location especially difficult
- The absence of a median refuge at the exit location because a turn lane begins nearby
- The fact that multiple traffic sources compete for the same exit lane in this area.

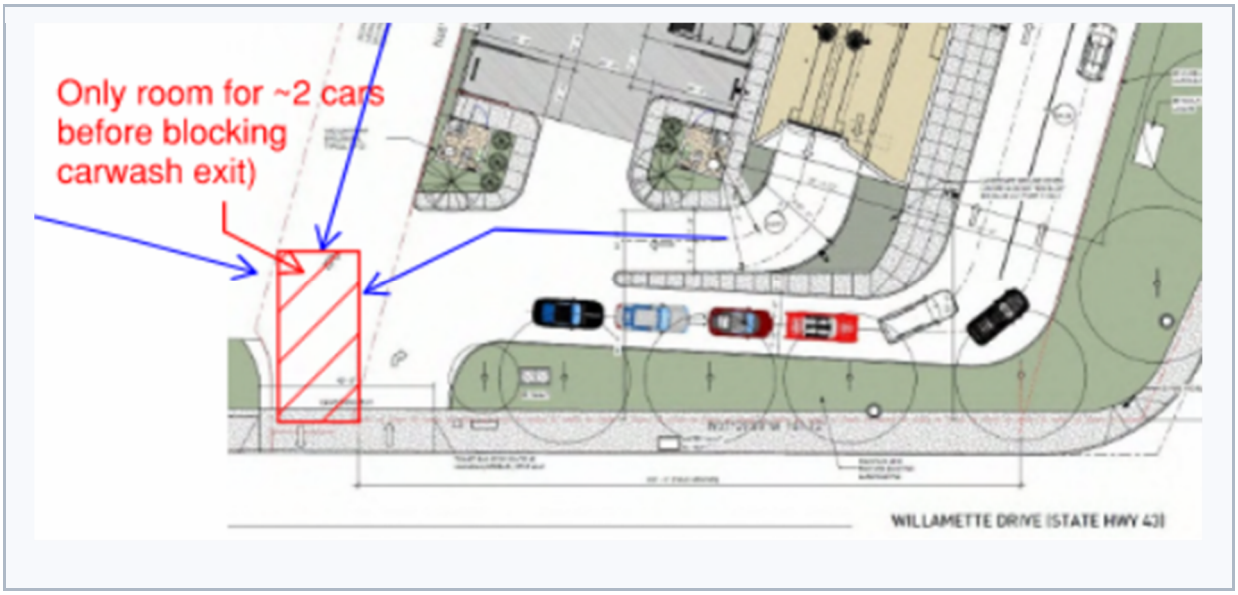


Figure 4 – Anticipated Left Turn Lane Issue

The report therefore does not function as a true Traffic Impact Analysis as contemplated by CDC Chapter 55.125 and CDC Chapter 85.170. It does not study the site's actual expected operating condition in a way that gives the Planning Commission a reliable basis for approval.

Where a proposal is already constrained by site access, high traffic volumes, nearby commercial activity, and limited turning opportunities, a comparison to a former use is not enough. The applicant must show that this use works on this site under present-day conditions. The current record does not do that.

5. Conditional Use Criteria – CDC Chapter 60

CDC 60.070.A requires the Planning Commission to approve or deny a conditional use application based on findings of fact regarding the applicable criteria. Two of those criteria are especially important here: site suitability and public benefit.

A. The Site Is Not Suitable for the Proposed Use

This site is not suitable for a car wash. It is partially within a Water Resource Area, it requires a use that depends on chemical storage and routine chemical discharge risk, and will require excavation work within the protected area. That alone raises serious incompatibility concerns.

The location is also not suitable from a traffic operations standpoint. The site is automobile-oriented, traffic volumes are already high, access is constrained, and the site lacks the operational advantages that might mitigate those problems, such as a signalized access point or more forgiving turning geometry.

B. The Proposal Provides No Meaningful Public Benefit

The proposal does not provide a discernable community benefit that would justify the environmental and traffic impacts. It does not add a needed service in any meaningful sense, as there are already two other car washes within an average of one mile in either direction.

More importantly, this type of use pushes the area toward a more auto-centric commercial pattern rather than a more livable, community-oriented corridor. A car wash is not a destination that supports walkability, public gathering, or neighborhood-serving activity. It is a drive-through use that contributes little to the character or vitality of the area.

That runs counter to the broader direction of Vision 43 and to the idea that this corridor should evolve in a way that better serves surrounding residents. Any minor temporary financial value associated with business taxes does not outweigh the environmental risk, traffic impacts, and land use drawbacks of the proposal.

Conditional use approval is not discretionary - it requires affirmative findings that the proposed use is appropriate for the site and provides a benefit to the community. Based on the environmental constraints, traffic limitations, and lack of demonstrated need, those findings cannot be supported. The proposal introduces risk without corresponding public benefit and is therefore does not meet the intent of Chapter 60.

Conclusion

In summary, the Kaady Car Wash application fails to meet multiple mandatory provisions of the West Linn Community Development Code, and the deficiencies identified are not minor—they are fundamental to the approval criteria.

- **CDC Chapter 32 – Water Resource Area (WRA):**
  The site is partially located within a protected WRA. No WRA permit has been submitted, and the proposed development includes activities that appear restricted or prohibited within this regulated area.
- **CDC Chapter 32 – Environmental Protection:**
  The applicant has not disclosed the chemical inventory associated with the proposed use and has not demonstrated that pollutants can be fully contained or prevented from entering the City's waterways.
- **CDC Chapter 32 – Stormwater:**
  The proposed stormwater system has not been shown to be designed for the specific pollutant profile or flow conditions associated with this use, and therefore cannot be verified as adequate.
- **CDC Chapter 55 – Traffic Impact Analysis:**
  The submitted traffic study does not evaluate actual operational impacts, relies on flawed assumptions, and does not meet the City's requirements for a compliant Traffic Impact Analysis.
- **CDC Chapter 60 – Conditional Use Criteria:**
  The site is not suitable for the proposed use, and the application does not demonstrate a clear or meaningful public benefit to the City.

Under CDC Chapter 60, approval requires affirmative findings that all applicable criteria are satisfied. Based on the current record—including materials and testimony presented at the hearing—those findings still cannot be made.

Approval of this application would require overlooking clear and unresolved non-compliance with City code.

For these reasons, I respectfully request that the Planning Commission deny the Kaady Car Wash application.

Sincerely,
Daniel Mercer, P.E.
West Linn Resident

Darren Wyss, Principal Planner
West Linn Planning Department
22500 Salamo Road
West Linn, OR 97068

March 25, 2026

RE: CUP-25-03/DR-25-03/VAR-25-02

I submit the attached comments for consideration.

I recommend that the project be denied due to traffic concerns and inconsistency with the Robinwood Neighborhood Plan.

Sincerely,

David Robison

I. Traffic Impact

SUMMARY: The proposed development will significantly disrupt existing traffic flow and safety along Highway 43, owing to increased vehicle ingress, egress, and queuing. These disruptions threaten both driver safety and pedestrian, bicycle, and transit accessibility. The engineer's report submitted by the applicant does not meet the requirements of a traffic analysis as specified in CDC.

Requirements for Traffic Analysis

CDC 85.170(B)(2)(B)(2)(d) states the requirements for the traffic analysis

1) At a minimum, the analysis area must include:

(A) All points of access onto the public street system;

(B) All intersections of arterials, collectors, and neighborhood routes within 1,000 linear feet from all points of access onto the public street system; and

(C) All intersections where the traffic generated by the proposed development exceeds five percent of existing a.m. or p.m. peak hour total intersection traffic volumes.

2) The analysis must analyze existing conditions and projected conditions upon completion of the proposed development.

4) The analysis must demonstrate that the transportation impacts from the proposed development will comply with the City's level-of-service and average daily traffic standards and the Oregon Department of Transportation's mobility standard.

Inadequacy of Applicant's Traffic Analysis

Figure 1 expands the traffic diagram provided by the applicant. The applicant projects peak traffic of sixty cars per hour or one every minute. They recognize that there will be an entry queue of perhaps eight cars waiting for service. Yet they do no analysis of the exit queue. With a car every minute, there will be some delay for customers to re-enter traffic.

In Figure 1,we add some exiting cars in the circled area. It is clear that only one or two cars waiting are sufficient to block access to the Cedaroak Shopping Center, which shares the same driveway. Customers blocked from entry may back up and interfere with north-bound traffic and the bike lane.

A majority of these customers will be seeking to re-enter south-bound traffic. This means that some customers will be trying to turn left out of the driveway while others are trying to turn into the driveway. Clearly, there is a safety issue as well as congestion.

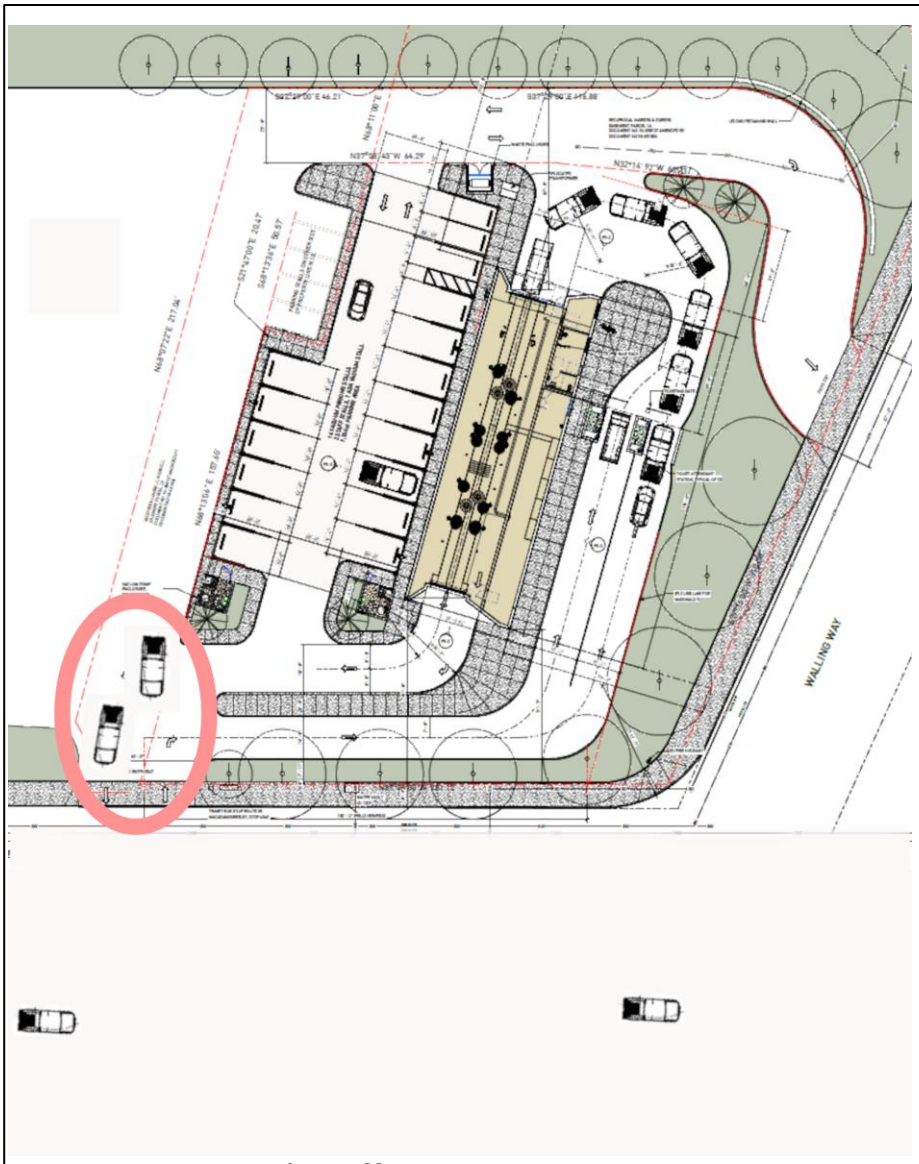


Figure 1: Revised Traffic Diagram

The revised traffic analysis does not address the length of the potential exit queue. To do so, we conducted our own traffic analysis. We recorded video sampled during evening peak hour on March 23. We recorded the intervals when when exiting traffic would be blocked. With traffic signals located to the south, there is typically an active spurt of traffic, followed by a quiet period. Thus, traffic is blocked from exiting for a period of 40 to 60 seconds. An example of peak traffic is shown in Figure 2.

Figure 2: Peak Hour Traffic March 23

We then applied the assumed traffic generation used by the applicant to estimate queue length to estimate frequency and length of the exciting queue. We applied a Monte Carlo simulation to summarize results over random starting periods. Based on this analysis, we estimate that cars will be waiting about 38% of the time. As shown in Table 1, queue length of 2 occurs 5% of the time; a queue length of 3 occurs 3% of the time. As indicated in Figure 1, a queue length of 2 or more is sufficient to block driveway access to the Cedaroak Shopping Center.

Table 1: Estimated Likelihood of Queue Length

One Vehicle	Two Vehicles	Three Vehicles
38%	5%	3%

The applicant does not satisfy safety concerns due to left-turns across traffic. The applicant points out that the intersection has historically not had a safety problem. That does not address the potential impact of increased future traffic.

The applicant has not addressed existing conditions and projected conditions. The applicant's study estimated current traffic at 19 trips per peak hour for the shared driveway. This

represents the current basecase. The increase of 60 cars per hour estimated in the queuing analysis would be an increase of 415% over existing traffic.

Figure 3: Cedaroak Parking March 24

Currently, the parking lot is shared with the Cedaroak Shopping Center. Figure 3 shows a recent example. As shown in Figure 1, the applicant proposes to reclaim the southern half of the shared parking and to install cleaning bays for customers. This will limit Cedaroak parking to the north half of the lot. It will also channel the Cedaroak customers into a more narrow movement pattern. There is no discussion in the proposal of how the parking lot changes will impact Cedaroak customers.

The applicant suggests that there will be no traffic impact compared with another commercial use that hypothetically might be permitted. The applicant has argued that carwash traffic will be less than for a business with high auto traffic, such as another McDonalds or a convenience store. There is no reason to single out these businesses as the only possibility. Allowed uses include sit-down restaurants, small office services and medical offices. These are the current and most typical uses in the surrounding area.

Based on the *ITE Trip Generation Manual*, published by the Institute of Transportation Engineers (https://www.scribd.com/document/799941282/ITE-trip-generation-9th-ed-201502241851120957), we note the following expected peak traffic. These traffic volumes are less than the proposal and we note the traffic increase computed according to the applicant's expected volume.

Table 2: Business Type Traffic Comparison

Facility Type	Peak Hour Trips	Proposed Increase
Office Park	34	229%
Sit-down Restaurant	30	260%
Medical Offices	29	268%

The applicant's comparison to high-traffic uses is a worst case scenario. If the project is to be compared to the type of facility most likely to be constructed, the traffic increase is over 200% as shown in Table 2. Comparison to another hypothetical facility is irrelevant for determination of this proposal.

The applicant has noted that Vision43 is likely to result in zoning changes and points out that future changes do not apply to the applicant. However, such expected changes would apply to other future construction. We can expect that, in the future, auto-centric businesses would no longer be permitted and future operations would likely be similar to Table 1. Thus, approving the project will result in a non-conforming use that would not match the surrounding community and would interfere with gaining the desired future development of adjoining tracts.

CDC 85.170(B)(2)(d) (5) references residential traffic criteria specifying West Linn's minimum level-of-service standards established in the Transportation System Plan (TSP). We note that TSP has not been updated since 2016 and was based on 2014 survey data. At that time, the intersection with Walling Way was forecast to have v/c ratio of .99 and Level of Service B/F. Thus, the intersection is already at capacity and experiences very poor Level of Service during peak times. The applicant has suggested that v/c of .99 is permissible. We suggest that it is already approaching that limit without any new business and that any traffic increase would be an unacceptable deterioration of service.

Conclusion

The applicant has failed to provide an analysis that meets CDC requirements specified in CDC 85. The applicant focused on only one narrow issue, that of the entrance queue. The applicant has done no analysis of expected impact for the Cedaroak Shopping Center, no analysis of the exit queue congestion, no discussion of impact on surrounding roadways and no analysis of future traffic conditions. The applicant did add analysis of left-turn safety issues but we believe it is inadequate. The report does not meet the request by City of West Linn Engineering and Public Works Department referenced in the Incompleteness Letter on October 24, 2025.

II. Inconsistency with Neighborhood Plan

SUMMARY: The Robinwood Neighborhood Plan emphasizes maintaining neighborhood character, enhancing community connectivity, and promoting environmentally sustainable development. The proposed car wash diverges significantly from these objectives, threatening the visual, environmental, and social fabric of the community. The Robinwood Neighborhood Plan represents "application of existing policy" as required for quasi-judicial action

The Robinwood Neighborhood Plan (Ordinance No. 1567-Exhibit "A") is a consensus document carefully worked out by local citizens to accommodate neighborhood concerns. It represents carefully considered recommendations that reflect our historic concerns.

Neighborhood goals are directly applicable to the present application.

GOAL 1:
Policies:
1.1 Provide continuous and wide pedestrian facilities on both sides of Willamette Drive.

1.2 Reconcile the competing interests of cross-traffic onto and over Willamette Drive with the needs of through traffic.

1.3 Beautify the length of Willamette Drive with a comprehensive and consistent streetscape.

1.4 Provide a continuous bike lane along Willamette Drive.

GOAL 2: Willamette Drive shall serve as the Robinwood Main Street. 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.

Policies:

2.2 Encourage additional commercial and mixed-use development along with small parks and gathering places within the gaps.

2.3 Keep the scale of commercial development consistent with the neighborhood setting.

2.4 Develop common a common architectural and design theme for commercial and mixed-use development along Willamette Drive.

2.5 Allow only commercial uses that are compatible with the main street concept.

The Neighborhood Plan specifically addresses the proposal in Action Measure 2.5 which states:

Allow only commercial uses that are compatible with the main street concept. Adopt Community Development Code Amendments to prohibit inappropriate automotive sales, repair, and storage uses.

Robinwood residents want to end the linear sprawl associated with highway ribbon development. Instead, our planning goal is small-scale, pedestrian-friendly, and mixed-use developments that serve and enrich the community. The applicant has explicitly stated that the area "does not support a pedestrian commercial environment." Thus, the applicant cannot

be expected to cooperate in the desired type of development.

The neighborhood has participated in the Vision43 planning process which states:

“Through community input and analysis, the City will re-imagine Highway 43 to seamlessly integrate with surrounding neighborhoods and the whole community, prioritizing a safe and accessible environment for people to comfortably walk, bike, and roll; encouraging development patterns that give people a variety of options to move within the corridor and enhancing connections and access to neighborhoods and surrounding areas, and developing the corridor to serve as a hub for living, working, and recreational activities, featuring a mix of housing, shopping, restaurants, and recreational spaces.”

We expect that within a few months, the Vision 43 process will result in zoning changes that will not allow automobile-centric businesses. Approving the project now will grandfather in a non-conforming use that will inhibit a cooperative community approach. While we understand that future zoning changes cannot be an action basis, we believe those same goals are articulated in the Robinwood Neighborhood Plan.

Robinwood Neighborhood Plan Qualifies As Existing Policy

The applicant has stated that the Robinwood Neighborhood Plan does not apply and is aspirational only. Thus, the applicant understands that their proposal does not conform to the neighborhood plan. A key decision point is whether the Robinwood Neighborhood Plan represents “application of existing law or policy” as required for quasi-judicial action. (Tips for Providing Effective Testimony at Land Use Hearings, West Linn)

The Robinwood Neighborhood Plan is intended to have the same effect as the goals and policies of the Comprehensive Plan. 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.”

Neighborhood Plans are specifically mentioned multiple times as part of the Comprehensive Plan.

- Definition: Neighborhood Plan. A refinement of the Comprehensive Plan that applies to a specific city neighborhood or core neighborhood.
- Section 1: Residential Development Goal 2 States: Allow a mix of residential and commercial uses in Commercial Districts and ensure compatibility of these districts with the residential character of existing neighborhoods and adopted neighborhood plans.
- Section 2: Neighborhood Commercial Development Policies 4. Emphasize pedestrian scale and accessibility and discourage auto-oriented development in neighborhood commercial centers.
- Section 3: Mixed Use/Commercial Development Goal 8. Provide enhanced opportunities for neighborhood involvement in neighborhood plan decisions to ensure they are livable, provide service improvements to area residents, and fit with the character of the neighborhood.

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 "enhance the community's identity" and "encourage strong neighborhoods." 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.

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:

- Keep the scale of commercial development consistent with the neighborhood setting.
- Allow only commercial uses that are compatible with the main street concept.
- Ensure that commercial development along Willamette Drive does not negatively impact nearby single-family residential neighborhoods.

The application is for a conditional variance, a term with specific meaning:

- Variance. The allowance of a permit to modify the terms of the City's Community Development Code based upon specific findings delineated in that code.
- Conditional Use. A use which may be permitted. By the approval authority following a public hearing, upon findings by the authority that the approval criteria have been met..

This proposal is not an allowed use that would be permitted automatically. The reason for a review process is because it is understood that there may be community issues, such as traffic, noise or other problems. The process explicitly asks for a modification of CDC requirements. The application has a burden of proof to explain why the change should be permitted.

CDC 60.070(3) states:

The granting of the proposal will produce a facility that provides benefit to the city.

For this proposal, there is no particular benefit since there is already a carwash facility two blocks away. Instead, the proposal raises issues of traffic safety and incompatibility with neighborhood development policy. Those problems are externality costs imposed on the rest of the community. No only are there the direct impacts of traffic, safety and noise, but there are also the indirect effect of discouraging small-scale, pedestrian-friendly, and mixed-use developments in the adjoining area. A single non-conforming business will contribute to further linear sprawl and highway ribbon development – the future that we prefer to avoid. The community bears the brunt of these problems.

III. Recommendation

I recommend that the project be denied based on

- Traffic issues which have not been addressed by an appropriate traffic analysis report as specified by CDC 85.
- Inconsistency with the Neighborhood plan for future community development as required by the Comprehensive Plan Goal 2.
- Lack of benefit as required by CDC 60.070(3)

March 24, 2026
18645 Midhill Circle
West Linn, OR 97068

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

Planning Commission members: We, Sean & Sharon Harbour, are current residents of the Robinwood neighborhood in West Linn, and we have lived continuously in our residence for over 22 years. We are opposed to the Kaady Car Wash new build proposal in the current form as it has been presented to the public so far, and recommend you deny the application.

Summary of Opposition: 18850 Willamette DR (Kaady Car Wash)

1. Noise and Acoustic Impact (Violation of WLMC 5.487)

- **Recurrent vs. Intermittent:** Contrary to the applicant's claim of "intermittent whooshing," our research indicates that the noise is **recurrent and constant** during peak hours (up to 60+ cars/hour), combined with the operation of numerous vacuum stations, would offer no respite for residents.
- **Structural Failures:** The existing 8-foot wall is an insufficient buffer because the McDonald's lot sits at a higher elevation than the wall's base, and the wall heights are inconsistent. Additionally, much of the sound from highway 43 and adjacent lots is audible from higher elevations up the hill.
- **Inaccurate Sound Study:** The applicant's sound study used data from Phoenix, AZ, and a slow period at a Burnside location. It did not account for "peak performance" dryer settings or the resonance caused by open bay doors. There are multiple Kaady Carwash locations in this area that could have been used to provide more relevant data, it's odd that they were left out.

2. Environmental and Riparian Risks

- **Chemical Dispersion:** The mechanized wash process creates airborne chemical spray and liquid polymers that can settle on nearby residential gardens and the protected Fern and Robin Creeks that lie directly downhill from the construction area.
- **Containment Issues:** Nightly "hose-out" procedures frequently result in contaminated water escaping the reclaim "pit" and flowing directly into the lot and surrounding drainage.
- **Habitat Disruption:** The site is a known corridor for deer and songbirds; the increased noise and chemical load threaten this "medium priority" riparian area.

3. Traffic and Public Safety Concerns

- **Outdated/Irrelevant Data:** The applicant's traffic study relies on 2012 data from Minnesota and bank drive-thrus in Kansas, which do not reflect West Linn's climate or the specific mechanics of a car wash queue.
- **Lot Congestion:** Unlike fast food, car wash customers are not in control of their vehicles once on the track. This creates a high risk of backlogs onto HWY 43 and Walling Way, impeding emergency access and neighborhood commuters.

4. Variance Request and Aesthetic Integrity

- **Cost-Cutting vs. Code:** The request to waive window transparency (glazing) is identified as a cost-cutting measure, not a sound-buffering necessity. The lack of visibility has been mentioned at multiple neighborhood meetings as a safety concern for employees during their shifts. Windows have also been mentioned as a deterrent to transients during off hours.
- **Comprehensive Plan Violation:** The proposal fails to "integrate aesthetically pleasing commercial development with residential uses" as required by Section 3, Policy 4(f) of the West Linn Comprehensive Plan.

5. Management Credibility and Employee Safety

- **Operational Inaccuracies:** The application falsely claims the wash bay is unoccupied during normal operating hours. Due diligence interviews of former employees indicate that they are frequently inside for maintenance, cleaning, and debris removal.

Conclusion

We conclude that the proposal fails to meet the criteria of **West Linn Code 60.070, A(3)**: It does not provide an "overall benefit to the city" and instead poses significant risks to the local environment, traffic flow, and neighborhood peace.

Sincerely,

Sean & Sharon Harbour

March 23, 2026

West Linn Planning Commission
City of West Linn
22500 Salamo Road
West Linn, OR 97068

Re: Supplemental Testimony in Opposition — CUP-25-03/DR-25-03/VAR-25-02 — Kaady Car Wash, 18850 Willamette Drive

Dear Members of the Planning Commission,

I am submitting this supplemental letter as a resident of the Robinwood neighborhood, to be entered into the hearing record for CUP-25-03/DR-25-03/VAR-25-02. This letter builds on my earlier written testimony and addresses both the evidence presented at the March 18, 2026 hearing and certain statements made by the applicant's counsel that require correction.

I respectfully urge the Commission to deny this application. The applicant has not met its burden of proof under the subjective approval criteria of CDC Chapter 60, and the record before you — including the complete absence of testimony in support of the project, the opposition of surrounding businesses, and residents — reflects that clearly.

I. The Applicant Has Not Met Its Burden Under CDC Chapter 60

Under West Linn's Community Development Code, the burden of proof rests entirely with the applicant to demonstrate that all approval criteria are satisfied. For a conditional use, that means satisfying the standards of CDC Chapter 60 — including the subjective compatibility criteria that go to the heart of whether this use belongs on this street.

CDC 60.070(A)(7) requires the use to comply with applicable policies of the Comprehensive Plan. The Robinwood Neighborhood Plan — adopted as Ordinance No. 1567 and carrying the same legal weight as the Comprehensive Plan — envisions Willamette Drive as the neighborhood's Main Street. It calls for locally-owned, pedestrian-friendly commercial uses, and its Action Measure 2.5 explicitly identifies automotive services as an incompatible use along this corridor. The applicant has provided no meaningful response to this standard.

CDC 60.070(C) requires the Commission to evaluate noise, hours of operation, and impacts on surrounding uses and neighborhood character. The applicant acknowledged at the neighborhood association meeting that the facility is designed to process up to 60 vehicles per hour — a near-continuous cycle of mechanical and dryer noise throughout operating hours. The application characterizes this as "intermittent" noise. That characterization is not credible and has not been substantiated.

These are not technical deficiencies that can be cured with a revised stormwater report or an updated site plan. Compatibility with neighborhood character is a judgment the Commission must make based on the full record — and that record does not support approval.

II. The Record Contains No Testimony in Favor of the Application

The Commission should weigh carefully what the March 18 hearing produced. Despite the applicant's presentation and legal representation, not a single community member, neighboring property owner, or business testified in support of this project. The turnout from affected neighbors was substantial, and their testimony was uniform in opposition.

In contrast, surrounding businesses have submitted a written letter opposing the project. Those businesses share this corridor. They have a direct stake in what gets built next to them, and they do not want this use as a neighbor. That is meaningful evidence of incompatibility under the Chapter 60 criteria — not a procedural footnote.

III. The Applicant's Counsel Made a Materially False Statement at the Hearing

During the March 18 hearing, applicant's counsel stated that the proposed site had been "home to vandals and drug dealers for the last seven years." This statement was false, and it should be given no weight in the Commission's deliberations.

A review of West Linn Police Department calls for service shows that from September 30, 2024 to October 6, 2025 — a period of over twelve months — there were exactly two calls for service in the 18800 block of Willamette Drive: one premises check and one suspicious activity report. It is not even established that either call was related to 18850 Willamette Drive specifically. Two calls in a year does not support the characterization counsel offered (see attached WLPD Call Report).

Under the Oregon Rules of Professional Conduct, attorneys have a strict obligation of candor. The statement made at the hearing was not a matter of opinion or legal argument — it was a factual claim about public safety conditions at a specific address, and it was not accurate. The Commission should disregard it entirely and should be skeptical of an application that relies on mischaracterizing the site to make its case.

IV. Incompatibility With the Neighborhood Plan and VISION43 Is Not Curable

I want to emphasize this point for the record, because it matters for any appeal that may follow: the conflicts between this project and the adopted planning framework are not the kind of deficiencies that can be addressed through conditions of approval. A car wash cannot be conditioned into a pedestrian-friendly Main Street use. A regional chain cannot be conditioned into a locally-owned business. A blank-walled drive-through facility — one that already requires a variance from basic façade transparency standards — cannot be conditioned into the kind of active, street-facing development the Neighborhood Plan and VISION43 call for.

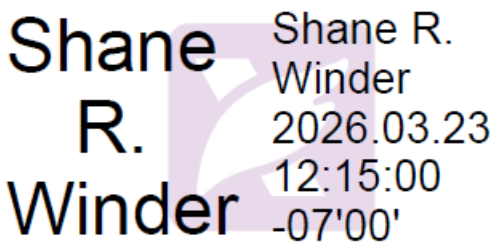
The VISION43 initiative, which the City Council has designated as a $200,000, 50-year planning priority, was built explicitly on the foundation of the Robinwood Neighborhood Plan. Its final adoption is imminent. Approving this application now — over the unanimous opposition of the neighborhood, the surrounding businesses, and in the absence of any staff recommendation — would not only conflict with adopted policy. It would undermine the credibility of the planning process itself.

Conclusion

The applicant has not carried its burden. The record contains no support for approval and substantial evidence of incompatibility. I respectfully urge the Commission to deny the application for CUP-25-03/DR-25-03/VAR-25-02 in its entirety.

Thank you for your continued attention to this matter and for your service to the West Linn community.

Respectfully submitted,



Shane R. Winder
Rose Way resident
West Linn, OR 97068

Police Call Report

18850 Willamette Drive, West Linn, OR

Summary

18850 Willamette Drive falls within the 18800 Block WILLAMETTE DR in police records. Police reports use "block addresses" for privacy, so the 18800 Block covers addresses from 18800-18899 Willamette Drive.

Total Calls for 18800 Block WILLAMETTE DR: 8

Report Period: September 30, 2024 to October 6, 2025

Breakdown by Category

Category	Number of Calls
Other	**3**
Proactive Policing	**2**
Traffic	**2**
Property Crime	**1**

Incident Details

Other (3 calls):

• 2 animal complaints
• 1 premise check

Proactive Policing (2 calls):

• 1 ordinance violation
• 1 suspicious circumstances

Traffic (2 calls):

• 2 traffic stops

Property Crime (1 call):

• 1 noise complaint

Timeline of Calls

Date	Incident Type
10/02/2024	WLPD] TS TRAFFIC STOP
10/03/2024	WLPD] TS TRAFFIC STOP
01/30/2025	WLPD] ORD ORDINANCE VIOL
03/12/2025	WLPD] NOI NOISE COMPLAINT
04/30/2025	WLPD] ANM ANIMAL COMPLAINT
06/15/2025	WLPD] ANM ANIMAL COMPLAINT

Date	Incident Type
08/19/2025	WLPD] PRM PREMISE CHECK
09/27/2025	WLPD] SSC SUSPICIOUS CIRC

Note: Police reports use block addresses (18800-18899) for privacy protection. These 8 calls could be at 18850 Willamette Drive specifically or anywhere else within the 18800 block.