



# CITY OF West Linn

## STAFF REPORT FOR THE CITY COUNCIL

**FILE NUMBER:** ANX-25-01

**HEARING DATE:** December 9, 2025

**REQUEST:** Annexation of 1.3 acres at Tax Lot Number 21E25CC00300

**APPROVAL  
CRITERIA:** Community Development Code (CDC) Chapter 81, West Linn  
Municipal Code (WLMC) 2.920-2.930, Metro Code 3.09, and  
Oregon Revised Statute 22.050 and 222.750.

**STAFF REPORT  
PREPARED BY:** Aaron Gudelj, Associate Planner

-----

-----

## TABLE OF CONTENTS

STAFF ANALYSIS AND RECOMMENDATION	
GENERAL INFORMATION .....	2
PUBLIC COMMENTS.....	3
BACKGROUND.....	3
RECOMMENDATION.....	4
APPLICABLE CRITERIA AND FINDINGS.....	5
EXHIBITS	
CC-1 APPLICANT SUBMITTAL.....	15
CC-2 CLACKAMAS COUNTY LOT LINE ADJUSTMENT – FILE NO Z0153-25.....	59
CC-3 AFFIDAVIT OF NOTICE AND MAILING.....	69

## GENERAL INFORMATION

<b>APPLICANT:</b>	Blue Palouse Properties 333 S. State Street, Suite V452 Lake Oswego, OR 97034
<b>OWNER:</b>	Gary Randall 4201 W Bolton Road Eagle, ID 83616
<b>SITE LOCATION:</b>	Tax Lot Number 21E25CC00300 (no address)
<b>DESCRIPTION:</b>	Clackamas County Assessor Map 2S 1E 25CC tax lot 00300
<b>SITE SIZE:</b>	55,934 square feet
<b>COUNTY ZONING:</b>	FU-10: Future Urban 10 Acre (Clackamas County)
<b>COMPREHENSIVE PLAN DESIGNATION:</b>	Low Density Residential
<b>PROPOSED ZONING DESIGNATION:</b>	R-7 (Single-Family Residential Detached and Attached: 7,000 square foot minimum lot size)
<b>PUBLIC NOTICE:</b>	Per ORS 197.763.2.a(A), notice was mailed on November 19, 2025, to satisfy the 20-day notice to all property owners within 500 feet (ORS only requires 100 feet), all West Linn Neighborhood Associations, and all “Necessary Parties” as defined by Metro Code 3.09.020(J). The property was posted with a sign on November 19, 2025. Notice was published in the West Linn Tidings on November 19, 2025, and December 3, 2025.

The affidavit of notice (Exhibit CC-4) validates the notice requirements of Metro Code, CDC, WLMC, and Oregon State statutes have been met.

<b>PROCESS:</b>	Annexations go through a two-step process. At Council discretion, both steps can be completed on the same hearing date. Step One is a land use decision, as outlined in WLMC 2.920, and determines whether the proposed annexation is consistent with the intent of the West Linn Comprehensive Plan, CDC Chapter 81 and Metro Code 3.09. Step One includes Council assignment of a zoning designation for the property.
-----------------	--

Step Two is a legislative or policy decision that applies the standards of WLMC 2.930. During Step Two, the Council, in its discretion may: 1) decide to set a public hearing for the annexation request; 2) delay a public hearing on the requested annexation; or, 3) pass a resolution placing the annexation request on a ballot for an advisory vote.

At the conclusion of Step Two, the Council may approve the annexation request if it finds that the annexation is in the best interest of the City based on the report prepared by the Planning Director; testimony and evidence presented at the public hearing; and any other information, evidence, or analysis the City or the Council deems relevant to the application.

The Council may deny an annexation acting in its legislative capacity even after it has approved the annexation application through the Step One process.

**PUBLIC COMMENT:** As of November 21, 2025, the City has not received any public comments related to the proposed annexation.

### **BACKGROUND**

The property at Tax Lot Number 21E25CC00300 is approximately 59,934 square feet and is owned by Gary Randall. The subject lot is currently vacant excluding a small shed and is located within the Urban Growth Boundary (UGB) and is primarily surrounded by properties already annexed into West Linn City Limits. Staff notes the 20,333 square foot property at 3945 S. Parker Road is directly adjacent to the subject lot and is not annexed into the City of West Linn at the time of this application. The adjacent property at 3945 S. Parker Road would not be altered by the subject annexation application and would remain within the boundaries of Clackamas County.

Staff also notes that the subject property (Tax Lot 21E25CC00300) and the adjacent property at 3945 S. Parker Road were part of a Lot Line Adjustment with Clackamas County (File No. 20153-25) which is included as Exhibit CC-2 in this report. The Lot Line Adjustment filed with Clackamas County was an exchange of land between the two lots of approximately 5,666 square feet.

The Step One process will be evaluated at the December 9<sup>th</sup>, 2025, public hearing. The applicant has requested a West Linn zoning designation of R-7, which is consistent with the Comprehensive Plan designation (Low-Density Residential) and the surrounding neighborhood. The property has access to City utilities – sanitary sewer, water, and stormwater are all available at Roxbury Road in front of the subject lot. The current County zoning designation of Future Urban (FU-10) signifies both the City and County have anticipated the annexation and urban use of this property.

Council has the option to also complete Step Two at the December 9<sup>th</sup>, 2025, hearing. If Council chooses to delay the Step Two hearing, a date must be selected for that action.

Approval of the annexation will remove them from the Clackamas County Enhanced Law Enforcement District.

### **RECOMMENDATION**

Staff recommends approval of both the Step One “Land Use Decision” (Ordinance 1767) and the Step Two “Policy Decision” (Ordinance 1768) to annex approximately 59,934 square feet at Tax Lot Number 21E25CC00300 into the West Linn City Limits, establish a West Linn zoning designation of R-7, and remove the property from the Clackamas County Enhanced Law Enforcement District.

## APPLICABLE CRITERIA AND ASSOCIATED FINDINGS

*West Linn Community Development Code  
Chapter 81, Boundary Changes  
81.030 Administration and Approval Process*

*A. Boundary change proposals shall be considered by the City Council. The Council decision on the proposal shall be considered the final decision for purposes of compliance with Metro Code Chapter 3.09.*

**Finding 1: The West Linn City Council held a public hearing on December 9th, 2025, to consider annexation of the subject property at Tax Lot Number 21E25CC00300. The City Council decision is the final decision for purposes of compliance with Metro Code Chapter 3.09 (see Findings 16 to 24). The criteria are met.**

*B. Notice of the Council hearing to consider the boundary change proposal shall follow the procedures of CDC 99.080(D) (quasi-judicial amendments), as well as the uniform notice requirements provided in Metro Code Section 3.09.030.*

**Finding 2: A public hearing notice was mailed on November 21, 2025, to all property owners within 500-feet of the property to be annexed, to all West Linn Neighborhood Associations, to the West Linn-Wilsonville School District, Metro, Clackamas County, NW Natural, CenturyLink, Comcast, and the Oregon Dept. of Transportation. Notice was posted on the property on November 21, 2025. Notice was published in the West Linn Tidings on November 21, 2025, and December 3, 2025. The West Linn City Council held a public hearing on December 9th, 2025. The criteria are met.**

*C. A staff report shall be issued prior to the hearing pursuant to the requirements of CDC 99.040 and Metro Code 3.09.050(b).*

**Finding 3: The Staff Report to the City Council for ANX-25-01 was posted to the City's website on November 28, 2025, 11 days before the public hearing date. The criteria are met.**

*D. The final decision shall be made by the Council after a public hearing. The decision shall be reduced to writing and shall follow the requirements of CDC 99.110 and uniform hearing requirements of Metro Code Section 3.09.050.*

**Finding 4: The West Linn City Council held a public hearing on December 9, 2025, to consider annexation of the subject property at Tax Lot Number 21E25CC00300. The City Council decision was reduced in writing and included in Ordinances 1767 and 1768. Please see Findings 16 to 23 for compliance with Metro Code Section 3.09.050. The criteria are met.**

*E. Should a proposal for annexation of property to the City obtain final approval through this step one process, the proposal will be set on the agenda of a Council meeting for consideration under the step two process as set forth in Section 2.950(2)(b) through (d) of the Municipal Code.*

*A proposal for any other boundary change shall be considered pursuant to the provisions of State law.*

**Finding 5: The West Linn City Council held a public hearing on December 9, 2025, for the purpose of considering annexation of the subject property at Tax Lot Number 21E25CC00300. Annexation is a two-step process in the City of West Linn. The City Council decided on Step One by adopting Ordinance 1767 and Step Two by adopting Ordinance 1768. The boundary change was considered pursuant to ORS 222.111. The criteria are met.**

*81.050 Approval Criteria*

*The City Council shall approve a boundary change proposal based on findings and conclusions that the proposal complies with the criteria of Metro Code Section 3.09.050(D) and:*

**Finding 6: Please see Findings 16 to 24 for compliance with Metro Code Section 3.09.050(D).**

*A. West Linn Municipal Code Section 2.920, Step 1: Land Use Decision.*

*1. The application of the zoning designation shall follow the criteria in CDC 81.055.*

*B. West Linn Municipal Code Section 2.930, Step 2: Policy Decision.*

**Finding 7: Please see Findings 10 to 15 for compliance with West Linn Municipal Code Section 2.920 and 2.930 and Finding 8 for compliance with CDC 81.055.**

*81.055 Zoning Designation*

*A decision on annexation shall also incorporate a decision on a zoning designation. The applicant may concurrently apply for a comprehensive plan amendment if desired. Any approval of an annexation shall designate the City zone to be applied if the annexation is approved by the voters. The City zone shall be designated based upon the existing West Linn comprehensive plan/land use designation, pursuant to the following table:*

COMPREHENSIVE PLAN/LAND USE DESIGNATION	ASSIGNED ZONING DISTRICT
Low Density Residential	R-40, R-20, R-15, R-10 or R-7
Medium Density Residential	R-5 or R-4.5
Medium High Density Residential	R-3 or R-2.1
Mixed Use	MU
Commercial	NC, GC, or OBC
Industrial	GI or CI
Other	FU-10

**Finding 8: The West Linn Comprehensive Plan designation for the subject property, and all adjacent properties, is Low Density Residential. Ordinance 1767 recommends West Linn Zoning of R-7; Residential to be applied to the subject property, which is consistent with the Low-Density Residential designation and no comprehensive plan amendment is required. The criteria are met.**

*Where the Council has discretion to apply zoning, the Council shall consider the following factors in making its decision:*

- A. Specific site characteristics such as topography, drainage, and existing vegetation.*
- B. The existing zoning and development patterns of surrounding properties.*
- C. The capacity of the City to provide road, sanitary sewer, storm drainage, and water service to the site.*

**Finding 9: The property has a moderate downward slope (60 feet difference in grade in approximately 300 linear feet) from North → South. The subject lot is mostly vacant with minimal vegetation consistent of large grassy areas, approximately 15 pine trees and deciduous trees in the middle of the parcel. Stormwater drainage and collection will be routed to an existing stormwater facility located at the Roxbury Drive frontage of the property directly east of the subject lot.**

**The property is currently zoned FU-10 (Future Urbanizable 10-Acre District). The adjacent properties to the west along Parker Road are within the City of West Linn and are zoned R-7 Residential. The two nearest lots to the west are 148,009 square feet and 87,353 square feet respectively, and are zoned R-7; Residential. The properties to the east of the subject lot are within the City of West Linn, zoned R-10 Residential, have an average lot sizes of 10,000 square feet, and contain a single-family residence on each lot. The lots to the south across Parker Road are zoned R-10; Residential, have an average lot size of 10,000 square feet, and contain a single-family residence.**

**The development patterns of surrounding properties consist of low-density residential development with newer developments along Parker Road being developed with single-family residences within the past 15-20 years and having lot sizes on average of 7,000 or 10,000 square feet. The lots to the west and north of the subject lot are a mixture of Clackamas County FU-10 zoned lots and City West Linn R-10 zoned lots that have not been developed as recent as other nearby lots, thereby lot sizes are substantially larger at 87,000 square feet up to 149,000 square feet, and residential density is substantially lower than surrounding properties that have been developed within the past 15-20 years. Despite the varying lot sizes of these surrounding properties and the varying residential density, the proposed R-7 zoning for the subject lot is consistent with the surrounding properties residential zoning and residential development patterns of the surrounding area.**

**The subject property has direct access to a public road via Roxbury Drive and direct access to sanitary sewer, stormwater drainage, and water service via Roxbury Drive. The criteria are met.**

*West Linn Municipal Code*

*Chapter 2, Government and Administration*

*2.920 Step 1: Land Use Decision.*

*When an annexation application has been properly initiated pursuant to ORS 222.111, 222.125, 222.170, or 222.840, Step 1 shall include review of the land use aspect of the petition pursuant to Community Development Code Chapter 81. If the application receives Council approval through the Step 1 process, the Council shall proceed to Step 2. A determination that the application meets the land use requirements does not obligate the City to approve the annexation application.*

**Finding 10: The Oregon Revised Statutes (ORS) allow property-owner initiation of annexation of property under the rules set forth in ORS 222.111. The property being considered for annexation proceedings meets the applicable criteria (See Findings 16 to 33). Therefore, the annexation application was properly initiated by the applicant/owner, Gary Randall. Please see Findings 1 to 9 for review of the land use aspect pursuant to CDC Chapter 81. The criteria are met.**

*2.930 Step 2: Policy Decision.*

*(1) Step 2 of the annexation process is a policy decision and shall follow the steps in the subsections below.*

*(2) If the annexation is approved in the Step 1 process, the Planning Director shall prepare a report which includes the following information:*

*(a) General information on the property or properties, including but not limited to location, size, access to infrastructure, recommended zone, protected resource areas and infrastructure status;*

**Finding 11: The property proposed for annexation is approximately 55,934 square feet and is primarily surrounded by property already annexed into the City, with a few lots directly to the north and an adjacent lot directly to the south still being under Clackamas County jurisdiction. The subject lot and other surrounding lots within Clackamas County jurisdiction are almost entirely surrounded by properties within the City of West Linn, thereby creating a cluster of "island" properties anticipated to be annexed in the future. The subject property is located within the adopted Urban Growth Boundary (UGB), which is acknowledged and approved by Metro and the State of Oregon. There are no protected resource areas - drainage channels, wetlands, floodplain - onsite. The surrounding properties are zoned R-10, Residential and R-7, Residential with adjacent lots to the north being with Clackamas County and zoned FU-10 (Future Urbanizable 10-Acre District). Residential Development on a majority of the R-7 and R-10 zoned properties has occurred with the past 15-20 years leading to primarily single-family residences in the surrounding neighborhood with average lot sizes of 7,000 square feet and 10,000 square feet. The subject lot has direct access to a public road,**



sanitary sewer, stormwater drainage, and water services via Roxbury Drive. The criteria are met.

*(b) Impact on the school district, including but not limited to impacted schools, taxes, and anticipated number of additional students;*

**Finding 12:** The property proposed for annexation is located within the catchment boundaries of Sunset Primary School, Rosemont Middle School, and West Linn High School. The proposed R-7, Residential zoning would allow for a minimum 6 residential units on the subject lot with the potential for up to 36 residential units if the subject lot was developed with townhomes when adjusted for required Roxbury Drive extension and Ridge Lane half-street (43,700 square foot lot). It is anticipated that 6 residential units would add 1.71 primary school students, 0.666 middle school students, and 0.75 high school student; and 36 townhomes would add 10.26 primary school students, 4.0 middle school students, and 4.5 high school students (CC-4 - WLWV 2019 Long Range Facility Plan; Pg. 53).

West Linn-Wilsonville School District provided this statement in regard to the impact on school district taxes. *“The school district is not bounded by city limits and we serve all children in the district regardless of location or address. There are nearly 10,000 students enrolled in 16 schools; a few more, or less, has minimal impact. Financial impact is also negligible because funding for education is collected at the state level and then evenly distributed to all districts in the state based enrollment. Capital bonds and the local option levy are voted on by the patrons of the district with each property taxpayer paying their share regardless of where they live. Thus, annexation of property from county to city is only a function of density from the school district perspective. If population is increased by annexation and more children are enrolled in schools, state funding for education is provided for each; and each property owner pays their county-calculated share of the local option and capital bond”.*

In addition to annual school district taxes of approximately \$4,200 per single-family home (\$500,000 assessed value), the construction of 6 new homes on would generate a one-time school district Construction Excise Tax of approximately \$3,360 per home (3,200 sq. ft. home).

*(c) Cost to City of infrastructure that is not funded by SDCs; and*

**Finding 13:** As noted at Finding 9, and Metro 3.09 Finding(s) 22 & 23, City infrastructure is available to serve the subject property. Although not part of the annexation application, should the property redevelop, SDCs would be assessed upon future development at the time of building permit submittal, which would fund any needed extension of City infrastructure.

*(d) Tax implications for the City.*

**Finding 14:** The permanent property tax rate for the City of West Linn is currently \$2.12 per \$1,000 of taxable assessed value. Bonds currently require \$0.42 per \$1,000 of assessed value.

According to the City of West Linn Finance department website, that tax rate is “*the lowest property tax rate for cities in the surrounding area*”.

For a house and land with an assessed valuation of \$500,000, the City tax and bond share would be \$1,270. Any new homes would yield taxes annually towards needed City infrastructure, operations, maintenance, and programs, as well as retirement of the bonds, which would fractionally reduce existing City of West Linn property owner costs.

*As part of the Step 1 process, the applicant shall provide to the Planning Director the information required above at the applicant’s cost.*

*(3) Following delivery of the report and consideration of the report by the City Council at a public meeting, the Council may, in its discretion, decide to set a public hearing for the annexation request, delay a public hearing on the requested annexation or pass a resolution placing the annexation request on a ballot for an advisory vote, at any election. At the public meeting, any person may appear and be heard on the questions of whether the annexation should proceed and whether the request should be placed on the ballot for an advisory vote.*

*(4) If City Council decides to proceed to a public hearing on the requested annexation without an advisory vote, a public hearing will be scheduled. Notice of the Step 2 public hearing shall be published in accordance with State law and the Metro Code.*

*(5) The City Council may approve an annexation request if it finds that the annexation is in the best interest of the City based on the report prepared by the Planning Director; testimony and evidence presented at the public hearing; and any other information, evidence, or analysis the City or the Council deems relevant to the application.*

*(6) The City Council may deny an annexation acting in its legislative capacity even after it has approved the annexation application through the Step 1 process. A decision to deny an annexation in Step 2 shall be specifically stated in the record and noted as a legislative act separate and apart from the land use decision in Step 1.*

**Finding 15: Staff recommends City Council proceed with the public hearing on Step 2 at December 9, 2025 for the proposed annexation, and not send it to an election for an advisory vote. Staff recommends City Council approval, at the December 9, 2025 public hearing, of both the Step One “Land Use Decision” (Ordinance 1767) and the Step Two “Policy Decision” (Ordinance 1768) to annex 59,934 square feet at Tax Lot Number 21E25CC00300, establish a West Linn zoning designation of R-7, Residential and remove the property from the Clackamas County Enhanced Law Enforcement District. The public hearing has been noticed in accordance with West Linn standards, the Oregon Revised Statutes, and Metro Code. The criteria are met.**

*Metro Code Chapter 3.09 Local Government Boundary Changes  
Section 3.09.030 Notice Requirements*

*A. The notice requirements in this section apply to all boundary change decisions by a reviewing entity except expedited decisions made pursuant to section 3.09.045. These requirements apply*

*in addition to, and do not supersede, applicable requirements of ORS Chapters 197, 198, 221 and 222 and any city or county charter provision on boundary changes.*

*B. Within 45 days after a reviewing entity determines that a petition is complete, the entity shall set a time for deliberations on a boundary change. The reviewing entity shall give notice of its proposed deliberations by mailing notice to all necessary parties, by weatherproof posting of the notice in the general vicinity of the affected territory, and by publishing notice in a newspaper of general circulation in the affected territory. Notice shall be mailed and posted at least 20 days prior to the date of deliberations. Notice shall be published as required by state law.*

**Finding 16: The City of West Linn deemed the annexation application complete on October 2, 2025 and set a public hearing within 120 days on December 9, 2025. A public hearing notice was mailed on November 19, 2025 to all property owners within 500-feet of the property to be annexed, to all West Linn Neighborhood Associations, to the West Linn-Wilsonville School District, Metro, Clackamas County, City of Lake Oswego, NW Natural, CenturyLink, Comcast, and the Oregon Dept. of Transportation. Notice was posted on the property on November 19, 2021. Notice was published in the West Linn Tidings on November 19, 2021, and December 3, 2025. The West Linn City Council held a public hearing on December 9, 2025. The criteria are met.**

*C. The notice required by subsection (B) shall:*

- 1. Describe the affected territory in a manner that allows certainty;*
- 2. State the date, time and place where the reviewing entity will consider the boundary change; and*
- 3. State the means by which any person may obtain a copy of the reviewing entity's report on the proposal.*

**Finding 17: A public hearing notice was mailed on November 19, 2025, to all property owners within 500-feet of the property to be annexed, to all West Linn Neighborhood Associations, to the West Linn-Wilsonville School District, Metro, Clackamas County, City of Lake Oswego, NW Natural, CenturyLink, Comcast, and the Oregon Dept. of Transportation. Notice was posted on the property on November 19, 2025. Notice was published in the West Linn Tidings on November 19, 2025. The notice included a description of the property to be annexed, stated the date, time, and place for the City Council public hearing, and stated how to obtain a copy of the Staff Report to City Council. The criteria are met.**

*D. A reviewing entity may adjourn or continue its final deliberations on a proposed boundary change to another time. For a continuance later than 28 days after the time stated in the original notice, notice shall be reissued in the form required by subsection (B) of this section at least five days prior to the continued date of decision.*

**Finding 18: If the public hearing is continued for a period of more than 28 days, the notice will be issued a minimum of five days prior to the continued hearing date. The criteria are met.**

*E. A reviewing entity's final decision shall be written and authenticated as its official act within 30 days following the decision and mailed or delivered to Metro and to all necessary parties. The mailing or delivery to Metro shall include payment to Metro of the filing fee required pursuant to section 3.09.060.*

**Finding 19: The final decision by the City Council will be signed and issued within 30 days of the decision and mailed to Metro and all necessary parties. The City will pay the Metro filing fee pursuant to section 3.09.060. The criteria are met.**

*Section 3.09.050 Hearing and Decision Requirements for Decisions Other Than Expedited Decisions.*

*A. The following requirements for hearings on petitions operate in addition to requirements for boundary changes in ORS Chapters 198, 221 and 222 and the reviewing entity's charter, ordinances or resolutions.*

*B. Not later than 15 days prior to the date set for a hearing the reviewing entity shall make available to the public a report that addresses the criteria identified in subsection (D) and includes the following information:*

- 1. The extent to which urban services are available to serve the affected territory, including any extra territorial extensions of service;*
- 2. Whether the proposed boundary change will result in the withdrawal of the affected territory from the legal boundary of any necessary party; and*
- 3. The proposed effective date of the boundary change.*

**Finding 20: A public hearing notice was mailed on November 19, 2025, to all property owners within 500-feet of the property to be annexed, to all West Linn Neighborhood Associations, to the West Linn-Wilsonville School District, Metro, Clackamas County, City of Lake Oswego, NW Natural, CenturyLink, Comcast, and the Oregon Dept. of Transportation. Notice was posted on the property on November 19, 2025. Notice was published in the West Linn Tidings on November 19, 2025, and December 3, 2025. The Staff Report to City Council and proposed Ordinances 1767 and 1768 were available 11 days in advance on November 28, 2025. The staff report addresses availability of urban services and Ordinance 1768 addresses the withdrawal of the property from the Clackamas County Enhanced Law Enforcement District and the effective date of the boundary change. The criteria are met.**

*C. The person or entity proposing the boundary change has the burden to demonstrate that the proposed boundary change meets the applicable criteria.*

**Finding 21: The City of West Linn deemed the application complete as allowed by rules set forth in Oregon Revised Statutes (ORS) 222.111. The Staff Report to the City Council provides substantial evidence the proposal meets the applicable criteria. The criteria are met.**

*D. To approve a boundary change, the reviewing entity shall apply the criteria and consider the factors set forth in subsections (D) and (E) of section 3.09.045.*

*Metro Code Section 3.09.045(D). To approve a boundary change through an expedited process, the city shall:*

- 1. Find that the change is consistent with expressly applicable provisions in:*
  - a. Any applicable urban service agreement adopted pursuant to ORS 195.065;*
  - b. Any applicable annexation plan adopted pursuant to ORS 195.205;*
  - c. Any applicable cooperative planning agreement adopted pursuant to ORS 195.020(2) between the affected entity and a necessary party;*
  - d. Any applicable public facility plan adopted pursuant to a statewide planning goal on public facilities and services;*
  - e. Any applicable comprehensive plan;*
  - f. Any applicable concept plan; and*

**Finding 22: The property is located within the adopted Urban Growth Boundary (UGB), which is acknowledged and approved by Metro and the State of Oregon. The UGB is recognized as the means of identifying lands that are appropriate and serviceable for annexation and urban level development.**

**The City of West Linn and Clackamas County have a signed Urban Growth Management Agreement (UGMA). The UGMA establishes a cooperative planning agreement outlining the responsibility for comprehensive planning activities, public facility planning, annexation proposals, and noticing and coordination requirements.**

**The City of West Linn is responsible for public facility planning, per the UGMA, and has adopted master plans for water, sanitary sewer, surface water management, and transportation. The master plans anticipate the future annexation and development of unincorporated lands within the UGB, including the property subject to this proposal. The annexation proposal is consistent with the public facility plans and the UGMA.**

**The proposal includes a West Linn zoning designation of R-7, Residential which is consistent with the West Linn Comprehensive Plan designation of Low Density Residential. The criteria are met.**

- 2. Consider whether the boundary change would:*
  - a. Promote the timely, orderly and economic provision of public facilities and services;*
  - b. Affect the quality and quantity of urban services; and*
  - c. Eliminate or avoid unnecessary duplication of facilities or services.*

**Finding 23: The City of West Linn and Clackamas County have a signed Urban Growth Management Agreement (UGMA). The UGMA establishes a cooperative planning agreement that identifies the City as responsible for public facility planning. The City has adopted master plans for water, sanitary sewer, surface water management, and transportation. The master plans anticipate the future annexation and development of unincorporated lands within the UGB, including the property subject to this proposal. No upgrades in capacity are needed.**

**Annexation of the properties will eliminate the need for Clackamas County Sheriff's officers to respond to calls at the property, which is within the city limits. West Linn Police are better positioned to provide coverage and eliminate duplication of services, thus promoting a more efficient economic provision of public safety services. The criteria are met.**

*E. A city may not annex territory that lies outside the UGB, except it may annex a lot or parcel that lies partially within and partially outside the UGB.*

**Finding 24: The property under proposal for annexation is located within the adopted Urban Growth Boundary (UGB). The criteria are met.**

*Oregon Revised Statute Chapter 222 – City Boundary Changes; Mergers; Consolidations; Withdrawals*

*22.050 Annexation of Contiguous Territory*

*Sec. 6. An area of land within the urban growth boundary of the metropolitan service district established in the Portland metropolitan area may not be annexed under ORS 222.750 if:*

- (1) The area of land is larger than seven acres and is zoned for industrial use;*
- (2) The land is owned by an Oregon-based business entity that has been in continuous operation, either directly or through a predecessor, for at least 60 years; and*
- (3) The business entity employs more than 500 individuals on the land.*

**Finding 25: The property is located within the urban growth boundary of the metropolitan service district and proposed for annexation under ORS 222.750. The property under proposal is 55,934 square feet, zoned for residential use, and no individuals are employed on the land. The criteria are met.**

*Sec. 7. An area of land within the urban growth boundary of the metropolitan service district established in the Portland metropolitan area may not be annexed under ORS 222.750 if:*

- (1) The area of land is larger than 14 acres and is zoned for industrial use;*
- (2) The land is owned by an Oregon-based business entity that has been in continuous operation on a portion of the land for at least 40 years; and*
- (3) The business entity employs more than 300 individuals on the land.*

**Finding 26: The property is located within the urban growth boundary of the metropolitan service district and proposed for annexation under ORS 222.750. The property under proposal is 55,934 square feet, zoned for residential use, and no individuals are employed on the land. The criteria are met.**

*Sec. 9. (2) Sections 5, 6 and 7 of this 2005 Act apply to an annexation of territory approved on or after March 1, 2005, and to an annexation of territory proposed on or after the effective date of this 2005 Act.*

*Sec. 11. (1) Sections 5, 6 and 7 of this 2005 Act are repealed on June 30, 2035.*

**Finding 27: The proposed annexation could be approved as early as December 24, 2025, effective upon subsequent filing of the appropriate paperwork with Clackamas County, Metro, and State agencies. The criteria are met.**

*222.750 Annexation of unincorporated territory surrounded by city; delayed annexation for certain property.*

*(1) As used in this section:*

*(a) "Creek" means a natural course of water that is smaller than, and often tributary to, a river, but is not shallow or intermittent.*

*(b) "River" means a large, continuous and natural stream of water that is fed along its course by converging tributaries and empties into an ocean, lake or other body of water.*

*(2) When territory not within a city is surrounded by the corporate boundaries of the city, or by the corporate boundaries of the city and the corporate boundaries of another city, the ocean shore, a river, a creek, a bay, a lake or Interstate Highway 5, the city may annex the territory pursuant to this section after holding at least one public hearing on the question for which notice has been mailed to each record owner of real property in the territory proposed to be annexed.*

**Finding 28: The property proposed for annexation is almost surrounded by the West Linn City Limits excluding two lots to the north and an adjacent parcel to the south (3945 S. Parker Road). The surrounding lots to the north and adjacent parcel to the south have created a cluster of 'island' properties within the jurisdiction of Clackamas County that are surrounded by properties within the City of West Linn boundaries. A public hearing has been properly noticed and scheduled for December 9, 2025. The notice was mailed to the owner of real property in the territory proposed to be annexed, Gary Randall. The criteria are met.**

*(3) This section does not apply if the territory not within a city:*

*(a) Is surrounded entirely by water; or*

*(b) Is surrounded as provided in subsection (2) of this section, but a portion of the corporate boundaries of the city that consists only of a public right of way, other than Interstate Highway 5, constitutes more than 25 percent of the perimeter of the territory.*

**Finding 29: No water touches the subject property. The property boundary is a total of lineal feet of 830. A 50-foot section of the Roxbury Drive right-of-way touches the perimeter of the east property boundary, which constitutes approximately 16 percent of the perimeter of the territory to be annexed. The criteria are met.**

*(4) Unless otherwise required by the city charter, annexation by a city under this section must be by ordinance or resolution subject to referendum, with or without the consent of any owner of real property within the territory or resident in the territory.*

**Finding 30: The City received an annexation application from the owner of property to be annexed. The criteria are met.**

*(5) For property that is zoned to allow residential use as a permitted use in the zone and is in residential use when annexation is initiated by the city under this section, the city shall specify an effective date for the annexation that is at least three years and not more than 10 years after the date the city proclaims the annexation approved. The city recorder or other officer performing the duties of the city recorder shall:*

*(a) Cause notice of the delayed annexation to be recorded by the county clerk of the county in which any part of the territory subject to delayed annexation is located within 60 days after the city proclaims the annexation approved; and*

*(b) Notify the county clerk of each county in which any part of the territory subject to delayed annexation is located not sooner than 120 days and not later than 90 days before the annexation takes effect.*

**Finding 31: The property is zoned to permit residential use and is relatively vacant excluding a single-story shed near the southeast corner of the property. No delayed annexation is required. The criteria are met.**

*(6) Notwithstanding subsection (5) of this section:*

*(a) Property that is subject to delayed annexation becomes part of the city immediately upon transfer of ownership.*

*(b) The record owner of real property described in subsection (5) of this section that is located in the territory to be annexed may waive the delay of the effective date of the annexation provided under subsection (5) of this section. The property becomes part of the city immediately upon the waiver.*

**Finding 32: The City is not required to approve a delayed annexation and City Council did not subject to approval to a delayed annexation. The criteria are met.**

*(7) This section does not limit provisions of a city charter, ordinance or resolution that are more restrictive than the provisions of this section for creating or annexing territory that is surrounded as described in subsection (2) of this section.*

*(8) If a city charter, ordinance or resolution requires the city to conduct an election in the city, the city shall allow electors, if any, in the territory proposed to be annexed to vote in the election on the question of annexation. If the governing body of the city finds that a majority of the votes cast in the city and the territory combined favor annexation, the governing body, by ordinance or resolution, shall proclaim the annexation approved. The proclamation shall contain a legal description of each territory annexed.*

**Finding 33: The City of West Linn does not have provisions to annex the property that are more restrictive than the provisions of this section. The City Council has the authority, under the West Linn Municipal Code, to send an annexation proposal for an advisory vote. The West Linn City Council did not require an advisory vote for the proposal since there have not been any objections to the annexation of the property. The criteria are met.**



## **EXHIBIT CC-1: APPLICANT SUBMITTAL**

## DEVELOPMENT REVIEW APPLICATION

For Office Use Only		
STAFF CONTACT	PROJECT NO(S). <div style="text-align: center;">ANX-25-01</div>	PRE-APPLICATION NO. <div style="text-align: center;">PA-25-11</div>
NON-REFUNDABLE FEE(S)    \$8,000	REFUNDABLE DEPOSIT(S)	TOTAL    \$8,000

**Type of Review** (Please check all that apply):

- |   |   |   |
|---|---|---|
| <input checked="" type="checkbox"/> Annexation (ANX)<br><input type="checkbox"/> Appeal (AP)<br><input type="checkbox"/> CDC Amendment (CDC)<br><input type="checkbox"/> Code Interpretation (MISC)<br><input type="checkbox"/> Conditional Use (CUP)<br><input type="checkbox"/> Design Review (DR)<br><input type="checkbox"/> Tree Easement Vacation (MISC)<br><input type="checkbox"/> Expediated Land Division (ELD)<br><input type="checkbox"/> Extension of Approval (EXT) | <input type="checkbox"/> Final Plat (FP) <span style="color: red;">Related File # _____</span><br><input type="checkbox"/> Flood Management Area (FMA)<br><input type="checkbox"/> Historic Review (HDR)<br><input type="checkbox"/> Lot Line Adjustment (LLA)<br><input type="checkbox"/> Minor Partition (MIP)<br><input type="checkbox"/> Modification of Approval (MOD)<br><input type="checkbox"/> Non-Conforming Lots, Uses & Structures<br><input type="checkbox"/> Planned Unit Development (PUD)<br><input type="checkbox"/> Street Vacation | <input type="checkbox"/> Subdivision (SUB)<br><input type="checkbox"/> Temporary Uses (MISC)<br><input type="checkbox"/> Time Extension (EXT)<br><input type="checkbox"/> Right of Way Vacation (VAC)<br><input type="checkbox"/> Variance (VAR)<br><input type="checkbox"/> Water Resource Area Protection/Single Lot (WAP)<br><input type="checkbox"/> Water Resource Area Protection/Wetland (WAP)<br><input type="checkbox"/> Willamette & Tualatin River Greenway (WRG)<br><input type="checkbox"/> Zone Change (ZC) |
|---|---|---|

Pre-Application, Home Occupation, Sidewalk Use, Addressing, and Sign applications require different forms, available on the website.

<b>Site Location/Address:</b> No address assigned. Easterly terminus of Roxbury Drive	<b>Assessor's Map No.:</b> 21E25CC <hr/> <b>Tax Lot(s):</b> 300 <hr/> <b>Total Land Area:</b> 1.29
---	--

**Brief Description of Proposal:**

Annex property into West Linn

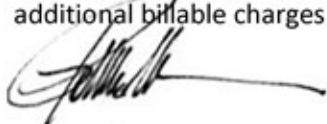
<b>Applicant Name*:</b> Blue Palouse Properties <b>Address:</b> 333 S. State Street, Suite V452 <b>City State Zip:</b> Lake Oswego, OR 97034	<b>Phone:</b> 503-936-3212 <b>Email:</b> robm@bluepalouse.com
--	--

<b>Owner Name (required):</b> Gary Randall <b>Address:</b> 4201 W Bolton Road <b>City State Zip:</b> Eagle, ID 83616	<b>Phone:</b> <b>Email:</b>
--	--------------------------------

<b>Consultant Name:</b> Jeff Vanderdasson <b>Address:</b> Vando Development, LLC 915 SW Rimrock Way, Ste 201-230 <b>City State Zip:</b> Redmond, OR 97756	<b>Phone:</b> 503-407-2228 <b>Email:</b> vandodevelopment@gmail.com
--	--

1. Application fees are non-refundable (excluding deposit). Applications with deposits will be billed monthly for time and materials above the initial deposit. **\*The applicant is financially responsible for all application costs.**
2. All information provided with the application is considered a public record and subject to disclosure.
3. The owner/applicant or their representative should attend all public hearings related to the application.
4. A decision may be reversed on appeal. The decision will become effective once the appeal period has expired.
5. Submit this form, application narrative, and all supporting documents as a single PDF through the web page: <https://westlinnoregon.gov/planning/submit-land-use-application>.

The undersigned property owner authorizes the application and grants city staff the right of entry onto the property to review the application. The applicant and owner affirm that the information provided in this application is true and correct. Applications with deposits will be billed monthly for time and materials incurred above the initial deposit. The applicant agrees to pay additional billable charges.



Applicant's signature

9-15-25

Date

Owner's signature (required)

Date

## DEVELOPMENT REVIEW APPLICATION

For Office Use Only		
STAFF CONTACT	PROJECT NO(S)	PRE-APPLICATION NO.
NON-REFUNDABLE FEE(S)	REFUNDABLE DEPOSIT(S)	TOTAL

**Type of Review** (Please check all that apply):

- |   |   |  |
|---|---|--|
| <input checked="" type="checkbox"/> Annexation (ANX)    | <input type="checkbox"/> Final Plat (FP) Related File # _____   | <input type="checkbox"/> Subdivision (SUB)                               |
| <input type="checkbox"/> Appeal (AP)                    | <input type="checkbox"/> Flood Management Area (FMA)            | <input type="checkbox"/> Temporary Uses (MISC)                           |
| <input type="checkbox"/> CDC Amendment (CDC)            | <input type="checkbox"/> Historic Review (HDR)                  | <input type="checkbox"/> Time Extension (EXT)                            |
| <input type="checkbox"/> Code Interpretation (MISC)     | <input type="checkbox"/> Lot Line Adjustment (LLA)              | <input type="checkbox"/> Right of Way Vacation (VAC)                     |
| <input type="checkbox"/> Conditional Use (CUP)          | <input type="checkbox"/> Minor Partition (MIP)                  | <input type="checkbox"/> Variance (VAR)                                  |
| <input type="checkbox"/> Design Review (DR)             | <input type="checkbox"/> Modification of Approval (MOD)         | <input type="checkbox"/> Water Resource Area Protection/Single Lot (WAP) |
| <input type="checkbox"/> Tree Easement Vacation (MISC)  | <input type="checkbox"/> Non-Conforming Lots, Uses & Structures | <input type="checkbox"/> Water Resource Area Protection/Wetland (WAP)    |
| <input type="checkbox"/> Expediated Land Division (ELD) | <input type="checkbox"/> Planned Unit Development (PUD)         | <input type="checkbox"/> Willamette & Tualatin River Greenway (WRG)      |
| <input type="checkbox"/> Extension of Approval (EXT)    | <input type="checkbox"/> Street Vacation                        | <input type="checkbox"/> Zone Change (ZC)                                |

Pre-Application, Home Occupation, Sidewalk Use, Addressing, and Sign applications require different forms, available on the website.

Site Location/Address: No address assigned. Easterly terminus of Roxbury Drive	Assessor's Map No.: 21E25CC
	Tax Lot(s): 300
	Total Land Area: 1.29

**Brief Description of Proposal:**

Annex property into West Linn

<b>Applicant Name*:</b> Blue Palouse Properties	Phone: 503-936-3212
Address: 333 S. State Street, Suite V452	Email: robm@bluepalouse.com
City State Zip: Lake Oswego, OR 97034	

<b>Owner Name (required):</b> Gary Randall	Phone: 503-504-0479
Address: 4201 W Bolton Road	Email: gtoddrandall@gmail.com
City State Zip: Eagle, ID 83616	

<b>Consultant Name:</b> Jeff Vanderdasson	Phone: 503-407-2228
Address: Vando Development, LLC	Email: vandodevelopment@gmail.com
City State Zip: 915 SW Rimrock Way, Ste 201-230 Redmond, OR 97756	

1. Application fees are non-refundable (excluding deposit). Applications with deposits will be billed monthly for time and materials above the initial deposit. **\*The applicant is financially responsible for all application costs.**
2. All information provided with the application is considered a public record and subject to disclosure.
3. The owner/applicant or their representative should attend all public hearings related to the application.
4. A decision may be reversed on appeal. The decision will become effective once the appeal period has expired.
5. Submit this form, application narrative, and all supporting documents as a single PDF through the web page: <https://westlinnoregon.gov/planning/submit-land-use-application>.

The undersigned property owner authorizes the application and grants city staff the right of entry onto the property to review the application. The applicant and owner affirm that the information provided in this application is true and correct. Applications with deposits will be billed monthly for time and materials incurred above the initial deposit. The applicant agrees to pay additional billable charges.

Applicant's signature

Date

Owner's signature (required)

Date



9/16/25



## DEVELOPMENT REVIEW CHECKLIST

The application form and supporting materials should be submitted electronically through <https://westlinnoregon.gov/planning/submit-land-use-application> as one (1) .pdf file. To create a single PDF file, go to [Adobe Acrobat Free Merge PDF](#) online tool. [Other free Acrobat PDF tools](#) like converting a file to PDF or reducing the file size are available on the Adobe website.

Supporting reports may be uploaded separately through this web form *if* the file size is too large. The separate submissions should be numbered (i.e., Submittal 1 of 2) and noted under transmittal contents. All plan set files **MUST** be flattened and reduced.

Submission requirement to upload through the web form:

- .pdf format.
- Individual file size no larger than 128 MB.
- Do not attach 'zip' files. Our server will reject all 'zip' files.
- Reduce and flatten all plan sets BEFORE uploading plan sets. The raster/vector settings should be optimized for printing.

A complete application must include the following:

- ☒ Development Review Application. Original signatures from all owners must be on the application form. **Do NOT use DocuSign.**
- ☒ A **project narrative** outlining the project's scope in detail, including the changes to the site, structure, landscaping, parking, land use, and lot consolidations.
- ☒ Complete written responses to identified approval criteria in the [Community Development Code \(CDC\)](#).
- ☐ A Service Provider Letter from Tualatin Valley Fire and Rescue - <https://www.tvfr.com/399/Service-Provider-Permit> Please contact Jason Arn at [jason.arn@tvfr.com](mailto:jason.arn@tvfr.com) with any questions about TVF&R requirements.
- ☒ Vicinity Map showing the site within the City.
- ☐ Site Plan drawn to scale showing the:
  - Taxlot and address of the project,
  - Area of the site (acres or square feet),
  - Zoning and Neighborhood Association,
  - Location and dimensions of existing and proposed buildings, structures,
  - Location of existing and proposed on-site driveways and off-street parking,
  - Configuration and dimensions of all existing and proposed lots and tracts, including a proposed park, open space, and or drainage tracts or easements,
  - Location and width of existing and proposed easement for access, drainage, etc., and
  - Location of existing and proposed trees and other proposed landscaping.
  - Location of existing public and private utilities, easements, and 100-year floodplain,
  - Sensitive areas, including the location of on-site wetlands and riparian areas,
  - Location of existing off-site driveways across the street,
  - If applicable, internal circulation system, name, and location of existing and proposed roadways and roadway easements (private and public), and
  - Location and width of existing and proposed on-site pedestrian and bicycle facilities on-site.
- ☐ If applicable, a Utility Plan and Landscape plan, drawn to scale.
- ☐ If applicable, Building elevation drawings with exterior elevations for every side of each structure, height including building materials and floor levels, drawn to scale.
- ☐ If required, documentation of any required meeting with the respective City-recognized neighborhood association per CDC [99.038](#).
- ☒ Any other materials identified by city staff at the pre-application meeting.

For applications that the Planning Commission decides, the applicant or applicant's representative should present their proposal to the PC at the public hearing.

# PARKER ROAD WEST LINN, OREGON

An Application for:  
Annexation and Zone Change

September 15, 2025

Applicant:

**Blue Palouse Properties**  
333 S. State Street, Suite V452  
Lake Oswego OR 97034

Prepared by:

**Vando Development, LLC**  
915 SW Rimrock Way, Ste 201-  
230  
Redmond, OR 97756



## Table of Contents

<b>TABLE OF CONTENTS</b> .....	<b>1</b>
<b>GENERAL INFORMATION:</b> .....	<b>2</b>
<b>General Proposal:</b> .....	<b>3</b>
<b>Site Conditions:</b> .....	<b>3</b>
<b>Surrounding Land Uses:</b> .....	<b>3</b>
<b>Why you believe the application should be approved as you propose it:</b> .....	<b>3</b>
<b>Description Of Surrounding Area</b> .....	<b>3</b>
<b>Public Utilities</b> .....	<b>3</b>
<b>Community Development Code Findings:</b> .....	<b>3</b>
<i>81.040 PETITION</i> .....	<b>3</b>
<i>81.050 APPROVAL CRITERIA</i> .....	<b>4</b>
<i>81.055 ZONING DESIGNATION</i> .....	<b>4</b>
<i>105.050 QUASI-JUDICIAL AMENDMENTS AND STANDARDS FOR MAKING DECISION</i> .....	<b>5</b>
<b>Municipal Code Findings:</b> .....	<b>7</b>
Chapter 2 GOVERNMENT AND ADMINISTRATION .....	<b>7</b>
<i>2.915 Annexation Purpose Statement.</i> .....	<b>7</b>
<i>2.920 Step 1: Land Use Decision.</i> .....	<b>8</b>
<i>2.930 Step 2: Policy Decision</i> .....	<b>8</b>
<b>West Linn's Comprehensive Plan Findings:</b> .....	<b>8</b>
<i>Goal 2: Land Use Planning</i> .....	<b>8</b>
<i>Goal 11: Public Facilities and Services</i> .....	<b>9</b>
<i>Goal 14: Urbanization</i> .....	<b>9</b>
<b>Metro Code Findings:</b> .....	<b>9</b>
<i>3.09.040 Requirements for Petitions</i> .....	<b>9</b>
<i>3.09.045 Expedited Decisions</i> .....	<b>9</b>
<b>Summary/Conclusion</b> .....	<b>11</b>
 <b><u>EXHIBITS</u></b>	
<b>A.</b> Application Form & Annexation Petition	
<b>B.</b> Certification of Property Ownership	
<b>C.</b> Certification of Legal Description and Exhibit Map	
<b>D.</b> Vicinity Map	
<b>E.</b> Traffic Impact Analysis Memo	



**GENERAL INFORMATION**

<b>Property Owner:</b>	<b>Gary Randall</b> 4201 W Bolton Road Eagle, ID 83616	
<b>Applicant:</b>	<b>Blue Palouse Properties</b> 333 S. State Street, Suite V452 Lake Oswego, OR 97034	
<b>Applicant’s Representative</b>	<b>Vando Development, LLC</b> 915 SW Rimrock Way, Ste 201-230 Redmond, OR 97756 (503) 407-2228 Contact: Jeff Vanderdasson <a href="mailto:vandodevelopment@gmail.com">vandodevelopment@gmail.com</a>	
<b>Tax Lot Information:</b>	Map	Tax Lot
	21E25CC	300
<b>Location:</b>	No address assigned	
<b>Property Size:</b>	1.29 ac	
<b>Comprehensive Plan Designation:</b>	Low-Density Residential	
<b>Requested Zoning Upon Annexation:</b>	R-7 (Single Family Residential Detached and Attached)	



**General Proposal:** Gary Randall is submitting this application to annex approximately 1.29 acres of land into the city of West Linn. The subject site is located immediately north of Parker Road, and west of the current terminus of Roxbury Drive. Additionally, the application seeks to replace the Clackamas County FU-10 Zoning designation with the City's R-7 Single-Family Residential Zoning District on the subject property, which is consistent with the City's Low Density Residential Comprehensive Plan Land Use designation that currently governs this property.

**Site Conditions:** The existing parcel slopes from north to south with slopes between 5% -15%. The area is mostly clear with large grassy areas approximately 15 pine trees and deciduous trees grouped in the middle of parcel.

**Surrounding Land Uses:** The properties to the north and south are in unincorporated Clackamas County and have single-family residential homes on them. The property to the west is in the West Linn city limits and is a large lot with a single-family residential home on it. Property to the east is a single-family residential subdivision with existing single family residential homes.

**Why you believe the application should be approved as you propose it:** We believe that project as proposed is consistent with the City's Comprehensive Plan designation, meets all Metro code criteria and satisfies all criteria from the City's Community Development Code, as outlined in the project narrative. The property to the west is zoned R-7 as well as properties further to the east but in close proximity to the site. The request for R-7 zoning, in our opinion, maximizes density and is consistent with the neighborhood. It would meet state, local and Metro goals for maximizing density within the urban growth boundary.

#### Description Of Surrounding Area

Area	Jurisdiction	Zoning	Land Uses
North	City of West Linn/Clackamas County	R-10/FU-10	Single-Family Residential
South	City of West Linn	R-10	Single-Family Residential
East	City of West Linn	R-10	Single-Family Residential
West	City of West Linn	R-7	Single-Family Residential

#### Public Utilities

Service	Provider	Size	Location	Distance from Site
Water	City of West Linn	8"	Roxbury Drive	Adjacent (E)
Sanitary Sewer	City of West Linn	8"	Roxbury Drive	Adjacent (E)
Storm Sewer	City of West Linn	Storm Facility	Roxbury Drive	Adjacent (E)

#### Community Development Code Findings:

##### 81.040 PETITION

A. A petition to annex to the City of West Linn may be initiated by a property owner(s) of the area to be annexed, or the City, as set forth in Section 2.950(1) of the City Code.





**Applicant's Finding:** This annexation is being initiated by the owner of the subject property. The criterion is met.

*B. A prerequisite to the filing of an annexation petition is a pre-application conference at which time the Director shall explain the requirements and provide the appropriate forms as specified in CDC [99.030](#)(B) and (C).*

**Applicant's Finding:** A pre-application conference regarding this application was held with City of West Linn staff and other interested parties on May 1, 2025. The criterion is met.

*C. A petition to annex shall include the completed petition form and three copies of each of the following, except for each drawing submitted, there shall be three copies at the original scale and three copies reduced to a paper size not greater than 11 inches by 17 inches.*

- 1. The minimum petition requirements of Metro Code Section 3.09.040.*
- 2. A narrative which addresses the approval criteria set forth in Municipal Code Section 2.920 and Metro Code Sections 3.09.050(d) and, if applicable, (e).*
- 3. Vicinity, legal, and other descriptive maps necessary to show compliance with Municipal Code Section 2.920 and Metro Code 3.09.040.*

**Applicant's Finding:** This application package includes all relevant documents and responses to all applicable Sections of Metro Code Title 3.09 as well as a Vicinity Map (Exhibit D), Legal Description (Exhibit C), and a Map of the Affected Territory (Exhibit C). Additionally, this narrative includes responses to all applicable Municipal Code criteria. The criteria are met.

*D. A petition of any type of boundary change, other than annexation, shall be processed as provided by State law and Metro Code Chapter 3.09.*

**Applicant's Finding:** This application includes an annexation and zone change. Responses to applicable sections of Metro Title 3.09 are included below.

*E. The applicant shall pay the requisite fee. The fee for a boundary change shall be established by resolution of the City Council. (Ord. 1442, 1999)*

**Applicant's Finding:** The City of West Linn Master Fees and Charges Schedule includes an annexation fee (Section 9.1) of \$8,000 plus \$1,000 per acre above 1.0 acres. Zone change fees are included in the cost of the annexation (see Staff's pre-application meeting summary dated May 1, 2025). The annexation fee for this 1.29-acre site totals \$9,000. A check made payable to the City of West Linn for the abovementioned sum is included with this application. This criterion is met.

#### **81.050 APPROVAL CRITERIA**

*The City Council shall approve a boundary change proposal based on findings and conclusions that the proposal complies with the criteria of Metro Code Section 3.09.050(D) and:*

**Applicant's Finding:** The applicable Metro Code criteria are responded to below. The criterion is met.

*A. West Linn Municipal Code Section 2.920, Step 1: Land Use Decision.*

- 1. The application of the zoning designation shall follow the criteria in CDC [81.055](#).*

**Applicant's Finding:** The findings provided by the applicant within this narrative satisfies all criteria from Chapter 81 of the City's Community Development Code. The criteria in Step One are met.

*B. West Linn Municipal Code Section 2.930, Step 2: Policy Decision. (Ord. 1442, 1999; Ord. 1635 § 29, 2014; Ord. 1675 § 52, 2018)*

**Applicant's Finding:** The findings provided by the applicant within this narrative satisfies all criteria from West Linn Municipal Code Section 2.930. The criteria in Step One are met.

#### **81.055 ZONING DESIGNATION**

*A decision on annexation shall also incorporate a decision on a zoning designation. The applicant may concurrently apply for a comprehensive plan amendment if desired. Any approval of an annexation shall designate the City zone to be applied if the annexation is approved by the voters.*



The City zone shall be designated based upon the existing West Linn comprehensive plan/land use designation, pursuant to the following table:

COMPREHENSIVE PLAN/LAND USE DESIGNATION	ASSIGNED ZONING DISTRICT
Low Density Residential	R-40, R-20, R-15, R-10 or R-7

Where the City Council has discretion to apply zoning, the Council shall consider the following factors in making its decision:

A. *Specific site characteristics such as topography, drainage, and existing vegetation.*

**Applicant's Finding:** The existing parcel slopes from north to south with slopes between 5% -15%. The area is mostly clear with large grassy areas approximately 15 pine trees and deciduous trees grouped in the middle of parcel. Most of the trees lie within the future right of way extension of Roxbury Drive. Stormwater will be collected and routed to an existing stormwater facility to the east of the site.

B. *The existing zoning and development patterns of surrounding properties.*

**Applicant's Finding:** The City of West Linn Comprehensive Plan designates the subject site as Low Density Residential. As shown in the table above, this land use designation corresponds with residential zoning from R-7 (7,000-square foot minimum lot size) to R-40 (40,000-square foot minimum lot size). The application requests that the R-7 Single-Family District be assigned to the property. R-7 zoning is consistent with the existing pattern of development in this area as the median lot size of all properties within one-quarter mile of the subject site is approximately 8,500 square feet.

C. *The capacity of the City to provide road, sanitary sewer, storm drainage, and water service to the site. (Ord. 1442, 1999; Ord. 1528, 2005; Ord. 1590 § 1, 2009; Ord. 1635 § 30, 2014)*

**Applicant's Finding:** During the preapplication conference Engineering staff confirmed that adequate road, sanitary sewer, storm drainage, and water service exist to accommodate development on this site at R-7 density.

Future development of this site would include new sidewalks along both sides of Roxbury Drive and provide street stubs to provide access to homes on site and on abutting properties to the north and west. Potential future development on the site would also include the construction of new water, sanitary sewer, and stormwater facilities to serve future homes in the area. Future residential development of the site would contribute system development charge revenue to the City's water, sanitary sewer, stormwater, transportation, parks, and bicycle and pedestrian funds as a direct payment to offset long-term and ongoing impacts to City infrastructure. The criteria are met.

#### 105.050 QUASI-JUDICIAL AMENDMENTS AND STANDARDS FOR MAKING DECISION

*A decision to approve, approve with conditions, or to deny an application for a quasi-judicial amendment shall be based on all of the following standards:*

A. *The standards set forth in CDC [99.110](#)(A), which provide that the decision shall be based on consideration of the following factors:*

- 1. The applicable Comprehensive Plan policies as identified in subsection C of this section and map designation.*
- 2. The applicable standards of any provision of this code or other applicable implementing ordinance.*

**Applicant's Finding:** All applicable zone change criteria, including all applicable Comprehensive Plan policies identified in 105.050.C. below, are responded to within this narrative. The criteria are met.

B. The standards set forth in CDC [99.110\(B\)](#), which provide that, in making the decision, consideration may also be given to the following:

1. Proof of change in the neighborhood or community or a mistake or inconsistency in the Comprehensive Plan or Zoning Map as it relates to the property which is the subject of the development application.

2. Factual oral testimony or written statements from the parties, other persons and other governmental agencies relevant to the existing conditions, other applicable standards and criteria, possible negative or positive attributes of the proposal or factors in sub-section A or (B)(1) of this section.

**Applicant's Finding:** The property that is the subject of this Annexation application is one of the remaining pockets in this area of West Linn that is under the jurisdiction of Clackamas County. As the remaining land within the urban growth boundary continues to slowly be developed, these types of pockets in this area have been incorporated into the City of West Linn's corporate boundary.

Today, this small island of County-zoned land relies on City transportation facilities and other services provided by the City of West Linn and Tualatin Valley Fire and Rescue. Additionally, the proximity of urbanized land makes farming and forestry uses inconsistent with surrounding residential development. Clackamas County and West Linn continue to experience residential development, creating much needed affordable housing within the urban growth boundary. Annexation and rezoning of this property will bring one of the remaining unincorporated areas into the city.

It is important to remember that the City has been actively planning for the inclusion of this land into its corporate boundary for some time. As discussed above, West Linn's adopted Comprehensive Plan designates the subject site as appropriate for Low Density Residential development. This land use designation allows for residential development at R-7 density (7,000-square foot minimum lot size). The application provides for the establishment of R-7 zoning on this site and is therefore wholly consistent with the City's Comprehensive Plan. The criteria are met.

C. The Comprehensive Plan, Plan and Ordinance Revision Process, and Specific Policy No. 4, which provides that the decision shall be based on consideration of the following criteria:

1. Conformance with the Comprehensive Plan policies and criteria.
2. There is a public need for the change or the change can be demonstrated to be in the interest of the present and future community.
3. The changes will not adversely affect the health, safety and welfare of the community.

**Applicant's Finding:** Responses to the applicable policies of the West Linn Comprehensive Plan are included below. The criteria are met.

D. Transportation Planning Rule compliance.

1. Review of applications for effect on transportation facilities. When a development application, whether initiated by the City or by a private interest, includes a proposed comprehensive plan amendment zone change or land use regulation change, the proposal shall be reviewed to determine whether it significantly affects a transportation facility, in accordance with Oregon Administrative Rule (OAR) 660-012-0060 (the Transportation Planning Rule: "TPR").

"Significant" means the proposal would:

- a. Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);
- b. Change standards implementing a functional classification system; or
- c. As measured at the end of the planning period identified in the adopted transportation system plan:

- 1) Allow land uses or levels of development that would result in types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

- 2) *Reduce the performance of an existing or planned transportation facility below the minimum acceptable performance standard identified in the TSP or comprehensive plan; or*
- 3) *Worsen the performance of an existing or planned transportation facility that is otherwise projected to perform below the minimum acceptable performance standard identified in the TSP or comprehensive plan.*

**Applicant's Finding:** The Comprehensive Plan currently designates the subject property as Low Density Residential, which corresponds to the R-7 zoning designation. This application does not request an amendment to this Comprehensive Plan land use designation, or any other regulation. These criterion do not apply.

*2. Amendments that affect transportation facilities. Amendments to the Comprehensive Plan and land use regulations that significantly affect a transportation facility shall ensure that allowed land uses are consistent with the function, capacity, and level of service of the facility identified in the TSP. This shall be accomplished by one or a combination of the following:*

- a. Adopting measures that demonstrate allowed land uses are consistent with the planned function, capacity, and performance standards of the transportation facility.*
- b. Amending the TSP or Comprehensive Plan to provide transportation facilities, improvements or services adequate to support the proposed land uses consistent with the requirements of OAR [660-012-0060](#) of the TPR.*
- c. Altering land use designations, densities, or design requirements to reduce demand for automobile travel and meet travel needs through other modes of transportation.*
- d. Amending the TSP to modify the planned function, capacity or performance standards of the transportation facility.*

**Applicant's Finding:** The Comprehensive Plan currently designates the subject property as Low Density Residential, which corresponds to the R-7 zoning designation. This application does not request an amendment to this Comprehensive Plan land use designation, or any other regulation. These criterion do not apply.

*3. Traffic impact analysis. A traffic impact analysis shall be submitted with a plan amendment or land use district change application. (Ord. 1584, 2008)*

**Applicant's Finding:** A Traffic Impact Analysis Memo dated August 18, 2025 was prepared by Ard Engineering and is included in Exhibit F.

#### **Municipal Code Findings:**

The Municipal Code can be found at: <https://www.codepublishing.com/OR/WestLinn/index.html>  
Chapter 2 GOVERNMENT AND ADMINISTRATION

*2.915 Annexation Purpose Statement.*

*(1) The purpose of Sections [2.915](#) to [2.940](#) is to establish a two-step process for annexation applications. The first step is a land use decision. The second step is a policy decision by the City Council to determine if the annexation should be approved. The Step 1 and Step 2 decisions can occur at the same meeting. An annexation to the City shall not be effective unless it is approved by the City Council at its discretion and by Metro pursuant to its authority regarding annexations within its boundaries.*

**Applicant's Finding:** The applicant acknowledges that an annexation to the City shall not be effective unless it is approved by the City Council at its discretion and by Metro pursuant to its authority regarding annexations within its boundaries.

*(2) The procedures and standards established in this chapter are required for review of proposed annexations in order to:*

- (a) Provide adequate public notice, information and sufficient time for public review before annexation hearings and elections;*
- (b) Maximize citizen involvement in the annexation review process; and*
- (c) Provide information to the public concerning the physical, environmental, financial and related social effects of annexation.*

**Applicant's Finding:** The applicant acknowledges the above requirements and provides this narrative and accompanying exhibits to demonstrate the annexation satisfies the required criteria.

*2.920 Step 1: Land Use Decision.*

*When an annexation application has been properly initiated pursuant to ORS [222.111](#), [222.125](#), [222.170](#), or [222.840](#), Step 1 shall include review of the land use aspect of the petition pursuant to Community Development Code Chapter 81. If the application receives Council approval through the Step 1 process, the Council shall proceed to Step 2. A determination that the application meets the land use requirements does not obligate the City to approve the annexation application.*

**Applicant's Finding:** As detailed throughout this narrative, the application satisfies all criteria from Chapter 81 of the City's Community Development Code. The criteria in Step One are met.

*2.930 Step 2: Policy Decision.*

*(1) Step 2 of the annexation process is a policy decision and shall follow the steps in the subsections below.*

*(2) If the annexation is approved in the Step 1 process, the Planning Director shall prepare a report which includes the following information:*

- (a) General information on the property or properties, including but not limited to location, size, access to infrastructure, recommended zone, protected resource areas and infrastructure status;*
- (b) Impact on the school district, including but not limited to impacted schools, taxes, and anticipated number of additional students;*
- (c) Cost to City of infrastructure that is not funded by SDCs; and*
- (d) Tax implications for the City.*

*(3) Following delivery of the report and consideration of the report by the City Council at a public meeting, the Council may, in its discretion, decide to set a public hearing for the annexation request, delay a public hearing on the requested annexation or pass a resolution placing the annexation request on a ballot for an advisory vote, at any election. At the public meeting, any person may appear and be heard on the questions of whether the annexation should proceed and whether the request should be placed on the ballot for an advisory vote.*

*(4) If City Council decides to proceed to a public hearing on the requested annexation without an advisory vote, a public hearing will be scheduled. Notice of the Step 2 public hearing shall be published in accordance with State law and the Metro Code.*

*(5) The City Council may approve an annexation request if it finds that the annexation is in the best interest of the City based on the report prepared by the Planning Director; testimony and evidence presented at the public hearing; and any other information, evidence, or analysis the City or the Council deems relevant to the application.*

*(6) The City Council may deny an annexation acting in its legislative capacity even after it has approved the annexation application through the Step 1 process. A decision to deny an annexation in Step 2 shall be specifically stated in the record and noted as a legislative act separate and apart from the land use decision in Step 1.*

**Applicant's Finding:** The applicant acknowledges step 2 of the approval process. No response is necessary.

**West Linn's Comprehensive Plan Findings:**

(Comprehensive Plan can be found:

[https://westlinnoregon.gov/sites/default/files/fileattachments/planning/page/6526/west\\_linn\\_comprehensive\\_plan\\_-\\_updated\\_07-31-2017.pdf](https://westlinnoregon.gov/sites/default/files/fileattachments/planning/page/6526/west_linn_comprehensive_plan_-_updated_07-31-2017.pdf))

*The following Goals and Policies within the City of West Linn's Comprehensive Plan are applicable and provide guidance regarding the annexation of properties into the City. The City's Comprehensive Plan provides a series of over-arching guidance for growth and development within the City. Structured as a goal setting and policy document, the guidance provided by the Comprehensive plan is meant to inform decisions and create a framework for the Community Development Code, which implements the visions, goals, and policies of the Plan.*

**Goal 2: Land Use Planning**

**Applicant's Finding:** The proposed development meets the land use criterion outlined in the comprehensive plan. The proposed future development is consistent with surrounding living





environments and densities and is compatible with the residential character of the existing surrounding neighborhood and adopted neighborhood plans. As documented in other portions of this narrative, services and infrastructure are available with adequate capacity to serve the project.

*Goal 11: Public Facilities and Services*

**Applicant's Finding:** The City requires a pre-application conference prior to accepting an application for annexation. Affected public service agencies are invited to attend and/or submit feedback during the pre-application meeting. Additionally, the City provides notice to potentially affected public service agencies of the application and notice of public hearings before the Planning Commission and City Council. These opportunities for outreach encourage cooperation and coordination between the City and potentially affected public service agencies and facilitate orderly development and service provision. The Policy is met.

*Goal 14: Urbanization*

**Applicant's Finding:** The adopted Comprehensive Plan (and the public outreach and coordination between affected stakeholders and interested parties which occurs as part of that process) and the procedural requirements for an annexation and zone change application (i.e., pre-application conference, public notices, and public hearings) ensures that opportunities for input and cooperation as expressed in Goal 14 are honored. Potential future development of this property requires the full range of infrastructure improvements necessary to serve new homes. At the time of new home construction, the City will also assess SDC fees to offset impacts to facilities and services City-wide.

**Metro Code Findings:**

Metro Code can be found at:

<https://www.oregonmetro.gov/sites/default/files/2017/09/20/complete-Metro-Code-updated-20170920.pdf>

*3.09.040 Requirements for Petitions*

*A. A petition for a boundary change must contain the following information:*

- 1. The jurisdiction of the reviewing entity to act on the petition;*
- 2. A map and a legal description of the affected territory in the form prescribed by the reviewing entity;*
- 3. For minor boundary changes, the names and mailing addresses of all persons owning property and all electors within the affected territory as shown in the records of the tax assessor and county clerk; and*
- 4. For boundary changes under ORS 198.855( 3), 198.857, 222.125 or 222.170, statements of consent to the annexation signed by the requisite number of owners or electors.*

**Applicant's Finding:** The Applicant seeks annexation into the incorporated limits of the City of West Linn. The City of West Linn has jurisdiction over amendments/annexations into its corporate boundary. A map and legal description of the affected territory are included in Exhibit C. The names and mailing addresses of all persons owning property and all electors within the affected territory are included in Exhibit A. Signed statements of consent to the annexation are included in Exhibit A. These criterion are met.

*B. A city, county and Metro may charge a fee to recover its reasonable costs to carry out its duties and responsibilities under this chapter.*

**Applicant's Finding:** The Applicant has enclosed a check made payable to Metro in the amount of \$250 for the annexation review fee and a check to the City of West Linn in the amount of \$9,000. The criterion is met.

*3.09.045 Expedited Decisions*

*A. The governing body of a city or Metro may use the process set forth in this section for minor boundary changes for which the petition is accompanied by the written consents of one hundred percent of property owners and at least fifty percent of the electors, if any, within the affected territory. No public hearing is required.*

**Applicant's Finding:** The proposed minor boundary change consists of one parcel. The petition is accompanied by the written consent of one hundred percent of property owners of that property.

*B. The expedited process must provide for a minimum of 20 days' notice prior to the date set for decision to all necessary parties and other persons entitled to notice by the laws of the city or Metro. The notice shall state that the petition is subject to the expedited process unless a necessary party gives written notice of its objection to the boundary change.*

**Applicant's Finding:** The applicant acknowledges this requirement. No response necessary.

*C. At least seven days prior to the date of decision the city or Metro shall make available to the public a report that includes the following information:*

- 1. The extent to which urban services are available to serve the affected territory, including any extra- territorial extensions of service;*
- 2. Whether the proposed boundary change will result in the withdrawal of the affected territory from the legal boundary of any necessary party; and*
- 3. The proposed effective date of the boundary change.*

**Applicant's Finding:** The applicant acknowledges this requirement. No response necessary.

*D. To approve a boundary change through an expedited process, the city shall:*

- 1. Find that the change is consistent with expressly applicable provisions in:*
  - a. Any applicable urban service agreement adopted pursuant to ORS 195.065;*
  - b. Any applicable annexation plan adopted pursuant to ORS 195.205;*
  - c. Any applicable cooperative planning agreement adopted pursuant to ORS 195.020(2) between the affected entity and a necessary party;*
  - d. Any applicable public facility plan adopted pursuant to a statewide planning goal on public facilities and services;*
  - e. Any applicable comprehensive plan;*
  - f. Any applicable concept plan; and*

**Applicant's Finding:** The City of West Linn and Clackamas County do not maintain an urban services agreement, annexation plan, or cooperative planning agreement. The City's Transportation Systems Plan shows a new east-west connection through this area, originating at Roxbury Drive. The annexation is consistent with the City of West Linn's Comprehensive Plan, which establishes a Low Density Residential Land Use designation on the subject property. Potential future development of this property will be in accordance with all applicable standards. The criteria are met.

*2. Consider whether the boundary change would:*

*a. Promote the timely, orderly and economic provision of public facilities and services;*

**Applicant's Finding:** The proposed boundary change will promote the timely, orderly and economic provision of public facilities and services. Once the change is adopted the property owner will immediately submit a land use application to subdivide the property.

*b. Affect the quality and quantity of urban services; and*

**Applicant's Finding:** As confirmed by staff at the May 1, 2025 pre-application conference, adequate urban services are currently available to serve future development on this property.

*c. Eliminate or avoid unnecessary duplication of facilities or services.*

**Applicant's Finding:** An 8-inch PVC sanitary sewer main and an 8-inch ductile iron water main are located in Roxbury Drive. Both will be extended thru the property to a point where they can serve future development to the west of the site. Stormwater runoff generated by future development on the site will be directed to an existing stormwater management facility east of the site.

*E . A city may not annex territory that lies outside the UGB, except it may annex a lot or parcel that lies partially within and partially outside the UGB.*

**Applicant's Finding:** The property is inside the UGB.

### **Summary/Conclusion**

All submittal requirements have been met and the required responses have been provided for all applicable approval criteria. The provided findings serve as the basis for the City of West Linn to approve this application and are supported by substantial evidence in the application materials. Therefore, the City can rely upon this information in its approval of the application.





## APPENDIX A - APPLICATION FORM & ANNEXATION PETITION



8:08:37

## APPENDIX B— CERIFICATION OF PROPERTY OWNERSHIP



## CITY OF WEST LINN

### CERTIFICATION OF PROPERTY OWNERSHIP

I hereby certify that the attached petition for annexation of the territory described herein to the City of West Linn contains the names of the owners\* of a majority of the land area of the territory to be annexed, as shown on the last available complete assessment roll.



NAME TERRY DONOHAN  
TITLE GIS CARTOGRAPHER 3  
DEPARTMENT A&T  
CLACKAMAS COUNTY ASSESSOR'S OFFICE  
DATE 9/9/25

\* "Owner" means the owner of the title to real property or the contract purchaser of real property.

\* \* \* \* \*

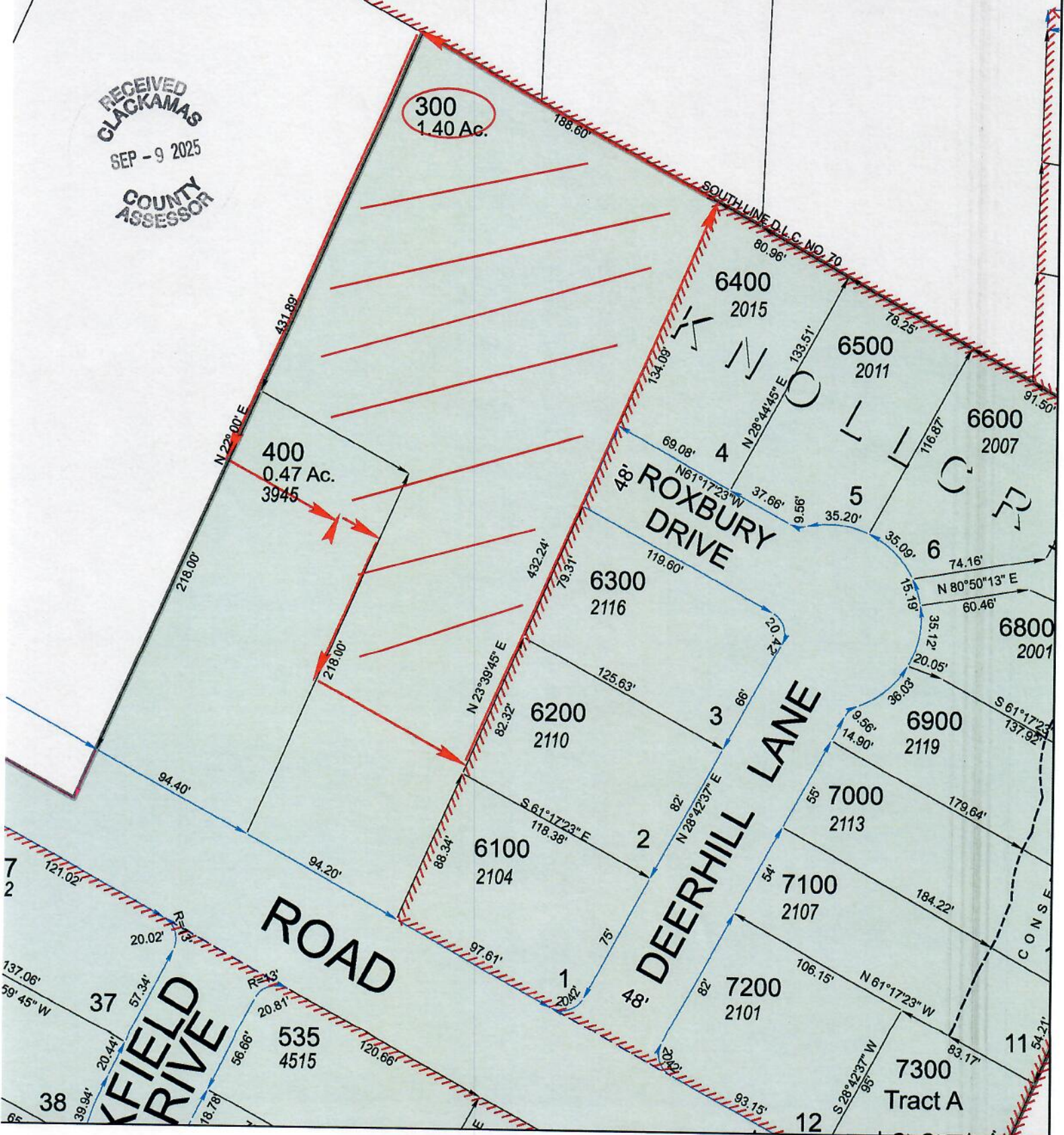
### CERTIFICATION OF REGISTERED VOTERS

I hereby certify that the attached petition for annexation of territory described herein to the City of West Linn contains the names of at least a majority of the electors registered in the territory to be annexed.

NAME \_\_\_\_\_  
TITLE \_\_\_\_\_  
DEPARTMENT \_\_\_\_\_  
CLACKAMAS COUNTY ASSESSOR'S OFFICE  
DATE \_\_\_\_\_



RECEIVED  
CLACKAMAS  
SEP - 9 2025  
COUNTY  
ASSESSOR



APPENDIX C – CERTIFICATION OF LEGAL DESCRIPTION AND EXHIBIT MAP



## CITY OF WEST LINN

### CERTIFICATION OF LEGAL DESCRIPTION AND MAP

I hereby certify that the description of the property included within the attached petition  
(located on Assessor's Map 251E25CC)  
has been checked by me and it is a true and exact description of the property under  
consideration, and the description corresponds to the attached map indicating the property  
under consideration.



NAME Terri Donohue  
TITLE GIS CARTOGRAPHER 3  
DEPARTMENT A-T  
CLACKAMAS COUNTY ASSESSOR'S OFFICE  
DATE 9/1/25



**AFTER RECORDING RETURN TO:**

Raymond Richard Hill  
3945 S Parker Rd  
West Linn, OR 97068

Clackamas County Official Records  
Catherine McMullen, County Clerk

**2025-032739**

08/22/2025 03:11:04 PM

D-D Cnt=1 Stn=76 ALICIA  
\$30.00 \$16.00 \$10.00 \$62.00

**\$118.00**

**TAX STATEMENTS TO:**

Same as above

**Bargain and Sale DEED for PROPERTY LINE ADJUSTMENT**

Raymond Richard Hill, Grantor, conveys to, Gary T. Randall, Grantee, the following described real property shown as Exhibit "B" in the County of Clackamas and State of Oregon:

See Exhibit "A" Conveyance to Tract 2  
See Exhibit "B" Conveyance to Tract 1  
See Exhibit "C" Legal Description Tract 1  
See Exhibit "D" Legal Description Tract 2

THIS DEED IS BEING RECORDED TO COMPLETE A PROPERTY LINE ADJUSTMENT IN  
Clackamas County CASEFILE NUMBER: Z0153-25.

Subject to all encumbrances of record.

The true consideration for this conveyance is \$ 0 However the actual consideration consists of other value or property give which is the whole consideration.

The information required by ORS 92.190(4) is as follows:

1. The names of the parties to this deed are as set forth above.
2. The description of the adjusted parcels is as follows: see exhibit A.
3. The deed where Grantor acquired title to the transferred property was recorded as 2023-006464 on February 28<sup>th</sup>, 2023 of Clackamas County Deed records.
4. The deed where Grantee acquired title to the transferred property was recorded as 2019-072494 on November 15<sup>th</sup>, 2019 of Clackamas County Deed records.

BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON TRANSFERRING FEE TITLE SHOULD INQUIRE ABOUT THE PERSON'S RIGHTS, IF ANY, UNDER ORS 195.300, 195.301 AND 195.305 TO 195.336 AND SECTIONS 5 TO 11, CHAPTER 424, OREGON LAWS 2007, SECTIONS 2 TO 9 AND 17, CHAPTER 855, OREGON LAWS 2009, AND SECTIONS 2 TO 7, CHAPTER 8, OREGON LAWS 2010. THIS INSTRUMENT DOES NOT ALLOW USE OF THE PROPERTY DESCRIBED IN THIS INSTRUMENT IN VIOLATION OF APPLICABLE LAND USE LAWS AND REGULATIONS. BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON ACQUIRING FEE TITLE TO THE PROPERTY SHOULD CHECK WITH THE APPROPRIATE CITY OR COUNTY PLANNING DEPARTMENT TO VERIFY THAT THE UNIT OF LAND BEING TRANSFERRED IS A LAWFULLY ESTABLISHED LOT OR PARCEL, AS DEFINED IN ORS 92.010 OR 215.010, TO VERIFY THE APPROVED USES OF THE LOT OR PARCEL, TO DETERMINE ANY LIMITS ON LAWSUITS AGAINST FARMING OR FOREST PRACTICES, AS DEFINED IN ORS 30.930, AND TO INQUIRE ABOUT THE RIGHTS OF NEIGHBORING PROPERTY OWNERS, IF ANY, UNDER ORS 195.300, 195.301 AND 195.305 TO 195.336 AND SECTIONS 5 TO 11, CHAPTER 424, OREGON LAWS 2007, SECTIONS 2 TO 9 AND 17, CHAPTER 855, OREGON LAWS 2009 AND SECTIONS 2 TO 7, CHAPTER 8, OREGON LAWS 20

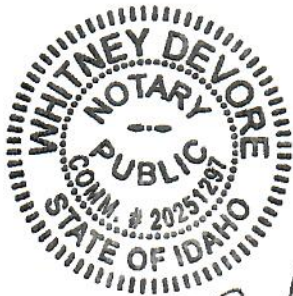


G. T. Randall  
By: Gary T. Randall

Idaho Ada  
STATE OF OREGON, County of Clackamas ) ss.  
WD WD

This instrument was acknowledged before me on August 20, 2025 by Gary T. Randall.

Whitney DeVore  
Notary Public for Oregon WD Idaho  
My Commission Expires: 4/4/2031



Raymond Richard Hill  
By: Raymond Richard Hill

STATE OF OREGON, County of Clackamas ) ss.

This instrument was acknowledged before me on August 18, 2025 by Raymond Richard Hill.

Julie Rauen  
Notary Public for Oregon  
My Commission Expires: 10-27-28





ANDY PARIS & ASSOCIATES, INC.  
REGISTERED PROFESSIONAL LAND SURVEYORS

June 8, 2025  
Project No. 25076

Page 1 of 1

**EXHIBIT 'C'**  
**LEGAL DESCRIPTION: TRACT 1**

Being portions of those tracts of lands as described in Fee Numbers. 2019-072494 & 2023-006464, Clackamas County deed records, situated in the Julia Ann Lewis Donation Land Claim No. 54, in the Southwest One-Quarter of Section 25, Township 2 South, Range 1 East, of the Willamette Meridian, Clackamas County, Oregon, being more particularly described as follows:

**BEGINNING AT** a point on the northeasterly line of said Julia Ann Lewis Donation Land Claim (DLC) No. 54, being 3206.44 feet southeasterly of the northerly corner thereof, which point is the northeast corner of said Fee No. 2019-072494, and the northwest corner of "KNOLLCREST" (Plat No. 4627), Clackamas County plat records, which point bears S23°39'45"W 0.16 feet from a found 5/8-inch iron rod with a yellow plastic cap marked "AKS ENGR"; thence along said northeasterly DLC line, N61°15'53"W a distance of 188.71 feet to the northwest corner of said Fee No. 2019-072494, being also the northeast corner of Fee No. 2023-006357, a found 5/8-inch iron rod with a yellow plastic cap marked "LOVE LS747" bears N23°42'49"E 0.22 feet; then leaving said DLC line, and running along the common line of said Fee Numbers 2019-072494, 2023-006464, & 2023-006357, S23°42'49"W a distance of 256.67 feet to a set 5/8-inch iron rod with a yellow plastic cap marked "ANDY PARIS & ASSOC INC" on the westerly line of said Fee No. 2023-006464; thence leaving westerly line, S61°16'29"E a distance of 69.37 feet to a set 5/8-inch iron rod with a yellow plastic cap marked "ANDY PARIS & ASSOC INC"; thence N23°42'39"E a distance of 3.26 feet to a set 5/8-inch iron rod with a yellow plastic cap marked "ANDY PARIS & ASSOC INC"; thence S61°16'29"E a distance of 25.03 feet to a set 5/8-inch iron rod with a yellow plastic cap marked "ANDY PARIS & ASSOC INC" on the easterly line of said Fee No. 2023-006464; thence along the easterly line thereof, S23°42'49"W a distance of 85.39 feet to a set 5/8-inch iron rod with a yellow plastic cap marked "ANDY PARIS & ASSOC INC"; thence leaving said easterly line, S61°16'29"E a distance of 94.62 feet to the easterly line of said Fee No. 2019-072494, being coincident with the westerly line of said "KNOLLCREST", said point being marked with a set 5/8-inch iron rod with a yellow plastic cap marked "ANDY PARIS & ASSOC INC"; thence along said westerly line, N23°39'45"E a distance of 338.78 feet to the **POINT OF BEGINNING**.

Containing 55,934 square feet. (1.284 acres more or less)



RENEWS 12/31/2026



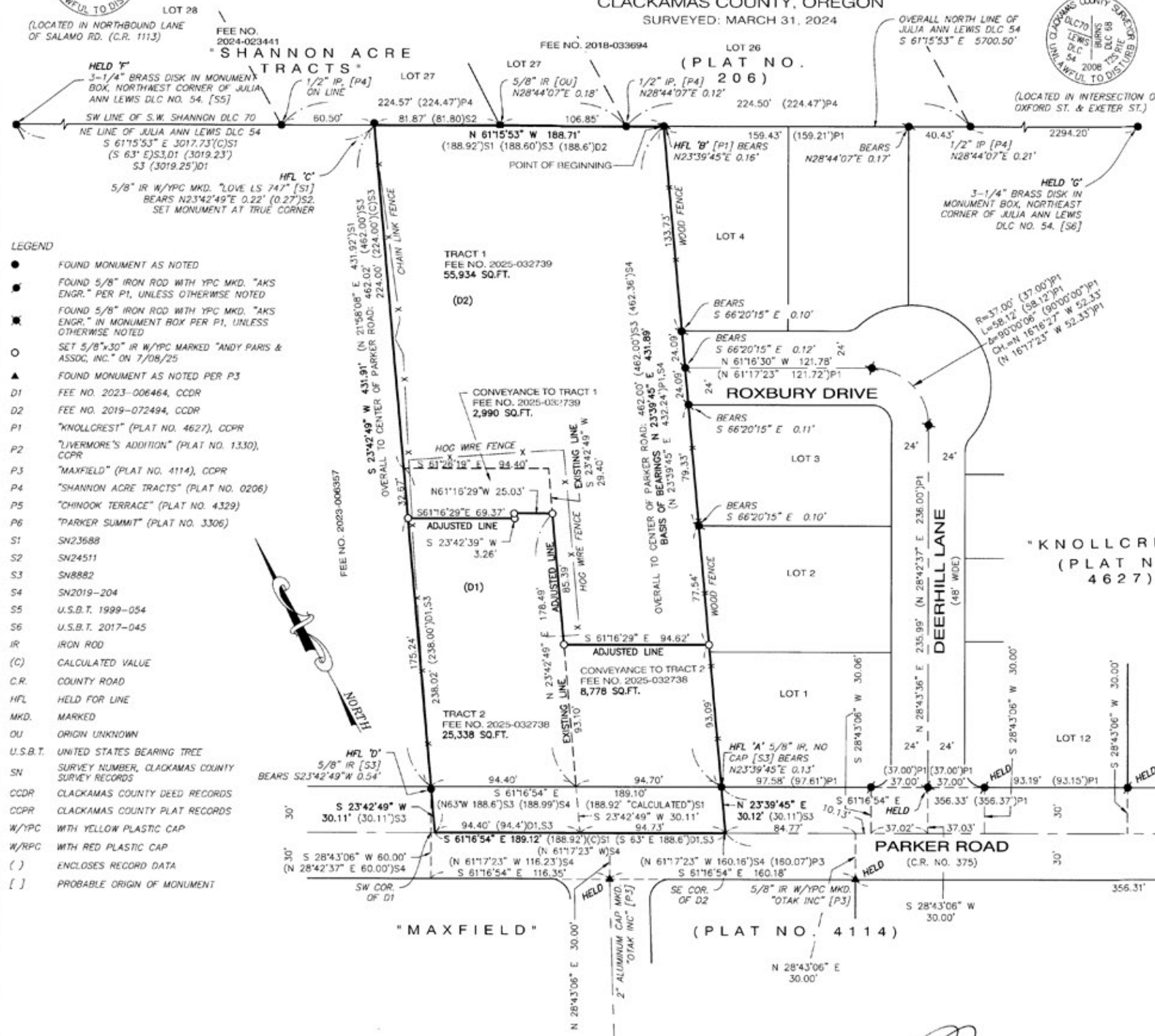


# PROPERTY LINE ADJUSTMENT SURVEY

FOR: BLUE PALOUSE PROPERTIES  
SITUATED IN THE JULIA ANN LEWIS DLC NO. 54  
IN THE SW 1/4 SECTION 25, T.2S, R.1E, W.M.  
CLACKAMAS COUNTY, OREGON

SURVEYED: MARCH 31, 2024

CLACKAMAS COUNTY SURVEYOR  
DATE RECEIVED: 06/11/2025  
DATE ACCEPTED/FILED: 08/28/2025  
SURVEY NUMBER: SN 2025-199



- LEGEND**
- FOUND MONUMENT AS NOTED
  - FOUND 5/8" IRON ROD WITH YPC MKD. "AKS ENGR." PER P1, UNLESS OTHERWISE NOTED
  - FOUND 5/8" IRON ROD WITH YPC MKD. "AKS ENGR." IN MONUMENT BOX PER P1, UNLESS OTHERWISE NOTED
  - SET 5/8"x30" IR W/YPC MARKED "ANDY PARIS & ASSOC. INC." ON 7/08/25
  - ▲ FOUND MONUMENT AS NOTED PER P3
  - D1 FEE NO. 2023-006464, CCOR
  - D2 FEE NO. 2019-072494, CCOR
  - P1 "KNOLLCREST" (PLAT NO. 4627), CCOR
  - P2 "LIVERMORE'S ADDITION" (PLAT NO. 1330), CCOR
  - P3 "MAXFIELD" (PLAT NO. 4114), CCOR
  - P4 "SHANNON ACRE TRACTS" (PLAT NO. 0206)
  - P5 "CHINOOK TERRACE" (PLAT NO. 4329)
  - P6 "PARKER SUMMIT" (PLAT NO. 3306)
  - S1 SN23688
  - S2 SN24511
  - S3 SN8882
  - S4 SN2019-204
  - S5 U.S.B.T. 1999-054
  - S6 U.S.B.T. 2017-045
  - IR IRON ROD
  - (C) CALCULATED VALUE
  - C.R. COUNTY ROAD
  - HFL HELD FOR LINE
  - MKD. MARKED
  - OU ORIGIN UNKNOWN
  - U.S.B.T. UNITED STATES BEARING TREE
  - SN SURVEY NUMBER, CLACKAMAS COUNTY SURVEY RECORDS
  - CCOR CLACKAMAS COUNTY DEED RECORDS
  - CCOR CLACKAMAS COUNTY PLAT RECORDS
  - W/YPC WITH YELLOW PLASTIC CAP
  - ( ) ENCLOSES RECORD DATA
  - [ ] PROBABLE ORIGIN OF MONUMENT

**PURPOSE**  
THE PURPOSE OF THIS SURVEY IS TO LOCATE AND ADJUST THE COMMON LINES BETWEEN TRACTS OF LANDS DESCRIBED IN FEE NUMBERS 2023-006464 AND 2019-072494, CLACKAMAS COUNTY DEED RECORDS, PER CLACKAMAS COUNTY LAND USE FILE NO. 20153-25, FOR THE PURPOSES OF A FUTURE SUBDIVISION (NO SUBDIVISION NAME RESERVED AT THIS TIME).

**BASIS OF BEARINGS**  
HELD N23°39'45"E PER S4 & P1, THROUGH MONUMENTS 'A' & 'B', SET IN S3 & P1 AS SHOWN.

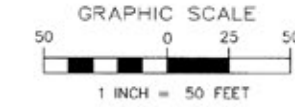
**NARRATIVE**  
THE SOUTHERLY LINE OF D1 & D2 SUBJECT PROPERTIES, WAS HELD ALONG THE CENTERLINE OF PARKER ROAD PER D1, D2, S3 AND PLATS P1 & P5. THE CENTERLINE OF PARKER ROAD (COUNTY ROAD 375, 60' WDE) WAS HELD BY HOLDING A LINE FROM MONUMENT 'E' (P5), THROUGH SEVERAL RECORD PLAT AND SURVEY OFFSETS OF 30.00' TO MONUMENTS ALONG RIGHT OF WAY LINES PARALLEL WITH AND 30.00 FEET NORTHERLY AND SOUTHERLY OF CENTERLINE THEREOF.

THE EASTERLY LINE OF D2 WAS HELD PER S3 & P1, RUNNING THROUGH MONUMENT 'A' SET IN S3 TO MONUMENT 'B' SET IN P1, EXTENDING SAID TO THE CENTERLINE OF PARKER ROAD PER D1, D2, & S3.

THE NORTHERLY LINE OF D2, BEING THE NORTHEASTERLY LINE OF DLC NO. 54 WAS HELD BETWEEN THE LOCATED DLC MONUMENTS 'F' & 'G' AS SHOWN.

THE WESTERLY LINE OF D1 & D2 WAS HELD PER S1 & S3 BY RUNNING A LINE THROUGH MONUMENTS 'C' SET IN S1 AND 'F' SET IN S3, EXTENDING SAID TO THE CENTERLINE OF PARKER ROAD PER D1, D2, & S3.

THE ADJUSTED LINES WERE DETERMINED BY PROPERTY OWNERS AND CLIENTS.



APPROVED BY: Roman Sierra 9/3/2025  
CLACKAMAS COUNTY PLANNING DEPARTMENT  
CLACKAMAS COUNTY LAND USE FILE NO. 20153-25

REGISTERED PROFESSIONAL LAND SURVEYOR  
OREGON  
SEPTEMBER 10, 2019  
BRIAN LEGGS  
77667PLS  
RENEW: DEC. 31, 2026

**ANDY PARIS & ASSOCIATES**  
LAND SURVEYORS, SINCE 1952  
15450 BOONES FERRY ROAD, SUITE 7, LAKE OSWEGO, OR 97035  
PH. 503.636.3341 | WWW.ANDYPARIS.COM  
PROJECT: 25076 | DRAWING: 25076PLA | DRAFTED: BL 6/08/2025

## APPENDIX D – VICINITY MAP





NTS



Vando Development LLC  
915 SW Rimrock Way, Ste 201-230  
Redmond, OR 97756

## VICINITY MAP

DATE

FIGURE

## APPENDIX E – TRAFFIC IMPACT ANALYSIS MEMO





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

## Technical Memorandum

**To:** Rob Matthews,  
Blue Palouse Properties

**From:** Michael Ard, PE

**Date:** August 18, 2025

**Re:** Parker Road Annexation Traffic Impact Analysis Memo

RENEWS: 12/31/2025

This memorandum is written to provide information regarding the potential traffic impacts associated with a proposed annexation of tax lot 21E25CC00300 into the City of West Linn and an accompanying zone change from Clackamas County FU-10 zoning to City of West Linn R7 zoning.

### Property Description

The subject property is located on the north side of Parker Road west of Deerhill Lane and has a gross area of approximately 1.39 acres. Although Parker Road abuts the south side of the subject property, it is anticipated that future site access will be via Deerhill Lane and an extension of Roxbury Drive, which currently stubs to the east side of the property.

To assess the potential transportation impacts of the proposed change in zoning, estimates of the trips that could be generated under the "reasonable worst case" development scenarios were prepared for both the current Clackamas County FU-10 zoning and the proposed City of West Linn R7 zoning. The resulting change in trips between the two scenarios represents the change in traffic which could result from the proposed zone change.

### Background Clackamas County FU-10 Zoning Description

Currently, the property is outside the city limits of the City of West Linn and is zoned FU-10 (Future Urban 10-acre) by Clackamas County. Uses permitted in the FU-10 zone include farming- and forestry-related uses as well as government owned parks and places of worship. However, the most likely reasonable, permitted use of the property under the FU-10 zoning would be construction of a single-family home or duplex on the property.

### Proposed City of West Linn R7 Zoning Description

Upon annexation into the City of West Linn, it is proposed that R7 residential zoning be applied to the subject property. This zoning allows development with single-family homes, duplex, triplex and quadplex units, cottage clusters, townhomes, and community recreation. Family day care facilities are also permitted; however, certified child-care centers require a conditional use permit in this zone.



The minimum lot sizes in the R7 zone are 7,000 square feet for single-family detached housing, 5,500 square feet per unit for single-family attached housing, and 1,500 square feet per townhouse unit.

Based on the size of the property plus the expectation that Roxbury Drive will be extended through the site and sufficient right-of-way for the eastern half of a new north/south roadway will need to be dedicated along the west side of the property consistent with the city's Transportation System Plan, the net developable area of the site is expected to be approximately 43,700 square feet or less.

When preparing a transportation analysis for a zone change, Oregon's Transportation Planning Rule requires that we analyze not just the proposed site use, but the highest intensity use which can reasonably be permitted within the zone. The City of West Linn allows development of townhomes with a minimum average lot size of 1,500 square feet. Accordingly, the 43,700 square feet of developable land area could accommodate a maximum of 29 townhome dwelling units on the subject property.

It should be noted that the actual development proposed on the subject property will consist of 6 lots, accommodating 6 single-family dwellings. To provide meaningful projections of future traffic and comply with the requirements of Oregon's Transportation Planning Rule, analysis of both the worst-case development scenario (31-townhomes) and the actual proposed development scenario (6 single-family homes) is provided herein.

### **Trip Generation**

To determine the potential increase in traffic attributable to the change from FU-10 to R7 zoning, a trip generation analysis was prepared using data from the Institute of Transportation Engineer's Trip Generation Manual, 10<sup>th</sup> Edition. The data used was for land use code 215, *Single Family Attached Housing*, and is based on the number of dwelling units.

Based on the analysis, the proposed annexation and zone change could result in a maximum increase of 13 trips during the morning peak hour, 16 trips during the evening peak hour, and 194 daily trips. A summary of the trip generation calculations is provided in Table 1 below. Detailed trip generation worksheets are also provided in the attached technical appendix.

**Table 1 - "Reasonable Worst Case" Trip Generation Calculation Summary**

	Morning Peak Hour			Evening Peak Hour			Daily Trips		
	In	Out	Total	In	Out	Total	In	Out	Total
29 Townhome Dwellings	4	10	14	10	7	17	104	104	208
- 2 Duplex Dwelling Units	0	-1	-1	-1	0	-1	-7	-7	-14
<b>Net Increase in Site Trips</b>	<b>4</b>	<b>9</b>	<b>13</b>	<b>9</b>	<b>7</b>	<b>16</b>	<b>97</b>	<b>97</b>	<b>194</b>

Based on the trip generation analysis for the "reasonable worst case" development scenario, even if the site is developed with the most intense use permitted in the R7 zone the site will generate just 194 daily site trips (an increase of 201 daily trips when compared to the allowed uses in the existing Clackamas County





FU-10 zoning.) The City of West Linn requires a full traffic impact analysis when a development would generate 250 or more daily trips. As such, the transportation impacts of even the worst-case development fall below the threshold at which a detailed operational analysis is required.

It should be further noted that the actual development proposed on the subject property consists of six single-family homes. This likely development scenario was also compared to the allowed uses under the existing FU-10 zoning to determine the actual expected transportation impact of the proposed annexation, zone change, and subsequent site development.

Again, the trip generation analysis was prepared using data from the Institute of Transportation Engineer's Trip Generation Manual, 10<sup>th</sup> Edition. The data used was for land use codes 210, *Single Family Detached Housing*, and 215, *Single Family Attached Housing*. For both land use categories the trip generation estimates are based on the number of dwelling units.

Based on the analysis, the actual proposed development within the site would result in an increase of 3 trips during the morning peak hour, 5 trips during the evening peak hour, and 42 daily trips. A summary of the trip generation calculations is provided in Table 2 below. Detailed trip generation worksheets are again provided in the attached technical appendix.

**Table 2 - Proposed Development Trip Generation Calculation Summary**

	Morning Peak Hour			Evening Peak Hour			Daily Trips		
	In	Out	Total	In	Out	Total	In	Out	Total
6 Single-Family Homes	1	3	4	4	2	6	28	28	56
- 2 Duplex Dwelling Units	0	-1	-1	-1	0	-1	-7	-7	-14
<b>Net Increase in Site Trips</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>5</b>	<b>21</b>	<b>21</b>	<b>42</b>

## Safety

To evaluate motor vehicle safety, crash data was obtained from the Oregon Department of Transportation's Crash Analysis and Reporting Unit for the intersection of Parker Road at Deerhill Lane as well as the full lengths of Deerhill Lane and Roxbury Drive. The data obtained was for the most recent five years available, from January 2019 through December 2023.

There were no reported crashes at the intersection of Parker Road and Deerhill Lane or along Deerhill Lane or Roxbury Drive during the five-year analysis period. Based on the analysis, the transportation system is currently operating safely in the site vicinity. No safety mitigations are necessary or recommended in conjunction with the proposed annexation and zone change.



## Transportation Planning Rule Analysis

To approve the requested zone change on the subject property, the City of West Linn must find that the requirements of Oregon's Transportation Planning Rule (OAR 660-012-0060) are met. This rule provides guidance regarding whether and how the transportation impacts of a plan amendment must be mitigated. The relevant portions of the Transportation Planning Rule are quoted below, along with responses specific to the proposed zone change.

### 660-012-0060

#### Plan and Land Use Regulation Amendments

*(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:*

*(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);*

No changes are proposed to the functional classification of existing or planned transportation facilities as part of this project.

*(b) Change standards implementing a functional classification system; or*

No changes are proposed to the standards implementing the functional classification system as part of this project.

*(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.*

*(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;*

*(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or*

*(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.*

Under the reasonable worst case development scenario, the proposed annexation and zone change from FU-10 to R7 zoning would result in a net increase of just 194 daily trips, and 16 or fewer trips during the



morning and evening peak hours. Such increases fall below the level at which the City of West Linn requires a full traffic study, since the net increase will have a de minimis impact on operation of area roadways and intersections. Additionally, since the R7 zoning is for residential development, the types of vehicles that will be added are consistent with those currently traveling on Roxbury Drive, Deerhill Lane, and the surrounding street network. Accordingly, the proposed annexation and zone change will not result in any of the effects listed.

Again, it should be noted that the actual anticipated development within the site will generate fewer trips than the worst-case development scenario. As such, the requirements of the Transportation Planning Rule are met for both development scenarios. The proposed zone change will not result in a significant effect on the transportation system, and no mitigation is necessary or recommended in conjunction with the proposed change from FU-10 to R7 zoning.

### **Conclusions**

Based on the analysis, the proposed annexation and zone change would have no significant negative safety or operational impacts on the surrounding street network and would help facilitate future local street connections anticipated in the City's Transportation System Plan. No mitigations are recommended in conjunction with the proposed annexation and zone change, and the proposal complies with the requirements of Oregon's Transportation Planning Rule.

If you have any questions regarding this analysis, please feel free to contact me at (503)537-8511 or at [mike.ard@gmail.com](mailto:mike.ard@gmail.com).

# Trip Generation Calculation Worksheet



Land Use Description: Single-Family Attached Housing

ITE Land Use Code: 215

Independent Variable: Dwelling Units

Quantity: 29 Dwelling Units

Setting: General Urban/Suburban and Rural

## Summary of ITE Trip Generation Data

### **AM Peak Hour of Adjacent Street Traffic**

Trip Rate: 0.48 trips per dwelling unit

Directional Distribution: 31% Entering 69% Exiting

### **PM Peak Hour of Adjacent Street Traffic**

Trip Rate: 0.57 trips per dwelling unit

Directional Distribution: 57% Entering 43% Exiting

### **Total Weekday Traffic**

Trip Rate: 7.2 trips per dwelling unit

Directional Distribution: 50% Entering 50% Exiting

## Site Trip Generation Calculations

29 Dwelling Units

	Entering	Exiting	Total
AM Peak Hour	4	10	14
PM Peak Hour	10	7	17
Weekday	104	104	208

# Trip Generation Calculation Worksheet



Land Use Description: Single-Family Attached Housing

ITE Land Use Code: 215

Independent Variable: Dwelling Units

Quantity: 2 Dwelling Units

Setting: General Urban/Suburban and Rural

## Summary of ITE Trip Generation Data

### **AM Peak Hour of Adjacent Street Traffic**

Trip Rate: 0.48 trips per dwelling unit

Directional Distribution: 31% Entering 69% Exiting

### **PM Peak Hour of Adjacent Street Traffic**

Trip Rate: 0.57 trips per dwelling unit

Directional Distribution: 57% Entering 43% Exiting

### **Total Weekday Traffic**

Trip Rate: 7.2 trips per dwelling unit

Directional Distribution: 50% Entering 50% Exiting

## Site Trip Generation Calculations

2 Dwelling Units

	Entering	Exiting	Total
AM Peak Hour	0	1	1
PM Peak Hour	1	0	1
Weekday	7	7	14

# Trip Generation Calculation Worksheet



Land Use Description: Single-Family Detached Housing

ITE Land Use Code: 210

Independent Variable: Dwelling Units

Quantity: 6 Dwelling Units

Setting: General Urban/Suburban and Rural

## Summary of ITE Trip Generation Data

### **AM Peak Hour of Adjacent Street Traffic**

Trip Rate: 0.70 trips per dwelling unit

Directional Distribution: 26% Entering 74% Exiting

### **PM Peak Hour of Adjacent Street Traffic**

Trip Rate: 0.94 trips per dwelling unit

Directional Distribution: 63% Entering 37% Exiting

### **Total Weekday Traffic**

Trip Rate: 9.43 trips per dwelling unit

Directional Distribution: 50% Entering 50% Exiting

## Site Trip Generation Calculations

6 Dwelling Units

	Entering	Exiting	Total
AM Peak Hour	1	3	4
PM Peak Hour	4	2	6
Weekday	28	28	56

CITY OF WEST LINN, CLATSOP COUNTY  
PARKER RD and Intersectional Crashes at PARKER RD, City of West Linn, Clatsop County, ALL Crashes Severity, 01/01/2015 to 12/31/2024

3 - 5 of 14 Crash records shown.

SER#	DATE	CLASS	CITY STREET	INT-TYPE	RD CHKA	INT-REL	OFFRD	WTHR	CRASH	SPEC USE	MOVE	FROM	TO	PRV	SVR	ERR	ACT	CAUSE
INVEST	FAULT	DAY	FIRST STREET	INT-TYPE	RD CHKA	INT-REL	OFFRD	WTHR	CRASH	SPEC USE	MOVE	FROM	TO	PRV	SVR	ERR	ACT	CAUSE
ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002	ENL002
00336	Y	N	N	N	02/09/20	17												
CITY	TH	0	PARKER RD															
N	6P	45 21 54.47	122.38															
N	45 21 54.47	122.38	31.29															
00858	N	Y	N	N	03/27/20	17												
CITY	TU	5.0	PARKER RD															
Y	2P	45 21 54.47	122.38															
Y	45 21 54.47	122.38	34.97															
00423	N	N	N	N	05/14/2022	17												
CITY	SA	0	PARKER RD															
N	11A	45 21 38.84	-122.38															
N	45 21 38.84	-122.38	49.4															
00508	Y	N	N	N	07/25/2023	17												
CITY	TU	0	PARKER RD															
N	6P	45 21 53.68	-122.38															
N	45 21 53.68	-122.38	49.4															
00865	N	N	N	N	03/23/2022	17												
CITY	WE	0	PARKER RD															
N	6P	45 21 54.04	-122.38															
N	45 21 54.04	-122.38	43.4															
00092	N	N	N	N	03/03/2018	17												
CITY	WE	0	PARKER RD															
N	7P	45 21 54.04	122.38															
N	45 21 54.04	122.38	53.4															

Disclaimer: The information contained in this report is compiled from individual driver and police crash reports submitted to the Oregon Department of Transportation as required in ORS 811.720. The Crash Analysis and Reporting Unit is committed to providing the highest quality crash data to customers. However, because a subset of crash report forms is the responsibility of the individual driver or the City of West Linn, the City of West Linn cannot guarantee that all qualifying crashes are represented nor can it guarantee that all data is accurate. Note: Legislative changes to ORS 811.720, may result in fewer property damage only crashes being eligible for inclusion in the Statewide Crash Data File.

CITY OF WEST LINN, CLATSOP COUNTY

PARKER RD and Intersectional Crashes at PARKER RD, City of West Linn, Clatsop County, ALL Crashes Severity, 01/01/2015 to 12/31/2024

7 - 14 of 14 Crash records shown.

SEQ#	S	D	M	INVEST	E	A	I	C	O	D	DAY	CLASS	CITY STREET	RE CLEAR	INT-REF	CEPD	WARR	CRASH	SECT. REP	TELE CITY	MOVL	FROM	TO	PRTC	INJ	A	S	FILE	CRASH	DATE	TIME	LOC	ERR#	ACT. EVENT	CAUSE	
04903	N	N	N	N	N	N	N	N	N	N	11/19/2013	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	11/19/2013	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	11/19/2013	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
02555	N	N	N	N	N	N	N	N	N	N	08/04/2002	16	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	08/04/2002	16	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	08/04/2002	16	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
02102	N	N	N	N	N	N	N	N	N	N	11/04/2016	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	11/04/2016	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	11/04/2016	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
01382	N	N	N	N	N	N	N	N	N	N	04/17/2015	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	04/17/2015	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	04/17/2015	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
04957	N	N	N	N	N	N	N	N	N	N	11/15/2013	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	11/15/2013	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0
N	N	N	N	N	N	N	N	N	N	N	11/15/2013	17	PARKER RD	INTER	CROSS	N	STOP SIGN	N	W	TURN	DRIVER CAR	02 NONE	0	STREET	0	0	0	0	0	0	0	0	0	0	0	0

Disclaimer: The information contained in this report is compiled from individual driver and police crash reports submitted to the Oregon Department of Transportation as required in ORS 811.720. The Crash Analysis and Reporting Unit is committed to providing the highest quality crash data to stakeholders. However, because submission of crash report forms is the responsibility of the individual driver, the Crash Analysis and Reporting Unit can not guarantee that all qualifying crashes are represented nor can assurances be made that all details pertaining to a single crash are accurate. Note: Legislative changes to DMV's vehicle crash reporting requirement, effective 01/01/2004, may result in fewer property damage only crashes being eligible for inclusion in the Statewide Crash Data File.



PARKER RD and Intersectional Crashes at PARKER RD, City of West Linn, Clackamas County, ALL Crashes Severity, ALL Crashes Circumstance, 01/01/2015 to 12/31/2024

12-7 of 14 crash records shown.

Disclaimer: The information contained in this report is compiled from individual driver and police crash reports submitted to the Oregon Department of Transportation as required in ORS 814.720. The Crash Analysis and Reporting Unit is committed to providing the highest quality crash data to customers. However, because submission of crash report forms is the responsibility of the individual driver, the Crash Analysis and Reporting Unit can not guarantee that all qualifying crashes are represented nor can we assume that all details pertaining to a single crash are accurate. Note: Legislative changes to DMV's vehicle crash reporting requirement, effective 01/01/2004, may result in fewer property damage only crashes being eligible for inclusion in the Statewide Crash Data File.

CITY OF WEST Linn, CLATSOP COUNTY

ROXBURY DR and Intersection Crashes at ROXBURY DR, City of West Linn, Clatsop County, ALL Crashes Severity, ALL Crashes Circumstance, 01/01/2015 to 12/31/2024

S E V E R I T Y										C R A S H C I R C U M S T A N C E										C R A S H D E T A I L S									
SEVER	R	J	S	W	DATE	CLASS	CITY STREET	INT-UTD	INT-REL	W-TR	CRASH	TRER QTY	MOVE	PRIC	ENJ	X	RES	LOC	ERROR	ACT	EVNT	CAUSE							
INVEST	F	A	I	C	DAY	DEST	FIRST STREET	AD CHAR	INT-REL	OFFER	W-TR	CRASH	TRER QTY	MOVE	PRIC	ENJ	X <th>RES</th> <th>LOC</th> <th>ERROR</th> <th>ACT</th> <th>EVNT</th> <th>CAUSE</th>	RES	LOC	ERROR	ACT	EVNT	CAUSE						
RD DET	E	L	G	N	R	TIME	FROM	DIRECT	LOSS	CHAF	EMER	SURE	COLL	EMER	PRIC	ENJ	X <th>RES</th> <th>LOC</th> <th>ERROR</th> <th>ACT</th> <th>EVNT</th> <th>CAUSE</th>	RES	LOC	ERROR	ACT	EVNT	CAUSE						
UNINCT	D	S	V	L	A	HAZ	LONG	LOCN	CONT	UNIN	LIGHT	SURTY	VE TYPE	TO	PRIC	ENJ	X <th>RES</th> <th>LOC</th> <th>ERROR</th> <th>ACT</th> <th>EVNT</th> <th>CAUSE</th>	RES	LOC	ERROR	ACT	EVNT	CAUSE						

Disclaimer: The information contained in this report is compiled from individual driver and police crash reports submitted to the Oregon Department of Transportation as required in ORS 811.720. The Crash Analysis and Reporting Unit is committed to providing the highest quality crash data to customers. However, because submittal of crash report forms is the responsibility of the individual driver, the Crash Analysis and Reporting Unit can not guarantee that all qualifying crashes are represented nor can assurances be made that all details pertaining to a single crash are accurate. Note: Legislative changes to DMV's vehicle crash reporting requirement, effective 01/01/2004, may result in fewer property damage only crashes being eligible for inclusion in the Statewide Crash Data File.

**EXHIBIT CC-2: CLACKAMAS COUNTY LOT LINE ADJUSTMENT – FILE NO Z0153-25**



**NOTICE OF DECISION ON A TYPE I LAND USE PERMIT**

**Decision:** Approved with Conditions

**Permit Type:** Property Line Adjustment

**File No.:** Z0153-25

**Proposal:** The applicant proposes to adjust 5,666 square feet from the property identified as Assessor's map and tax lot T2S R5E Section 25CC Tax Lot 300 to the property identified as Assessor's map and tax lot T2S R5E Section 25CC, Tax Lot 400.

**Decision Date:** May 12, 2025

**Issued By:** Mya Ganzer, Planner I, [MGanzer@clackamas.us](mailto:MGanzer@clackamas.us)

**Assessor's Map & Tax Lot(s):** T2S R5E Section 25CC Tax Lot 300 and 400

**Site Address(es):** 3945 S PARKER Rd.

**Applicant:** Blue Palouse Properties

**Owner of Property:** Gary Randall and Raymond Hill

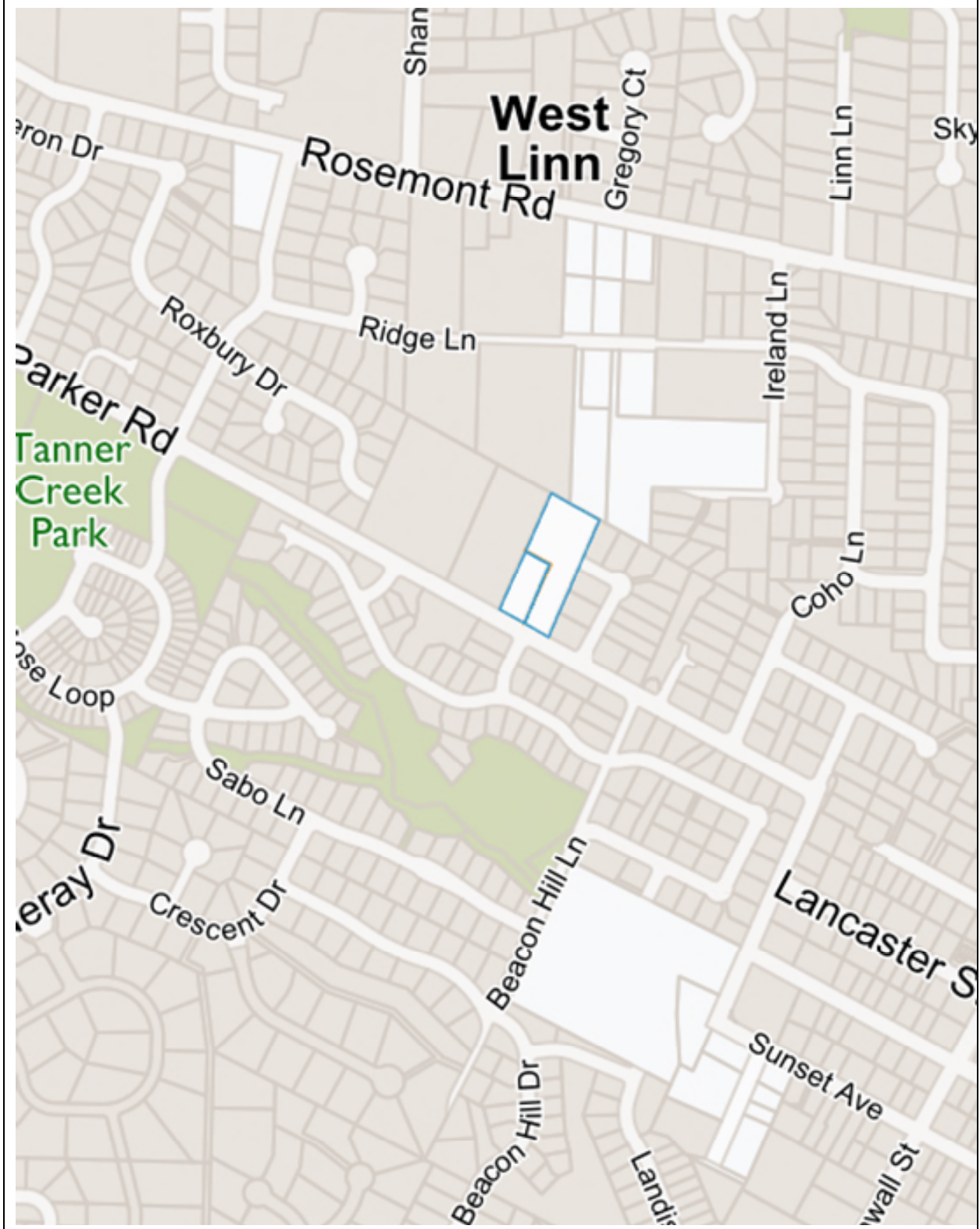
**Zoning:** FU10

**APPLICABLE APPROVAL CRITERIA:** This application is subject to Clackamas County Zoning and Development Ordinance (ZDO) Section(s) 202, 316, 1107, and 1307.

*Clackamas County is committed to providing meaningful access and will make reasonable accommodations, modifications, or provide translation, interpretation or other services upon request. Please contact us at 503-742-4545 or email [DRenhard@clackamas.us](mailto:DRenhard@clackamas.us).*

503-742-4545: ¿Traducción e interpretación? | Требуется ли вам устный или письменный перевод? | 翻译或口译? | Cần Biên dịch hoặc Phiên dịch? | 번역 또는 통역?

## Location Map



### Site Plan

The site plan illustrates the proposed subdivision of a property located between Roxbury Drive (40' WOC) to the north and South Parker Road (60' WOC) to the south. The plan includes the following details:

- Original Lot 1:** 61,735 sf. **Proposed Lot 1:** 56,069 sf. **Transfer Tract to Lot 2:** 8,823 sf. **Transfer Tract from Lot 1:** 3,159 sf.
- Original Lot 2:** 19,552 sf. **Proposed Lot 2:** 25,218 sf. **Transfer Tract to Lot 3:** 1,599 sf. **Transfer Tract from Lot 2:** 8,823 sf.
- Setbacks:** 30' REAR YARD SETBACK (TYP.), 8' SIDE YARD SETBACK (TYP.), and 30' FRONT YARD SETBACK (TYP.).
- Boundaries:** The property is bounded by Roxbury Drive (40' WOC) to the north, South Parker Road (60' WOC) to the south, and an existing driveway to the east.
- Structures and Features:** An existing house is shown on the south side of the property. The approximate location of a septic system is indicated. An existing well is also marked.
- Proposed Lot Lines:** The plan shows the proposed lot lines for Lots 1 and 2, along with the existing lot lines and the driveway.
- Dimensions:** Various dimensions are provided for the lot lines and setbacks, including bearings and distances (e.g., S 23°42'40" E 431.33', S 61°16'30" E 168.71').

## PERMIT EXPIRATION

---

Pursuant to ZDO Subsection 1107.05, approval of a property line adjustment is valid for two years from the date of the final decision. Unless an appeal is filed, the date of the final decision is the “decision date” listed above. **During this two-year period, the requirements of Chapter 11.01.040 of the Clackamas County Code and Subsection 1107.06 or 1107.07 (whichever is applicable) of the Zoning and Development Ordinance shall be satisfied, or the approval will become void.** The requirements are summarized in the conditions of approval below.

This is the only notice you will receive of this deadline.

## CONDITIONS OF APPROVAL

---

The conditions listed are necessary to ensure that approval criteria for this land use permit are satisfied. Where a condition relates to a specific approval criterion, the code citation for that criterion follows in parentheses.

1. Approval of this land use permit is based on the submitted written narrative and plan(s) filed with the County on 4/17/2025 and additional documents submitted on 4/28/25. No work shall occur under this permit other than that which is specified within these documents, unless otherwise required or specified in the conditions below. It shall be the responsibility of the property owner(s) to comply with these document(s) and the limitation of any approval resulting from the decision described herein.
2. Prior to Planning Director approval of the final property line adjustment record of survey map or final plat required pursuant to ZDO Subsection 1107.06 or 1107.07, respectively, setbacks from the proposed relocated property line for all existing structures on the subject property shall be verified by a site plan prepared and stamped by an Oregon registered professional land surveyor. If no structures exist, the surveyor shall submit a stamped letter so stating. (ZDO Subsection 1107.03(C))
3. To finalize the property line adjustment, a record of survey map shall be filed unless the County Surveyor waives this requirement or unless the adjustment constitutes a replat under ORS Chapter 92. (ZDO Subsection 1107.06)
  - a. The form and content of the record of survey map shall comply with the County's final decision approving the tentative plan and applicable provisions of Chapter 11.01 of the Clackamas County Code and Oregon Revised Statutes Chapters 92 and 209.

- b. As required by Section 11.01.040 of the Clackamas County Code, revised legal descriptions of the properties affected by the adjustment (for new deeds) shall be prepared by a registered professional land surveyor, refer to the record of survey map that is filed with the County, and be recorded with the County Clerk. A property line adjustment deed shall contain the names of the parties, the description of the adjusted line, references to original recorded documents, and signatures of all parties with proper acknowledgement.
4. If the property line adjustment constitutes a replat under ORS chapter 92, finalizing the adjustment requires the filing of a final plat, except that a final plat is not required for a replat in which all parcels are larger than 80 acres. (ZDO Subsection 1107.07)
  - a. The form and content of the final plat shall comply with the County's final decision approving the adjustment and applicable provisions of Chapters 11.01 and 11.02 of the Clackamas County Code and ORS chapters 92, 94, 100, and 209.

## FINDINGS

---

The findings below identify the standards and criteria that are relevant to this decision, state the facts relied upon in rendering the decision, and explain the justification for the decision based on the standards, criteria and facts set forth.

1. **Background/Overview of Applicant's Proposal:** The applicant proposes to adjust 5,666 square feet from the property identified as Assessor's map and tax lot T2S R5E Section 25CC Tax Lot 300 to the property identified as Assessor's map and tax lot T2S R5E Section 25CC, Tax Lot 400.

2. **ZDO Section 202, Definitions**

Section 202 defines a property line adjustment as:

*A relocation or elimination of all or a portion of the common property line between two abutting lots of record that does not create an additional lot of record. As used in this definition, a property line is the division line between two abutting lots of record.*

Section 202 defines a lot of record as:

1. *A lot or parcel created by a subdivision or partition plat, as defined in ORS chapter 92, filed with the Clackamas County Surveyor and recorded with the Clackamas County Clerk;*
2. *A unit of land created by a recorded deed or recorded land sales contract and in compliance with all applicable planning, zoning, and subdivision or partition ordinances and regulations, if any, in effect on the date the deed or land sales contract was signed by the parties to the deed or contract; or*



3. *A unit of land created solely to establish a separate tax account or for mortgage purposes; that did not conform to all planning, zoning, or subdivision or partition ordinances or regulations in effect on the date it was created; and that was sold prior to September 5, 2023, under the foreclosure provisions of ORS chapter 88.*

**Finding** The property identified at on Assessors Map 21E25CC as tax lot 300 is a lot of record. This unit of land was created by deed on May 21, 1970, by document 70-10154. The property was zoned R-20 which had a minimum square footage requirement of 20,000 square feet, which was met, in addition to other dimensional standards. In the same year tax lot 400 was excluded, which is discussed below. This was also prior to the 1974 Partitioning Ordinance. **Tax lot 300 will be referred to as Lot of Record 1 throughout this decision.**

The property identified at on Assessors Map 21E25CC as tax lot 300 is a lot of record. This unit of land was created by deed on July 9, 1970, by document 70-13419. The property was zoned R-20 which had a minimum square footage requirement of 20,000 square feet, which was met, in addition to other dimensional standards. This was also prior to the 1974 Partitioning Ordinance. **Tax lot 400 will be referred to as Lot of Record 2 throughout this decision.**

**This criterion is met**

### 3. **ZDO Section 316, Future Urban 10-acres**

Section 316 applies to the FU-10 zoning district where the subject property is located. Table 316-2 establishes applicable dimensional standards.

**Finding:** Findings of compliance with lot size and setback standards are included below.

Maximum lot coverage: There is no maximum lot coverage standards in the FU-10 zoning district.

Minimum lot size: The minimum lot size in the FU-10 zoning district is 10-acres, both lots are undersized lots of record, which is addressed later in the Land Use Decision.

Setback standards: Compliance with the FU-10 setback standards are addressed below.

**This criterion is met.**

### 4. **ZDO Section 1107, Property Line Adjustments**

#### **1107.03 General Provisions**

*Property line adjustments shall be subject to the following standards and criteria:*

- A. *A property line adjustment is subject to the minimum and maximum lot size standards of the applicable zoning district, except as follows:*

1. *If a lot of record is smaller than the minimum lot size standard, its size may be reduced, provided that it is not in an AG/F, EFU, or TBR District.*
2. *If a lot of record is larger than the maximum lot size standard, its size may be reduced even if the reduction is not sufficient to comply with the maximum lot size standard.*
3. *If a lot of record in an AG/F, EFU, or TBR District is smaller than the minimum lot size standard, its size may be reduced subject to Subsection 1107.04.*

**Finding:** The minimum lot size standard in the FU-10 District is 10 acres. As demonstrated by the submitted site plan, Lot of Record 1 and 2 are both below the minimum lot size. Reductions in size of undersized Lot of Records is permitted pursuant to 1107.03(a). There is no maximum lot size in the FU-10 District. **This criterion is met.**

*B. Subsequent subdivision or partition (or development of dwelling units subject to Section 1012, Lot Size and Density) of a lot of record that was the subject of a property line adjustment shall be limited as follows:*

1. *A property line adjustment shall not be used to later permit development that exceeds the maximum density established by Section 1012. In calculating density, all lots or parcels (or dwelling units subject to 1012) within both lots of record that were the subject of the property line adjustment shall be included.*

**Finding:** Section 1012 does not establish a maximum density standard in the FU-10 District; therefore, this criterion is not applicable.

2. *In the RA-1, RRFF-5 and FF-10 Districts, where averaging of lot sizes may be permitted pursuant to table 316-2, Dimensional Standards in the Rural Residential and Future Urban Residential Zoning Districts, a property line adjustment shall not be used to later permit a subdivision or partition that reduces the minimum average lot size below the minimum average lot size standard. In calculating the minimum average lot size, all lots or parcels within both lots of record that were the subject of the property line adjustment shall be included.*

**Finding:** The subject property is not zoned RA-1, RRFF-5 or FF-10; therefore, this criterion is not applicable.

*C. A property line adjustment is subject to the minimum setback standards of the applicable zoning district, except that if a lawfully established nonconforming setback exists, the property line adjustment may be approved if it does not reduce that depth. Prior to Planning Director approval of the final property line adjustment record of survey map or final plat required pursuant to Subsection 1107.06 or 1107.07, respectively, setbacks from the proposed relocated property*

*line for all existing structures on the subject property shall be verified by a site plan prepared and stamped by an Oregon registered professional land surveyor. If no structures exist, the surveyor may submit a stamped letter so stating.*

**Finding:** The proposed PLA will reduce the south front setback for Lot of Record 1, which is currently undeveloped. The minimum front yard setback in the FU-10 District is 30 feet. A condition of approval is included requiring that setbacks from the relocated property line for existing structures are verified by a site plan prepared and stamped by an Oregon registered professional land surveyor, or if no structures exist, by a stamped letter from the surveyor stating that no structures exist. **As conditioned, this criterion is met.**

- D. A property line adjustment shall be prohibited between lots of record separated by a Comprehensive Plan land use designation boundary, as identified on Comprehensive Plan Map IV-3, Lake Oswego Land Use Plan Map, IV-4, West Linn Land Use Plan Map, IV-5, Oregon City Land Use Plan Map, IV-6, North Urban Area Land Use Plan Map, or IV-7, Non-Urban Area Land Use Plan, and Mt. Hood Corridor Land Use Plan, if the boundary separates an Urban, Unincorporated Community, or Rural Plan designation from an Agriculture or Forest Plan designation, except an adjustment may be granted when it results in an increase in size of the lot of record with the Agriculture or Forest plan designation. However, approval of such an adjustment shall not be used to reconfigure a lot of record, the result of which is to qualify the lot of record for a land division pursuant to Subsection 1012.02(D).*

**Finding:** Neither Lot of Record 1 nor Lot of Record 2 have a Plan designation of Agriculture or Forest. **This criterion is met.**

- E. A property line adjustment is prohibited between lots of record separated by the Portland Metropolitan Urban Growth Boundary (UGB) or the unincorporated community boundary of Government Camp, Rhododendron, Wemme/Welches, Wildwood/Timberline or Zigzag Village.*

**Finding:** The proposed PLA does not involve lots of record that are separated by the Portland Metropolitan UGB or the unincorporated community boundary of Government Camp, Rhododendron, Wemme/Welches, Wildwood/Timberline or Zigzag Village. **This criterion is met.**

- F. A property line adjustment shall not result in the adjustment of a dwelling from one lot of record to the other unless the lot of record receiving the dwelling otherwise complies with all applicable standards of this Ordinance for the siting of a dwelling.*

**Finding:** As demonstrated by the submitted site plan and a review of aerial photography and Department of Assessment and Taxation records, the proposed PLA will not result in the adjustment of a dwelling from one lot of record to the other. **This criterion is met.**

### **1107.06 Record of Survey Map Review**

*If a property line adjustment application is approved, finalizing the adjustment requires the filing of a record of survey map unless the County Surveyor waives this requirement or unless the adjustment constitutes a replat under ORS Chapter 92. The applicant shall comply with the following:*

- A. The form and content of the record of survey map shall comply with the County's final decision approving the tentative plan and applicable provisions of Chapter 11.01 of the Clackamas County Code and Oregon Revised Statutes Chapters 92 and 209.*
- B. Final Planning Director Approval of the Record of Survey Map: The final record of survey map shall be submitted to the County for review. If it is consistent with the approved tentative plan and the conditions of approval included in the County's final decision on the application have been satisfied, the Planning Director shall sign the record of survey map.*

**Finding:** Conditions of approval have been included requiring compliance with either Subsection 1107.06 or 1107.07. **As conditioned, this criterion is met.**

### **1107.07 Final Plat Review for Replats**

*If an application is approved for a property line adjustment that constitutes a replat under ORS chapter 92, finalizing the adjustment requires the filing of a final plat, except that a final plat is not required for a replat in which all parcels are larger than 80 acres. The applicant shall comply with the following:*

- B. The form and content of the final plat shall comply with the County's final decision approving the adjustment and applicable provisions of Chapters 11.01 and 11.02 of the Clackamas County Code and ORS chapters 92, 94, 100, and 209.*
- C. The final plat shall be submitted to the County for review. If a homeowners association is required, the declaration for a planned community, articles of incorporation, and bylaws shall be submitted to the County with the final plat. If the final plat and, if a homeowners association is required, the declaration for a planned community, articles of incorporation, and bylaws are consistent with the approved adjustment and the conditions of approval included in the County's final decision on the application have either been satisfied or guaranteed pursuant to Section 1311, Completion of Improvements, Sureties, and Maintenance, the Planning Director shall sign the plat.*

**Finding:** Conditions of approval have been included requiring compliance with either Subsection 1107.06 or 1107.07. **As conditioned, this criterion is met.**

**EXHIBIT CC-3: AFFIDAVIT OF NOTICE AND MAILING PACKET**



**NOTICE OF CITY COUNCIL PUBLIC HEARING  
ANNEXATION OF 59,934 SQUARE FEET AT ROXBURY DRIVE/PARKER ROAD  
TAX LOT NUMBER 21E25CC00300  
FILE NO. ANX-25-01**

The West Linn City Council will hold a public hearing on **Tuesday, December 9, 2025, starting at 6:00 p.m.** in the Council Chambers of City Hall, 22500 Salamo Road, West Linn, to consider an annexation request for 59,934 square feet at Roxbury Drive - Tax Lot Number 21E25CC00300. The applicants are requesting an R-7 zone designation. The area is identified by Clackamas County as assessor's map 21 E25 CC00 tax lot 300.

The City Council will decide based on the criteria of Community Development Code (CDC), Chapter 81, West Linn Municipal Code 2.920-2.930, Metro Code 3.09.045 and 3.09.050(D), and Oregon Revised Statute 222.050 and 222.750. The CDC approval criteria are available for review on the City website <http://www.westlinnoregon.gov/cdc> or at City Hall and the City Library.

Metro Code LOCAL GOVERNMENT BOUNDARY CHANGES may be found at [https://www.oregonmetro.gov/sites/default/files/2014/06/05/309\\_eff\\_071112\\_final.pdf](https://www.oregonmetro.gov/sites/default/files/2014/06/05/309_eff_071112_final.pdf).

Annexations go through a two-step hearing process. Step one is a land use decision. The Council determines whether the proposed annexation is consistent with the intent of the West Linn Comprehensive Plan and CDC Chapter 81. The Council will assign a zone for the property. At the conclusion of step one, the Council may, in its discretion: 1) decide to set a public hearing for the annexation request (step two), 2) delay a public hearing on the requested annexation or 3) pass a resolution placing the annexation request on a ballot for an advisory vote. Step two review for annexation proposals is a decision that applies the standards of WLMC 2.930. Both Step 1 and Step 2 can occur on the same night.

The annexation application is posted on the City's website <https://westlinnoregon.gov/planning/3945-parker-rdroxbury-drive-annexation-129-acres>. The application, all documents or evidence relied upon by the applicant, and applicable criteria are available for inspection at City Hall at no cost. Copies may be obtained at a reasonable cost. The staff report will be posted on the website and available for inspection at no cost, or copies may be obtained at a reasonable cost, at least 15 days before the hearing.

The hearing will be conducted in a hybrid format with some Councilors, staff, presenters, and members of the public attending remotely via Webex and others attending in-person at City Hall. The public can watch the meeting online at <https://westlinnoregon.gov/meetings> or on Cable Channel 30.

**Anyone wishing to present written testimony for consideration shall submit all material before 12:00 pm on December 9, 2025.** Persons interested in party status should submit a letter outlining all concerns about the proposal by the comment deadline. Written comments may be submitted to [agudelj@westlinnoregon.gov](mailto:agudelj@westlinnoregon.gov) or mailed to City Hall.

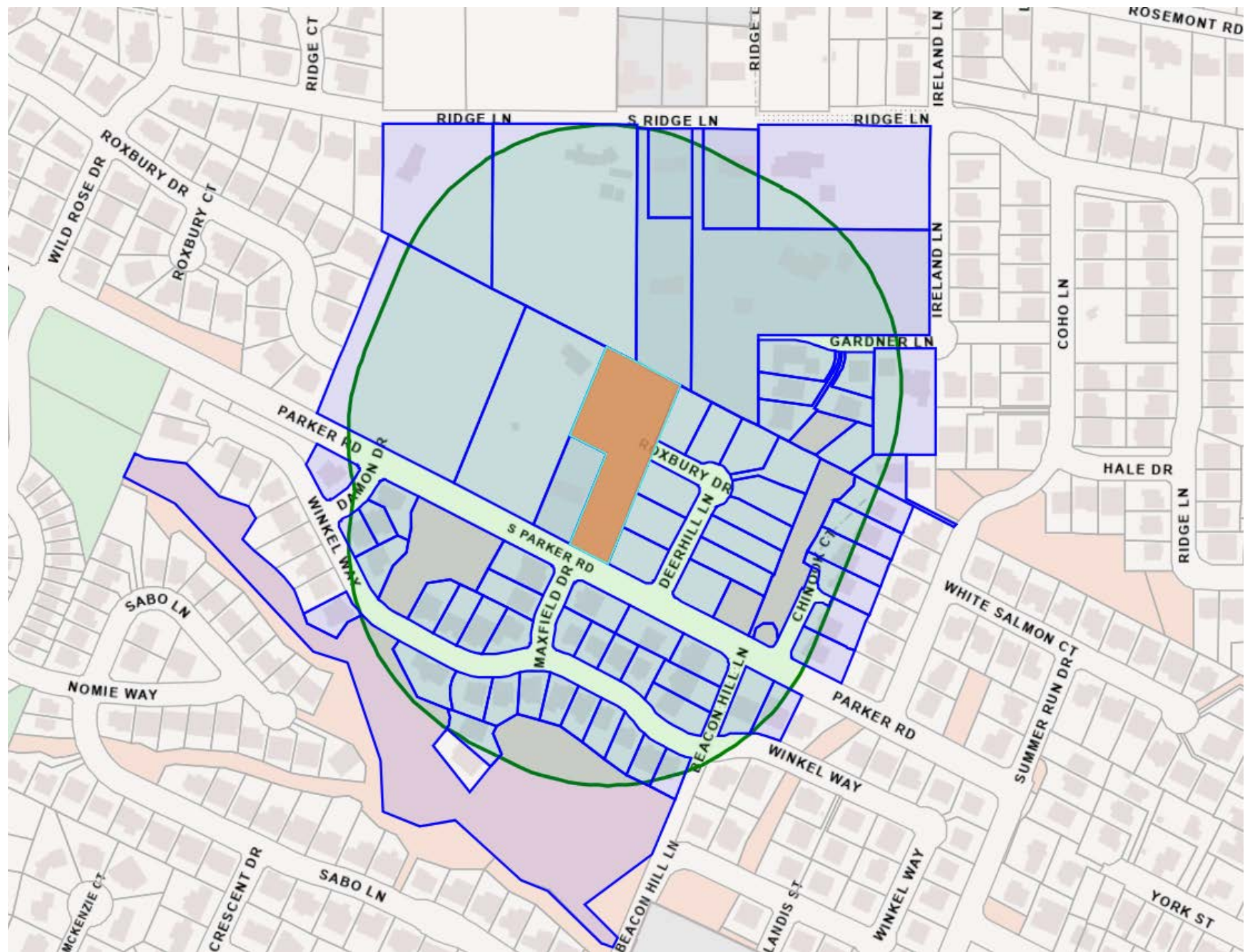
Those who wish to participate remotely should complete the speaker form at <https://westlinnoregon.gov/citycouncil/meeting-request-speak-signup> **before 4:00 pm on the meeting day** to receive an invitation to join the meeting. Virtual participants can join online or dial in by phone.

**It is important to submit all testimony in response to this notice.** All comments submitted for consideration of this application should relate specifically to the applicable criteria. Failure to raise an issue in a hearing, in person, or by letter, or failure to provide sufficient specificity to afford the decision-maker an opportunity to respond to the issue, precludes an appeal to the appellant body with jurisdiction based on that issue.

For additional information, please contact Aaron Gudelj, Associate Planner, City Hall, 22500 Salamo Rd., West Linn, OR 97068, 503-742-6057.



ANN-25-01 - Properties within 500 feet of Tax Lot Number 21E25CC00300





**NOTICE OF UPCOMING  
CITY COUNCIL DECISION**

**PROJECT # ANX-25-01**

**MAIL: 11/19/2025 TIDINGS: 11/19/2025 and 12/3/2025**

**CITIZEN CONTACT INFORMATION**

To lessen the bulk of agenda packets and land use application notice, and to address the concerns of some City residents about testimony contact information and online application packets containing their names and addresses as a reflection of the mailing notice area, this sheet substitutes for the photocopy of the testimony forms and/or mailing labels. A copy is available upon request.



# CITY OF West Linn

## AFFIDAVIT OF NOTICE

### Type A

We, the undersigned do hereby certify that, in the interest of the party (parties) initiating a proposed land use, the following took place on the dates indicated below:

#### PROJECT

File No.: ANX-25-01

Applicant's Name: Blue Palouse Properties

Development Name: Tax Lot Number 21E25CC00300

Scheduled Decision Date: City Council Hearing on 12/9/25

#### MAILED NOTICE

Notices were mailed at least 20 days prior to the decision date per Section 99.080 of the Community Development Code to:

1	WLWLS and School Board	11/19/25	<i>Lynn Schroder</i>
2	Metro	11/19/25	<i>Lynn Schroder</i>
3	Clackamas County	11/19/25	<i>Lynn Schroder</i>
4	City of Lake Oswego	11/19/25	<i>Lynn Schroder</i>
5	ODOT	11/19/25	<i>Lynn Schroder</i>
6	Century Link	11/19/25	<i>Lynn Schroder</i>
7	NW Natural Account Services	11/19/25	<i>Lynn Schroder</i>
8	Comcast	11/19/25	<i>Lynn Schroder</i>
6	Property Owners within 500 feet	11/19/25	<i>Lynn Schroder</i>
7	All Neighborhood Associations	11/19/25	<i>Lynn Schroder</i>

#### TIDINGS

Notice was posted in the West Linn Tidings twice prior to the decision date.

11/19/25 & 12/3/25	<i>Lynn Schroder</i>
--------------------	----------------------

#### WEBSITE

Notice was posted on the City's website at least 20 days prior to the decision date.

11/19/25	<i>Lynn Schroder</i>
----------	----------------------

#### SIGN

At least 20 days prior to the decision date, a sign was posted on the property per Metro Code.

11/19/25	<i>Aaron Gudely</i>
----------	---------------------

STAFF REPORT was available at least 15 days prior to the decision date.

11/25/2025	<i>Aaron Gudely</i>
------------	---------------------

FINAL DECISION notice mailed to applicant, all other parties with standing, and, if zone change, the County surveyor's office.

11/25/25	<i>Lynn Schroder</i>
----------	----------------------