

DR-25-04/LLA-25-02

Public Comments Received
July 31, 2026 to August 5, 2026

Wyss, Darren

From: Janet Pearce <jcpearce2015@gmail.com>
Sent: Friday, July 31, 2026 4:20 PM
To: Ischroder@westlinnoregon.com; Wyss, Darren
Subject: Addendum to previous letter

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Yesterday we had a house fire up

On the hill. It was in Quail Run. Fortunately, it was contained. This is the second house fire up here in a very short time. I'm fearful a disaster is looming. I've been in this exact situation before in the Camp Fire. What are the city's rules on defensible space and where is the evacuation plan for this area? Have people been instructed how to prepare with a go bag? I've heard no mention of it. People need to know where to go and what to do. In California I set up a community speaking event with Cal Fire and the local fire department. They educated people on defensible space but they did not have an evacuation plan in place. The Camp Fire happened one month later. 88 people died in the Camp Fire and the whole town was lost. Generations of families, just like West Linn all lost their homes and some family members. It changed the neighboring cities forever as people had to find a place to live. They couldn't afford housing in the city. They chose to live in the mountains because they didn't like the city. What will happen when you reroute Tannler? People will be clogged up not able to get out. Just like Paradise. The City has been lucky 2 times now. All it would have taken is some wind and many many homes and lives could have been lost. What is your evacuation plan once Tannler is rerouted and there are 300 plus units of families trying to get out. That is a lot of extra cars coming down the mountain. Please don't close Tannler. You are setting us up to fail during a fire. I'm adamantly opposed.

Janet Pearce

Schroder, Lynn

From: Kirsten Solis <soliskirs@gmail.com>
Sent: Thursday, July 30, 2026 5:02 PM
To: Schroder, Lynn
Subject: Written Testimony - City File No. DR-25-04 / LLA-25-02

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RE: City File No. DR-25-04 / LLA-25-02 Request to Include This Testimony in the Public Record

Dear Members of the West Linn Planning Commission,

My name is Kirsten Solis, and I am a West Linn resident living at 2350 Falcon Drive with my husband and our four children, including our one-year-old son. Our home is directly adjacent to the proposed Tannler development, and I respectfully request that this testimony be included in the public record.

As a mother of four children, this proposal is deeply personal to me. My husband and I chose to raise our family in this neighborhood because it offered something increasingly rare — a safe, quiet community where children can play outside, ride their bikes, explore nature, and grow up surrounded by neighbors who care about one another. We love this community and have invested our lives here.

I understand Oregon's need for additional housing, and I support responsible growth. However, this proposed 320-unit multifamily development raises serious compatibility and impact concerns that must be carefully evaluated under the applicable Community Development Code criteria. As the owner of property immediately adjacent to the proposed development, my family will experience the direct impacts of decisions regarding traffic, public rights-of-way, tree removal, stormwater management, lighting, noise, and the loss of existing natural buffers.

My greatest concern is public safety. A 320-unit development will generate additional vehicle, pedestrian, service, and emergency-response activity on roads already shared by school buses, families, pedestrians, cyclists, and children. As parents, we teach our children to safely cross streets and remain aware of traffic, but increased activity also increases the importance of thoughtful planning. I respectfully ask the Planning Commission to ensure the project fully complies with all applicable Community Development Code requirements related to transportation, pedestrian safety, circulation, emergency access, and traffic impacts before any approval is granted.

I am also deeply concerned about any proposal involving the vacation, closure, conveyance, or reconfiguration of Tannler Drive. Changes to an existing public street have the potential to affect neighborhood traffic patterns, emergency response routes, pedestrian safety, and access for existing

residents. If the application includes any vacation, closure, conveyance, or reconfiguration of Tannler Drive, I respectfully request that the Planning Commission identify the evidence demonstrating that the proposal satisfies the applicable Community Development Code standards governing transportation, circulation, public safety, and the public interest before any such action is approved.

Additionally, I respectfully request that the City preserve the Greene Street public right-of-way immediately behind our property. This corridor provides an important physical separation between our home and the proposed development and is regularly used as a pedestrian connection by neighborhood families accessing the White Oak Savanna and surrounding trails. I respectfully request that the Planning Commission identify the evidence supporting any decision affecting the Greene Street public right-of-way, including its impacts on pedestrian circulation, neighborhood connectivity, public infrastructure, drainage, utilities, privacy, and access for existing residents.

I am also concerned about community infrastructure. The school district recently approved school consolidations, and enrollment boundaries are changing. I respectfully ask the City to obtain and consider current information from the school district regarding capacity and enrollment impacts, as well as whether nearby roads, utilities, parks, and emergency services can adequately support this level of growth while maintaining the quality of life residents value.

Another significant concern is the protection of our natural environment. The proposed development is immediately adjacent to the broader White Oak Savanna area and includes mature Oregon white oak habitat that contributes to one of the region's most unique ecosystems. Our family regularly walks the nearby trails and enjoys these natural areas. They are where children explore, neighbors gather, families exercise, and wildlife continues to thrive. The wooded area behind our home provides privacy, habitat, and a peaceful buffer that cannot be replaced once it is removed. I respectfully request that the Planning Commission identify the evidence demonstrating compliance with all applicable Community Development Code standards related to natural resource protection, tree preservation, landscaping, stormwater management, ecological impacts, and required buffering between the proposed development and adjacent single-family homes.

The cumulative impacts of this proposal are concerning. Increased traffic, additional pressure on infrastructure, loss of mature trees, removal of natural buffers, increased noise and lighting, and permanent changes to the character of our neighborhood will affect families for generations. While each issue may appear manageable individually, together they represent a significant transformation of an established residential community.

When my children look out our back windows today, they see trees, wildlife, and open space. They ride their bikes through our neighborhood, walk to the White Oak Savanna, and are growing up in a place that feels safe, peaceful, and connected to nature. The Greene Street corridor and the wooded area behind our home are an important part of that experience. The decisions you make regarding this proposal will shape not only this property but also the childhoods of my children and many other families in our neighborhood.

I respectfully request that the Planning Commission deny the application unless the applicant demonstrates compliance with every applicable approval criterion contained within the Community

Development Code and Oregon law. This includes, but is not limited to, the standards governing transportation, public facilities, natural resources, landscaping, design review, compatibility with surrounding development, transitions between differing residential uses, pedestrian circulation, emergency access, and protection of public rights-of-way. If the Commission determines that the applicable criteria can be satisfied, I respectfully request that it require every legally available condition and mitigation measure necessary to protect public safety, public infrastructure, natural resources, existing neighborhoods, and the public interest.

Thank you for your time, your service, and your thoughtful consideration of my testimony.

Respectfully,

Kirsten Solis
2350 Falcon Drive
West Linn, Oregon

Wyss, Darren

From: Len & Linda Grill <2lgrills@gmail.com>
Sent: Thursday, July 30, 2026 5:45 PM
To: Wyss, Darren
Cc: Roberta Schwarz
Subject: Additional sentence as testimony

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We, Leonard and Linda Grill, adopt and agree with the comments submitted by or on behalf of Roberta and Ed Schwarz before, on, or after July 30, 2026 in reference to DR-25-04/LLA-25-02. Please add this to the Public Record and acknowledge receipt to us.

Respectfully,
Leonard and Linda Grill

Schroder, Lynn

From: ed.schwarz@gmail.com
Sent: Monday, August 3, 2026 9:27 AM
To: Schroder, Lynn
Subject: Planning Commission Testimony for DR-25-04/LLA-25-02 - Residential Deliberations
Attachments: Ed Schwarz PC Testimony for SONA - 2026-07-30 - Residential Deliberations.pdf;
SONA_Meeting_Minutes_03-10-26 - Draft.pdf; OTAK Inc Stormwater report for ConAm
Development 2015.pdf

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Lynn,

Please add the attached testimony to the Public Record for DR-25-04/LLA-25-02 – Residential Deliberations.

Please acknowledge receipt of this email and attachment.

Thank you.

Ed Schwarz
West Linn

August 3, 2026

Subject: Development Application DR-25-04/LLA-25-02 – Residential Deliberations

To the Planning Commission,

My name is Ed Schwarz and I live in West Linn. I submit this testimony as Treasurer of the Savanna Oaks Neighborhood Association. Attached are SONA meeting minutes from March 10, 2026 authorizing me to represent Savanna Oaks NA in front of the Planning Commission on this issue.

At the March 10, 2026 meeting SONA members discussed the proposed project and its effects on the Savanna Oaks neighborhood. Many issues were raised and discussed including:

- Vacation of Tannler Drive
- Density and Affordability
- Traffic
- Parking
- Stormwater and Geologic
- Tree Preservation
- Effect on the White Oak Savanna Park

The members of Savanna Oaks NA ask the Planning Commission to deny this application, DR-25-04/LLA-25-02 for the reasons stated below.

In this document I will address each of the above issues and provide to you our members' concerns about this project.

Vacation of Tannler Drive

SONA members expressed concerns about the closing of the bottom 275 feet of Tannler Drive. Their concerns include having to navigate through the new development and its commercial area and pedestrians to reach Blankenship Road whereas, currently, it is a straight drive down Tannler to Blankenship. This will add time to their daily commutes down and up Tannler as well as any other trips they need to make on the street. In addition, there are safety concerns with the angled street parking which is located just after the sharp right-hand turn on Tannler.

Density and Affordability

Concerns were raised about the number and density of apartments being proposed for this steep hillside. Previous application for this location included approximately 200 apartments. This proposal for 320 apartments is much too dense for this hillside. By comparison, the Cascade Summit Apartments at Day Road and Salamo Road have 26 fewer apartments on twice as much land, resulting in a density of less than half that of the proposal.

The proposal for 320 market-rate apartments does not address the housing affordability problem we have in this area and across the country. The state has been pushing developers to act responsibly and propose affordable housing. This proposal does not respond to that need.

Traffic

Adding the vehicles from 320 one-bedroom, two-bedroom, and three-bedroom apartments to an already very busy intersection of Tannler Drive and Blankenship Road will only increase the traffic congestion. Assuming a conservative average of 2 vehicles per apartment and 8 vehicle trips per day leads to over 5,000 vehicle trips per day generated just from this one development. We anticipate that gridlock will occur in this area, especially during commute hours.

Adding many additional vehicles to the already overburdened streets will also create enormous safety concerns in the event of a major disaster such as wildfire or earthquake where everyone is on the road at once trying to flee.

Parking

The applicant proposes 400 total parking spaces be provided on-site for the entire development. Given the above assumption of 2 vehicles per apartment, there will be approximately 640 vehicles on-site which belong to the renters. This leaves a deficit of over 200 parking spaces. We anticipate that the overflow parking not met by the development will end up on local neighborhood streets and the parking lot at the existing commercial development across Blankship Road from this development.

Stormwater and Geologic

The applicant proposes to use vault storage with filters for the stormwater which will accumulate from the apartment buildings and pavement. We believe this does not meet the requirements of CDC 55.130 (E)(4) and CDC 92.010(E) (3-4).

Additionally, we contend that the use of vaults for stormwater storage conflicts with the CDC and West Linn Stormwater Management Manual Section 1.5.2 which prioritizes surface detention over vault storage. The applicant attempts to justify their use of vault storage by stating that the site is not suitable for surface storage. However, a previous, similarly sized, mixed-use application for this property proposed surface storage for stormwater.

Please refer to the “Tannler Drive Mixed-Use Development Preliminary Stormwater Management Plan”, dated July 20, 2015, and prepared by OTAK, Inc. for ConAm Development, that deals with stormwater detention entirely through an above ground swale and pond system (see attachment). The OTAK plan includes eight large buildings and was estimated to add 5.14 acres of new impervious area to the site. In contrast, this application estimates it will add 6.77 acres of new impervious surface area. It seems reasonable to assume that a swale and pond system could be upsized by 32% and meet the needs of the current application. It is worth quoting from the 2015 plan “The stormwater management system for the Tannler Drive development project will contain a regional treatment swale and detention pond. Stormwater runoff from the entire development (approximately 9.95 acres of pervious and impervious area) will be collected and conveyed to the swale for treatment of flows up to and including water quality design storm. Larger flows will bypass around the swale to the regional detention pond which will attenuate and discharge site flows into the existing stormwater conveyance system located in Blankenship Road.”

The entire application for the above proposed development can be found here:

https://westlinnoregon.gov/sites/default/files/fileattachments/planning/project/10025/supplemental_submittal_07-20-15-reduced.pdf

Based on the above, there is no reason that this development should also not be required to use surface stormwater storage. Therefore, the stormwater plan for this application fails to meet the standards of CDC 55.105(N)(2), CDC 55.130(B)(C), CDC 92.010(E)(2)(4), SWMM 1.1(1) and SWMM 1.5.2(1-4). SWMM 1.1(1) not previously quoted states that the overall intent of the SWMM is to “1. Prioritize the use of green development practices.”

The basalt rock which underlies this property poses significant challenges when it comes to building, especially given the large retaining walls (up to 30 feet in height) proposed for the development. The applicant has not provided enough detail regarding the construction of these retaining walls for the Planning Commission to understand if the walls will be safe.

Additionally, Savanna Oaks NA is aware of adjacent residential properties which have had issues with landslides causing significant expenditures to attempt to remedy. Despite the efforts, not all the issues have been remedied to this day.

Tree Preservation

The application states that only 80 of the 408 onsite trees inventoried are to be retained. This means that 328 trees are proposed for removal. Or, to put it another way, 80% of the trees will be removed.

As this property is across the street from the White Oak Savanna Park, its trees combine with those in the White Oak Savanna to form an ecosystem. Removing 80% of the trees from the site could have adverse effects on the entire White Oak Savanna ecosystem.

The Planning Commission should require that a higher percentage of trees be retained for the project.

Effect on the White Oak Savanna Park

As stated above, tree removal could affect the White Oak Savanna Park ecosystem. But there are other effects which are harder to quantify yet can still be detrimental to the park.

As an example, the White Oak Savanna is a “No Dogs” park. Apartment dwellers living across the street will be very tempted to walk their dogs in the Savanna. Doing so harms the delicate ecosystem for the 108 vertebrates that have been identified in the park. Just the mere presence of animals such as dogs can cause the native wildlife to flee the area.

In addition, the aforementioned closing of the bottom of Tannler Drive will make it more difficult for visitors to the park to find the lower entrance. The concern expressed earlier regarding overflow parking from the apartments will also mean fewer on-street parking spots will be available for visitors to the park.

Summary

As described in this document, this development application is not suited for this location. Our concerns include too many apartment units, high density, insufficient parking, safety concerns, increased traffic, the closing of the lower portion of Tannler Drive, insufficient tree preservation, effect on the White Oak Savanna park, and geologic and stormwater issues.

We have shown that the application does not meet several sections of the Community Development Code and the West Linn Stormwater Management Manual.

The members of Savanna Oaks NA respectfully ask the Planning Commission to deny this application, DR-25-04/LLA-25-02, for the reasons stated above.

Thank you,

/s/ Ed Schwarz

Ed Schwarz, Treasurer
Savanna Oaks Neighborhood Association

Tannler Drive Mixed-Use Development Preliminary Stormwater Management Plan

July 10, 2015
(Resubmitted July 20, 2015)

Submitted to:
ConAm Development

Prepared by:
Otak, Inc.

Gary Alfson PE
Project Manager

Ashley Cantlon, PE
Water Resources Engineer

Jeremy Tamargo EI
Water Resources Engineer Designer



HanmiGlobal Partner

Otak Project No. 17122

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Attachments

- Attachment A: Figures
- Attachment B: NRCS Soils Report
- Attachment C: FEMA Floodplain Maps
- Attachment D: TR55 Table 2-2a CN
- Attachment E: Swale Calculations
- Attachment F: Detention Calculations

Preliminary Stormwater Management Plan

Introduction

The Tannler Drive Mixed-Use project, hereafter referred to as the Tannler Drive development, is a proposed mixed-use development in the City of West Linn, Oregon. The development consists of commercial and multi-family residential housing, sidewalks, roadways, utilities, and a stormwater management system. The stormwater management system will include a collection and conveyance system, a flow-through planter, a regional water quality swale, and a detention pond. This Stormwater Management Plan documents compliance of the Tannler Drive stormwater management system with the *West Linn Surface Water Management Plan* (City of West Linn, 2006), the *City of West Linn Public Works Design Standards* (City of West Linn, 2010), *City of Portland Stormwater Management Manual* (COP, 2014), and the *Stormwater Standards for Clackamas County Service District No. 1* (Clackamas County, 2013). Included are descriptions of the existing and proposed hydrologic conditions, as well as design details of the proposed onsite stormwater management facilities.

Site Description

The Tannler Drive development project is located along the west side of Tannler Drive, north of its intersection with Blankenship Road. The project proposes to develop portions of 3 existing taxlots containing approximately 11 acres of mainly undeveloped land. Existing site conditions consist of undisturbed ground covered with native vegetation (grasses, bushes, and shrubs), and areas of oak and Douglas fir trees. Approximately 0.6 acres of the lot are currently developed, however for the purposes of this analysis the site is assumed to be fully undeveloped, allowing for a conservative preliminary design.

The project site is located on steep (9- to 24-percent slopes) terrain that slopes from north to south toward Blankenship Road. Underlying soils consist primarily of Witzel very stony silt loam, and are underlain by relatively shallow bedrock. This type of soil is classified as Hydrologic Soil Group D, which is characterized by very low infiltration rates and high runoff potential. Attachment B contains a soils map and information from the Natural Resources Conservation Service (NRCS).

Figure 1 is a vicinity map that shows the project site location.

Preliminary Stormwater Management Plan

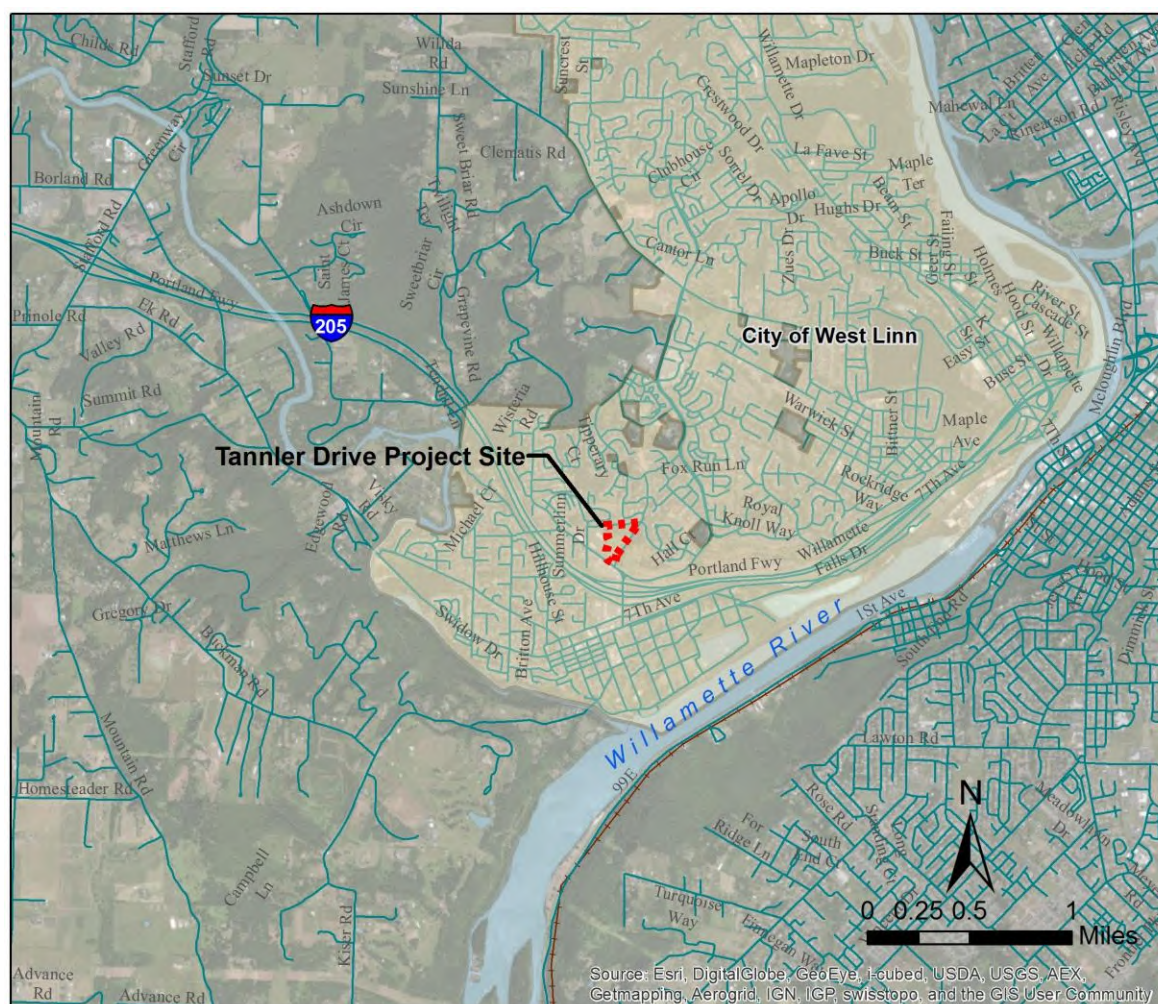


Figure 1: Vicinity Map

Design Criteria

Development of the project area will follow three sets of design criteria for stormwater management:

- *West Linn Surface Water Management Plan* (City of West Linn, 2006)
- *City of West Linn Public Works Design Standards* (City of West Linn, 2010)
- *City of Portland Stormwater Management Manual* (COP, 2014)

Design Approach

The Tannler Drive project site is under the jurisdiction of the City of West Linn. Proposed developments must meet the requirements set forth in the West Linn Surface Water Management Plan and Public Works Design Standards. These standards include requirements to provide adequate

Preliminary Stormwater Management Plan

stormwater conveyance during design storm events, mitigate for increased stormwater runoff, and reduce runoff pollutants using design guidelines set forth in the City of Portland Stormwater Management Manual. The City of West Linn (hereafter referred to as the City) requires detention of stormwater runoff such that post-developed flows generated by the 2-year, 5-year, 10-year, and 25-year storm events shall not exceed corresponding discharge rates under pre-developed conditions.

The City of Portland Stormwater Management Manual was used for water quality facility design guidance along with Clackamas County's water quality flow rate, defined as the amount runoff generated by 1 inch of rainfall in 24-hours.

Existing Drainage

The Tannler Drive project will be constructed on an undeveloped hillside with existing slopes ranging between 9 and 24 percent. Existing elevations throughout the property vary from approximately 390 feet along the north edge of the property, to 215 feet along the southern lot boundary. There is no existing drainage infrastructure on the property.

Floodplain

FEMA Flood Insurance Rate Maps for Clackamas County identify floodplains for the Willamette River, but not within the project limits. The FEMA map included in Attachment C (Firmette ID 41005C0257D) show floodplain limits located approximately 1/5 mile downstream of the project site.

Drainage Basins

The stormwater management system for the Tannler Drive development project will contain a regional treatment swale and detention pond. Stormwater runoff from the entire development (approximately 9.95 acres of pervious and impervious area) will be collected and conveyed to the swale for treatment of flows up to and including the water quality design storm. Larger flows will bypass around the swale to the regional detention pond, which will attenuate and discharge site flows into the existing public stormwater conveyance system located in Blankenship Road. Existing and project conditions maps are included in Attachment A.

Existing Conditions

Drainage on the existing site flows overland from north to south across undeveloped ground with brushy vegetated cover. Runoff flows down the slope and is intercepted by vegetation, local depressions in the soil, and shallow ditches long the adjacent roads. Stormwater runoff that exceeds the capacity for the receiving ditches currently enters the existing 12-inch diameter drainage systems in Blankenship Road and Tanner Drive before entering a 30-inch diameter main conveyance system at the intersection of Blankenship Road and Tanner Drive. This main conveyance system extends approximately 1 mile to an outfall at the Willamette River.

Preliminary Stormwater Management Plan

Proposed Conditions

Of the 11 acres within the lot boundary, 9.95 acres will require stormwater management. 1.17 acres are not included in this analysis, as they are located downhill of the project site and stormwater management system, and will remain undeveloped. Post-development stormwater runoff flow patterns will generally follow those described for existing conditions, when viewed from a regional perspective: post-development stormwater runoff will continue to drain to the downstream roadway drainage system, which currently receives runoff from the project site area. It is assumed that the existing drainage system will contain capacity to accommodate detained flows from the proposed development. Drainage basins have been delineated for areas which will contribute runoff to the onsite pond and grassy swale upon project completion. A proposed drainage basin and site layout is shown on Figure 3 in Attachment A.

Table 1 presents the contributing areas from the proposed Tannler Drive development project limits. Pervious areas under developed conditions will be a combination of approximately 1.64 acres of lawn, which produces higher runoff rates, and 3.17 acres of undisturbed, highly vegetated area uphill from the development located along Falcon Drive, Summerhinn Way, and the Tannler Drive project site. For the purposes of providing a conservative preliminary analysis and stormwater management design, the full 4.81 acres of pervious area were modeled as developed lawn.

Table 1: Proposed Tannler Drive Project Areas	
Area Type	Area (acres)
New Impervious Area	5.14
Project Pervious Area (lawn)	1.64
Project Pervious Area (undisturbed)	3.17
Total Project Drainage Area	9.95

Hydrology

Catchment areas for existing and proposed basins were modeled using HydroCAD® 10.0 software. Drainage basin areas described previously, as well as rainfall distributions, curve numbers, and times of concentration were entered into each catchment to create runoff hydrographs using the Santa Barbara Urban Hydrograph (SBUH) runoff method. Under existing conditions, the basin behaves like a more natural, contiguous watershed, and a single time of concentration was applied to the entire basin. In order to more accurately represent the post-development runoff hydrograph from a given basin, the impervious and pervious areas were input into separate catchments and flows were calculated separately to allow different times of concentration to be used for different land uses. Resulting hydrographs were then added together to produce a combined peak runoff flow rate. This calculation approach isolates the impervious surfaces from the pervious areas, and accounts for the rapid initial runoff from impervious surfaces followed by runoff from pervious surfaces within the

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basin.

Rainfall Depth

Rainfall depths for the storm events of interest, obtained from NOAA Atlas maps were applied to the Natural Resource Conservation Service (NRCS) Type 1A rainfall distribution and routed through the pre- and post-developed watershed basins.

Table 2: Precipitation Depths	
Recurrence Interval	Precipitation Depth (in)
2-Year	2.50
5-year	3.00
10-Year	3.40
25-Year	3.90
100-Year	4.50

Curve Number

Curve Numbers (CN), listed in Table 3 for impervious and pervious areas during existing and post-development conditions were selected using Table 2-2a – Runoff Curve Numbers for Urban Areas from Technical Release 55: Urban Hydrology for Small Watersheds (TR-55) (see Attachment D).

Table 3: Runoff Curve Numbers			
Category	Cover Type	Hydrologic Soil Group	Curve Number
Impervious Area	Pavement, roofs, sidewalks	D	98
Existing Pervious Area	Brush	D	77
Post-development Pervious Area	Open Space, Good Condition	D	80

Time of Concentration

The time of concentration (ToC) represents the maximum time needed for all areas of the basin to be contributing to the outflow hydrograph. Time of concentration values for each contributing drainage basin during existing conditions were calculated using the method provided by the SCS Technical Release 55 (SCS 1986) in HydroCAD. The minimum allowable time of concentration for any drainage basin is five minutes.

Existing Conditions

The pre-project area was modeled as one existing drainage basin and one time of concentration was calculated. Using the time of concentration calculation method programed into HydroCAD (similar

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to the TR55 method), it was assumed that existing runoff behavior consists of 50 feet of sheet flow, while the remaining 900 feet to the point of compliance was assumed to be shallow concentrated flow on steep slopes. A ToC of 6.4 minutes was calculated and applied to this analysis.

Proposed Conditions

Times of concentration are much lower post-development due to the additional impervious area created in the basin, which consequently increases the overall curve number within the basin. The time of concentration for post-development conditions within each drainage basin was assumed to be five minutes; a conservative assumption for preliminary calculations based on the high impervious percentages resulting from development.

Drainage Basin Runoff

Stormwater runoff rates for each basin, during existing and proposed conditions, were calculated using HydroCAD®, as described above. The total existing runoff rate generated by the existing areas within the project site was calculated to set targets for water quantity mitigation in the pond. The existing runoff rate for the project area was determined by computing a runoff hydrograph and routing it through a storage node with a flow control structure representing a detention pond. Table 4 lists the existing runoff rates calculated for the project site.

Table 4: Existing Conditions Runoff Rates	
Storm Event	Runoff Flow Rate (cfs)
2-year	1.25
5-year	2.08
10-year	2.82
25-year	3.80
100-year	5.06

Runoff rates for each drainage basin during post-developed conditions are included in the output report from HydroCAD (see Attachment F). Runoff from each of these basins was routed to the onsite pond via the proposed stormwater conveyance system described below.

Water Quality

Runoff from the water quality storm event is generated by 1-inch of precipitation falling in a 24-hour period, as defined by Clackamas County Water Environment Services (WES). Approximately 5.14 acres of new impervious area will be created with the new development. Runoff from the developed area will be treated using a grassy swale as described below.

Pretreatment

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A pollution control manhole will be located upstream of the regional grassy swale facility to remove floatable material and allow some solids to settle out before being discharged into the swale. A City of West Linn standard pollution/flow control manhole will be installed in the private roadway right-of-way at the downstream end of the main conveyance line following a flow split that will direct low flows through the pollution control manhole and swale, and high flows directly into the detention pond.

Grassy Swale

The City of West Linn refers to the City of Portland Stormwater Management Manual for water quality facility design guidance. Parameters for this type of facility, as defined by the City of Portland, include:

- Minimum two foot bottom width
- Maximum 4H:1V side slopes
- Maximum design velocity of 0.9 ft/s
- Minimum hydraulic residence time of nine minutes
- Manning n value of 0.25
- One foot of freeboard between the water quality surface elevation
- Minimum length is 100 feet
- Flow spreaders shall be placed every 50 feet in swales with a bottom width greater than 6 feet.

A swale was preliminarily designed for the proposed project site using these parameters with the following dimensions:

- Bottom width = 7 feet
- Longitudinal slope = 0.6%
- Length = 133 feet
- Depth = 18 inches
- Side slopes = 4H:1V

Calculations for the proposed grassy swale are included in Attachment E.

LIDA Planter

The frontage along Tannler Drive will have a new eight-foot wide sidewalk within the public right-of-way, set along the back of the existing street curb line. This new impervious area (approximately 5,200 square feet) will be treated using a Low Impact Development Approach (LIDA) flow-through planter within the proposed dedicated right-of-way on the back side of the sidewalk. The sidewalk sheds toward the street, combining with roadway runoff in the existing Tannler Drive curb and gutter system. Tannler Drive has a slope of approximately 13 percent with existing catch basins collecting gutter flows. Since the sidewalk runoff will be combined with the existing roadway runoff, the City is open to an approach which allows an equivalent area of roadway runoff to be treated in place of sidewalk runoff. The LIDA planter shown on Figure 2 will collect 5,200 sf of sidewalk and existing roadway for treatment. Table 5 summarizes the LIDA planter sizing.

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Table 5: LIDA Planter Sizing Summary

Contributing Impervious Area	5,200 square feet
LIDA Sizing Factor	6%
LIDA Treatment Area	312 square feet

Water Quantity

The discharge rate from the proposed development into the Blankenship Road drainage system must be less than or equal to the peak flow rate from pre-developed 2-year, 5-year, 10-year, and 25-year recurrence interval storm events, per City of West Linn water quantity standards. Pre- and post-development flow rates from the pond are listed in Table 6.

Detention Pond

Water quantity requirements will be met by routing proposed runoff into a single detention pond, located at the southwest corner of the development. Post development runoff rates were routed through this pond, which was sized to match release rates of existing conditions using storage and a flow control structure before directing stormwater into the existing downstream stormwater conveyance system.

Flow Control Structure

Peak flow attenuation will be achieved using a standard City of West Linn flow control structure on the pond outlet pipes. The low-flow control orifice plate will include a low-flow control orifice to regulate the release of the 2-year storm event. A second orifice will be located higher to regulate the release of the 5- and 10-year flow events, and a notched weir will be incorporated into the riser structure to regulate the 25-year flow rate. The result will be slight over-detention of the 10-year and 25-year storm events. Table 6 summarizes the flow control structure for the proposed pond, and Attachment F includes additional orifice and weir data from the HydroCAD model.

Table 6: Flow Control Structure Summary

Flow Control Device	Dimension/Elevation
2-year Flow Control Orifice Diameter/Elevation	5.1"/270'
5/10-year Flow Control Orifice Diameter/Elevation	6.3"/273.3'
High-Flow Control Weir Length/Elevation	12"/274.4'

Release Rates

The flow control structure was sized using an iterative process in the HydroCAD model, adjusting the storage volume and outflow structure until the pond outflow rates for the design storm events were less than or equal to the calculated existing basin runoff rates. The resultant project condition runoff rates and release rates from the pond are listed in Table 7, along with the existing basin runoff rates for comparison.

Preliminary Stormwater Management Plan

Table 7: Pre- and Post-development Release Rate Comparison

Storm Event	Existing Runoff Rate (cfs)	Proposed Developed Undetained Rate (cfs)	Proposed Release Rate (cfs)
2-year	1.25	3.78	1.24
5-year	2.08	4.85	2.07
10-year	2.82	5.74	2.47
25-year	3.80	6.88	3.60

Pond Capacity

The pond has capacity to contain the detained flow up to and including the 25-year storm event, with 1 foot of freeboard. Table 8 lists the pond water surface elevation and subsequent pond volume from the HydroCAD model during each of the design storm events.

Table 8: Pond Volumes and Water Surface Elevations

Storm Event	Water Surface Elevation (ft)	Volume (cf)
2-year	273.29	8,930
5-year	273.8	10,977
10-year	274.31	13,242
25-year	274.82	15,725
100-year*	275.23	17,119

*Volume not contained within the pond, discharge through emergency overflow occurs.

Pond Emergency Overflow

Either a separate riser pipe or an emergency overflow weir at the top of the pond embankment adjacent to the proposed development will be designed to convey the entirety of the 100-year storm event runoff rate should the primary flow control outfall be compromised, or its capacity exceeded. Attachment F includes emergency overflow weir sizing, which was calculated using Hydraflow Express software as well as sizing for an overflow riser as an alternative option if the weir is not able to be configured in a way that provides a safe overflow route. Should a storm event exceed the maximum capacity of the ponds, the excess stormwater in the pond will either spill through the emergency overflow weir, directing flows downhill across the preserved lot area and into the roadway conveyance system or into the overflow riser, which will convey flows into the main conveyance line downstream of the pond.

Conveyance

A stormwater conveyance pipe network within the Tannler Drive development will be designed in accordance with City of West Linn standards for storm sewer pipe networks. The stormwater conveyance network will collect and convey runoff flows to the onsite stormwater pond. The conveyance system will be sized using the Rational Method to meet the following criteria:

Preliminary Stormwater Management Plan

- Five minute minimum time of concentration
- Minimum pipe slope of 0.0055 ft/ft with minimum velocity of 2 ft/second
- Minimum pipe roughness coefficient of 0.013
- Design storm = 100-year event.

Conclusions

The stormwater management approach for the Tannler Drive Mixed-Use development project is to provide onsite stormwater collection, conveyance, water quality treatment, and detention designed to meet City standards. The conveyance system will be sized to convey the 100-year storm event. Water quality requirements will be met using a regional grassy swale using a one-inch water quality design storm and City of Portland design standards. The onsite regional detention pond will be designed to release post-development runoff flows at a rate less than or equal to existing peak runoff rates for the 2-year, 5-year, 10-year, and 25-year storm events.

Wyss, Darren

From: Ann Michael <amichaelsq@gmail.com>
Sent: Wednesday, July 29, 2026 2:17 PM
To: Wyss, Darren
Subject: City File No. DR-25-04/LLA-25-02

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

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Dear Mr. Wyss,

This email shall serve as my written testimony related to residential application DR-25-04/LLS-25-02, and I respectfully request that it be included in the public record for said application. Please confirm receipt of this email.

I vehemently oppose this application and request that it be denied, as it puts the financial gain of a non-resident developer over the well-being of your constituents, the residents of West Linn, and will increase the traffic congestion on the 10th street interchange with the freeway. In addition, the application does not comply with many sections of the City of West Linn Community Development Code (the "CDC"). Among others, the application is in violation of the following CDC sections:

1. CDC 55.105(N)(2), 55.130(B) and (C), 92.010(E)(2)(4), SWMM 1.1(1) and 1.5.2(1-4). The application does not meet the requirements for stormwater capture and runoff, as it uses in-ground detention facilities without showing that surface facilities cannot be used. It is my understanding that the Stormwater Management Manual prefers surface facilities. It is also my understanding that in a prior application for the property in question filed by the applicant proposed surface facilities. He has provided no reason which prevents the use of surface detention. How will the in-ground facilities be maintained and replaced? The application is silent on this issue. Finally, as required by the Stormwater Management Manual (SWMM), the application does not prioritize green development practices.
2. CDC 54.030. The application seeks a design exception to the requirements of this section regarding planting strips, which violates the "clear and objective" standards of CDC 55.015(A). The only reason the applicant wants this exception is to increase the amount of land on which he can build. Pure greed.
3. CDC 46.030. The application does not include the required delineation and dimensions of individual parking and loading spaces, compact parking spaces, disabled parking spaces or the location of electric vehicle conduit. The application calls for 320-1-, 2-and 3-bedroom apartments, plus 12,100 square feet of commercial space. Where are the people living and visiting here going to park? The property in question is not large enough to accommodate these structures, and if built, will be extremely dense, further congesting an already congested area. It is already difficult to turn left on Blankenship, and the addition of 320-plus extra cars will only exacerbate this problem, making things worse for your constituents who already live in the area. Last week, it took me almost 15 minutes to get through the 10th Street intersection. Finally, one pleasant thing about living in this area is the ability

to walk among the beautiful trees and wooded areas nearby. The building of this project will make Tannler Drive like any other densely populated area.

In addition to the foregoing CDC noncompliance, the application seeks to close and realign Tannler Drive. Doing so is not in the best interests of the residents of the surrounding area and all citizens of West Linn. With Tannler Drive open, it is easy to cut through the neighborhood to get to the Safeway shopping center, the middle school and places beyond Rosemont. Closing Tannler Drive will force residents to take Salamo to get to these destinations, thus increasing the commute. In addition, one of the entrances to the White Oak Savanna Park will be closed if Tannler is closed. This will prejudice the public's interest in visiting the Park and imperil the habitats of the 108 species of wildlife that live there. Closing Tannler and re-routing it through the proposed development will slow travel between Greene Street and Blankenship Road in both directions, hampering morning and afternoon commutes, as well as the experience of customers visiting the stores and restaurants located in the nearby shopping center on Blankenship. The response time of emergency vehicles will also be slowed. Allowing the applicant to close Tannler is effectively giving him the street and taking it from the residents of West Linn.

For the foregoing reasons, I oppose the application and again ask it be denied.

Thank you,
Ann Michael

Schroder, Lynn

From: Deb Berggren <debberggren114@gmail.com>
Sent: Monday, August 3, 2026 4:04 PM
To: Schroder, Lynn
Subject: Testimony for Public Hearing -- Residential
Attachments: Comments_Residential Public Hearing_20260810.pdf

You don't often get email from debberggren114@gmail.com. [Learn why this is important](#)

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Please accept this written testimony for the public hearing scheduled on August 10, 2026.

Thank you in advance for confirming that you have received this written testimony, and that it will be included in the public record.

See Attached File

Ms. Deborah A. Berggren

West Linn Resident

August 2,2026

Ms. Lynn Schroder

Management Analyst

City of West Linn

lschroder@westlinnoregon.gov

Re: City File No.: DR-25-04/LLA-25-02

Residential Public Hearing

Tannler Mixed Use Application

Dear Ms. Schroder:

Please accept this written testimony for the residential public hearing scheduled on August 10,2026. Thank you in advance for confirming that you have received this written testimony, and that it will be included in the public record.

This letter contains slight revisions to the comments letter previously submitted for the commercial application; and now points out that new residents (with only one assigned parking spot per unit) might also consider “scooters” as viable alternative transportation.

I am strongly opposed to the proposed development application, and believe the application should be denied.

Too Many Buildings Dedicated to Residential-Only

My primary concern is that the application does not meet the zoning requirements (and/or the community intent) for this property as outlined in the code **CDC21.010-Office Business Center (OBC) Zone**. The application fails to properly address the OBC zoning rule that requires **every** building must include a commercial

component on the first floor. The developer does not include commercial space in every stand-alone building. The proposed project overwhelmingly favors residential-only buildings to the significant detriment of available commercial space. I believe this project fails to meet the community intent of mixed-use zoning. A well-planned mixed-use project would have better balanced the mix of commercial and residential spaces.

Please note that I have calculated some rough estimated numbers to help demonstrate the case that there is insufficient available commercial space relative to residential space. I have no prior experience reading development project plans. That said, the consulting architect did a very good job detailing the master layout as published on the city website, and appears to indicate that the below (roughly calculated) estimated percentages are in the ball park for the purposes of further demonstrating at a high level my objection under the rules of **CDC21.010-Office Business Center (OBC) Zone**.

Reviewing the proposed project's architectural plan, I was very surprised to see that very few of the buildings met the OBC requirement that each stand-alone building must include first floor commercial space. Looking at the master layout, each "building" was labeled "1" through "11". I can only see that three buildings (27.3%) out of a possible 11 buildings (100%) were labeled as "commercial". Please note that the term "commercial", specific to this plan, does not mean 100% commercial. We should be thinking about the buildings labeled "commercial" as "mixed-use" – a combination of commercial and residential space. There are no commercial-only buildings. Only three buildings appear to properly combine both commercial and residential spaces properly meeting the requirements of **CDC21.010-Office Business Center (OBC) Zone**.

Eight (72.7%) out of eleven buildings appear to be solely dedicated to residential spaces. This number also includes the clubhouse. I made the assumption that the clubhouse is for residents only, and will not be open to the public.

Given the property's location relative to Interstate 205, I truly appreciate why West Linn designated the property for mixed-use under OBC zoning. It is common sense to encourage business growth and economic opportunity where we can, and to recognize the importance of this property's location relative to Interstate 205.

Using SB 1537 to allow buildings that are "residential only" while providing for an under-whelming number of buildings designated for mixed-use appears to not serve the intent of **CDC21.010-Office Business Center (OBC) Zone**. I believe inadequate building space has been dedicated to commercial use needed by West Linn to encourage and facilitate local economic growth.

I fully support the idea of incentivizing both local commercial and residential development. West linn can, and will, greatly benefit from well-planned projects that enhance not only more access to local housing; but also increase our local opportunities for economic growth. The proposed development falls short of this worthy goal. At a bird's eye view, this application is not such much "mixed-use" but more akin to an application that is primarily residential with some office space sprinkled in. The application should be denied.

Inadequate Parking

Compounding the lack of compliance with required OBC zoning, the mixed-use project also demonstrates a significant lack of available on-site parking for the future residential tenants and commercial employees/customers. Inadequate on-site parking will most likely generate a broad range of traffic and/or parking problems for the broader local community. A lack of on-site parking creates more dangerous traffic patterns through the 10th/Blankenship/Salamo intersection.

Each residential unit is allowed one parking spot. At face value, this assumption lacks basic common sense. In today's world, it is a rarity for households to drive only one vehicle. Due to the challenges of housing affordability, it is very reasonable to assume many, if not most units (including one-bedroom units) will be housing multiple adults. Some units will be housing families including children. Many units will be housing multiple adults living in room-mate arrangements. This highly predictable situation (multiple on-site parking spots will be needed for each unit) will create significant traffic and parking nightmares for the new residents (aka our future neighbors), as well as for the surrounding local community. Quality of life will decay. At a minimum, the number of on-site parking spots should be doubled to provide a more adequate number of on-site parking spaces given the significant number of residential units.

It is the community's understanding that TriMet will be discontinuing the current bus service that currently serves the adjacent street (Blankenship/Salamo) effective August 2026. The only available modes of transportation available to the future tenants will be cars, walking and biking. We should also expect to see an uptick in "scooters", including both the traditional scooters powered by humans, and the faster, battery assisted models.

Our neighborhood is simply too hilly to assume that each residential unit "only needs one parking spot".

Looking ahead, the rising popularity of E-Bikes will further complicate traffic for the 10th/Blankenship/Salamo intersection. The insufficient number of on-site parking spaces will no doubt result in more E-bikes navigating an already busy 10th/Blankenship/Salamo intersection. If residents are only allowed one on-site parking spot per unit, it is reasonable to assume E-Bikes will become an attractive option for alternative transportation. The idea of numerous E-Bikes (and scooters) being ridden up and down Salamo, then moving through an already awkward intersection sounds dangerous. The actual empirical impact is unknown, but it is predictable we will be seeing many more E-Bikes and scooters racing through this part of town.

Three final traffic-related questions that could further impact traffic safety at the cumbersome intersection:

- 1)What happens to traffic patterns/safety when/if the State implements Interstate 205 toll collection?
- 2)What happens to traffic patterns/safety when the City of West Linn develops it's new Public Works site with its only access point on Salamo Road?
- 3)What happens during commuting hours as traffic starts backing up on the 10th street exit from Interstate 205? Will drivers waiting to enter West Linn be put into danger if the flow of traffic begins lining up on Interstate 205?

The intersection near Interstate 205 will become increasingly more dangerous as new factors are introduced, one by one, to the high-traffic area. This intersection has the potential of becoming one of the most aggravating, possibly most dangerous, in Clackamas County.

The 10th/Blankenship/Salamo intersection will become a public-safety nightmare for drivers, bikers and pedestrians. I believe the planning commission should deny the application as it is currently proposed.

Sincerely,

Deb Berggren

West Linn Resident

Schroder, Lynn

From: gregg sturtevant <greggr5@yahoo.com>
Sent: Monday, August 3, 2026 1:11 PM
To: Schroder, Lynn
Subject: Please reject Tannler Application

[You don't often get email from greggr5@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Testimony submitted by Gregg Sturtevant on Tannler Application DR-25-04/LLA-25-02.

This testimony is submitted before August 5, 2006 deadline of 4 PM.

Please add this testimony to the Public Record and email me confirmation of receipt. Thank you.

Dear Ms. Schroder,

My name is Gregg Sturtevant and I am a resident of West Linn, Oregon. I am deeply concerned about the proposed development on the hill across from Park Rose Hardware.

While I understand that building on the hill may be something that would be beneficial to West Linn, the development as its being proposed is completely unreasonable and would pose many hazardous conditions not only to the residents living in that development but for all those living within a mile or more of it.

The traffic that we get through that area is very heavy as there are several main roads that converge right next to or very close to the exit and entrance to the 205 freeway, those being 10th, Salamo, Blankenship, and Willamette Falls Drive. This proposal would add another 500 to 700 vehicles belonging to the inhabitants of this new development right in the center of this already congested area.

According to CDC 85.170 the proposed development should be taking into account how bicyclists and pedestrians are affected by proposed development. In this proposal there are 8 new entrance and exit points onto Tannler Drive from this development. These transition points will cause significant issues for pedestrians and bicyclists walking and riding through this area. With the number of parking spots available for the new complex it seems that there will have to be more people on foot and also there will be vehicles parked outside of the development on Tannler creating blind spots for traffic and pedestrians.

The Vacation/Realignment of Tannler Drive would also cause massive backups and delays as all traffic that used to come down Tannler would now have to be diverted through the new community with very narrow lanes and no planting strips next to the roads. According to CDC 54.030 there has to be planting strips for any modified and new streets and the applicant has asked for there to be no planting stops. The pedestrians and bicyclists coming through this development would be sharing sidewalks (because the applicant has asked that there be no bike lanes) or they would be in the road to avoid running into each other. We would have all of this with hundreds of cars coming down Tannler and through the development with no barrier of a planting strip between those on the sidewalk and the cars coming through. This is an accident waiting to happen and god forbid we have any fatalities as a result of this nonsense.

Not only would there be hundreds of vehicles coming through that new community but in order for them to get out of the community to the 205 they would have to turn left to get out onto Blankenship. Turning left onto Blankenship would cause further delays and more vehicles to be backed up coming out of the community. If people coming down Tannler decided to go the other way and out onto Salamo to get to the freeway they would now cause backups on Salamo. Please also consider that the new West Linn Operations Complex is right in that area as well which further complicates things and adds to the traffic which is already congested and will be further congested. In addition to all of this the additional traffic generated by the West Linn Operations Complex was not taken into account by the Analysis that was provided by the Applicant for this proposed development.

With the amount of people and vehicles that are going to be crammed into this area there will be delays in commutes through the area and also in emergency situations such as medical response, police response and emergency evacuations.

In addition to all of what is in and not in this application causing a multitude of unsafe conditions for those living in and around the area, the beauty of this area would be greatly diminished. It appears that the reasoning behind removing planting strips from the development was to squeeze in additional buildings at the expense of safety and beauty to the area. Planting strips not only provide a barrier between those on the sidewalk and traffic as discussed earlier but they also provide an additional green space for runoff water coming down hill. This additional water will runoff into the road and without green spaces there will be flooding below.

When I moved to West Linn about a decade ago I was amazed at the beauty of the place. I have lived in many cities from the east coast to the west coast and have never lived in a city so beautiful and safe. I feel that this proposed development will change all of that. I often wonder with all of the proposed development if people who haven't lived in other cities don't understand how good they have it here. It would truly be a shame if this beautiful city started to become just another ugly city made of concrete with no foresight to the consequences of removing green spaces. It seems to me that this applicant is just looking for multiple ways to squeeze more buildings into this area without any thought to the consequences of what it does to the city or the people who live here.

The applicant has not met the requirements to be able to have this application approved and has requested a development that will not only take away from the natural beauty of our area but will also make it much more dangerous to those living in and around this area, while asking you to approve this application that violated several of our community development codes. For all of these reasons I ask that you reject this application.

Thank you so much for reading my letter,

Sincerely yours,

A very concerned resident and Citizen,

Gregg Sturtevant

Schroder, Lynn

From: Kathie Halicki <khalicki@msn.com>
Sent: Monday, August 3, 2026 2:32 PM
To: Schroder, Lynn
Subject: DR-25-04-LLA-25-02
Attachments: DR.docx

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Lynn,

Please add this letter to the Public record for the housing part of this application. I know that I sent this letter before, to both you and Darren. I am just making sure that it gets into **both parts** of the hearing on the 10th.

Thank you,

Kathie Halicki

July 30, 2026

Dear Planning Commissioners,

This letter is about DR-25-04/LLA-25-02 (The Tannler Blankenship project).

This is my input:

a). There is no longer any public transportation on this side of the hill. This may alter/nullify the minimum parking requirements.

b). Putting 3% of the West Linn population onto a small (11 acre) steeply sloped hill plus 12,500 sq. ft. of commercial space is too much for this property and the surrounding community. Something smaller that assimilates with the community would be much preferable.

c). The current infrastructure is unable to accommodate this large project. Those of us above this project have water pressure issues, at times. I have been a resident for 25 years and have been in many of these houses. Every one of us has a plunger beside our toilets (even the germaphobes) to help with the flushing issues. Also, Tannler itself is unable to accommodate the additional traffic of 2,500-3,000 extra car trips. As we have seen even after the city has “fixed” Tannler the springs and street damage pop back up after 7-10 years.

d). This project has insufficient parking for both the commercial and the residential. With large amounts of cars parked along our streets (both in the interior of the project and outside of the project) it is an accident/fatality waiting to happen. It is an issue for pedestrians/bikes.

e). Blankenship already has an issue with speeding. This would just exacerbate the issue.

f). Should you decide to grant the commercial part of this application, please make the developer build the commercial first. (He has said during prior applications that he would build the apartments first to help pay to build the commercial, since there is very little financing to build commercial at this time.) There is no market for additional

commercial space, currently. Each of our commercial compounds currently has vacant spaces.

g). This housing application is not helpful to the TIF which the city imposed a couple of years ago. This property is grandfathered in with 350,000 sq. ft. of commercial space. That project would be much more beneficial to the TIF.

h). We as citizens, have no idea what said apartments look like. Will the 4 flights of stairs be on the inside or outside of the buildings? (No elevators). This project is not affordable housing. It has been stated that these apartments will be “market rate”.

i). A huge concern is the applicants proposed use of explosives to do the excavation. Huge safety and noise issues there. Damage to houses up the hill from development.

j). As of yet, there has not been a vacation application/hearing for this project. (The re-routing of Tannler, vacating the lower portion).

k). With vacancies all over the city, in both commercial and residential, is this project truly in the best interest of the community? (There are vacancies in both apartment complexes right down the street). When these buildings go empty, it will greatly add to the “blight” of the city. Being this close to the freeway, it could become a safety/crime issue. Our police department does not have the manpower to cover this. West Linn was just voted “safest city” in Oregon, let’s keep it that way.

l). Since this property is zoned OBC please deny the housing portion of this application and keep his ‘grandfathered’ commercial property application.

Thank you for taking the time to read this.

Kathie Halicki, West Linn resident

Schroder, Lynn

From: Michele Cinque <mcinque11@yahoo.com>
Sent: Monday, August 3, 2026 3:45 PM
To: Schroder, Lynn
Subject: DR-25-04/LLA-25-02 Opposition

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Testimony submitted by Michele Cinque on Tannler Application DR-25-04/LLA-25-02. This testimony was submitted before August 5th deadline of 4 pm. Please add this testimony to the Public Record and email me confirmation or receipt.

Dear Ms. Schroder,

I am a resident of West Linn and own property in the Madison Heights Condominium community adjacent to the property of the proposed application. As part of this community, I am very familiar with this piece of land, White Oak Savanna, and the surrounding neighborhoods and roadways. I travel through these areas almost every day. When this proposal came to light back in September 2025, I was greatly concerned about the density and scope of this mixed use development. The closing/realigning of Tannler Drive through the proposed development does not appear in any way to benefit the residents living in the area or people using this street for commuting locally or via the 10th Street exchange. The size and density of this mixed use development, and all the variances the applicant is requiring, make this application unsuitable for this property and location. I am strongly opposed to application DR-25-04/LLA-25-02 as currently submitted.

With the newly passes bill HB 4037, it appears that all issues and concerns related to established city codes are being dismissed and overridden in favor of the developer. How can we the people who live, work, own property, and have a real stake in this community not be heard? Isn't it our constitutional right? How can these codes established by the City to protect and provide safe, responsible growth and decision making for this beautiful city no longer hold any authority or value?

I believe the majority of citizens recognize more housing is a big priority for all cities. As proposed in this application, the development does not meet many of requirement the city codes require. Many of application and code requirements that were required by all past applicants in West Linn have not been met by the current application. For myself, as with many of us, HB 4037 favors the applicants's rights over our constitutional rights to be heard and be afforded due process.

The application states "Tannler is realigned through the site to meet the City's Transportation System Plan. (TSP)". However the application can meet the requirements of the TSP by completing M20 instead of realigning Tannler Drive.

Losing the right-of-way to the end of Tannler Drive goes against this city's and neighbors' land planning efforts for of the past twenty years. It also goes against the prior and current Parks Master Plan for the White Oak Savanna. Vacating/closing/taking the right-of-way does not benefit the neighbors living nearby or the community members utilizing this road way. The residents have not been allowed to vote on the taking of their street. Rerouting Tannler Drive through the development will have negative effects, such as slowing traffic for morning and afternoon commuters, as well as people wanting to visit existing businesses at he shopping center on Blankenship Rd. Fire/police and

emergency responders will all most likely be slowed in their response times.. Emergency evacuations due to earthquakes, fires, etc. will also be negatively impacted. The area is already overwhelmed by the morning and evening commuters. Safety and liability issues for cyclists, e-bikes and pedestrians must also be factored in with the increase traffic flow and congestion. Realigning Tannler Drive is not in the best interest of the neighboring communities and will create many negative issues for residents.

The applicant is asking for design exception to requirements of section CDC 54.090. This violates clear and objective standards of the CDC 55.105 (A). This applicant wants to eliminate the planting strip improvements, which act as a buffer and extra space between the roadway and sidewalks. These planting strips add to the aesthetic of our existing beautiful green lined streets. Eliminating these planting strips is only beneficial to the applicant's need to accommodate the number of buildings desired for construction in this small area,

Thank you for your consideration of my objection to this application. There are more issues involved in why this application is not the right fit for this space. It is my understanding the applicant has not been willing to modify/downsize the scope and density of the buildings for this site. This is unfortunate in my opinion. This application has not met the standards and codes required of all past applications within the city. It does not provide critical information necessary to make the best most informed decisions and plans going forward. With so many details unknown, it is not hard to imagine how this may negatively effect not only the residents and neighborhoods, but also the city of West Linn.

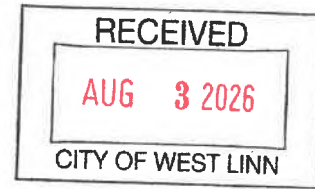
After my first year living full time in West Linn, I felt like I had hit jackpot. I came to appreciate the thoughtful planning leaders had put into the growth, maintenance and vision for this beautiful city. I have never felt as safe, and as much a part of the a community that strives to preserve and protect its natural landscape, wildlife and community spirit. West Linn is a very special place. I believe as citizens and community members, we should always have a voice in helping our leaders make the most thoughtful and balanced decisions to meet the needs of our communities. Please help us in this endeavor.

I am opposed to application DR-25/LLA-25-02. I am asking the Planning Committee to deny this application.

Sincerely,

Michele Cinque
5630 Summerlinn Way
West Linn OR 97068

August 4, 2026



Ms. Lynn Schroder, Management Analyst
City Hall
22500 Salamo Road
West Linn, Oregon, 97068

Dear Ms. Schroder:

Regarding City File No. DR-25-04/LLA-25-02

This is my written testimony relating to application DR-25-04/LLA-25-02. Please send confirmation that my testimony has been received. I request that my testimony be included in the public record for the application. I oppose the application of DR-25-04/LLA-25-02 and list the following reasons:

On September 24, 2025 representatives of Mill Creek Residential Trust gave their initial presentation at City Hall, West Linn. They were unable to answer many pertinent questions and assured us they would meet again with answers. This did not take place. No notice was given to the residents of West Linn that HB4037 was being written and considered for passage in Salem. It was done without constituent knowledge or input even though the passage of HB4037 would directly affect each one of us "neighbors".

My request to you is to take another focused look at the negative impact of HB4037. It is unconstitutional to NOT allow a public hearing and public appeal of land use applications for housing. HB4037 was effective July 1, 2026. Jeff Parker and his partner of Tannler Holdings LLC/owners of the property on the corner of Tannler and Blankenship Roads did not follow through with their commitment at the initial presentation. They "requested several/many adjustments" to the plans for the complex apartment buildings and used ORS227.178 (2)(c) to force the city to deem the application complete. The applicant submitted additional information in June, 2026 just in time for the law to take effect July 1, 2026 - mission complete averting the need to get back to us with issues they did not want to deal with (complex issues still not answered). It is now a new law - HB4037 which I implore you to take a critical re-assessment of HB4037, pulling all the fragmented issues together and evaluate the finished product. My understanding is that the applicant/developer must meet ALL applicable (CDC) Community Development Codes or the application will be denied by the Planning Commission.

I fervently believe HB4037 would not have been passed if those making decisions in Salem had the full knowledge of the thoughtless, reckless, strategy of packing people away like sardines in a painfully small plot of land. I wish to point out injustice where we see it, collectively as neighbors to do our part in helping bring to light the infractions as a

preventive gesture rather than keep quiet and realize consequences after the damage is done.

Tannler Property - 320 units on 11.41 steeply graded acres, including 10,500 square feet of Commercial Space with 80% tree removal across the property. A good comparison five minutes away is Cascade Summit Apartments on Salamo Drive with 294 units on 22 acres (26 fewer units on twice as much land - not steeply graded)

Parking: (1.2 cars per apartment).

Apartment Buildings - 30% less glass than previously required by code - the feel and look of institutional housing. No balconies, questionable green space, questionable disability considerations. Being an OBC (Office Business Center) each building is zoned residential with commercial on ground floor of each building. Question: does each apartment include washer/dryer or will the laundromat be located on the ground floors of each building? I understand the applicant/developer has verbalized the commercial areas be located close to Blankenship Road and the rest of the buildings be 100% residential. I understand that violated the code SB1537 which requires each building include commercial.

Stormwater: SWMM Stormwater Management Manual. I'm concerned the application does not prioritize green development practices as is currently required by SWMM. Surface facilities are preferred by SWMM over in-ground detention which is not in code or user friendly (replacement of filters that weigh 150-250 pounds). The applicant requested in-ground - why?

Realignment of Tannler Drive - TSP Transportation Systems Plan: Closing the current Tannler Drive will negatively affect our commute each day since Tannler is one of three major roads that lead to the 205. It will affect our entrance to White Oak Savanna Park. This Savanna became a park after 10 years of fundraising to acquire the property as a public park, 16 years to restore the land with over 21,600 hours of physical labor volunteered by the neighbors. Tannler Drive as we know it will come to an end. The City of West Linn is giving up the last 275 feet of our street to the Developer with no benefit to our due process. The benefit goes to the Developer unless the legislature takes another assessment of HB4037.

Traffic/Streets: CDC54.030 Landscaping - this application requests design exception to the requirements. This violated the clear and objective standards CDC55.105(A). Imagine the sidewalk without a sliver of green space for a tree - just sidewalk, curb, street. Add these facts to the Stormwater request that asks for in-ground filter rather than the preferred (in code) surface facilities.

CDC46.120 Requirements for off-street parking which includes the size of the clubhouse 6,495 SF. The property will not have a meeting space to accommodate more than 35 people at one time. Grossly congested - inadequate to accommodate 320 apartments.

Bicycle: Why is the bicycle lane being eliminated? With only one car per apartment, no bus service, no available train, the residents of this 320 apartment complex will be a throwback to the 1950's -

Conflict of Interest - creating two new bills passed by the legislature, SB1537 and HB4037, the applicant has requested several adjustments to the plans for the apartment complex. They have caused West Linn to divide the application into two parts: residential and commercial. Some issues are relevant to both residential and commercial.

It has been obvious that the major concern of the applicant/developer is to squeeze as many apartments /buildings in as little space and to chip away (ask for more exceptions of code). I am dismayed that there have been so many requests for exceptions by the applicant.

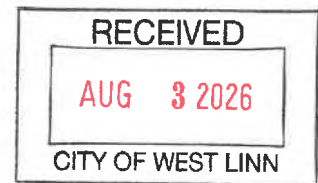
I oppose the application and ask the Planning Commission to deny the application.
Thank you for your thoughtful consideration to this important matter.

Sincerely,

Beatrice H. Neff

*43915 Summerland Drive
West Linn, Oregon*

August 4, 2026



Ms. Lynn Schroder, Management Analyst
City Hall
22500 Salamo Road
West Linn, Oregon, 97068

Dear Ms. Schroder:

Regarding City File No. DR-25-04/LLA-25-02

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I oppose the application and ask the Planning Commission to deny the application. Thank you for your thoughtful consideration to this important matter.

Sincerely,



Chris & Eileen Neff
1836 Barnes Cir
West Linn, OR 97068

Schroder, Lynn

From: ed.schwarz@gmail.com
Sent: Monday, August 3, 2026 9:24 AM
To: Schroder, Lynn
Subject: Planning Commission Testimony for DR-25-04/LLA-25-02 - Residential Deliberations
Attachments: Schwarz Comments re DR-25-04 LLA-25-02 - Residential Deliberations.pdf

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

Lynn,

Please add the attached testimony to the Public Record for DR-25-04/LLA-25-02 – Residential Deliberations.

Please acknowledge receipt of this email and attachment.

Thank you.

Ed Schwarz
West Linn

August 3, 2026

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

Subject: Modera Apartment Application – DR-25-04/LLA-25-02 – Residential Deliberations

Chair Schulte-Hillen and Commissioners,

My name is Ed Schwarz and I live in West Linn.

As I understand that this evening’s testimony is restricted to the commercial portion of this application, I want to make it clear that I will be discussing the removal of commercial space from six of the buildings in this application and the requirements of the OBC zoning of this property. I am not addressing anything specifically related to the residential portion of the application.

Over the past several years there have been many changes in the way cities can manage code requirements on new housing development. These changes arose from a desire to permit the construction of more affordable housing in Oregon.

HB 2001, HB 2003, and SB 1537 all impacted what could be built and how much control local jurisdictions have over it.

SB 1537 allows developers to request up to ten mandatory “adjustments” on their housing projects. These adjustments fall in various categories such as increased building height, lessening the total window area in a building, reducing the number of bicycle parking spaces, reducing requirements for balconies and porches, and prohibitions on ground floors of mixed use buildings against residential uses except for one face of the building facing the street and within 20 feet of the street or against nonresidential active uses that support the residential uses of the building, and others.

Now comes HB 4037, which was recently passed by the legislature in its abbreviated session and took effect on July 1.

In summary, HB 4037 eliminates public hearings where citizen input is normally allowed in cases where the application meets the “clear and objective” standards of the code. Additionally, HB 4037 limits public notice requirements and eliminates the ability of anyone except the applicant to appeal any decision by the hearings body or planning manager.

On July 9, 2026 attorney Andrew Mulkey submitted a letter in which he raises objections to the requirements of HB 4037, calling them “blatantly unconstitutional”. Mr. Mulkey has been retained by a group of West Linn residents to help us in navigating the ever-changing requirements of state law when it comes to development applications.

I would like to add to Mr. Mulkey’s position by stating that HB 4037 does not apply to the Tannler Drive apartments development application. The underlying zoning for this property is OBC – Office Business Center. The applicant has used the adjustment clause in SB 1537 to make 6 of their 10 proposed buildings 100% residential. They then claim that HB 4037 and its prohibitions against public testimony now apply to their development as it is “housing.” That is not correct, and the city should not have fallen for this wordsmithing.

Section 38(1)(b) of SB 1537 states that an allowable adjustment does not include a request to allow use of property not otherwise permissible under applicable zoning requirements. The underlying zoning for this application is OBC, not residential, and 100% residential buildings are not allowed in this zone. Therefore, the SB 1537 adjustment should not be allowed, and HB 4037 does not apply as this is not “housing” under our codes. The entire house of cards on which this application is built falls apart.

The Planning Commission should deny this application for its non-adherence to the underlying OBC zone, which is a violation of CDC 21.030, CDC 21.050, and CDC 21.060, all of which list the permitted uses in the zone. Buildings which are 100% residential are not permitted uses.

There have been numerous previous applications on this property which have been denied by the Planning Commission for not adhering to the requirements of the OBC zone. Please make this yet another and deny this application based on the many points of nonadherence to code that you will hear tonight.

Thank you,
Ed Schwarz
West Linn

Schroder, Lynn

From: ed.schwarz@gmail.com
Sent: Monday, August 3, 2026 9:33 AM
To: Schroder, Lynn
Subject: Planning Commission Testimony for DR-25-04/LLA-25-02 - Residential Deliberations
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Thank you.

Ed Schwarz
West Linn

ORS 271.120 defines the legal standard regarding the City Council's review and decision of a Petition to Vacate. The statute also grants the City Council broad discretion in determining whether the Public Interest would be prejudiced by the Petition to Vacate. It is important to note that the initial discussion of this application for 314 apartments and 10,500 sq. ft. of commercial office space on Tannler Drive included a vacation of the lower portion of Tannler Drive. That has now been removed, even though a taking or vacation of that street portion must be done for this development to be completed as proposed.

The neighbors signing the petition below believe that this taking or vacating of the lower portion of Tannler Drive will result in the Public Interest being prejudiced (i.e. it is not in the Public Interest). Two of the many reasons are: 1) the neighbors will have a longer route to get to the I-205 on-ramp each day and 2) there will be diminished access to the White Oak Savanna Park. The neighbors have spent over ten years to acquire it as a West Linn city park and over sixteen years, and more than 21,360 hours of volunteer labor, to restore it.

I believe the Public Interest will be prejudiced by the taking/vacating of a lower portion of Tannler Drive.

Printed Name	Signature	Address
Gary Davidson	Gary Davidson	3501 Summerlin Dr, West Linn
Sharon Davidson	Sharon Davidson	3501 Summerlin Dr. West Linn
LAURIE BORNSTEIN	Laurie Bornstein	3385 SUMMERLIN DR
NICHOLE BORNSTEIN	Nichole Bornstein	3385 SUMMERLIN DR
JUDY WHITT	Judy Whitt	3701 Summerlin Dr. W. Linn
Haskell Hedges	Haskell Hedges	3701 Summerlin Dr. West Linn

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Printed Name	Signature	Address
PATRICK J. GREEN	<i>Patrick J. Green</i>	2912 Bluegrass Way W.L. 97068
Patty Mattner	<i>Patty Mattner</i>	2332 Athena W.L.
Lisa Treiber	<i>[Signature]</i>	2580 Kensington Ct
Irene Huget	<i>Irene Huget</i>	22045 Chelan Loop W.L.
Eleanor Clang	<i>Eleanor Clang</i>	21365 Miles Dr. WL
Bobbie Dennett	<i>[Signature]</i>	19476 Wilderness Dr. W.L.
JANET McDONALD	<i>Janet M. Donald</i>	2498 Safford St West Linn
WILLIAM S. RICK III	<i>WRick</i>	21430 ROSE PARK Ct WL
Mary S. Fay	<i>Mary S Fay</i>	3109 Winkel Way WL
Lyndalea Ruffner	<i>Lyndalea Ruffner</i>	19995 Suncrest Dr, W.L.

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Printed Name	Signature	Address
MARY CROSLAND	Mary Crosland	4070 ROSE PARK DR. WL, OR
Lena Green	Lena Green	2912 Bluegrass Way WL
Rita Burton	Rita Burton	2323 HASKINS RD. 97068
Eileen Ashcraft	Eileen Ashcraft	2585 Kensington Ct
Christine B. Moffett	Christine B. Moffett	2562 Pimlico Dr, WL
Molly Hooflich	Molly Hooflich	1860 Churchill Ter WL
Jaime Etheredge	Jaime Etheredge	1945 Taylor Ct, West Linn, OR 97068
Nancy Jacobson	Nancy Jacobson	19970 Bluegrass Circle,
Dan Crosland	Dan Crosland	4070 Rose park Dr WL
MARY RAETHKE	Mary Raethke	6240 FAIRING ST WL
Brenda Turner	Brenda Turner	3920 N. Hampton St. WL
MARTHA RIAL	Martha Rial	21430 Goosepark Ct.
Charles Mathews	Charles Mathews	3443 Chippewa Ct West Linn
Tammy Gann	Tammy Gann	21360 S. Shapansky Rd West Linn

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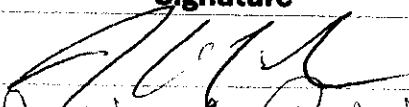
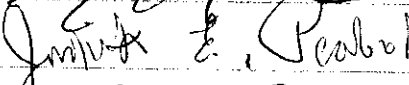
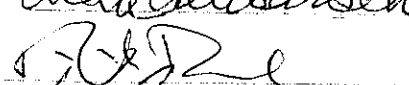
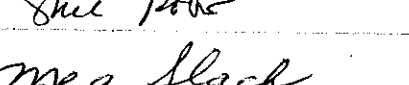
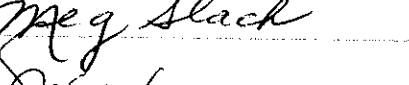
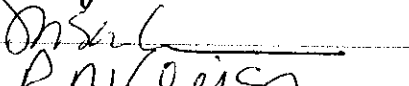
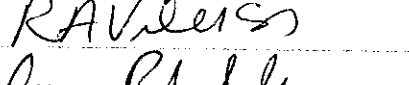
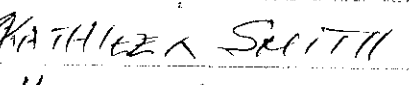
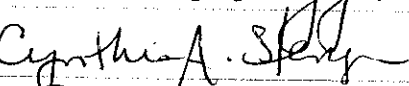
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Printed Name	Signature	Address
Wendy DuBois		²⁴⁹⁸ 2469 Crestview Dr, WL
Ashley Leonard		2469 Crestview Dr. WL
Richard DuBois		2498 2469 Crestview Dr. WL
Michael Leonard		2469 Crestview Dr. WL

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Jeff Crawford		2450 Warwick St West Linn, OR 97068
Judy Flabody		2270 Sunset Ave, West Linn OR 97068
DIANA PERSON		19363 Wilamette Dr #510, WL / OR 97068
RAJASINGH ISRAEL		905 Springtree Ln West Linn OR 97068
Kirstin Bawn		2450 Warwick St West Linn OR 97068
Sheri Roberts		3100 SW Schaeffer Rd West Linn, OR 97068
Meg Slack		19720 Spring Ridge Dr West Linn OR 97068
SUSAN LARSON		1975 Ostrum Rd WEST LINN 97068
RITA VILEISIS		19090 Kantarra West Linn, 97068
Jenna Rohrbacher		3969 Ridgewood Way West Linn
Julia Simpson		1611 Killatney Dr. WL 97068
	KATHLEEN SMITH	3950 RIDGEWOOD WAY WEST LINN 97068
Kathy Selvaaggio		1611 6th St, West Linn 97068
Cynthia A. Stenger		19936 Derby St. West Linn OR 97068
David Macemon		19936 Derby St West Linn OR 97068

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Printed Name	Signature	Address
Sara Walkenhorst	Sara Walkenhorst	22994 Bland Cir. West Linn, OR 97068
Mike Walkenhorst	Mike Walkenhorst	22994 Bland Circle, West Linn, OR 97068
Jaran Sve	Jaran Sve	1915 Bristol Ct West Linn 97068
Greg Shell	Greg Shell	23121 Bland Circle West Linn 97068
STEVE RANTENBERG	Steve Rantenberg	2415 MICHAEL DRIVE, West Linn
Susanne Kraetschmer	Susanne Kraetschmer	826 Nicole Ct. WL 97068
Patty Nastari	Patty Nastari	1930 Bristol Ct WL 97068
MICHAEL NASTARI	Michael Nastari	1930 Bristol Ct. WL. 97068
MARK L. WILLS	Mark L. Wills	5410 SE HULL AVE 97267 NOT WL

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Printed Name	Signature	Address
Kathie Halicki	Kathie Halicki	2307 Falcon Dr.
Diana Carbaugh	Diana Carbaugh	4690 Sunnyside Way
Michael Piazza	Michael Piazza	3750 Rosepark Dr.
Kimberlee O'Neill	Kimberlee O'Neill	6278 Peakcross Dr.
Jorge Mendoza	Jorge Mendoza	2387 Taylor Dr., 97068
Renee Peterson	Renee Peterson	1252 Willametta Falls Dr. 97061
Thomas M. Purr THOMAS M. PURR	Thomas M. Purr	1340 S WOODBINE RD
Ken Shotwell	Ken Shotwell	3167 Cottonwood Ct., west Linn

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Printed Name	Signature	Address
Kennedy Ortega	<i>Kennedy Ortega</i>	1628 Killarney Drive West Linn, OR 97068
Jeannie Ortega	<i>Jeannie Ortega</i>	1628 Killarney Dr West Linn, OR 97068
DENNIS ORTEGA	<i>Dennis Ortega</i>	1628 KILLARNEY DR. WEST LINN, OR 97068
Jodi Amato	<i>Jodi Amato</i>	1658 Killarney Dr West Linn, OR 97068
GEORGE HARPER	<i>George Harper</i>	3531 CHLAW DR West Linn 97068
MARK Vuylsteker	<i>Mark Vuylsteker</i>	5000 Broadway ST 7 West Linn, OR 97068
Catherine Graham	<i>Catherine Graham</i>	2461 Warwick St West Linn, OR 97068
Gerlev	<i>Gerlev</i>	675 Rosemont Rd WL 97068
GARY HAINES	<i>Gary Haines</i>	3477 Chelan Dr. WEST LINN, OR 97068
E. OMAN	<i>E. Oman</i>	3098 Kensington Ct 97068
PHIL BRUS	<i>Phil Brus</i>	1948 FURLONG DR WEST LINN, OR 97068
Nancy Breen	<i>Nancy Breen</i>	505 SW Long Farm Rd West Linn 97068
JAMES KELLY	<i>James Kelly</i>	19597 Barton St West Linn, OR
Rich Beckman	<i>Richard Beckman</i>	1116 Madison Street Oregon City, OR 97045

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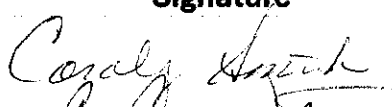
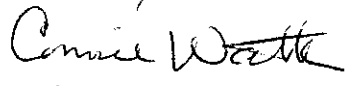
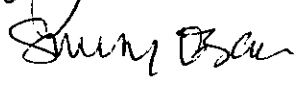
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Printed Name	Signature	Address
CARMEN ADAMS	<i>Carmen Adams</i>	5800 Summerlin Way West Linn OR
MATI EVANS	<i>Mati Evans</i>	2070 ALPINE DR
Linda Grill	<i>Linda Grill</i>	5395 Summerlin Way WL OR
LEN GRILL	<i>Lenard Grill</i>	" " "
Marilyn Rasmussen	<i>Marilyn Rasmussen</i>	3305 " "
GREGG SWANSON	<i>G. Swanson</i>	6430 SUMMERLIN WAY W LINN OR
CHARLES MATHEWS	<i>Charles Mathews</i>	2305 Crestview DR. OR
Bobbie Mathews	<i>Bobbie Mathews</i>	" " " "
Peter Binn	<i>Peter U. Binn</i>	2301 Chickadee Ct. WL OR
ROBERT MITCHELL	<i>Robert Mitchell</i>	1122 MEADOWVIEW CT. WEST LINN OR 97068

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Printed Name	Signature	Address
CAROL J Smith		4575 Summerlin way ^{West Linn}
Cody Watts		2236 Greene St West Linn
Connie Watts		2236 Greene St, West Linn
Caitlin Sutton		3860 Summerlin Drive
Dave Johnson		3932 N. Hampton Ct W 2 97068
Sherry Esau		6270 Haverhill Ct. West Linn, MO 97068
Beau Harrison		13910 SE Aldridge Rd 97082
EDWARD ABEL		2254 ROGUE WAY, WL 97068

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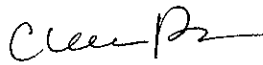
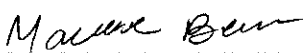
I believe the Public Interest will be prejudiced by the taking/vacating of a lower portion of Tannler Drive.

Printed Name	Signature	Address
April Goehring	<i>April Goehring</i>	2309 Falcon Drive West Linn 97068
Brad Goehring	<i>Brad Goehring</i>	2309 Falcon Dr. West Linn 97068
Tristan Goehring	<i>Tristan Goehring</i>	2309 Falcon Dr. West Linn 97068
Heidi Goehring	<i>Heidi Goehring</i>	2309 Falcon Dr. West Linn, OR 97068
Bev Flaminio	<i>Bev Flaminio</i>	3030 Regington WL 97068
Debra Garcia	<i>Debra Garcia</i>	19555 Willamette Dr #397068
Lara Mullins	<i>Lara Mullins</i>	535 Springtree Ln 97068
Sandra Rowland	<i>Sandra Rowland</i>	3537 Chelan Dr. West Linn, OR 97068
Phil Cherk	<i>Phil Cherk</i>	2350 S.W. HA HARKINS
Keith Brush	<i>Keith Brush</i>	3760 Mapleton WEST Linn. 97068
Grant Loriaux	<i>Grant Loriaux</i>	9700 West Linn OR
JOSE FLOOD	<i>Jose Flood</i>	3675 Deschutes Ln, OR
Quiky FLOOD	<i>Quiky Flood</i>	3075 Deschutes Lane, WL
Janina Kraetschmer	<i>Janina Kraetschmer</i>	826 Nicole Ct. West Linn, OR 97068
Vanessa Kraetschmer	<i>Vanessa Kraetschmer</i>	826 Nicole Ct. West Linn, OR 97068

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Printed Name	Signature	Address
Caitlin Burns		2165 Alpine Dr
Megan Burns		2165 Alpine Dr.
Mike Burns		2165 Alpine Dr.
Sophia Burns		2165 Alpine Dr.
Maddie Burns		2165 Alpine Dr.
DANIEL EMMI		6102 CENTER LN.
PHILIP WILBERTSON		2200 MICHAEL DR.
LANAN RUPP		307 SWEET LN
DEB BERGGREN		2357 TAYLOR DRIVE
Matt Hendrix		1603 19th
Prot Vandeype		1055 Snidow Dr.
Kaitly Carlson		10635 SW Mundock LN
DEB BERGGREN		
Linda J. Birn		2301 Chickadee Ct.
Vickie Cosentino		3012 Deschutes Lane

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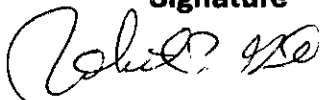
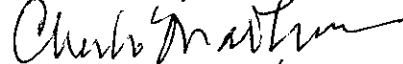
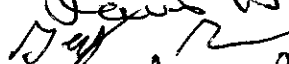
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Printed Name	Signature	Address
LESLIE A. WALSH	Leslie A. Walsh	5890 Summerlenn Wy West Linn, OR
LAWRENCE P. WALSH	Lawrence P. Walsh	5890 Summerlenn Wy West Linn, OR
Jon Overen	Jon Overen	5800 Summerlenn Wy West Linn OR
Debbie Keller	Debbie Keller	5600 Summerlenn Way
Jane Klein	Jane Klein	3351 SW Turner
JEFF HENSEN	Jeff Hensen	3351 SW TURNER RD
Ellen Derr	Ellen Derr	1340 S Woodbine Rd

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Printed Name	Signature	Address
Robert B. Giler		4935 Summerlin Way ^{West Linn}
Karen Better		4975 Summerlin Way ^{West Linn} 97068
Debbie Keller		5600 Summerlin Way, W.L.
Charles Mathews		2305 CRESTVIEW DR, W.L.
Bobbie Mathews		2305 Crestview Dr. - WL
Timur Chabuk		1835 Bay Meadows Dr. WL
WILLIAM BRADLEY		4050 SUMMITLINN WAY WL
TIMOTHY SELEN		1747 5 TH AVE WL
Larry Sheeley		22760 SW Johnson Rd WL
Randy Gibson		2631 Oregon City Blvd WL
MARK ALLSUP		3264 Forest Ct, WL 97068
Paris Hancock		5345 Broadway WL
Geoff Graham		2461 WARMICK ST WL
JASON FERRELL		2503 SATTER ST, WEST LINN
CINDY BRUS		1948 Fullong Dr. W.L.

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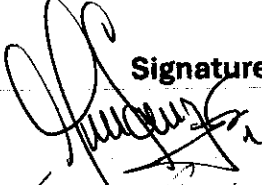
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Printed Name	Signature	Address
O. Jerry Andersen	<i>O. Jerry Andersen</i>	5055 Linn Lane
ANDREA ANDERSEN	<i>Andrea Andersen</i>	5055 LINN LANE WL
Bonnie David	<i>Bonnie David</i>	2017 19th St WL

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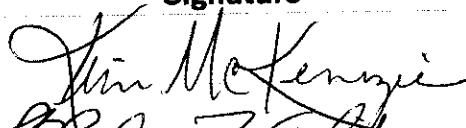
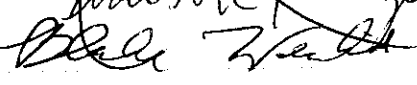
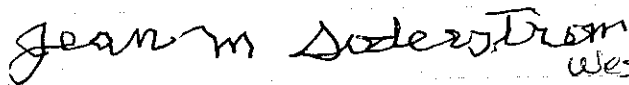
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Printed Name	Signature	Address
Glenda Urizar		22121 Horizon Dr. West Linn, OR 97068
BARB PUCHY		22733 W Bluff W. Linn, OR 97068
Mike Barnes		22193 Horizon Dr. West Linn, OR 97068
Andrew Riemer		22709 W Bluff CT W. Linn

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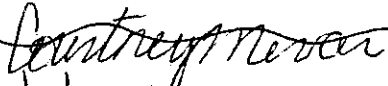
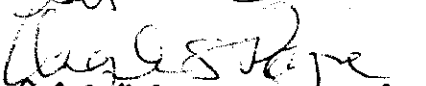
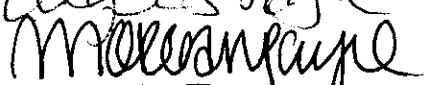
I believe the Public Interest will be prejudiced by the taking/vacating of a lower portion of Tannler Drive.

Printed Name	Signature	Address
Jim McKenzie		22123 Horizon Dr.
Stacey Weichert		West Linn, OR 97068
		22114 Horizon Dr
Jean Soderstrom		62130 Horizon
BRIAN SINGER		West Linn OR 97068
		1521 11th St
		West Linn OR 97068

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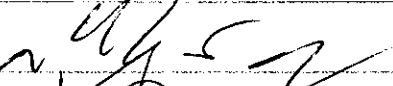
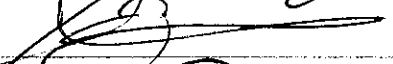
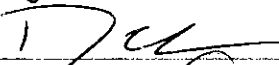
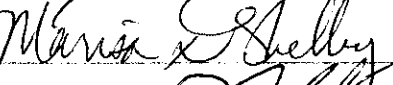
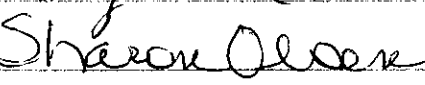
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Printed Name	Signature	Address	not w/
Courtney Mercer		12990 Jays Drive, Oregon City OR 97045	
Grant Morgan		"	not w/
Angela Kayne		2368 Falcon Dr. West Linn OR 97068	
Morgan Payne		2378 Falcon dr. West Linn OR 97068	
DOUG PAYNE		2378 FALCON DR WEST LINN, OR 97068	

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Printed Name	Signature	Address
Liz Carrese		2539 Limerick Ln, West Linn OR 97068
Anthony Carrese		2539 Limerick Ln, West Linn OR 97068
HOWARD J. ANDERSON		1632 PAUL PLACE
SCOTT ZURBANI		2550 KENWORTH CT
Don DeCambra		2013 Virginia Ln
Tom Murtagh		2551 TROY CT. West Linn
Anita Lane		23130 Blvd Ln, West Linn, 97068
Dolan Lane		23130 Island Cir West Linn 97068
Marisa Shelby		2685 Coeur d'Alene Dr, West Linn 97068
Kent Shelby		2685 Coeur d'Alene Dr, West Linn 97068
DAWN WELLENBRINK		2383 MARGERY ST WL 97068
SCOTT WELLENBRINK		2383 MARGERY ST WL 97068
Rodney L. Rose		1615 Jamie Cir West Linn
Sharon Olsen		2060 Sunray Cir W.L.

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Printed Name	Signature	Address
PAT RUSHTON	Patricia J Rushton	2585 REMINGTON DR.
STEPHEN RUSHTON	[Signature]	2585 REMINGTON DR. WEST LINN
Justin Schmidt	[Signature]	2560 Remington Dr. West Linn
Dale Laird	Dale Laird	2580 Remington Dr. W.L.
Mar Udagawa	Krista Badger	2590 Remington Dr - W.L.
Jeremy Hapler	[Signature]	2570 Remington Dr. W.L.
Victoria N. Laird	Victoria N. Laird	2580 Remington Dr.
Joseph Badger	[Signature]	2590 Remington Dr
Morgan Benson	[Signature]	2575 Remington Dr
Cari Benson	[Signature]	2575 W.L.

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Printed Name	Signature	Address
Virginia Bauer	Virginia Bauer	22880 W. Bluff Dr. West Linn OR 97068
Diana Kerman	Diana Kerman	19087 Kantana Ct West Linn OR 97068
Phillip Kerman	Phillip Kerman	19087 Kantana Ct West Linn OR 97068
Lois Hawkins	Lois Hawkins	22923 W. Bluff Dr. West Linn OR 97068
Lois Hawkins	Lois Hawkins	22880 W. Bluff Dr. West Linn OR 97068
Saher Khan	Saher Khan	22721 W. Bluff Dr. West Linn OR 97068
BLAIR HEINTZ	Blair Heintz	22914 West Bluff Drive West Linn, OR 97068
GWYNETH BALL	Gwyneth Ball	22903 W. Bluff Rd. W.L.
A.J. GIARDINA	A.J. Giardina	22901 W. Bluff Dr. West Linn OR 97068
PHYLLIS WOODS	Phyllis Woods	22902 W. Bluff Dr. West Linn OR 97068
Christine Desheria	Christine Desheria	22843 W. Bluff Rd. West Linn OR 97068
Joe Hilliard	Joe Hilliard	22812 W. Bluff Dr. West Linn OR 97068
Pamela Kelleas-Hilliard	Pamela Kelleas-Hilliard	22812 W. Bluff Dr. West Linn OR 97068
Vuong Tran	Vuong Tran	22606 W. Bluff Dr. West Linn OR 97068
Ziv Anchel	Ziv Anchel	22608 West Bluff Dr. West Linn OR 97068

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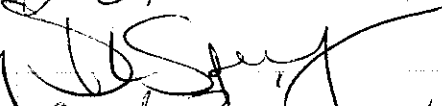
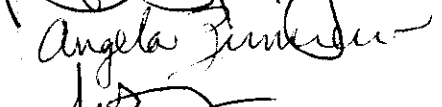
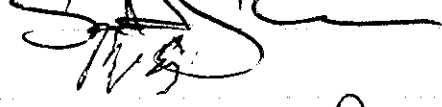
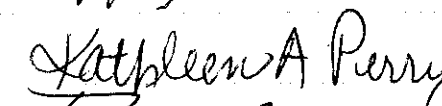
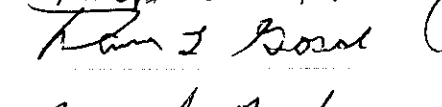
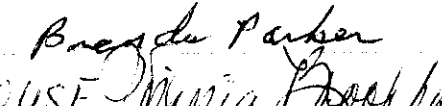
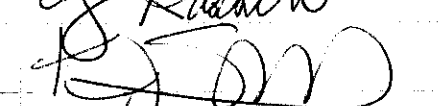
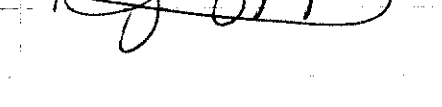
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Printed Name	Signature	Address
Rij Nathan	K Ray	1955 Taylor Ct, West Linn
William Zetler	W Zetler	3016 Sable Lane, W.L.
Patricia Tama	Patricia Faltra	4800 Summerlin Way
Jill Gruen	Jill X Gruen	1974 Hall St. W.Linn
Ruth Buccino	Ruth Buccino	1984 Hall St. West Linn
ANTHONY BUCCINO	Anthony Buccino	" " " "
JOHN GRUEN	John Gruen	1974 HALL ST WL
Theresa Cummings	Theresa Cummings	2190 Valley Ct West Linn, OR
Pat Kelly	Pat Kelly	824 Sibley Loop SE
Henry Achcar	Henry Achcar	2243 Greene St
SYDNEE ACHCAR	Sydnee Achcar	"
Paul Arginski	Paul Arginski	2425 Remington Drive, W.L. OR 97008
JOE BENON	Joe Benon	3320 Barrington Dr W.L. 97065
Tom Clausen	Tom Clausen	3330 Barrington Dr. 97065

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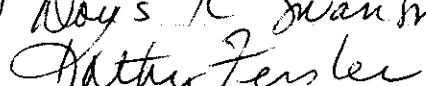
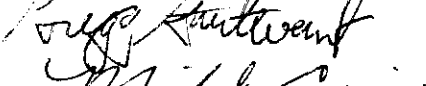
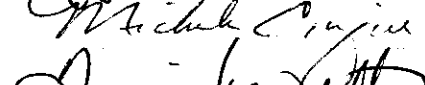
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Printed Name	Signature	Address
Laurie Tesiero		4555 Summerlinn Way West Linn OR 97068
Deborah Spelleary		6440 Summerlinn Way West Linn, OR 97068
Angela Zimmerman		6301 Summerlinn Way West Linn, OR 97068
Jonathan Wasy		3620 Summerlinn Dr West Linn, OR 97068
Scott Chapple		5555 Summerlinn Way West Linn, OR 97068
Bernd Scholz		Mr. Bernd Scholz 5355 Summerlinn Way West Linn, OR 97068
Kathleen A Perry		4505 Summerlinn Way West Linn, OR 97068
PAULA L GOSCH		5135 Summerlinn Way West Linn, OR 97068
BRENDA PARKER		4495 SUMMERLINN WAY WESTLINN, OR 97068
VIRGINIA BROOKHOUSE		4395 SUMMERLINN WAY WEST LINN, OR 97068
Mary Kossiter		6000 Summerlinn Way West Linn, OR 97068
Kelsey Staats		5505 Summerlinn Way West Linn, OR 97068

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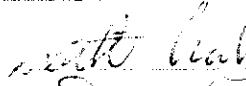
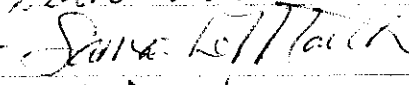
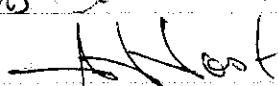
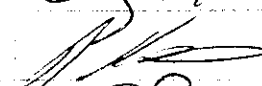
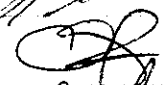
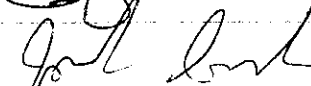
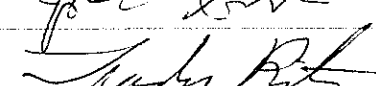
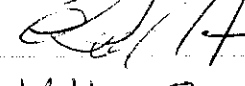
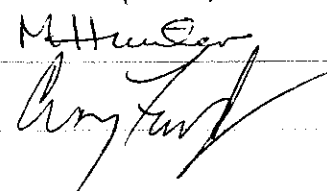
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Printed Name	Signature	Address
CHRIS CONTRERAS		5335 SUMMERLIN WAY
Joyce Ann Michael		4705 Summerlin Way
Deborah Jones		
Deborah Jones		6775 Summerlin Way
Lisa Farmer		6355 Summerlin Way
Quince Aguilar		6450 Summerlin Way
DORIS SWANSON		6430 SUMMERLIN WAY
Kathy Fessler		6290 Summerlin Way
David F Farmer		6355 Summerlin 97068
Gregg Hartweg		5630 Summerlin Way 97068
Michelle Cingre		5630 Summerlin Way
Toni Ewalt		5595 Summerlin Way
Devon Singrey		5840 Summerlin Way
William Barger		6060 Summerlin Way W/L
TANA BARGER		6060 Summerlin Way, W/L

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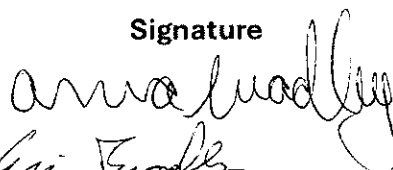
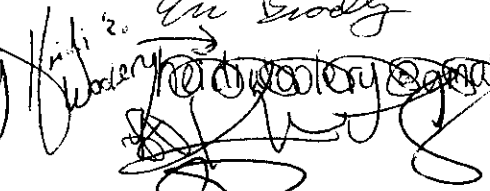
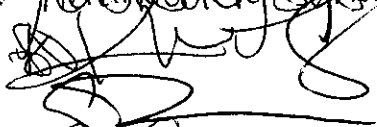
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Printed Name	Signature	Address
Scott Cook		2125 Greene St. West Linn OR 97068
Samantha Matthews		2125 Greene St, West Linn, OR 97068
GREG FOSTER		1610 19th St 97068
Kerry Rivers		2389 Debut Rd. West Linn OR 97068
Greg Masson		1975 Alpine Drive 97068
Noah Kamp		1796 8th Ave West Linn
Stephanie Card		6102 Center Lane West Linn, OR 97068
John Sramels		2738 Sunset Ave West Linn 97068
Trudy R. K.		22845 Safford Rd. Tualatin.
BARRY NAONE		22615 SW WISKY ROAD
KALISTA NAONE		22615 SW Wisky Rd. 97068
Bob BeRo		24108 Sweetbrier Rd 97068
Russell Danielson		1926 Aztec Ct W 97068
Meredith Hunter		2270 19th St W 97068
Craig Farley		21370 Horton Ct W 97068

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Printed Name	Signature	Address
Anna Bradley		2637 Umpqua, West Linn, OR
Eric Bradley		2637 Umpqua Ln, West Linn, OR
Heidi Woolery		2640 Umpqua Lane, West Linn, OR
Kevin Woolery		2640 Umpqua Lane, West Linn, OR 97068
Eric Rouleau		2465 River Heights Cir, WL OR 97068
STUART STRANER		1196 S. WOODBINE, WEST LINN, OR 97068
Karie Oakes		1125 Marylhurst DR, West Linn

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Printed Name	Signature	Address
Mary K. Bartrom	<i>Mary K. Bartrom</i>	2102 Greene St. West Linn
Arthur J. Rasmussen	<i>Arthur J. Rasmussen</i>	5305 Summerlinn Way
PATRICIA FOSTER	<i>Patricia Foster</i>	42124 HORIZON DR. WL OR 97068
Marilyn Rasmussen	<i>Marilyn Rasmussen</i>	5305 Summerlinn Way West Linn OR 97068
Kurt A. Auld	<i>Kurt A. Auld</i>	4260 Summerlinn
Barbara H. Bridge	<i>Barbara H. Bridge</i>	3585 Summerlinn Dr.
Greg Rossiter	<i>Greg Rossiter</i>	6000 Summerlinn Way
PAUL MOLNAR	<i>Paul Molnar</i>	2310 CRESTVIEW DR. WILLAM
PATRICIA RUSHTON	<i>Patricia Rushton</i>	2585 REMINGTON DR

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Address

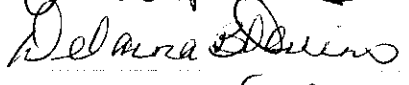
Kath S. Swanson Kathie Swanson 4701 Summerlinn Way
Westham

WALTER A. SWANSON Walter A. Swanson #701 Summerlin way
west Linn

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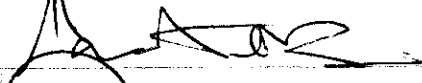
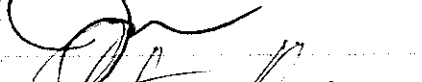
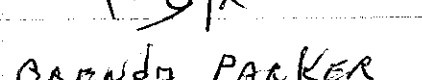
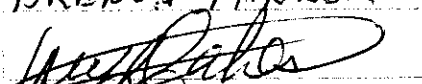
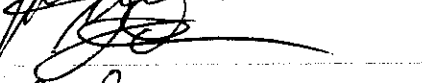
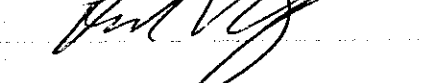
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Printed Name	Signature	Address
Mina Utgaard		22184 Horizon Dr. West Linn, OR 97068
Delana Blevins		22182 Horizon Dr. West Linn, OR 97068
Candace Trout		22183 Horizon Dr. West Linn 97068
Aubrienne Trout		22183 Horizon Dr West Linn 97068

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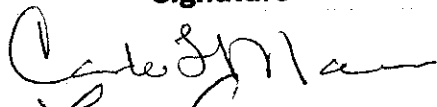
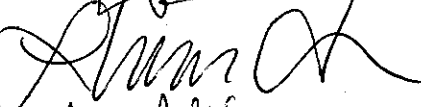
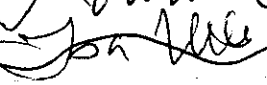
Printed Name	Signature	Address
LORETTE EVANS	Lorette Evans	2070 Alpine Dr West Linn, OR 97068
Glenn DelBene		2098 Alpine Dr West Linn, OR 97068
LENN PETRIN		4225 Sussex St West Linn, OR 97068
Stephen Keresztes		4707 Summer Run Drive West Linn, OR 97068
Math Nowak		2585 Haskins Rd West Linn, OR 97068
BEN FINKLEA		14810 Spring Ridge Dr W.L.
Brenda Parker	BRENDA PARKER	4995 SUMMER LINNWAY WEST LINN OR 97068
Tony Oakes		1125 Mayhew Ct West Linn, OR 97068
Take Down		2467 Tray Ct, West Linn OR 97068
W Steffen Bursey		25210 Ranch Lake Ct West Linn OR 97068
Derek Vicks		14661 Sun Cir West Linn 97068



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Printed Name	Signature	Address
Carole L. Mann		5830 Summerlawn Way West Linn, OR 97068
Lorne Cross		22660 Ponderay Dr West Linn, OR 97068
SARAH HALLAS		4292 Riverview Dr West Linn, OR 97068
RAMIAH RAMASUBRAMANIAN		1995 Alpine Road West Linn OR 97068.
STEVEN DEWITT		20967 NOBLE LN 97068
Shannon Johnson		3932 N Hampton Ct West Linn OR 97068
Lisa Wills		5410 SE Hill Ave Portland OR 97207 (NWHL)
Kathy Kipperberg	Kathy Kipperberg	1709 Blankenship Rd West Linn, OR 97068
Jessica Trout	Jessica Trout	4455 Simpson St West Linn, OR 97068

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Printed Name	Signature	Address
MARILYN K. GRANT	<i>Marilyn K. Grant</i>	2131 Greene St. West Linn OR 97068

①

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Printed Name	Signature	Address
Jeanette Larson	Jeanette Larson	6060 Summerlin Way West Linn, Or 97068
LEN & LINDA GRILL	Donald Grill Linda Grill	5395 SUMMERLIN WAY
Mary Witty	Mary Witty	5501 Summerlin Way
Michelle Sue	Michelle Sue	1915 Bristol Ct West Linn OR 97068
Nigel Lumby	Nigel Lumby	4292 Riverview Drive 97068
Susan Allen	SUSAN ALLEN	21975 CHELAN LOOP WEST LINN 97068
Julianna Guy	Julianna Guy	4455 Simpson St West Linn OR 97068

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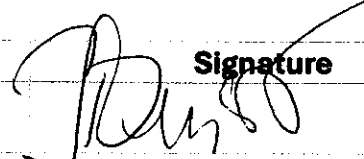
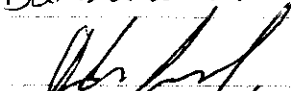
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Printed Name	Signature	Address
BRUCE THOMPSON	Bruce Thompson	2276 SAINT MORITZ LOOP
Marg Witty	Marg Witty	5501 Summerlin Way
Keri Fisher	Keri Fisher	5301 Summerlin Way
Debbie Susujara	Debbie Susujara	1121 Ryan Ct.
Judith K. Thompson	Judith K. Thompson	2276 SAINT MORITZ LOOP
Richard Ellis	Richard Ellis	2398 Taylor Drive, WL OR 97068
DAVID DODDS	David Dodds	18931 Old River Dr.
STEPHEN RUSHTON	Stephen Rushton	2585 REMINGTON DRIVE WEST LINN OR 97068
BOB PETERSEN	Bob Petersen	3030 REMINGTON DR WEST LINN OR 97068
Stacy LeMay	Stacy LeMay	1568 SW STRIGHTUP RD FOREST GROVE OR 97116
Kym Devault	Kym Devault	20091 Noble Ln West Linn, OR 97068
Mallory King	Mallory King	2380 19th St West Linn 97068

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Printed Name	Signature	Address
Benjamin Kervag		2218 Tanner Dr. W.L.
Don Finkins		2218 Tanner Dr.
Sarah Shicki		2235 Tanner Dr.
Nathan. & Shicki		2235 Tanner Dr
Barbara Udell		2255 Tanner Dr.
Adam Joseph		23136 Bland Cir
Stephane Joseph		23136 Bland Cir
Marty Archer		Huachuca West Line

8

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Printed Name	Signature	Address
Lizbeth Thomas	Lizbeth Thomas	2613 Umpqua Lane, West Linn
Richard Thomas	[Signature]	2613 Umpqua Lane, West Linn, OR

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[illegible]

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[illegible]

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Printed Name	Signature	Address
BARBARA BRUNDAGE		5505 SUMMERLIN WAY WEST LINN, OR 97068
CHRISTOPHER COLBATE		6575 SUMMERLIN WAY WEST LINN, OR 97068
HOME ADDRESS :		1105 KAMOOKOA PLACE HONOLULU, HI 96825



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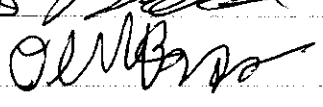
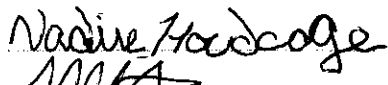
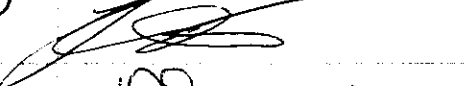
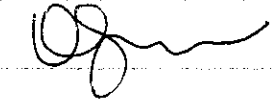
I believe the Public Interest will be prejudiced by the taking/vacating of a lower portion of Tannler Drive.

Printed Name	Signature	Address
Teresa Delgado	Teresa Delgado	3084 Remington Dr
Theresa Lummings	Theresa Lummings	2190 Valley Ct. West Linn ⁹⁷⁰⁶⁸
Nancy Bush	Nancy Bush	6705 Springtree Ln, West Linn OK

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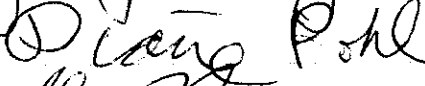
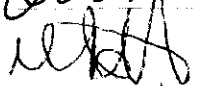
I believe the Public Interest will be prejudiced by the taking/vacating of a lower portion of Tannler Drive.

Printed Name	Signature	Address
Bret Renger		23040 Bland circle WL
Kachael Houdage		23040 Bland cis
Olivia Baranzano		23040 Bland cit WL
Nadine Houdage		23040 Bland cie WL
Mika Baksay		3420 Ponderosa loop
Thomas Baksay		3420 Ponderosa loop
Debra Lim		3470 Belknap Dr.

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Printed Name	Signature	Address
Hannah Schroeder		1122 Meadowview Ct. West Linn 97068
Jennifer Aberg		1088 9th St West Linn 97068
Diane Pohl		3041 Maxfield Dr. 97068
Quinn Mitchell		1122 Meadowview Ct. West Linn 97068
MATT HARVEY		1134 Meadowview Ct. W.L. 97068
Seamon Yung		3247 JOURNEY CT. W.L. 97068

Schroder, Lynn

From: ed.schwarz@gmail.com
Sent: Monday, August 3, 2026 9:28 AM
To: Schroder, Lynn
Subject: Planning Commission Testimony for DR-25-04/LLA-25-02 - Residential Deliberations
Attachments: Tannler Drive Apartments West Linn DR-25-04 LLA-25-02 Rev1 w Appendices.pdf

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

Lynn,

Please add the attached testimony to the Public Record for DR-25-04/LLA-25-02 – Residential Deliberations.

Please acknowledge receipt of this email and attachment.

Thank you.

Ed Schwarz
West Linn

An analysis of various aspects of the “Modera” multiunit apartment development plan.

I was asked by the group “Tannler Development Facts’ headed by Ed and Roberta Schwarz to review the proposed Modera development plan with a particular eye to any problems with the application by the applicant “Mill Creek Residential Trust”, (thereafter the “applicant”) that in my opinion might warrant denial of the proposal or at the least require a different site plan such that the application would need to be withdrawn and resubmitted.

I grant Ed and Roberta Schwarz the right to share this report with whomever they wish. I only ask that anyone given this report be given the complete report including appendixes unless I give express permission otherwise. I received no compensation for this report and did this purely for concern for the West Linn community and its quality of life.

Let it be explicitly stated that I am not an attorney or an engineer and am not representing myself to be one. Furthermore, this report should be read with the clear understanding that the observations and analysis are my opinions and not declarative statements of fact. I have thoroughly reviewed the materials available to me and in all cases attempted to be as accurate as possible and any errors in this analysis are entirely unintentional. I have not attempted to cover every aspect of this application, only those parts that I thought were most germane and relevant. The report has the following sections: Geotechnical site excavation and grading, Stormwater, Lower Tannler Drive right of way (ROW) and street vacation issues, and Miscellaneous issues.

Materials referenced in the report include the following:

Modera development application (application) prepared by Harper, Houf, Peterson, Righellis Inc. (HHPR) dated February 27, 2026.

A geotechnical analysis of this site by Columbia West Engineering (CW) dated September 16, 2025 (CW 2025).

A preliminary stormwater management report by HHPR dated February 2026 (HHPR 2026)

A geotechnical report for the same site by GeoDesign Inc. (GD) dated July 28, 2014 (GD 2014)

A preliminary stormwater management plan for the same site from OTAK dated July 10, 2015 (OTAK 2015)

A geotechnical report for the same site from GeoDesign dated April 11, 2005 (GD 2005)

A stormwater report (same site) from Group Mackenzie dated August 22, 2006 (GM 2006)

The West Linn Community Development Code current as of January 13, 2026 (CDC)

West Linn Stormwater Management Manual dated May 2025 (SWMM)

The West Linn Transportation Systems Plan dated March 28, 2016 (TSP)

A note about pagination, sometime after 2005 the City planning department must have stopped requiring a uniform pagination system for applications making it cumbersome to cite source materials. Therefore, I have included copies of various pages from sources in appendix pages with the following pagination (source), best approximation of page from source and appendix page number, for example (GM 2006) (Page 13) (appendix page 1). Except for the City codes and manuals, I will be returning all the source materials to the Schwarz's after completion of this report.

Geotechnical, grading and Excavation.

All the geotechnical reports are very similar in their overall findings and recommendations. The site is described in all three as mildly to steeply sloping with the slope rising upward from the south to the north. All three note that the soil is silt, gravel with occasional clay. The soil sits atop intact basalt bedrock with a layer of eroded and broken basalt before encountering solid bedrock, (GD 2005) (page2), (GD 2015) (pages 2-3) and (CW 2025) (pages 3-4). Each geotechnical report had test pits dug to determine soil composition, groundwater seepage and depth of soil before bedrock was encountered. The 2005 report had 9 test pits dug, the 2015 17 pits and the 2025 10 pits. The 2015 report did find groundwater seepage in three test pits despite the 2015 excavations occurring during particular hot and dry conditions.

Somewhat confusingly the CW 2025 report includes test pits done by GD from 2006 not from 2005. Except for the test pit data, I did not review the GD 2006 geotech report, because it was unavailable, but given that 2005 and 2015 reports

are very similar it may be assumed that the 2005 and 2006 reports are similar except that the 2006 test pits were dug in the summer as opposed to the spring for the 2005 report. The CW2025 report relies on 33 test pits from the 2006, 2051 reports and 10 additional pits in 2025. The CW report, therefore, relies on a total of 43 test pits for its investigation CW 2025 (page 3, section 5.3) (appendix page 1)

All three reports find the soil to be of low permeability and is useable as fill only if properly dried (GD 2005) (section 4.4.2, page 5). GD 2014 (page 7) states “silty soil will be difficult if not impossible to adequately compact at all times of year, except the dry summer months”. CW 2025 states “project stakeholders should understand that wet weather construction is risky and costly” (page 13) (appendix page 2).

As a consequence, I recommend that respondents to this application demand that if approved that all excavation, grading, filling foundation and retaining wall work be limited to the five driest months of the year. Basis for this demand would be supported by CDC 55.105(N)(2) and CDC 55.130(A)(C) (E) (2,4).

The application entails extensive amounts of excavation, in many locations existing grades will be reduced by close to 20 feet, see site diagrams C811, C831 And C841. The development plan also envisions extensive use of retaining walls of 15, 20, 25 and even 30 feet in height, see site diagrams: C301, C304, C306-11, C312(20-25ft), C313, C314(30ft), C315, C-316(30ft) and C317(30ft). Worth noting is that the two earlier Geotech reports envision much more modest retaining wall than the CW2025 or the application and site diagrams (HHPR 2026). GD 2005 makes its recommendations based on the assumption that “the walls are less than 10 feet in height” (GD 2005 page 8) While GD 2014 states that “our retaining wall design recommendation are based on the following assumptions; (1) the walls consist of conventional cantilevered, gravity or reinforced retaining walls (2) the wall are less than 9 feet in height” (GD 2014, page 13). Even the CW 2025 report states “our retaining wall design recommendations are based on the following assumption (1) the wall consist of conventional cantilevered retaining walls (2) the walls are less than 8 feet in height” (page 8, appendix page 3).

If there is any discussion in the application of how retaining walls of 15, 20, 25, or 30 feet are to be constructed, reinforced, stabilized and consequently made structurally safe I was unable to find it. The CW 2025 way of addressing this problem seems to be to state, “we recommend that a qualified geotechnical

engineer perform design calculations for the larger on-site walls once the wall type and geometry has been determined” (page 8, appendix page 3).

I would suggest that this apparent lack of crucial information does not meet the standards of CDC 55.130(E)(2)(4). This seems particularly relevant given the retaining wall issue on portions of the adjacent Summerlin development (the Schwarz’s can provide information on this). Also of note is that the setbacks from very tall retaining walls are very close to structures, parking spaces and internal driveways. As can be seen in site diagram C312 where a 20-foot retaining wall directly abuts a garage, or C311 where a 25-foot wall abuts garages. Also note C314 where a 30-foot wall is within 10 feet of parking spaces and directly abuts the internal street (since they are not public right of way, perhaps, they should be identified as internal driveways). Diagrams C315 and C317 show retaining walls that, should they fail, have the potential to directly impact the Tannler Drive ROW. Not to be redundant, I think a very good argument can be made that there is a glaring insufficiency of information for a decision-making body to determine that the grading plan is safe and structurally sound.

It is not just the retaining wall specifics that the application leaves to be determined at some later date. All three reports raise concerns about the possible existence of bedding planes within the solid basalt bedrock. The issue, as I understand it, is that it is impossible to determine from the 43 test pits what the structure of the intact basalt bedrock is. Intact solid basalt bedrock is encountered very close to the surface throughout the site. It is, therefore, anticipated that the application will require extensive hard rock excavation. CW 2025 states that solid basalt was encountered from 2-6 feet in the 2025 test pits and 3.3 to 13.5 BGS in the 2006 and 2014 excavations (CW page 4 (section 5.3.5) appendix page 4).

Apparently as a consequence of this need for excavation it is vital to determine whether the bedrock is solid throughout the entire depth of excavation. It is possible, apparently, that the bedrock exists in layers, with bands of solid bedrock separated by a layer of looser material, or as stated in CW 2025 (page 8) “however, we recommend additional exploration via rock coring to evaluate the presence of bedding planes to assess the feasibility of constructing large, over-steepened cuts into the rock”. CW 2025 further goes on to state “based on the current conceptual plan, we anticipate that at least three borings with rock coring to depths between approximately 25 and 35 BGS will be required” (page 8 section 6.4.1). The 2005 and 2014 both state “rock slopes should be evaluated to determine if bedding

planes exist” DG 2005 (page 6) and GD 2014 (page 10). Furthermore CW 2025 (page 11) states “for proposed walls exceeding 15 feet in height we recommend additional exploration via rock coring to evaluate the presence of bedding planes”.

I would suggest that this is vitally important information whose absence fails to meet the requirements of CDC 55.130(C)(E)(4).

The last issue related to excavation and grading that this report will raise concerns the actual mechanism to be employed for the hard rock excavation that will be unavoidable in this application. GD 2005 say “special excavation equipment such as hydraulic breakers or rock trenchers will likely be required to excavate the less weathered zones of basalt bedrock (page 4). GD 2014 states “the test pit excavations could not penetrate the intact bedrock. Special excavation techniques (such as hydraulic breakers, rock trenchers or blasting will likely be required to excavate the intact basalt bedrock (page 6). And finally, CW2025 states “special excavation techniques such as hydraulic breakers, rock trenchers or blasting will likely be required to excavate the intact basalt bedrock where test pits encountered refusal” (page 13 section 7.3.1)

The application seems to view this as a technical issue presumably to be addressed as a building code standard. I would suggest that the method of excavation and potential offsite impacts (see proximity of the 30-foot retaining wall on site diagrams C316 and C317 to the Falcon Street residential properties) should absolutely be addressed as part of the land use approval process as per CDC 55.105(N)(2) and CDC 55.130(C) (E) (2,4).

Stormwater plan and related stormwater issues:

The application’s stormwater plan HHPR 2026 can be divided into two separate elements; (1) The collection, treatment, storage and conveyance of stormwater runoff from the privately-owned portions of the development plan and (2) a stormwater plan for the public ROW, predominately the realigned portions of Tannler Drive. The ROW plan conveys stormwater runoff from the impervious portions of the ROW via drains and piping to an above ground vegetated non-pervious pond, where the water is filtered, stored and ultimately dispersed into the City’s stormwater system. There is little to be said about the ROW plan since it seems to be fully compliant with CDC 50.105(B) (C), CDC 92.010(E) (2-4) and SWMM 1.5.2(1-4) and SWMM 3.11.1.

The private part of the plan, however, raises considerable issues and concerns. In this plan stormwater that runs off of impervious surfaces is conveyed via piping to below ground storage vaults that contain a series of cartridge filters. Not counting the public ROW, the site is divided into eight drainage basins lettered A-G (see site diagram EX 3) and has eight total storage vaults (see site diagram C400). The vault sizes range from large to very large (see vault between buildings 6 and 8 (C400)). All together it is envisioned that there will be 34 cartridges. In HHPR 2026 (appendix H) is an operation and maintenance manual that states that the new dry cartridges weigh up to 150lb and used wet cartridges up to 250lb (page 4 appendix page 5). Maintenance or replacement of cartridges requires heavy lifting equipment. The inspection and maintenance procedures from ConTech Engineered Solutions states that the cartridge filter should be replaced every 1 to 5 years based on site conditions.

Except for one storage vault located below building 8 (see C400) all the other vaults are sited between parking spaces or parking spaces and garages under the private drives of the development. Presumably these drives would need to be closed when maintenance of the vault occurs, thereby impeding traffic circulation within the complex.

Needless to say, it can be anticipated that it would be extremely difficult, if not impossible, for the City to verify that the vaults were being properly maintained and that any failures of the system would become apparent only after they occurred and could not be easily anticipated.

It could be argued that this alone fails to meet the standards of CDC 55.130 (E)(4) and CDC 92.010(E) (3-4).

There is in my opinion a much more serious problem with the application's stormwater plan (HHPR 2026) which is compliance SWMM standards of 1.5.2. These standards state in part *"To meet the water quality performance standard, stormwater management facilities must be selected based on the following order of prioritization to manage the water quality design storm:*

1. *Full infiltration or partial infiltration as determined by the design infiltration of the site...*
2. *Vegetated filtration or other green infrastructure*
3. *Alternative treatments (i.e. manufactured stormwater treatment technology)*
4. *Offsite Mitigation*

Prior to proceeding to a lesser priority stormwater management facility, it must be demonstrated to the City Engineer's satisfaction and approval that a higher priority solution is not feasible. Stormwater management facilities that are cited as "cost prohibitive" will not be accepted as infeasible"

The HHPR 2026 plan is unequivocally a priority 3 plan. A lined stormwater pond as is used for the ROW would be a priority 2 plan. The reason that the ROW uses a priority 2 plan is presumably because SWMM 3.11.1 (appendix page 6) states categorically "No underground detention facilities will be authorized for subdivision applications or Public Improvement/ROW applications."

HHPR recognizes that its plan is priority 3, but justifies the lower hierarchy ranking by stating in part "vegetated filtration on site is not feasible due to the site's topography. The entire site is steep, and the proposed development will grade flatter areas onsite for its buildings and hardscape with retaining walls placed throughout the site leaving only very steep terrain as options for placing a vegetated swale or pond. Placing a pond or swale on the steep slope of the site would not provide adequate resistance time for stormwater treatment and/or would require additional large walls to accommodate the cut section for a pond. Therefore, underground detention is proposed beneath the asphalt of the parking lots" HHPR (page 4, appendix page 7)

There are several counter arguments to the above presentation:

1. Given the very extensive use of retaining walls in the application it seems disingenuous at best to suggest that retaining walls are a prohibitive factor for not using a swale or pond.
2. It seems very likely that the removal of one or two buildings would provide adequate space for pond(s) without additional cutting, filling, excavation or retaining walls. The desire of the applicant to get the absolute maximum intensity of usage from the site seems to be what is driving the presumed "infeasibility" of using above ground detention ponds.
3. Lastly, and easily to me the most persuasive argument as to why the applicant can and should be required to use priority 2 above ground detention, is to be found in the stormwater plan prepared by OTAK Engineering (OTAK 2014) that deals with stormwater detention entirely through an above ground swale and pond system (appendix page 8). The OTAK plan appears to contain eight large buildings and was estimated to add 5.14 acres of new impervious area to the site (page 4). In contrast HHPR

2026 estimates the current application will add 6.77 acres of new impervious surface area. It seems reasonable to assume that a swale and pond system could be upsized by 32% and meet the needs of the current application. It is worth quoting from the 2014 plan “The stormwater management system for the Tannler Drive development project will contain a regional treatment swale and detention pond. Stormwater runoff from the entire development (approximately 9.95 acres of pervious and impervious area) will be collected and conveyed to the swale for treatment of flows up to and including water quality design storm. Larger flow will bypass around the swale to the regional detention pond which will attenuate and discharge site flows into the existing stormwater conveyance system located in Blankenship Road (OTAK 2014, Page 3).

Consequently, it should be easy to argue that the HHPR 2026 stormwater plan fails to meet the standards of CDC 55.105(N)(2), CDC 55.130(B)(C), CDC 92.010(E)(2)(4), SWMM 1.1(1) and SWMM 1.5.2(1-4). SWMM 1.1(1) not previously quoted states that the overall intent of the SWMM is to “1. Prioritize the use of green development practices”

Before moving on to the Tannler Drive encroachment/vacation issue it is worth noting an issue that involves both retaining walls and stormwater drainage. All three geotechnical reports make similar recommendations as to retaining walls. To paraphrase; due to the very low permeability of the soil and the existence of bedrock very close to the surface, during periods of heavy rainfall it is likely that rainwater will become perched on the bedrock and, as a consequence, retaining walls should be provided with drainage pipes to keep water from accumulating behind the retaining walls and lessen their structural integrity. Or to quote more directly “groundwater may become perched on the shallow bedrock during periods of persistent rainfall and may impact side cuts, retaining wall and below grade structures” CW 2025 (page ii)

Again, quoting from CW 2025 (page 9, appendix page 9) “A minimum 6 inch-diameter perforated collector pipe should be placed at the bases of the walls ... the perforated collector pipes should discharge at an appropriate location away from the bases of the walls. The discharge pipes should not be tied directly into the stormwater drain systems, unless measures are taken to prevent backflow into the drainage systems of the walls”. An examination of site diagram C400 appears to confirm that there is no direct tie-in between the anticipated retaining wall pipes

and the stormwater system. All of which begs the question of where the water from the retaining wall pipes is supposed to go, especially given as HHPR 2026 (page 3) says “the site is underlain by shallow weathered bedrock and moisture sensitive soils with little to no infiltration”. As elsewhere in the application, issues that can be argued are critical to determining the viability and safety of the project are presumably left to be addressed after land use approval. A very good argument can be made that the retaining wall drainage issue is not addressed in compliance with CDC 55.130(B)(C)(E)(2)(4) and CDC 92.010(E)(2)(4).

Lower (southern) Tannler easement, encroachment, and vacation issue:

The development plan envisions that Tannler Drive where it intersects to Blankenship will be realigned and routed through the development site to intersect with Blankenship Road further to the west (please see discussion of the purported necessity for realignment in the miscellaneous issues section of this report). Approximately 280 feet of the exist lower Tannler will no longer be used as a public road and the existing sanitary sewer line under this section will be decommissioned. This lower Tannler (LT) section will be used as an extension of the private drive that is proposed between building 9 and 10 (see site diagrams C202, C303 and C306) and will have 23 parking spaces and a 15-foot retaining wall. In addition, the ROW stormwater detention pond will extend approximately 40 feet into this LT section.

All of this would be unremarkable if the applicant were requesting the vacation of the LT ROW. Instead there is a notation that says “Proposed R/W Encroachment Esmt” (C 202) which I am presuming means encroachment easement. It appears that the applicant intends to place a private drive, 23 parking spaces and a stormwater detention pond on the LT ROW. Nothing I could find in the application contradicted that interpretation.

I have never seen anything like this in any land use application before. While existing ROW vacation is, as far as I understand, an administrative decision of the City Council rather than a pure land use decision, this issue affects a very significant portion of the entire development plan. That a public road ROW should have private structures on it that would preclude its future use again as a public road unless such structure were removed is, I believe, absolutely incredible. I believe a very strong argument can be made that such an arrangement would constitute a gift of Public Property and as such actionable as a tort claim.

At the risk of being redundant, a public road ROW is public property that has been dedicated to public ownership for the express purpose of someday being a public road/street. CDC 92.010(A)(b) appears to mandate that existing road ROW undergo either full or half street improvement unless alternative routing exists and then, as per CDC 92.010(2)(a), the applicant may be required to request a vacation of the unnecessary ROW. Since LT is neither planned for half street improvements or vacation, the application appears to suggest that private structures that are effectively permanent be placed on a public road ROW for the express benefit of the applicant and that somehow this is not a ridiculously unacceptable or irregular practice.

And finally, CDC 92.010(1) states in part that “unless the applicant requests an exception as part of a discretionary review” adjustment to the requirements of CDC chapter 92 can not be made. Since the applicant has chosen to submit the application under the requirements of CDC 55.105, as opposed to CDC 55.100, and CDC 55.105 is the non-discretionary option for chapter 55 design review, it would appear that such an exception is not allowed.

Miscellaneous Issues.

1. Tannler Drive realignment: Application page 8 of 71 states “Tannler is realigned through the site to meet the City’s Transportation Systems Plan (TSP)”. On page 91 of the TSP addressing problems with the 10th Street interchange makes the following recommendation “add a second exclusive right turn lane to the eastbound approach to the 10th Street/Blankenship-Salamo road intersection if necessary to address queueing; however, the need for this improvement would be eliminated by realigning Tannler Drive with the commercial driveway located approximately 350 feet west of its current alignment”. TSP page 93 identifies the above mentioned added turning lane as project M20 costing a quite modest amount of \$160,000 in 2016 dollars. Even allowing for inflation, the adding turning lane option would undoubtedly be much less expensive and incalculably less disruptive than realigning Tannler Drive. I think a very good argument can be made that the application can meet the requirements of the TSP by completing project M20 instead of realigning Tannler.
2. Site diagram EX 2 is not in the scale stipulated by CDC 55.110(B).

3. Application page 44 of 71: In response to CDC 54.030 the applicant is asking for a design exception to the requirements of this section. This would appear to violate the clear and objective standards of CDC 55.105(A).
4. HHPR 2026 (page 4, appendix page 7) has a table that lists predevelopment and post-development impervious and pervious acres. When I added the figures, I got 1.006 predevelopment impervious acres, 8.8.39 post development impervious acres, for a total of 7.384 net new impervious acres and, even excluding public impervious acres, an increase of 7.159 acres. However, on page 6 HHPR 2026 it says “the project proposes to add 6.77 acres (295,107sf) of impervious area to the site” (appendix page 10). I cannot reconcile these differing figures. It suggests at least to me that even basic calculations in the application might not be implicitly relied on.
5. CDC 21.070(A)(5) says that “the maximum lot coverage shall be 50 percent”. In the design diagram labeled Conceptual site and grading plan 2.2, dated February 26, 2026, there is a table that lists net lot area of 10.48 acres and total lot coverage of 3.47 or 33.1%. This figure does not appear to include the clubhouse, amphitheater, or pool area. Given that, per Miscellaneous issue 4, I found 7.159 net new non-public impervious area which would equal 68.3% of 10.48 I suppose one is to presume that in addition to the lot coverage of 3.47 acres there is an additional 3.69 acres of impervious surface area that is not lot coverage. I can not tell if the table on this site diagram is accurate or not, but I do have concerns about these figures and whether the application is truly in compliance with CDC 21.070(A)(5).
6. The application proposes a clubhouse of 6,495SF and is envisioned to have 125 single bedroom, 137 two bedroom and 52 three-bedroom apartments and yet states that per CDC 46.120 (application page 17 or 71) that it will not have a meeting space designed to accommodate more than 35 people at one time. This seems dubious at best. Unless the applicant is going to very strictly limit occupancy of the clubhouse I do not know how this standard will be met.

I hope anyone reading this report will find it helpful in preparing their responses to this application.

Sincerely,

David Dodds

5.0 SITE CONDITIONS

5.1 GEOLOGY

The site is located on an upland terrace extending southeast from the Tualatin Mountains. The Tualatin Mountains form the physiographic boundary between the Portland Basin to the north and east, the Tualatin Basin to the west, and the Central Willamette Valley to the south. These basins are part of the larger Puget Sound-Willamette Valley physiographic province, a tectonically active lowland situated between the Coast Range to the west and the Cascade Mountains to the east (Orr and Orr 1999).

Geologic mapping by Schlicker and Finlayson (1979) and Madin (2009) indicates that near-surface geology consists of Miocene-aged (16 million to 12 million years old) basalt flows of the CRBG. The CRBG is a series of basalt flows that originated from southeastern Washington and northeastern Oregon.

5.2 SURFACE CONDITIONS

The 11.41-acre site is bounded by Tannler Drive to the east, Blankenship Road to the south, commercial development to the west, and residential development to the north. The site is generally open, vacant, and covered by grasses and brush. Scattered mature trees are present in the north portion of the site and along property boundaries. The site slopes up to the north, with grades ranging from approximately 12 to 17 percent. Site elevations range from approximately 384 feet at the northern site boundary to 200 feet adjacent to Blankenship Road (WGS 84).

5.3 SUBSURFACE CONDITIONS

Subsurface conditions were explored by excavating 10 test pits (TP-1 through TP-10) to depths between 2 and 6 feet BGS. Our subsurface exploration program was supplemented with previous subsurface explorations conducted at the site by GeoDesign (GeoDesign 2006, 2014).

GeoDesign's explorations included 33 test pits excavated to depths between 3.3 and 13.5 feet BGS.

The recent exploration locations are shown on Figures 2 and 3. A description of our field exploration program and the exploration logs are presented in Appendix A. A description of the laboratory testing program and the test results are presented in Appendix B. Prior exploration locations, exploration logs, and laboratory test results prepared by GeoDesign are presented in Appendix C. A summary of the subsurface conditions is presented below.

5.3.1 Root Zone and Topsoil

All of our test pits were explored through surface vegetation consisting of 8 to 12 inches of topsoil and a 2- to 5-inch-thick root zone. The topsoil generally consists of silt with gravel and trace organics. Previous explorations by GeoDesign encountered 2- to 8-inch-thick root zones with up to 18 inches of topsoil that contains abundant shrub roots.

5.3.2 Undocumented Fill

Undocumented fill was encountered in test pit TP-11 of GeoDesign's 2006 field investigation and extends to a depth of 4 feet BGS. The fill consists of silt with trace to some gravel and trace clay.

If construction occurs during wet weather conditions or if the moisture content of the surficial soil is more than a few percentage points above optimum, site stripping and cutting may need to be accomplished using track-mounted equipment. Under these conditions, granular access pads and staging areas will also be necessary provide a firm support base and sustain construction equipment.

Based on our experience, between 12 and 18 inches of imported granular material is generally required in staging areas and between 18 and 24 inches in areas supporting construction traffic. In areas of heavy construction traffic, geotextile separation fabric may be placed between the subgrade soil and imported granular material to increase subgrade support and minimize fines migration into the aggregate base layer.

As an alternative to thickened crushed rock sections, haul roads and utility work zones may be constructed using cement-amended subgrade overlain by a crushed rock wearing surface. If this approach is used, the thickness of granular material in staging areas and along haul roads can typically be reduced to between 6 and 9 inches. This recommendation is based on an assumed minimum unconfined compressive strength of 100 psi for subgrade amended to a depth of 12 to 16 inches. The actual thickness of the amended material and imported granular material will depend on the contractor's means and methods and, accordingly, should be the contractor's responsibility.

Project stakeholders should understand that wet weather construction is risky and costly. Proper construction methods and techniques are critical to overall project integrity and should be observed and documented by Columbia West.

7.3 EXCAVATION

7.3.1 Basalt Bedrock

The upper portions of the basalt bedrock are weathered and fractured and could generally be penetrated to varying degrees by an excavator. While excavation of weathered bedrock is expected to be more difficult than the silt, we do not expect special excavation equipment to be necessary in the moderately weathered to decomposed material. Excavators used for the current and previous explorations could not penetrate the intact bedrock. Special excavation techniques such as hydraulic breakers, rock trenchers, or blasting will likely be required to excavate the intact basalt bedrock where test pits encountered refusal. The observed depth to refusal on basalt for the current explorations are shown on Figures 2 and 3. The depth to weathered and intact bedrock encountered in the previous explorations are shown on the 2006 Figure 2 and 2014 Figure 2 presented in Appendix C.

The contract bid documents should require that contractors list a unit cost for rock excavation using in-place (bank) volumes, which can be measured by surveying. The unit cost should not be provided in excavated (swelled) volumes, which are more difficult to accurately measure.

7.3.2 Rockfall Hazards

Grading and excavation should be conducted by the earthwork contractor in a sequence that will prevent overhanging rock material that might become dislodged. The contractor should also be responsible for providing protection for property and personnel. This might include sloping of cut

Table 1. Seismic Design Parameters in Accordance with ASCE 7-16

Parameter	Short Period (T_s)	1-Second Period (T_1)
MCE spectral response acceleration, S	$S_s = 0.837 \text{ g}$	$S_1 = 0.378 \text{ g}$
Site class	B	
Site coefficient, F	$F_a = 0.9$	$F_v = 0.8$
Adjusted spectral response acceleration, S_M	$S_{MS} = 0.75 \text{ g}$	$S_{M1} = 0.30 \text{ g}$
Design spectral response acceleration, S_D	$S_{DS} = 0.50 \text{ g}$	$S_{D1} = 0.20 \text{ g}$

6.4 RETAINING STRUCTURES

6.4.1 Assumptions

Our retaining wall design recommendations are based on the following assumptions: (1) the walls consist of conventional, cantilevered retaining walls, (2) the walls are less than 8 feet in height, (3) the backfill is drained, and (4) the backfill has a slope flatter than 4H:1V. We recommend that a qualified geotechnical engineer perform design calculations for the larger on-site walls once the wall type and geometry has been determined.

The following design parameters may be applicable for larger walls that may be proposed. However, if design is performed by others, Columbia West should review preliminary wall plans to determine if the design parameters are suitable and should review the final wall calculations.

Retaining walls may not be necessary where intact bedrock is encountered. However, we recommend additional exploration via rock coring to evaluate the presence of bedding planes; assess the feasibility of constructing large, over-steepened cuts into the rock; and assess the potential need for retaining walls. Based on the current conceptual plan, we anticipate that at least three borings with rock coring to depths between approximately 25 and 35 feet BGS will be required.

We expect that walls can be constructed directly on top of the intact bedrock. In this case, the project team should consider installing fascia over the entire wall to create a uniform appearance.

6.4.2 Wall Design Parameters

Unrestrained site walls that retain native soil and decomposed bedrock should be designed to resist active earth pressures of 35 to 55 pcf when supporting slopes between 4H:1V and 2H:1V, respectively. These values can be reduced to 25 to 30 pcf for wall supporting moderately weathered bedrock at the same slope angles. Where retained slopes are between inclinations of 4H:1V and 2H:1V, the designer may linearly interpolate between these active earth pressures. For embedded building walls, seismic lateral forces can be modeled assuming a force of $6H^2$ pounds per lineal foot of wall, where H is the height of the wall in feet, and applied as a distributed load with centroid located at $0.6H$ from the base of the wall, where H is the height of the wall.

If retaining walls are restrained from rotation prior to being backfilled, the aforementioned active earth pressures should be increased by 15 pcf. If other surcharges (e.g., slopes steeper than 2H:1V, foundations, vehicles, etc.) are located within a horizontal distance from the back of a wall

5.3.3 Silt (Colluvium)

Underlying the topsoil in test pits TP-1 through TP-7, and TP-10, medium stiff silt with varying proportions of gravel extends to depths between 1.5 and 5 feet BGS. This unit represents colluvium. The tested moisture content of the silt ranged from 12 to 23 percent at the time of exploration. Atterberg limits testing indicates that the silt exhibits medium plasticity. Previous explorations by GeoDesign encountered the silt to similar depths.

5.3.4 Decomposed Basalt

Underlying the topsoil in test pits TP-8 and TP-9 and the silt layer in test pit TP-6, gravelly silt to silty gravel extends to depths of 3 to 4 feet BGS. The gravelly silt is stiff to very stiff and the silty gravel is medium dense to very dense. This unit represents decomposed residual soil of the underlying basalt bedrock. The silt and gravel constituents vary across the site based on the degree of decomposition. Our excavator was able to penetrate this unit without much difficulty. Previous explorations by GeoDesign also encountered this unit, which was observed to be up to 8 feet thick. The tested moisture content of the unit ranged from 11 to 33 percent at the time of exploration.

5.3.5 Basalt

All of our test pits met refusal on basalt at depths between 2 and 6 feet BGS. The observed depth to refusal in each test pit is shown on Figures 2 and 3. Many of the previous explorations by GeoDesign also met refusal on basalt at depths between 3.3 and 13.5 feet BGS. The upper portion of the bedrock is generally decomposed to weathered and fractured. Weathering appears to generally decrease with depth. The excavator was able to penetrate the weathered zones of basalt but was unable to penetrate the intact basalt, even with significant effort. Our scope of services did not include exploration of the intact basalt using rock coring techniques. Accordingly, we are unable to assess the degree of weathering and fracturing of the intact basalt. The upper rock layers exposed in the test pits are generally moderately to intensely fractured and very close to close jointed. Based on our experience and prior observations of deep rock coring in the site vicinity, we believe that the upper portion of the intact bedrock is likely highly to slightly weathered and very intensely to moderately fractured.

5.3.6 Groundwater

Groundwater was not observed in our current explorations. Slow to moderate groundwater seepage was reported in three of the previous test pits at depths between 3.5 and 10 feet BGS. According to Snyder (2008), the approximate elevation of the static groundwater table at the site is 175 feet. This elevation corresponds to an approximate depth to groundwater of 25 to 210 feet BGS depending on location and ground surface elevation. Groundwater levels are also subject to seasonal variation and may rise during extended periods of increased precipitation or flooding. During and after periods of rainfall, groundwater will likely become perched on the shallow bedrock formation and travel downslope where it could manifest at the ground surface or in walls where the top of bedrock is exposed by cuts or below-grade structures.

5.4 SEISMIC HAZARDS

5.4.1 Liquefaction

Liquefaction is a phenomenon caused by a rapid increase in pore water pressure that reduces the effective stress between soil particles. Granular soil, which relies on interparticle friction for

Maintenance

Depending on the configuration of the particular system, maintenance personnel will be required to enter the vault to perform the maintenance.

Important: If vault entry is required, OSHA rules for confined space entry must be followed.

Filter cartridge replacement should occur during dry weather. It may be necessary to plug the filter inlet pipe if base flows is occurring.

Replacement cartridges can be delivered to the site or customers facility. Information concerning how to obtain the replacement cartridges is available from Contech Engineered Solutions.

Warning: In the case of a spill, the maintenance personnel should abort maintenance activities until the proper guidance is obtained. Notify the local hazard control agency and Contech Engineered Solutions immediately.

To conduct cartridge replacement and sediment removal maintenance:

1. If applicable, set up safety equipment to protect maintenance personnel and pedestrians from site hazards.
2. Visually inspect the external condition of the unit and take notes concerning defects/problems.
3. Open the doors (access portals) to the vault and allow the system to vent.
4. Without entering the vault, give the inside of the unit, including components, a general condition inspection.
5. Make notes about the external and internal condition of the vault. Give particular attention to recording the level of sediment build-up on the floor of the vault, in the forebay, and on top of the internal components.
6. Using appropriate equipment offload the replacement cartridges (up to 150 lbs. each) and set aside.
7. Remove used cartridges from the vault using one of the following methods:

Method 1:

- A. This activity will require that maintenance personnel enter the vault to remove the cartridges from the under drain manifold and place them under the vault opening for lifting (removal). Disconnect each filter cartridge from the underdrain connector by rotating counterclockwise 1/4 of a turn. Roll the loose cartridge, on edge, to a convenient spot beneath the vault access.

Using appropriate hoisting equipment, attach a cable from the boom, crane, or tripod to the loose cartridge. Contact Contech Engineered Solutions for suggested attachment devices.

- B. Remove the used cartridges (up to 250 lbs. each) from the vault.



Important: Care must be used to avoid damaging the cartridges during removal and installation. The cost of repairing components damaged during maintenance will be the responsibility of the owner.

- C. Set the used cartridge aside or load onto the hauling truck.
- D. Continue steps a through c until all cartridges have been removed.

Method 2:

- A. This activity will require that maintenance personnel enter the vault to remove the cartridges from the under drain manifold and place them under the vault opening for lifting (removal). Disconnect each filter cartridge from the underdrain connector by rotating counterclockwise 1/4 of a turn. Roll the loose cartridge, on edge, to a convenient spot beneath the vault access.
- B. Unscrew the cartridge cap.
- C. Remove the cartridge hood and float.
- D. At location under structure access, tip the cartridge on its side.
- E. Empty the cartridge onto the vault floor. Reassemble the empty cartridge.
- F. Set the empty, used cartridge aside or load onto the hauling truck.
- G. Continue steps a through e until all cartridges have been removed.

3.11 Structural Detention Facilities

Structural detention facilities such as tanks, vaults, and oversized pipes can be used to meet the flow control performance standard by slowly releasing stormwater at a rate determined by an orifice at the outlet. These structures must be designed not only for their function as flow control facilities, but also to withstand an environment of periodic inundation, potentially corrosive chemical or electrochemical soil conditions, and heavy ground and surface loadings.



3.11.1 Applicability

Structural detention facilities such as tanks, pipe or vaults will be approved by the City Engineer only when a pond is impracticable. **No underground detention facilities will be authorized for Subdivision applications or Public Improvements/ROW applications.**

Structural detention facilities are used to meet the flow control performance standard and require upstream pretreatment or a separate stormwater management facility to meet the infiltration and water quality performance standards. Stormwater management facilities provided in **Section 3** for meeting the water quality performance standard are considered adequate pretreatment upstream of a structural detention facility.

3.11.2 Design Requirements

The following provides design requirements for structural detention facilities:

- **Access:** All areas of a tank or vault must be within 50 ft. of a minimum 24-in.-diameter access entry cover. All access openings must have round, solid locking lids.

Detention pipes/vaults managing runoff from Single-Lot or Large Projects shall be privately owned, maintained, and located to allow for easy maintenance and access.

- **Sizing:** Design engineer shall provide all calculations in accordance with the Engineered Method to confirm facility size, material, and ballast requirements. Access for inspection and maintenance shall be provided for all detention pipes.

The maximum water surface elevation in any structural detention facility must adhere to a minimum 1-ft. of freeboard in any catch basin below the catch basin's grate. The minimum internal height of a vault or tank must be 3 ft., and the minimum width must be 3 ft. The maximum depth of the vault or tank invert is 20 ft.

Where the tank or vault is designed to provide sediment containment, a minimum of ½ ft. of dead storage must be provided, and the tank or vault must be laid flat.

- **Materials and Structural Stability:** Concrete pipe is the strongly preferred material for detention tank or pipe applications. Before any other alternative material is used for detention pipe or tank applications, the applicant must demonstrate that concrete pipe is either

STORMWATER MANAGEMENT REPORT

MODERA WEST LINN

Table 2. Impervious & Pervious Basin Areas

Basin	Pre-Development			Post-Development		
	Impervious (ac)	Pervious (ac)	Total (ac)	Impervious (ac)	Pervious (ac)	Total (ac)
A	0 (0.000)	77,120 (1.770)	77,120 (1.770)	39,896 (0.916)	37,244 (0.855)	77,120 (1.770)
B	0 (0.000)	126,849 (2.912)	126,849 (2.912)	72,634 (1.667)	54,215 (1.245)	126,849 (2.912)
C	0 (0.000)	55,848 (1.282)	55,848 (1.282)	44,891 (1.031)	10,957 (0.252)	55,848 (1.282)
D	0 (0.000)	95,094 (2.183)	95,094 (2.183)	72,391 (1.662)	22,703 (0.521)	95,094 (2.183)
E	7,314 (0.168)	24,156 (0.555)	31,470 (0.722)	25,464 (0.585)	6,006 (0.138)	31,470 (0.722)
F	9,389 (0.216)	33,696 (0.774)	43,085 (0.989)	38,196 (0.877)	4,889 (0.112)	43,085 (0.989)
G	0 (0.000)	19,198 (0.441)	19,198 (0.441)	18,338 (0.421)	860 (0.020)	19,198 (0.441)
PUBLIC	27,089 (0.622)	64,299 (1.476)	91,388 (2.098)	73,185 (1.680)	18,203 (0.418)	91,388 (2.098)

The following technical criteria were determined for the proposed site:

- **Time of Concentration (all basins): 6 minutes**
- **Curve Number:**
 - **98 (Proposed Impervious Area)**
 - **80 (Proposed Landscaping)**

The proposed basin map and storm plan sheets are available in Appendix A.

STORMWATER MANAGEMENT**Water Quality**

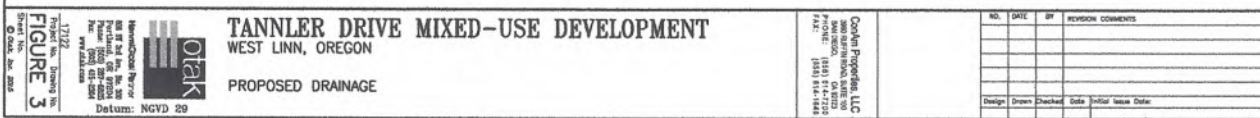
The City of West Linn water quality requirements will be met by treating runoff using proprietary treatment vaults for the private site except for a small portion of Building 10, which will be treated by a lined, vegetated planter. A lined, vegetated stormwater planter located at the lowest point in Blankenship Rd right-of-way will also be utilized for the public roadways. According to the City of West Linn Stormwater Management Manual, “manufactured stormwater treatment technology” is ranked third in the hierarchy of stormwater management facilities used to manage the water quality design storm, behind full or partial infiltration, and vegetated filtration or other green infrastructure. Per the geotechnical report (see Appendix G), infiltration is not recommended due to the site’s steep slopes and subsurface conditions. **Vegetated filtration onsite is not feasible due to the site’s topography. The entire site is steep, and the proposed development will grade flatter areas onsite for its buildings and hardscape with retaining walls placed throughout the site, leaving only very steep terrain as options for placing a vegetated swale or pond. Placing a pond or swale on the steep slopes of the site would not provide adequate residence time for stormwater treatment and/or would require additional large walls to accommodate the cut section of a pond. Therefore, underground detention is proposed beneath the asphalt of the parking lots** with upstream treatment provided by Contech StormFilter vaults.

The following City of West Linn Water Quality Design Storm was used for water quality calculations:

- **1 inch per 24-hour period**

P17122420
 018-WEST 9
 01867900
 P17122401A
 P171224A00

Printed: Jul 10, 2015 - 12:46pm Jersey L:\Project\17100\17122\Day\WSP\figure 3 Proposed Drainage.dwg Layout Name: Figure 2



NO.	DATE	BY	REVISION COMMENTS
Design	Drawn	Checked	Date

equal to twice the height of the wall, additional pressures should be accounted for in the wall design. Lateral earth pressures induced by surcharge loads may be estimated using the criteria presented on Figure 5.

The wall footings should be designed in accordance with the guidelines in Section 6.1 (Foundation Support).

6.4.3 Wall Drainage and Backfill

The above design parameters have been provided assuming drains will be installed behind the wall to prevent buildup of hydrostatic pressures behind all walls. If a drainage system is not installed, our office should be contacted for revised design forces.

Backfill placed behind the walls and extending a horizontal distance of $\frac{1}{2}H$, where H is the height of the retaining wall, should consist of retaining wall select backfill placed and compacted in conformance with Section 7.4.1 (Structural Fill).

A minimum 6-inch-diameter, perforated collector pipe should be placed at the bases of the walls. The pipe should be embedded in a minimum 2-foot-wide zone of angular drain rock that is wrapped in a drainage geotextile fabric and extends up the back of the walls to within 1 foot of the finish grade. The drain rock and drainage geotextile fabric should meet the specifications in Section 7.4 (Materials). The perforated collector pipes should discharge at an appropriate location away from the bases of the walls. The discharge pipes should not be tied directly into stormwater drain systems, unless measures are taken to prevent backflow into the drainage systems of the walls.

Settlement of up to 1 percent of the wall height commonly occurs immediately adjacent to the wall as the wall rotates and develops active lateral earth pressures. Consequently, we recommend construction of flatwork adjacent to retaining walls be postponed at least four weeks after backfilling of the walls, unless survey data indicates that settlement is complete prior to that time.

6.5 PAVEMENT

We understand that private AC pavement may be proposed for on-site access drives and vehicle parking. Pavement should be installed on compacted subgrade or new engineered fill prepared in conformance with Section 7.1 (Site Preparation). Pavement improvements in the public right-of-way should adhere to jurisdictional guidelines.

6.5.1 Design Values

At the time this report was prepared, the volume of traffic for the development was unknown. Consequently, we have provided pavement sections for automobile-only parking, automobile-only drive aisles, and drive aisles that will also service heavy vehicle traffic (i.e., garbage trucks, semitrucks, etc.). Our pavement recommendations are based on the following design parameters and assumptions:

- Resilient moduli for subgrade soil and aggregate base material were assumed to be 4,000 psi and 20,000 psi, respectively.
- Pavement design life of 20 years with no expected traffic growth.

Refer to Appendix A for water quality basin map. Refer to Appendix C for hydrographs.

Flow Control

The project proposes to add 6.77 acres (295,107 SF) of impervious area to the site; therefore, it is classified as a 'large development' by the City of West Linn Stormwater Management Manual. Peak-flow matching is required for the pre-developed 2, 10, and 25-year, 24-hour storm events. The site layout lends itself to a 'centralized' approach with all stormwater on site being piped to a single centralized underground detention facility for each respective basin. The Santa Barbara Urban Hydrograph (SBUH) was chosen to demonstrate the detention facilities are adequately sized for flow control using the following parameters:

- **2-Year: 2.5 inches/hour**
- **10-Year: 3.45 inches/hour**
- **25-Year: 3.9 inches/hour**
- **100-Year: 4.74 inches/hour**
- **Type 1A Rainfall Distribution**

Site stormwater will be routed to R-Tank underground containment systems beneath each parking area. Flow out of each R-Tank system is regulated by a flow control manhole with a single orifice. A 12" overflow is provided to help convey the 10-, 25-, and 100-year storm events.

Proposed R-Tank facilities are designed to capture and detain runoff from onsite only. Runoff in the public right-of-way from Tannler and Blankenship will be captured via catch basins and piped to a public stormwater planter. Refer to the Conveyance section of this report for more information and refer to Appendix A for the proposed basin map.

Table 4 below provides a summary of the flow control data for the private onsite portion of this project and Table 5 provides a summary of the public offsite portion.

Table 4. Flow Control Data – Private Onsite

Storm Event	Pre-Developed Flow (cfs)	Post-Developed Flow (cfs)	Detained Release Rate (cfs)
2-Year	0.34	4.61	0.34
10-Year	1.54	6.83	1.25
25-Year	2.24	7.90	1.89
100-Year*	3.71	9.93	4.15

*100-year storm event not required for peak flow matching. Shown for conveyance through the R-Tank system only.

To mitigate the impacts of the new or reconstructed impervious areas within the public right-of-way, a walled filtration planter with a perforated underdrain and beehive control structure will be utilized to treat runoff and reduce the peak discharge of post-development stormwater flows.

Schroder, Lynn

From: Vickee Cosentino <vickee.cosentino@gmail.com>
Sent: Monday, August 3, 2026 2:34 PM
To: Schroder, Lynn
Cc: Vickee Cosentino
Subject: Testimony submitted by Vickee Cosentino on Tannler Application DR-25-04/LLA-25-02

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

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*Testimony submitted by Vickee Cosentino on Tannler Application DR-25-04/LLA-25-02
This testimony was submitted prior to the August 5th 4:00 pm deadline.*

Dear Ms. Schroder,

Please add this testimony to the Public Record and email me confirmation of receipt. Below is a note I recently sent this to TVF&R, and I wish to state my opposition to the Tannler Apartment development referenced by the file number above.

Thank you and I look forward to receiving a confirmation email as requested.

Vickee Cosentino

West Linn Resident

“Dear TVF&R Team,

I am writing to bring your attention to a request to close (vacate) the lower portion of Tannler Drive in West Linn as part of a larger commercial/residential development plan currently before the City Council and Planning Commission.

Tannler Drive Apartment/Development Plan:

- The proposal is for a mixed-use redevelopment at 2410, 2422, and 2444 Tannler Drive (and associated parcels near Blankenship Road).*
- The current application describes roughly 320 multi-family apartment units in ten buildings, plus about 11,600–12,100 sq ft of ground-floor commercial/retail space, garages, a clubhouse, and related amenities.*
- To make the site layout work, the developer is asking the City to vacate/permanently close the lower segment of Tannler Drive and realign traffic as part of the project’s access and circulation plan.*

- City staff state that a realignment of Tannler Drive has been in the adopted Transportation System Plan (TSP) since 2016, citing intersection safety and engineering standards, and note that any development must bring affected street segments into conformance with the TSP.

Why this matters for emergency access and evacuation Tannler Drive functions as a key local connector in West Linn. If it is closed or significantly “redirected,” more traffic—including daily commuters and, critically, evacuation traffic—would be funneled onto already constrained routes such as Salamo Road and the Highway 43 corridor.

West Linn’s population is now over 30,000, and the region’s wildfire risk makes robust, redundant evacuation routes essential. The 2018 Camp Fire in Paradise, California—where a community effectively had one primary way in and one way out—demonstrates how dangerous limited egress can be during fast-moving emergencies.

I respectfully ask TVF&R to:

- *Review the proposed Tannler Drive closure/realignment specifically for emergency vehicle access, turn radii, staging, and two-way egress capacity under peak and emergency conditions.*
- *Evaluate whether the plan preserves multiple independent evacuation routes for this neighborhood and for West Linn as a whole, or whether it creates a bottleneck that could trap residents during a wildfire or other disaster.*
- *Provide written comments to the City Council and Planning Commission on any life-safety concerns and recommend conditions (or denial) if the closure/realignment degrades emergency access or evacuation resilience.*

I wish to restate my opposition to the current Tannler Drive apartment plan which would compromise our community’s ability to evacuate safely and to be reached quickly by fire and rescue crews.

Thank you for your time and attention.

Vickee Cosentino"

--

Vickee Cosentino / vickee.cosentino@gmail.com / (503) 539-0579

Schroder, Lynn

From: Roberta Schwarz <roberta.schwarz@comcast.net>
Sent: Monday, August 3, 2026 3:29 PM
To: Schroder, Lynn
Subject: DR-25-04/LLA-25-02 Public Testimony for Commercial Portion of Planning Commission Hearing
Attachments: Planning Commission Testimony DR-25-04 LLA-25-02.pdf; Planning Commission Testimony 2.pdf

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Lynn,

Please confirm receipt of the attached documents. These are the two parts of my testimony for the residential portion of the subject hearing.

Please place them in the public record for the subject application.

Thank you,
Roberta Schwarz
West Linn

Testimony submitted by Roberta Schwarz on Tannler Dr Application: DR-25-04/LLA-25-02

This testimony was submitted on August 3rd, 2026, prior to the deadline of 4 pm on August 5th

Please add this testimony to the Public Record and email me confirmation of receipt.

Part 1 of 2 parts of testimony for today

“Unbelievable!” “Ridiculous!” “That’s crazy!” “You’re Kidding!” Just some of the interesting responses Ed and I have received as we’ve talked to people in the area about this proposed Tannler Dr. development application. Picture, if you will, on a mere 11.4 acres of steep, OBC zoned land, building four stories comprised of 320 apartments that vary in size from 1, 2, and 3 bedrooms along with over 12,000 square feet of commercial space. In the twenty-four years that we have lived here we have seen many proposals for this particular spot, but never anything so literally over the top.

It has been wonderful to see so many of the people who live here become organized like never before, gathering over 350 signatures in opposition, placing signs on their yards, attending meetings, and giving money to a fund to hire four experts in their fields: two attorneys, a traffic engineer, and a civil engineer.

Tonight, we will discuss the many reasons that this Planning Commission cannot approve this application. I will start with our traffic engineer’s technical review of the applicant’s Traffic Impact Analysis.

This review was sent to you before the July 30th deadline, so I hope that you all have had a chance to read it.

Rick Nys, P.E., the Principal Traffic Engineer, states in his conclusion the following:

“The deficiencies identified in this review are not limited to isolated technical omissions. Rather they involve fundamental components of transportation safety, access, management, and operational analysis that are necessary for the Planning Commission to evaluate compliance with applicable approval criteria. These include lack of access analysis for all driveways, absence of required sight distance evaluations, insufficient evaluation of driveway placement on curved roadway segments, unaddressed backing and parking conflicts, incomplete multimodal transition analysis, and unsupported signal warrant conclusions.”

in his report, he cites over a half dozen CDC codes that are not in compliance in the submitted TIA and application. “Each of these issues” he states, “bears directly on the Planning Commission’s ability to make the required findings under CDC 85.170(B)(2)(g) and related provisions. Based on the application materials, those findings cannot be supported with substantial evidence.”

Please do not approve this application.

Thank you,

Roberta Schwarz

West Linn

Testimony submitted by Roberta Schwarz on Tannler Dr Application: DR-25-04/LLA-25-02

This testimony was submitted on August 3rd, 2026, prior to the deadline of 4 pm on August 5th

Please add this testimony to the Public Record and email me confirmation of receipt.

Part 2 of 2 parts of testimony for today

Reasons why the closing/taking/vacating/realignment of Tannler Drive is not in the public interest and would cause the public interest to be prejudiced.

1. The White Oak Savanna park was listed as a proposed land acquisition in the 1998 West Linn Park, Recreation, and Open Space Plan years before Mr. Parker owned the parcel directly across the street which he is now proposing to develop. The public interest would be prejudiced if one of the entrances to the park were closed due to the closure of Tannler Dr at the intersection with Blankenship.
2. In an email dated May 1, 2026, Brad Kilby, Planning Manager for Harper, Houf Peterson Righellis, a consultant for the application, stated when referring to Tannler Drive, "We are not proposing to vacate the right of way, but we will have to close it off near the bottom of our site, It will just be a dead end public street with parallel parking". The parallel parking has since been removed from the plans for the project but the applicant still proposes to add a traffic lane which will only serve the commercial portion of the project. Doing this will leave the lower, abandoned part of Tannler Dr to serve only to collect debris as there will be no

mechanism to keep it clean. This is not in the public interest. It would prejudice the public interest.

3. There is substantial community interest in the protection of the White Oak Savanna Park. As of July 30th, 2026, over 350 signatures have been received opposing the closing of Tannler Dr so that the street it is located on remains open.
4. The rerouting of Tannler Dr removes approximately 275 feet of the current frontage road of Tannler Dr from the White Oak Savanna Park. This limits access to the park, especially to those approaching from Blankenship Road.
5. Ten years of fundraising \$3.5 million by the neighbors made possible the acquisition of the White Oak Savanna as a public park. Sixteen years and 21, 690 hours of volunteer work have also been donated to the restoration of the Savanna by the neighbors. Closing Tannler Drive, one of the ways into the Savanna, would not be in the best interest of the public.

Thank you,
Roberta Schwarz

Schroder, Lynn

From: c.saletta@comcast.net
Sent: Tuesday, August 4, 2026 9:54 AM
To: Schroder, Lynn
Subject: Public Comment on Proposed Tannler/Blankenship Development

You don't often get email from c.saletta@comcast.net. [Learn why this is important](#)

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Testimony submitted by Corinne Saletta on Tannler Application DR-25-04/LLA-25-02:

- 1) Originally submitted on July 28, 2026 before the July 30th deadline for the commercial components of the project (see email heading below) to be considered during the 1st part of the hearing on August 10, 2026.
- 2) **Submitting again today/August 4, 2026 before the August 5th deadline of 4 pm for the residential components of the project to also be considered during the 2nd part of the hearing on August 10, 2026. Please add this testimony to the Public Record and email me confirmation of receipt.**

Thank you.

Corinne Saletta
c.saletta@comcast.net

From: c.saletta@comcast.net <c.saletta@comcast.net>
Sent: Tuesday, July 28, 2026 3:56 PM
To: dwyss@westlinnoregon.gov; lschroder@westlinnoregon.gov
Subject: Public Comment on Proposed Tannler/Blankenship Development

Attn: West Linn Planning Commission

City of West Linn
City Hall, 22500 Salamo Road
West Linn, OR 97068

RE: FORMAL OBJECTION – Class 2 Design Review & Lot Line Adjustment
Project ID: DR-25-04 / LLA-25-02
Site Locations: 2410, 2422, & 2444 Tannler Drive and 1800 Blankenship Road
Public Hearing Date: Monday, August 10, 2026

Dear Planning Commission Members,

I am writing as a local property owner and resident to formally state my strong **OPPOSITION** to the proposed 320-unit multi-family development with ground-floor commercial space. Project ID DR-25-04 / LLA-25-02

While I understand the inevitability of growth, the density and location chosen for this massive project are structurally incompatible with our community. The surrounding infrastructure is already

strained, and approving this high-density layout will result in daily gridlock while actively eroding the economic health and overall livability of the surrounding neighborhoods.

I urge the Planning Commission to deny this application based on the following critical planning and community impact concerns:

- **Existing Burden at the I-205 10th Street Interchange:** The north end of the I-205 10th Street interchange leading to Salamo Road and Blankenship Road already experiences significant traffic backups during both peak and non-peak hours. Forcing a conservative estimate of over **400** additional resident vehicles directly into this burdened interchange network is unfeasible and logistically reckless.
- **Neighborhood Traffic Dispersal and Safety Risks:** Because the immediate access points cannot handle this volume, drivers will actively seek cut-through routes. This will inevitably divert heavy commuter traffic up Tannler Drive to Bland Circle, or across Greene Street to Salamo Road. These are primarily residential streets and are designed for local traffic, not high-volume arterial bypasses, creating direct safety hazards for families in the surrounding neighborhoods.
- **Ineffectiveness of Proposed Traffic Mitigation:** The developer's proposal to add a traffic light at the bottom of a redirected Tannler Drive is entirely inadequate. A signal at this bottleneck will not increase the overall carrying capacity of the receiving roads; it will simply pool a massive volume of vehicles on an already taxed system.
- **Flawed Traffic Impact Analysis Assumptions:** The Traffic Impact Analysis submitted by the applicant does not accurately reflect the real-world operational weaknesses that residents witness daily on these roads and specific intersections. The Commission must look past idealized theoretical routing models and evaluate the true, compounding impact of adding 320 units and 12,100 sq ft of commercial spaces to this exact pinch point.
- **Incompatible Scale and Density:** A complex of this magnitude dramatically alters the established physical character of the surrounding neighborhoods and the city overall. The design fails to blend seamlessly with the existing commercial and housing development patterns.
- **Negative Impact on Local Home Values:** The sheer scale, height, and density of this development threaten to permanently degrade the aesthetic appeal, quiet enjoyment, and physical character of the surrounding residential neighborhoods. This poses a direct, anticipated negative impact on our neighborhood home values. Introducing a project that lowers nearby property values while simultaneously overburdening the very roads and municipal systems we fund creates a severe inequity for established residents/taxpayers.
- **Loss of Natural Tree Canopy:** Our city prides itself on its mature trees and urban parks/forested areas. The extensive site clearing outlined in the Arborist Report undermines the city's climate resilience and environmental sustainability goals.
- **Stormwater Runoff & Infrastructure Strain:** Replacing permeable land on a steep hillside with massive building footprints and parking spaces threatens our local water management. The Civil Plans and Stormwater Report require rigorous oversight to prevent local flooding or utility failures.

The physical constraints of our existing road infrastructure cannot be engineered away by a single traffic light, nor should the economic well-being of and area livability for tax-paying residents be compromised. For these reasons, the proposal fails to meet the safety, compatibility, and community welfare requirements necessary for a Class II Design Review approval.

I have been a resident of West Linn for 26 years and I am accustomed to development and change in the area, however, I believe a project of this size and scale in this location would set a bad precedent and take our city in the wrong direction.

I respectfully request that the Planning Commission deny this application.

Sincerely,

Corinne Saletta
2275 Tannler Drive
West Linn, OR 97068
c.saletta@comcast.net

Schroder, Lynn

From: Cyndi Lubisich <clubisich@gmail.com>
Sent: Tuesday, August 4, 2026 5:16 PM
To: Schroder, Lynn
Subject: 320 multi family development

[You don't often get email from clubisich@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Sent from my iPhone

Hi, I've been living in West Linn since 1976. I was raised here and now I have raised my children in West Linn. We just recently sold our family home on Falcon Dr. but I lived in that house since it was built in the 1990's. We have had this same recurring problem with Jeff Parker for years. It's so unsettling to have to keep dealing with this threat of apartments being built behind our house. We sold our Falcon house in April and we disclosed the possibility of the apartments. I love how people would walk behind our house and stop and take pictures of the view on their way to Savannah oaks. It's a beautiful area and I hope you don't allow it to be ruined by apartments. Also, I can't even imagine the amount of traffic this will cause. Even though I moved to a different home in west Linn, I pray this isn't allowed.

Thank you,
Cyndi Lubisich

Schroder, Lynn

From: Daniel Mercer <dmercer@engineering-solutions-inc.com>
Sent: Tuesday, August 4, 2026 6:31 PM
To: Schroder, Lynn
Cc: Schwarz, Ed; 'Roberta Schwarz'; Engineering Solutions Inc
Subject: DR-25-04/LLA-25-02 Residential Hearing Testimony
Attachments: ESI Engineering Review Report - DR-25-04.pdf

You don't often get email from dmercer@engineering-solutions-inc.com. [Learn why this is important](#)

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

Good Afternoon Lynn,

Kindly find the attached report for submission to the residential public testimony for consideration for DR-25-04.

Please confirm receipt of this email and inclusion of this report into the public record.

Thank you,

Daniel Mercer, PE | President and Consultant
Engineering Solutions, Inc.

 dmercer@engineering-solutions-inc.com

 www.linkedin.com/company/engineeringsolutionsinc/

 www.engineering-solutions-inc.com



Engineering Solutions Inc.

Engineering Review Report Land Use Application DR-25-04 Tannler Drive Apartment Complex

Revision Date: 7/29/26

Revision: A

July 29, 2026

City of West Linn Planning Department
Attn: Planning Commission, Darren Wyss
22500 Salamo Road
West Linn, OR 97068

Subject: DR-25-04 Tannler Drive Apartment Complex

Dear Planning Commission and Mr. Wyss,

Engineering Solutions Inc. (ESI) has been retained by members of the West Linn community to conduct an independent engineering review of the applicant's submittal documents for City of West Linn Project DR-25-04. The purpose of this report is to evaluate the application for consistency with the applicable provisions of the City of West Linn Community Development Code (CDC). Because this is a quasi-judicial land use application, the burden rests with the applicant to demonstrate compliance with the applicable approval criteria.

The applicant has submitted an application for Design Review (DR-25-04) to redevelop approximately 11.36 acres located at 2410 Tannler Drive in West Linn, Oregon. The proposed mixed-use development consists of approximately 320 residential dwelling units distributed among eleven residential buildings, together with supporting commercial space, internal roadways, parking areas, utilities, landscaping, and associated site improvements.

The property is zoned Office Business Center (OBC) and is subject to the applicable provisions of the West Linn CDC. As part of its review, the Planning Commission must evaluate the application against the approval criteria contained within CDC Chapters **21, 42, 44, 46, 48, 54, 55, 85, and 96**. The applicant also requests several development standard adjustments pursuant to Section 38 of Oregon Senate Bill 1537 (SB 1537), including adjustments to the maximum building height requirements of Chapter 21.

This report evaluates the applicant's submitted materials from an engineering perspective to determine whether the application demonstrates compliance with the applicable provisions of the CDC and whether the record contains sufficient technical information to support the findings required for approval.

Sincerely,

A handwritten signature in black ink, appearing to read 'Danny Mercer', is positioned above the printed name.

Danny Mercer, PE (OR)
President
Engineering Solutions Inc.

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Executive Summary

Table 1 below summarizes Engineering Solutions Inc.'s assessment of each applicable CDC chapter based on the information contained in the current application record as of the time of the issuance of this report.

Table 1: CDC Compliance Summary

CDC Chapter	Compliance Demonstrated?	Primary Code Section(s)	Summary
21 – Office Business Center	Partial	21.070(A)(6)	Requested SB 1537 building height adjustment not adequately supported.
42 – Clear Vision	Yes		Appears compliant.
44 – Fences	Yes		Appears compliant. Minor clarification recommended regarding retaining wall fall prevention safety.
46 – Parking	Yes		Appears compliant.
48 – Access & Circulation	No	48.030(E)(5)	Insufficient engineering documentation to support required findings.
54 – Landscaping	Yes		Generally compliant.
55 – Design Review	No	55.130(B)-(C) 55.105(N)(1)(a)	Current record does not provide sufficient engineering information to verify compliance.
85 – Land Division	No	85.200(A)(5)(a)	Current record does not provide sufficient engineering information to verify compliance.
96 – Public Improvements	No	96.010(A)(3)	No substantive evaluation of applicable Chapter 96 requirements was provided.

ESI conducted an independent engineering review of the applicant's submitted materials for City of West Linn Project DR-25-04 to evaluate whether the current application demonstrates compliance with the applicable engineering provisions of the West Linn CDC and provides sufficient technical information to support the findings required for approval.

As summarized in Table 1, several portions of the application, including the clear vision analysis, fencing, parking, and landscaping, generally appear to satisfy the applicable engineering requirements of the CDC. However, the review also identified several critical areas where the current application does not provide sufficient engineering information for the City to independently verify compliance or make the findings required for approval.

The principal engineering concern identified throughout this review is not that the proposed development is necessarily infeasible. Rather, the application at present is unable to substantiate that the proposed development is feasible. Instead, it repeatedly relies upon future engineering design, public infrastructure improvements, agency coordination, utility modifications, easement revisions, and other subsequent activities to demonstrate compliance with several applicable approval criteria. While these activities are common during project development, they also represent engineering work necessary to substantiate compliance with the CDC and feasibility of construction.

As a result, several required findings cannot presently be verified based upon the information contained within the current application record. The most significant engineering issues identified during this review include:

- **Building Height Adjustment (Chapter 21):** The application does not provide sufficient evidence to support the findings necessary for approval of the requested SB 1537 building height adjustment.
- **Access and Circulation (Chapter 48):** Compliance with several access, circulation, and reciprocal easement requirements is not supported by sufficient engineering documentation.
- **Design Review (Chapter 55):** The proposed grading, retaining wall systems, stormwater management approach, and transportation improvements rely upon future engineering analyses and public improvements before compliance can be verified.
- **Land Division (Chapter 85):** Compliance with the incorporated land division standards cannot presently be verified because multiple engineering elements remain dependent upon future design, coordination, and implementation.
- **Public Improvements (Chapter 96):** The application does not include a substantive evaluation of the applicable public improvement requirements despite relying upon significant transportation, utility, drainage, and right-of-way improvements.

Accordingly, while portions of the application appear consistent with the applicable engineering requirements of the CDC, the current record does not provide sufficient engineering and technical information to support approval of the application. As it is the burden of the applicant to demonstrate compliance with the CDC, ESI recommends that the Planning Commission deny the current application based upon the current record.

CDC Chapter 21 – Office Business Center, OBC.

The approximate project surface areas are as follows:

Project Area = 494,715 SF (11.36 acres)
Proposed Impervious Area = 349,536 SF = 70% impervious
Building Area = 151,000 = 33% of the site

Chapter 21 establishes the primary development standards for properties within the Office Business District, including permitted uses, residential density, building setbacks, maximum building height, and maximum lot coverage. From an engineering perspective, the principal review items applicable to this development include:

- Permitted mixed-use development;
- Residential density;
- Building setbacks;
- Maximum building height; and
- Maximum lot coverage.

A. Permitted Mixed-Use Development

Mixed Use development appears to be acceptable on this lot under Chapter 21.

B. Residential Density

The proposed development includes approximately 320 dwelling units on an approximately 11.15-acre site, resulting in an overall density of approximately 28.7 dwelling units per gross acre, or approximately one dwelling unit per 1,500 square feet of site area. Unlike many residential zoning districts within West Linn and neighboring jurisdictions that regulate maximum residential density through units-per-acre limitations, Chapter 21 does not establish a maximum residential density for mixed-use residential development. Instead, development intensity is primarily regulated through dimensional standards including maximum building height, setbacks, lot coverage, parking, landscaping, and other site development requirements. Consequently, compliance with these dimensional standards serves as the primary mechanism by which Chapter 21 regulates the overall scale and intensity of development.

For context, this density exceeds the maximum residential densities permitted in most residential zoning districts within West Linn, where maximum densities generally range from approximately 6 to 24 dwelling units per acre depending on zoning designation.

C. Building Setbacks

Building setbacks appear to comply with Chapter 21 and no variances have been requested.

D. Maximum Building Height

The proposed buildings are subject to the maximum building-height standards of CDC 21.070(A)(6). The applicant acknowledges that 10 of the 11 proposed buildings exceed the underlying Chapter 21 height limitations and requests an adjustment pursuant to Section 38 of SB 1537. The proposed building heights are compared with the applicable CDC standards in Table 2 below.

Table 2: Proposed Building Heights

Building	Proposed Residential Floors	CDC Allowable Floors	Proposed Building Height (ft)	CDC Allowable Height (ft)
1 (Type B)	4	3.5	54'	45'
2 (Type G)	4	3.5	54'	45'
3 (Type B)	4	3.5	54'	45'
4 (Type B)	4	3.5	54'	45'
5 (Type B)	4	3.5	54'	45'
6 (Type B)	4	3.5	54'	45'
7 (Type D)	4	3.5	54'	45'
8 (Type C)	4	3.5	54'	45'
9 (Type E)	4	3.5	54'	45'
10 (Type F)	4	3.5	54'	45'
11 (Type A)	1	3.5	Not Provided	45'

The applicant characterizes the requested building height adjustment as mandatory under SB 1537. However, the adjustment becomes mandatory only if the City first determines that all qualification criteria in Section 38(2)(a) through (g) have been satisfied. The submitted narrative does not clearly demonstrate compliance with all eligibility criteria or provide sufficient analysis to support several required findings. Accordingly, the City must independently evaluate the evidence and adopt findings

supported by substantial evidence before determining whether the requested adjustment qualifies for approval under SB 1537.

The applicant additionally asserts that the requested adjustments will result in approximately 148–154 additional dwelling units but does not provide a quantitative analysis demonstrating how this figure was derived. The application combines the effects of the requested building height adjustment and the requested ground-floor residential adjustment into a single estimated increase without identifying the contribution of each individual adjustment or establishing the code-compliant baseline development from which the increase is measured. Consequently, the application does not provide sufficient evidence for the City to independently verify the claimed increase in dwelling units or adopt the findings required under Section 38(2)(g)(C) based on substantial evidence.

Engineering Finding: Ten of the eleven proposed buildings exceed the maximum building height permitted by **CDC 21.070(A)(6)** and therefore require a height adjustment under Section 38 of SB 1537. Because the applicant has not provided sufficient evidence demonstrating eligibility for the requested SB 1537 height adjustment, the Planning Commission lacks a sufficient evidentiary basis to approve the requested adjustment. Since the proposed development exceeds the underlying Chapter 21 height limitations, the requested development cannot be approved under the current application record.

E. Lot Coverage

The applicant indicates that the proposed development will result in approximately 70% impervious area. While this represents a substantial amount of site coverage, the CDC does not establish a maximum allowable impervious surface percentage for development within the Office Business District. Instead, Chapter 21 regulates lot coverage, which is defined as the area covered by buildings.

The submitted plans indicate building lot coverage of approximately 33%, which is below the 50% maximum lot coverage permitted by Chapter 21. Based on the information submitted, no apparent exception or noncompliance with the Chapter 21 lot coverage standard was identified.

CDC Chapter 42 – Clear Vision Areas

Chapter 42 establishes minimum clear vision area requirements at intersections and access points. The submitted application identifies the required clear vision triangles at the proposed access locations on the civil plans, which generally appears consistent with the intent of CDC Chapter 42.

Engineering Finding: The submitted application generally appears consistent with the intent of CDC Chapter 42 by identifying the required clear vision areas on the civil plans. This review did not independently evaluate available sight distance or otherwise verify the adequacy of visibility at the proposed access locations, as such analyses are not required to demonstrate compliance with the provisions of CDC Chapter 42.

CDC Chapter 44 – Fences

CDC Chapter 44 establishes standards governing the location, height, and design of fences. These standards are intended to ensure that fencing is compatible with adjacent land uses while maintaining visibility, safety, and compliance with applicable development requirements.

The applicant proposes three fence installations, which are identified in the project narrative and depicted on the submitted site and landscape plans. Based on the submitted materials, the proposed fence locations and heights appear consistent with the requirements of CDC Chapter 44.

The applicant's narrative states that no fences are proposed on top of the retaining walls. While this appears consistent with the proposed site design, the application does not identify whether guardrails or other protective barriers will be provided where required to address fall protection adjacent to retaining walls. Although such requirements may be governed by applicable building codes or other design standards rather than CDC Chapter 44, this aspect of the design should be clarified during subsequent design or permitting, as applicable.

Engineering Finding: The proposed fencing appears to comply with the requirements of CDC Chapter 44. Accordingly, this chapter does not present an engineering impediment to the Planning Commission making the findings required for approval. The absence of fencing, guardrails or protective barriers adjacent to retaining walls is noted as an item requiring clarification under applicable design or building standards, if required.

CDC Chapter 46 – Off-Street Parking, Loading and Reservoir Areas

CDC Chapter 46 provides standards for the number and arrangement of parking, loading, and reservoir areas. Unlike many zoning districts, the applicable parking standards establish a maximum allowable number of parking spaces rather than a minimum parking requirement. The proposed development provides 400 parking spaces to serve 320 residential units, ranging from one- to three-bedroom units, together with the proposed commercial space. Based on the submitted parking calculations, the project appears to remain below the maximum parking allowance established by the code.

For reference, the Institute of Transportation Engineers (ITE) Parking Generation Manual reports that comparable multifamily developments commonly exhibit peak parking demand in the range of approximately 1.3 to 1.4 parked vehicles per dwelling unit. The proposed project provides approximately 1.25 parking spaces per residential unit, exclusive of any parking demand associated with the proposed commercial uses. While this ratio is somewhat below the average parking demand observed for comparable developments, Chapter 46 does not establish a minimum parking requirement or require a parking demand analysis.

Engineering Finding: Based on the submitted application materials, the proposed parking facilities appear to comply with the applicable requirements of CDC Chapter 46 and remain below the maximum parking allowance established by the code. However, the proposed parking supply is modestly below the average peak parking demand reported by the ITE for comparable multifamily developments. Although this does not indicate noncompliance with Chapter 46, the proposed parking ratio may warrant

consideration from an operational perspective, particularly given the inclusion of commercial space, 52 three-bedroom residential units, and the limited availability of on-street parking.

CDC Chapter 48 – Access, Egress and Circulation

CDC Chapter 48 establishes standards governing vehicular access, internal circulation, driveway design, and pedestrian and bicycle connectivity. The applicant has provided a narrative response to each applicable section of the code and references the accompanying civil plans and Traffic Impact Analysis in support of the proposed access and circulation system. The application proposes multiple access points from Tannler Drive, internal private roadways connecting the various residential buildings, reciprocal vehicle and pedestrian access with the adjacent Willamette 205 Office Center, and pedestrian facilities throughout the site intended to connect buildings, parking areas, common open spaces, and commercial uses.

Several portions of the Chapter 48 narrative rely primarily on statements of compliance rather than providing supporting engineering calculations or documentation within the application itself. For example, CDC 48.030(E) limits multifamily access drives to an average grade of 10 percent with a maximum grade of 15 percent. The applicant states that proposed driveways range from 4 percent to the maximum allowable 15 percent and concludes that the average grade complies with the code; however, no supporting calculations or grade tabulations are provided demonstrating how the average grade was determined for each access drive. Similarly, the narrative asserts compliance with access spacing and internal circulation requirements without providing the underlying engineering analyses within the application record. While these items may ultimately be demonstrated through the accompanying engineering plans or subsequent construction documents, the narrative generally does not provide sufficient supporting information to independently verify these conclusions.

The application also indicates that reciprocal access agreements and associated easements with the adjoining Willamette 205 Office Center will be amended following project approval to reflect the proposed access configuration. While this approach may ultimately satisfy the intent of the shared access provisions, the application relies upon future documentation rather than demonstrating that the necessary reciprocal access easements have been executed or otherwise established as proposed.

Engineering Finding: The current application record does not provide sufficient engineering information to verify compliance with the access, driveway grade, access spacing, and reciprocal access requirements of **CDC 48.030(E)**. Because these items remain unsupported by engineering calculations or executed documentation, the Planning Commission lacks sufficient evidence to make the findings required for approval under Chapter 48.

CDC Chapter 54 – Landscaping

CDC Chapter 54 establishes the City's landscaping requirements, including minimum landscaped area, parking lot landscaping, plant selection, irrigation, and long-term maintenance. The applicant has submitted a comprehensive landscape plan prepared by a licensed landscape architect and has provided responses addressing each applicable approval criterion. The proposed landscaping generally appears consistent with the applicable standards, with detailed planting plans, species schedules, parking lot landscaping, perimeter buffers, and irrigation provisions identified on the submitted landscape sheets.

Final irrigation specifications and certain installation details are appropriately deferred to the construction documents, consistent with the level of design typically provided during final engineering.

The application requests a design exception from the planting strip standards applicable to the proposed modifications of Tannler Drive. Specifically, the applicant requests approval of an alternative planting strip design in lieu of the standard configuration otherwise required by CDC Chapter 54. The merits of this requested design exception, including the applicable review criteria and procedural considerations, are discussed further in the review of CDC Chapter 96.

Engineering Finding: Based on the submitted application materials, the proposed landscaping generally appears to comply with the applicable requirements of CDC Chapter 54. The landscape plans provide sufficient detail to demonstrate compliance with the majority of the chapter's objective standards. The requested planting strip design exception is addressed separately under the review of CDC Chapter 96.

CDC Chapter 55 – Design Review

CDC Chapter 55 establishes the design review standards applicable to the proposed development, including site planning, building orientation and design, protection of natural features, grading and drainage, circulation, landscaping, and the availability of adequate public facilities. The applicant has elected to proceed under the clear and objective standards of CDC 55.105 and has submitted architectural, civil, landscape, traffic, stormwater, arborist, and geotechnical materials in support of the application. Particular attention is warranted where the application relies on requested adjustments, preliminary engineering assumptions, future design work, or improvements that must occur before the proposed development can be safely constructed and occupied.

This review is broken out into the following sections:

- Clear and Objective Review and Requested Adjustments
- Tree Removal
- Grading and Site Modifications
- Geotechnical Investigation
- Retaining Wall Design
- Retaining Wall Drainage
- Site Stormwater Management
- Transportation

A. Clear and Objective Review and Requested Adjustments

The applicant has elected to proceed under the clear and objective review process authorized by CDC 55.105 and Senate Bill 1537. Within the Chapter 55 narrative, however, the applicant acknowledges that several objective design standards are not met by the proposed development and requests adjustments for façade articulation, window area, building orientation, and balcony or porch requirements. Rather than demonstrating compliance with the underlying standards, the application relies upon approval of these requested adjustments to satisfy the applicable Chapter 55 design criteria.

As discussed previously in the review of CDC Chapter 21, SB 1537 authorizes qualifying adjustments to clear and objective standards only where the applicant demonstrates that the adjustment is necessary to accommodate the proposed housing development and satisfies the applicable statutory criteria. Because several Chapter 55 design standards depend upon approval of these requested adjustments,

the City's ability to make the required findings under this chapter is contingent upon the adequacy of the supporting evidence for those requests. Accordingly, the requested adjustments are not evaluated further within this chapter but are incorporated by reference to the discussion and findings presented under CDC Chapter 21.

B. Tree Removal

The proposed development will substantially alter the existing wooded character of the site. According to the applicant's arborist report, 328 of the 408 inventoried onsite trees are proposed for removal, while 80 trees, including 70 significant trees, are proposed to remain. The applicant has submitted a detailed arborist report, tree inventory, and tree preservation plan documenting the existing tree resources, evaluating individual tree health and structural condition, identifying significant trees, and establishing tree protection measures for retained trees during construction. The report further calculates the protected area associated with retained significant trees and concludes that approximately 24 percent of the significant tree protected area on property owned or controlled by the applicant will be preserved.

While the proposed removal of existing trees is substantial and will significantly alter the site's existing tree canopy, Chapter 55 does not prohibit extensive tree removal where the applicable tree preservation standards are otherwise satisfied. Based on the submitted arborist report and supporting exhibits, the applicant appears to have adequately documented the existing tree resources, identified trees proposed for retention and removal, and provided construction-phase protection measures for retained trees. Although portions of the proposed development will occur within typical root protection zones requiring arborist oversight during construction, the report provides recommendations intended to minimize construction impacts and maintain the viability of retained trees.

C. Grading and Site Modifications

The proposed development requires extensive grading to transform the existing undeveloped hillside into a multi-building residential development with structured parking, internal roadways, utilities, and associated site improvements. The project site generally slopes from north to south and includes significant elevation changes that necessitate substantial cut and fill operations, numerous retaining walls, and extensive modification of the existing terrain. The submitted grading plans indicate multiple retaining walls throughout the site, with wall heights ranging from approximately six feet to as much as 30 feet. These grading improvements form a fundamental component of the proposed development and directly influence the design of the retaining walls, stormwater management system, utilities, roadway improvements, and building foundations.

The applicant has submitted preliminary grading plans together with a geotechnical investigation intended to evaluate subsurface conditions and provide recommendations for site development. The geotechnical report identifies shallow basalt bedrock across much of the site, variable surficial soils, and the potential for perched groundwater during prolonged wet periods. The report further recognizes that the proposed development will require significant excavation into rock and recommends additional subsurface investigation, including supplemental borings and rock coring, to evaluate bedding orientations and support the final design of excavations and retaining structures.

At the land use stage, it is recognized that detailed structural design and final construction drawings are typically developed during subsequent engineering and permitting. Nevertheless, CDC Chapter 55 requires sufficient factual and engineering information to demonstrate that the proposed grading

concept is feasible and that known or potential geotechnical hazards can be adequately addressed. Because the proposed grading strategy relies upon extensive excavation, tall retaining walls, and site-specific geotechnical conditions that remain subject to additional investigation, the submitted application must provide adequate engineering support for the grading concept depicted on the plans, independent of the final construction-level design that will occur during later phases of the project.

Engineering Finding: Given the scale of the proposed grading, extensive rock excavation, and reliance upon numerous tall retaining walls, the application does not provide sufficient engineering information and other factual data to support the conclusions of the submitted grading plan as required by **CDC 55.130(C)**. Accordingly, the Planning Commission lacks sufficient engineering evidence to conclude that the proposed grading concept can be safely implemented as required under Chapter 55.

D. Geotechnical Investigation

The applicant submitted a geotechnical investigation prepared to evaluate subsurface conditions and provide recommendations for development of the site. The investigation identifies shallow basalt bedrock across much of the property, variable surficial soils, and the potential for perched groundwater during extended periods of rainfall. Based upon the available information, the geotechnical report concludes that the site can be developed provided its recommendations are incorporated into the final design. At the same time, however, the report recognizes that additional subsurface investigation will be necessary to support portions of the proposed development. Specifically, the geotechnical engineer recommends supplemental borings and rock coring to evaluate bedrock conditions, bedding orientations, and excavation feasibility in areas of significant rock cuts and retaining walls.

The preliminary nature of the geotechnical investigation is also reflected throughout the report, which anticipates additional engineering analysis as the project design progresses. While this sequencing is common during project development, the proposed grading concept shown on the current civil plans incorporates substantial excavation and retaining wall systems that rely upon the geotechnical conditions described in the report. Consequently, the City's findings under CDC Chapter 55 must be based upon sufficient factual and engineering information demonstrating that the proposed grading concept is feasible and that identified geotechnical hazards can be adequately addressed.

E. Retaining Wall Design

The submitted civil plans identify numerous retaining walls throughout the site ranging from approximately six feet to over 20 feet in height, including several walls approaching 25 feet and one wall reaching approximately 30 feet. These retaining walls are integral to the proposed grading concept and will support building pads, parking areas, internal roadways, and other site improvements.

The submitted geotechnical investigation, however, provides design recommendations for conventional cantilever retaining walls not exceeding approximately eight feet in height. While the report acknowledges that larger retaining structures may be required, it does not provide preliminary design recommendations, stability analyses, or engineering criteria specifically applicable to many of the retaining walls depicted on the current civil plans. Likewise, the application does not identify the anticipated retaining wall systems, provide preliminary wall sections, or include global stability analyses demonstrating the feasibility of the taller retaining structures proposed throughout the site.

Preparation of detailed retaining wall design calculations is appropriately performed during final engineering and permitting. Nevertheless, the retaining walls shown on the preliminary grading plans

substantially exceed the conventional wall heights evaluated within the submitted geotechnical investigation. As a result, the application presently relies upon future engineering analyses to demonstrate the feasibility of significant portions of the proposed retaining wall system rather than providing sufficient preliminary engineering information to support the grading concept depicted in the current application.

Engineering Finding: Given the number and height of the proposed retaining walls, together with the absence of preliminary engineering analyses addressing these larger structures, the application does not provide sufficient engineering information and other factual data to support the conclusions of the submitted retaining wall concept as required by **CDC 55.130(C)**. Accordingly, the Planning Commission lacks sufficient engineering evidence to conclude that the proposed retaining wall system can be safely constructed as required under Chapter 55.

F. Retaining Wall Drainage

Proper drainage behind retaining walls is a critical component of long-term wall performance and slope stability. The submitted geotechnical investigation recognizes that perched groundwater may develop above shallow bedrock during prolonged rainfall events and recommends installation of foundation drains and retaining wall drainage systems to intercept groundwater and relieve hydrostatic pressures. The report further recommends that these drainage systems discharge into the site's storm drainage system as part of the overall drainage design.

Although the application includes an overall stormwater management plan, the submitted materials do not clearly identify how retaining wall drainage associated with the numerous retaining walls will be collected, conveyed, and discharged into the proposed storm drainage system. Likewise, preliminary wall details illustrating collector drains, outlet locations, cleanouts, or the integration of retaining wall drainage with the overall stormwater system were not identified within the application materials reviewed.

Particular attention is warranted for the tallest retaining wall proposed along Green Street, which appears to function primarily as a deep cut wall excavated into the existing hillside rather than a conventional fill retaining wall. Because groundwater interception and drainage for this type of retaining structure can differ significantly from conventional retaining wall systems, additional engineering information describing the proposed drainage approach for this excavation would assist the City in evaluating the feasibility of the proposed grading concept and the long-term performance of the retaining wall system.

G. Site Stormwater Management

The applicant has submitted a preliminary stormwater report utilizing Contech treatment facilities and underground detention systems to collect, treat, and detain runoff prior to discharge. While underground stormwater facilities are an accepted design approach, the City's Stormwater Design Standards generally identify surface facilities as the preferred best management practice where site conditions allow. The application does not discuss the engineering considerations that resulted in selection of underground treatment and detention facilities rather than surface facilities for this development.

The proposed underground system will require substantial excavation and installation within an area already characterized by shallow basalt bedrock and extensive grading. Given the City's stated

preference for surface stormwater facilities, the application does not provide sufficient engineering justification to support the selection of an underground detention system in lieu of the preferred approach. In the absence of that supporting information, the application has not adequately demonstrated that the proposed deviation from the City's preferred stormwater management practice is warranted.

Engineering Finding: From an engineering standpoint, the application has not demonstrated why the City's preferred stormwater management approach is not feasible for this site or provided sufficient justification for relying upon an underground detention system requiring substantial excavation within shallow basalt conditions. Accordingly, the application does not provide sufficient engineering information and other factual data to demonstrate that the proposed stormwater management approach satisfies the applicable engineering requirements or to support the conclusions of the submitted stormwater concept as required by **CDC 55.130(B) and (C)**. Therefore, the Planning Commission lacks sufficient engineering evidence to conclude that the proposed stormwater management approach complies with the applicable requirements of Chapter 55.

H. Transportation

The applicant submitted a Traffic Impact Analysis evaluating the impacts of the proposed development on the surrounding transportation network. The analysis concludes that acceptable intersection operations can be achieved following project buildout; however, those conclusions are expressly dependent upon construction of a comprehensive package of transportation improvements at the relocated Blankenship Road/Tannler Drive intersection. These improvements include construction of a new traffic signal, implementation of specific signal phasing, restriping of Blankenship Road to provide separate left-turn lanes with additional storage, and construction of new turn lanes and roadway improvements along the relocated Tannler Drive approach. The Traffic Impact Analysis further concludes that implementation of these improvements would improve the PM peak operating conditions at the intersection from the existing failing LOS F condition to LOS D.

The reported improvement from the existing failing LOS F condition to LOS D is entirely dependent upon completion of this package of roadway and intersection improvements. The Traffic Impact Analysis does not identify these improvements as planned, committed, or funded. Instead, it recommends that the applicant collaborate with the City to identify funding for construction of the signalized intersection and associated roadway improvements prior to occupancy of the proposed development. The application materials reviewed do not identify a funding source, executed improvement agreement, or other enforceable mechanism demonstrating that these transportation improvements will be completed. Accordingly, the improved LOS D operating conditions presented within the Traffic Impact Analysis represent a future scenario that has not been demonstrated to occur.

Engineering Finding: The acceptable operating conditions presented in the Traffic Impact Analysis depend upon implementation of a substantial package of roadway and intersection improvements that have not been demonstrated to be funded, committed, or otherwise assured. Accordingly, the application does not provide sufficient engineering information and other factual data to support a finding that adequate transportation facilities will exist to serve the proposed development as required by **CDC 55.105(N)(1)(a)**. Therefore, the Planning Commission lacks sufficient engineering evidence to conclude that the applicable transportation approval criteria have been satisfied.

Chapter 55 Engineering Finding Summary: While portions of the proposed development, including tree preservation and general site planning, appear to satisfy applicable Chapter 55 standards, the application does not provide sufficient engineering information and other factual data to support the findings required under **CDC 55.130(B) and (C)** for the proposed grading, retaining wall systems, and stormwater management approach, or the transportation findings required under **CDC 55.105(N)(1)**. Accordingly, the Planning Commission cannot determine, based on the current record, that the applicable engineering requirements of Chapter 55 have been satisfied.

CDC Chapter 85 – Land Divisions – General Provisions

CDC Chapter 85 establishes the standards governing land divisions and property line adjustments, including whether the resulting parcel configuration can support development that complies with the applicable land division and public infrastructure requirements.

The applicant has provided responses addressing the approval criteria contained within Chapter 85, and generally states that the proposed property line adjustment complies with the applicable provisions of Chapter 85. The supplemental narrative further asserts that certain approval criteria elsewhere in the CDC are not "clear and objective" and therefore do not apply to the proposed development.

Whether a particular approval criterion is applicable is a determination to be made by the City, not the applicant. Accordingly, this review assumes that all applicable provisions of Chapter 85 remain subject to evaluation unless expressly determined otherwise by the City.

CDC 85.200(A)(5)(a) requires land divisions to provide street improvements, right-of-way, and roadway design that conform to the City's Transportation System Plan and Public Works Design Standards. The proposed property line adjustment is intended to facilitate redevelopment that relies upon substantial modifications to Tannler Drive, including revised roadway geometry, public improvements, a requested street design exception, and associated right-of-way improvements. As discussed in Chapter 96, the current application does not provide sufficient engineering information to demonstrate that these required public improvements comply with the applicable Public Works Design Standards or satisfy the requested design exception. Because compliance with these street improvement requirements is a condition of approval under CDC Chapter 85, the current application record does not provide sufficient engineering information for the City to determine that the proposed property line adjustment satisfies the applicable approval criteria.

Engineering Finding: The application does not provide sufficient engineering information and other factual data to demonstrate that the proposed street improvements, right-of-way modifications, and roadway design conform to the City's Transportation System Plan and Public Works Design Standards as required by **CDC 85.200(A)(5)(a)**. Accordingly, the Planning Commission lacks sufficient engineering evidence to determine that the applicable Chapter 85 approval criteria have been satisfied.

CDC Chapter 96 – Street Improvement Construction

CDC Chapter 96 establishes the standards and approval process for public improvements associated with development. The applicant's narrative does not identify, evaluate, or demonstrate compliance with any of the applicable provisions of Chapter 96, despite the proposed development relying upon

substantial public improvements, including transportation, utility, drainage, and right-of-way improvements identified elsewhere in the application.

The application requests a design exception modifying the standard Tannler Drive street section by providing a curb-tight sidewalk, relocating the planting strip and street trees behind the sidewalk, and eliminating the planned bicycle lane due to the roadway grade. While the application identifies these proposed modifications, it does not provide the engineering analysis or evaluation necessary to support the requested exception. No engineering assessment is provided demonstrating why the standard street section is infeasible, how the proposed alternative satisfies the applicable public improvement objectives, or why elimination of the bicycle lane is appropriate. Instead, the narrative states only that a future design exception will be submitted to the City Engineer. As a result, the current application does not provide sufficient engineering information for the City to evaluate the requested public improvement modifications or make the findings necessary for approval.

Engineering Finding: The application does not provide the engineering analysis necessary to evaluate the requested public improvement exceptions under **CDC 96.010(A)(3)**. Accordingly, the Planning Commission lacks sufficient engineering information to verify compliance with Chapter 96 or make the findings required for approval.

Conclusion

Based on the engineering review presented herein, ESI concludes that the current application does not contain sufficient engineering and technical information to support several findings required for approval. While the deficiencies identified in this report do not necessarily indicate that the proposed development cannot ultimately satisfy the applicable approval criteria, the current application record does not provide an adequate engineering basis for the Planning Commission to make the findings required for approval. Accordingly, ESI recommends that the Planning Commission deny the current application without prejudice.

Sincerely,



Danny Mercer, PE (OR)

President

Engineering Solutions Inc.

dmercer@engineering-solutions-inc.com

Appendix A - Documents Reviewed

ESI's review was based upon the applicant's submitted land use application materials and supporting technical reports, including the following principal documents:

Document	Prepared By	Date
Land Use Application Narrative	HHPR	June 12, 2026
Supplemental Land Use Application Narrative – Ground Floor Commercial	HHPR	July 16, 2026
Civil Engineering Plans	HHPR	May 22, 2026
Geotechnical Report	Columbia West	Sept 16, 2025
Architectural Plan Set	Hill Architects	Feb 26, 2026
Landscape Plans	Hill Architects	May 22, 2026
Arborist Report	Todd Prager & Associates	May 22, 2026
Preliminary Stormwater Report	HHPR	May 2026
Traffic Impact Analysis	Kittleson & Associates	June 12, 2026
Property Line Adjustment Exhibit	HHPR	May 22, 2026

Unless otherwise noted, references within this report correspond to the most recent revisions of the application materials available to ESI as of the date of this report.

Appendix B - Codes and Standards Reviewed

ESI reviewed the following codes and standards in support of this report:

- City of West Linn Community Development Code (CDC)
- Oregon Senate Bill 1537, Section 38
- Applicable City of West Linn Stormwater Design Standards
- Applicable City of West Linn Engineering Design Standards
- Institute of Transportation Engineers (ITE) Trip Generation Manual
- Institute of Transportation Engineers (ITE) Parking Generation Manual

Schroder, Lynn

From: dlspellecy@yahoo.com
Sent: Tuesday, August 4, 2026 7:36 AM
To: Schroder, Lynn
Subject: I'm Really Worried

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

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

Good morning,

The huge concern I have is for our beautiful and peaceful West Linn.

If over 300 apartments with 600 cars are added to a very small area just above Dutch Bros. On Blankenship I can't help but worry.

Getting off the freeway now after work we are dealing with huge backups. And if you allow 600 more cars to this little area it will be a disaster.

How will emergency vehicles get through?? Ambulances Fire Trucks or the Police.

I understand that area will someday be developed, but 300 plus apartments and 600 added cars can't be what's best for West Linn and its citizens.

Please don't let this happen.

Sincerely,
Debbie Spellecy
6440 Summerlinn Way
503-928-1080

Schroder, Lynn

From: Ken Pryor <paragon399@yahoo.com>
Sent: Tuesday, August 4, 2026 11:18 AM
To: Schroder, Lynn
Subject: Opposition to Mixed-Use Development in the Savanna Oaks Neighborhood

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

Written Testimony for the Public Records File No.: DR-25-04/LLA-25-02

West Linn Planning Commission & West Linn City Council Re: Opposition to Mixed-Use Development in the Savanna Oaks Neighborhood

Thank you for the opportunity to provide input on this critical issue affecting our community. As a long-time resident, I appreciate your dedication to thoughtful planning and responsible decision-making that reflect the needs and values of Savanna Oaks.

Chair, Commissioners, Mayor, and Councilors,

My name is Ken Pryor, and I am submitting this letter for the public record regarding the consideration of mixed-use development in the Savanna Oaks neighborhood. I urge both the Planning Commission and the City Council to reject any proposal or policy direction that would introduce mixed-use zoning into this area. Such a move would contradict the City's adopted plans, exceed the capacity of existing infrastructure, and expose residents to significant undisclosed financial burdens.

1. The Savanna Oaks Neighborhood Plan Explicitly Rejects Commercial or Mixed-Use Development

The Savanna Oaks Neighborhood Plan is unequivocal in its description of the area:

- “Primarily low-density residential”
- Characterized by “steep slopes,” “limited access,” and “significant natural resources”
- An area where “commercial uses are not appropriate due to topography and infrastructure constraints”

The Plan's land-use map designates:

- **R-10 low-density residential** as the dominant zoning
- **Light industrial** only in the existing business park
- **No commercial or mixed-use nodes**

Any attempt to introduce mixed-use development would directly contradict the adopted neighborhood vision and require a formal plan amendment. More importantly, it would disregard the physical realities that the Plan was designed to respect.

2. The Transportation System Plan (TSP) Confirms the Area Cannot Support Mixed-Use Intensity

The TSP identifies Savanna Oaks as an area with:

A. No collector-level street network

The neighborhood is served exclusively by local streets, cul-de-sacs, and steep, narrow roads. There is no grid, no redundancy, and no commercial-scale access. Mixed-use development requires a connected street network capable of handling commercial traffic, delivery vehicles, and increased trip generation. Savanna Oaks has none of this, and the TSP does not propose building it.

The addition of the new Operations Center on Salamo is another example of malfeasance; traffic impact of vehicles entering/exiting a main artery to City Hall and shopping will create a significant deterrence to shoppers that will opt to other commercial sites where access is

less congested. Other than Safeway, has consideration been given to the small businesses that are dependent on convenient access or the rush hour congestion at the terminus of Salamo, 10th Street, and Blankenship, plus >300 apartment dwellers + associated commercial traffic? This is a disaster in the making that will not be easily remedied resulting in the deterioration of local home values and existing commercial investments. How is the public better served by this development? Who really benefits from this debacle in the making?

B. Substandard pedestrian and bicycle infrastructure

The TSP documents:

- Missing sidewalks
- Steep grades
- Limited pedestrian connectivity
- No safe multimodal routes

Mixed-use development depends on walkability. Savanna Oaks is physically incapable of providing it without massive capital investment.

3. The Public Facilities Plan (PFP) Shows No Capacity—and No Planned Upgrades—for Mixed-Use Development

The PFP does **not** identify:

- Water main upsizing
- Sewer trunk expansion
- Stormwater capacity improvements
- Roadway widening
- Intersection upgrades

Yet mixed-use development would require all of these.

To put it plainly: **the infrastructure required for mixed-use does not exist, is not planned, and is not funded.**

4. Hidden Costs and Fiscal Stewardship

This is where the issue becomes not just a planning concern, but a matter of public trust.

Proceeding with a proposal that hides its true financial impacts is like taking a fatted cow to market and judging its value only by the size of its shadow. It looks impressive from a distance, but once the animal is actually weighed, you discover that what appeared to be solid value is mostly hollow. At that point, the seller is committed, and the community is left holding the bag, there are no magic beans.

In public policy, **concealing or deferring known costs is not merely poor planning—it borders on malfeasance.** Stewardship of public resources requires transparency **before** commitments are made, not after the bill arrives.

Mixed-use development in Savanna Oaks requires:

- Millions in water and sewer upgrades
- Road reconstruction
- Stormwater expansion
- Emergency access improvements

... the public deserves to know **when, how, and from whom** those costs will be collected.

Because if the city **cannot** answer those questions today, then the answer is self-evident: **Residents will pay—through higher taxes, new fees, diminished home value and/or cuts to essential services.**

5. Mixed-Use Planning Is Already Focused Where It Belongs

The City's mixed-use planning efforts—VISION43, the Highway 43 corridor, Bolton, and Robinwood—identify the appropriate locations for higher-intensity development. Savanna Oaks **is not included in any mixed-use planning area**. It was excluded for a reason: **the topography, infrastructure, and neighborhood character make mixed-use fundamentally incompatible**.

Conclusion

Mixed-use development in Savanna Oaks would:

- Contradict the Savanna Oaks Neighborhood Plan
- Violate Comprehensive Plan siting criteria
- Overwhelm the transportation network.
- Require unfunded infrastructure upgrades!
- Shift hidden costs onto taxpayers!
- Undermine public trust and responsible governance!

And when the costs inevitably exceed projections — as they often do — developers can walk away, leaving the City and its residents to absorb the financial consequences. **When that happens, who benefits? Certainly not the taxpayers who are left paying for infrastructure they never asked for and that never should have been required in the first place.**

Any idea that building the Tannler Drive project eases the housing crisis is flawed and instead creates an upper-class enclave predicated on decoupling of housing supply from local economic realities. The housing crisis is a shortage of affordable units, not luxury ones. Building units that require a six-figure income does absolutely nothing to house the teachers, service workers, and civil servants who are actually being priced out of West Linn. How many city employees, police, firemen live in West Linn?

By using state law (HB 4037) to bypass local zoning, the project concentrates a dense, exclusive enclave of high-income earners behind a corporate-managed firewall. It creates a wealthy island that does not integrate with or serve the broader community

In highly desirable areas, older housing pricing often filters *up* rather than down. Instead of depreciating and becoming cheaper as it ages, older housing stock is bought by investors, renovated with modern finishes, and flipped or rented out at significantly higher rates.

Instead of lowering regional prices, injecting 320 luxury units signals to surrounding landlords that the neighborhood can support higher prices. This causes nearby rents to spike, effectively walling off West Linn as an exclusive, upper-class monoculture while displacing the remaining working class.

For these reasons, I respectfully request that both the Planning Commission and the City Council **exclude Savanna Oaks from any consideration of mixed-use zoning** and uphold the integrity of the City's adopted plans and fiscal responsibilities and not ask residents to swallow a poison pill.

Thank you for your attention to this matter.

Sincerely, Ken Pryor West Linn, Oregon

Schroder, Lynn

From: Mary Tony Rossiter <mtrossiter@gmail.com>
Sent: Tuesday, August 4, 2026 3:53 PM
To: Schroder, Lynn
Subject: Testimony submitted by Greg Rossiter on Tannler Application DR-25-04/LLA-25-02

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

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

This testimony was submitted before the August 5 deadline of 4 pm.

Please add this testimony to the Public Record and email us confirmation of receipt.

Dear Ms. Schroder,

I am a West Linn resident and am writing to you in **strong opposition** to the Tannler Drive Application. I believe the application (DR-25-04/LLA-25-02) **fails to meet** the Community Development Code (CDC) in these important respects:

- The applicant has improperly used Oregon SB 1537 to try to include a number of residential buildings on the property, however the proper zoning for the Tannler Drive property in this application is designated as an Office Business Center (OBC). This **violates OBC zoning** which requires that every building in a proposed development must include commercial space on the first floor of the property (CDC 21.010).
- The proposed closure of Tannler Drive at Blankenship Drive would exacerbate what is already a traffic nightmare at the intersection of 10th Street, Salomo Road and Blankenship Road. Traffic traveling north on Blankenship Road often backs up all the way to the Parkrose Hardware store entrance. During the morning and evening commute, and on weekends, traffic often backs up nearly a quarter-mile up Salomo Road. Frequently, there are families and children on bikes and scooters crossing 10th Street to/from Blankenship Road while some impatient drivers fly through the intersection well above posted speed limits. At a minimum, it would be an inconvenience to commuters. Worse, it would be a detriment to the businesses in River Falls plaza whose customers will be discouraged from negotiating the increased traffic. At worst, it will become confusing and dangerous, with serious accidents only a question of when, not if.
- The proposed closure of Tannler Drive would eliminate one of the three entrances to the White Oak Savanna Park, limiting access to the park from Blankenship Road. White Oak Savanna Park is a gem, not only for West Linn but for Oregon. Of the more than half a million acres of White Oak Savanna habitat that existed in the region, less than 2,000 acres remains. West Linn neighbors raised more than \$3 million over 10 years to acquire the park and contributed more than 20,000 hours of volunteer work to restore the park. It took more than 15 years

to protect the White Oak Savanna and over 100 vertebrate species who live and migrate to/from the park. Rerouting Tannler Drive would eliminate more than 275 feet of frontage from the park, greatly limiting park access.

- In addition, the application does not even mention, let alone comply with CDC Chapter 96, which governs the process for public improvements involving developments like this. The application provides no engineering analysis in support of the exception it seeks to modify Tannler Drive. In fact, the application offers nothing to justify public improvement exceptions as required under Chapter 96.

Thank you,

Greg Rossiter
6000 Summerlinn Way
West Linn, OR 97068

Schroder, Lynn

From: riad.alharithi@comcast.net
Sent: Tuesday, August 4, 2026 8:36 PM
To: Schroder, Lynn
Subject: Testimony submitted by Riad Alharithi on Tannler Application DR-25-04/LLA-25-02
Attachments: Riad_Alharithi_Written_Testimony_Tannler_HB4037.pdf

You don't often get email from riad.alharithi@comcast.net. [Learn why this is important](#)

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WRITTEN COMMUNITY COMMENT

Tannler Drive Development and House Bill 4037

Submitted to the West Linn City Council | August, 04, 2026

To: Mayor Bialostosky and Members of the West Linn City Council

From: Riad Alharithi, West Linn resident

Re: Tannler Holdings LLC applications, DR-25-04 / LLA-25-02, City File No. 2025-04

Purpose of this comment

I am submitting this written community comment regarding the applicant's request to apply Section 17 of House Bill 4037 to the pending Tannler Drive development application.

My comments are not intended to address whether the development should ultimately be approved or denied. I am asking the City Council to preserve the community's right to participate in the established public process before that decision is made.

The community relied on the existing process

Residents have followed this application for nearly a year with the reasonable understanding that there would be an opportunity to review the evidence, submit testimony, respond to the applicant's materials, and participate in public hearings before the Planning Commission and City Council.

The applicant is now asking the City to change that process after the application has already been pending for many months. As I understand the request, applying Section 17 of HB 4037 would eliminate the public hearing and prevent affected residents from pursuing a local appeal, while preserving appeal rights for the applicant.

Changing the procedural rules at this stage would remove rights that residents reasonably expected to have when they began participating in this matter and investing time and resources in understanding the application.

A hearing is necessary for a complete and fair record

This is a large and complex application. It involves issues that may include transportation, infrastructure, environmental resources, grading, stormwater, public safety, and neighborhood impacts. I am not asking the Council to decide those issues tonight. I am asking that residents be allowed to present relevant evidence and testimony through the established land-use process.

Public hearings are not simply delays or obstacles. They allow the applicant, City staff, technical experts, and affected residents to address the same record in an open and transparent setting. They also help ensure that the City's adopted standards are applied consistently and that important local information is not overlooked.

Eliminating the hearing may also eliminate meaningful review

The right to appeal may depend on a person's ability to participate in the local proceeding, raise issues, and preserve those issues for further review. Eliminating the hearing may therefore do more than prevent residents from speaking; it may also prevent affected residents from establishing standing, preserving issues, exhausting local remedies, and obtaining meaningful review of the City's decision.

A process in which the applicant may challenge the City's decision but affected residents may not is fundamentally unbalanced.

Serious legal questions should be resolved publicly

The neighborhood's attorney has raised serious legal concerns regarding whether Section 17 of HB 4037 may properly be applied to this already-pending application. Those concerns include whether the newly enacted provisions are procedural rather than substantive, whether the applicant may use the goal-post statute to obtain a new procedural process, whether the City may change its established review process without first amending its code, and whether eliminating both hearing and appeal rights would deprive affected residents of access to judicial review.

I understand that the City must comply with state law. However, the applicant's interpretation should not be accepted automatically, particularly when that interpretation would eliminate long-established rights of notice, participation, hearing, and appeal. The Council should require a careful, written, and publicly available legal analysis before changing the process for this application.

Requested action

1. Reject the applicant's request to eliminate the public hearing and local appeal process for this pending application.
2. Direct the City Attorney to provide a written and publicly available legal analysis addressing whether Section 17 of HB 4037 may lawfully be applied to an application that was already pending when the legislation became effective.
3. Preserve the established public hearing process before the Planning Commission and City Council.
4. Preserve the public's ability to participate in the proceeding and pursue any appeal rights available under Oregon law.
5. Avoid taking any action that would prevent affected residents from establishing standing, preserving issues, exhausting local remedies, or seeking review of the City's eventual decision.

Conclusion

The public is not asking the Council to prejudge the application. We are asking the Council to allow the established process to continue so that all parties can be heard fairly before a decision is made.

Regardless of anyone's position on the proposed development, basic fairness requires that both the applicant and the affected community have a meaningful opportunity to participate. Please protect the public's right to be heard and allow this application to proceed through the public hearing and appeal process that existed when it was submitted and that the community reasonably expected would apply.

Thank you for your consideration.

Respectfully submitted,

Riad Alharithi | West Linn, Oregon

Schroder, Lynn

From: Rick Nys <rick@greenlightengineering.com>
Sent: Tuesday, August 4, 2026 8:39 PM
To: Schroder, Lynn
Cc: roberta.schwarz@comcast.net; Schwarz, Ed
Subject: DR-25-04/LLA-25-02
Attachments: Modera Transportation Review Letter 7-28-26.pdf

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

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Hi Lynn,

Please enter the attached file into the record for the referenced file.

Thanks,

Rick Nys, P.E.
Principal Traffic Engineer
Greenlight Engineering
503-317-4559

www.greenlightengineering.com





July 28, 2026

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

Re: Modera Mixed-Use Development (DR-25-04/LLA-25-02) – Transportation Impact Review

Planning Commissioners,

I have been retained by Roberta and Ed Schwarz to provide a technical review of the applicant's Traffic Impact Analysis (TIA) and associated transportation-related materials for the proposed Modera mixed-use development located west of Tannler Drive and north of Blankenship Road in West Linn.

Based on my review, the submitted TIA and application do not contain substantial evidence to demonstrate compliance with the City of West Linn Community Development Code (CDC) and the City of West Linn Public Works Design Standards, particularly with respect to traffic impact evaluation, access management, sight distance, driveway design, and safe multimodal circulation.

Executive Summary

Key issues include the following:

- The TIA does not provide adequate operational or safety analysis for all proposed access points, including eight curb cuts along Tannler Drive, and does not evaluate whether access consolidation or alternative circulation configurations would reduce conflicts and improve safety as required by CDC 85.170.
- Required intersection sight distance and stopping sight distance analyses are not provided for any proposed driveway locations, despite explicit CDC requirements that access points demonstrate adequate sight distance as a threshold safety condition for approval. This is especially important given the significant number of driveways with several located very close to horizontal curves.
- The proposed angled on-street parking between curved roadway segments is not evaluated for backing operations, sight distance adequacy, or conflicts with through traffic, or driveway movements.
- The MUTCD four-hour volume warrant conclusion for a potential traffic signal is not supported by sufficient data.

- The multimodal circulation analysis is incomplete, including lack of evaluation of pedestrian and bicycle transitions between facilities, inadequate assessment of crossing operations across multiple driveway conflicts, and insufficient consideration of user safety along the proposed shared-use path.
- Collectively, the application does not demonstrate that the proposed design minimizes transportation hazards, provides safe and efficient circulation, or meets the multimodal accommodation requirements of CDC 85.170(B)(2)(g)(1)(C).

Based on these deficiencies, the applicant has failed to provide substantial evidence necessary for the Planning Commission to make the findings required for approval.

Failure to Analyze All Access Points

CDC 85.170 requires that a traffic impact analysis evaluate whether the transportation system can accommodate the proposed development, including a full assessment of access points to the public street system. This requirement is not limited to general capacity discussion but extends to operational performance, safety, and access configuration.

CDC 85.170(B)(2)(d) requires:

“ Traffic impact analysis (dwellings). For development applications that propose new dwelling units, an applicant must submit a traffic impact analysis unless the application is exempt from this requirement pursuant to subsection (B)(2)(d)(6) of this section. Failure to submit the analysis will result in an incomplete application. The applicant shall prepare the analysis in accordance with the following:

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

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

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

(C) All intersections where the traffic generated by the proposed development exceeds five percent of existing a.m. or p.m. peak hour total intersection traffic volumes. Trip generation shall be determined by using Institute of Transportation Engineers Trip Generation Manual (11th Edition).” (emphasis added)

In this case, the proposed development includes eight curb cuts along Tannler Drive, yet the TIA does not provide adequate analysis of how each of these access points will operate under projected traffic conditions as required. Without the analysis of each of the proposed driveways, the application does not satisfy the minimum traffic impact analysis requirements of CDC 85.170(B)(2)(d). The applicant is required to provide a level of service analysis of each proposed driveway. The report does not evaluate expected performance of these driveways or potential queuing interactions between closely spaced driveways.

The TIA does appear to address spacing standards. CDC 85.170(B)(2)(g)(1)(C) requires that site design minimize negative impacts to the transportation system and make efficient use of public facilities. Without analysis of whether access consolidation is feasible, whether shared access could reduce conflict density, or whether internal circulation could better distribute traffic, the applicant has failed to demonstrate that this standard has been met.

Missing Sight Distance Analysis (CDC 85.170(B)(2)(c)(1)(C)(3))

CDC 85.170 explicitly identifies inadequate sight distance at access points as a condition requiring evaluation in a traffic impact analysis. Sight distance is a fundamental safety element because it directly governs a driver's ability to perceive, react to, and safely execute turning movements.

The City of West Linn Public Works Design Standards also state that "The following information shall be included in each TIA submitted to the City...Intersection and stopping sight distance related to new and impacted driveways and intersections." Despite these requirements, the TIA does not provide any quantitative intersection sight distance or stopping sight distance calculations for the proposed driveways along Tannler Drive. Instead, the TIA states:

"Intersection sight distance documentation at the site access points and along the site frontage will be documented on the civil engineering plans provided through the site plan application process. We recommend that on-site landscaping, signage, and any new above-ground utilities be appropriately located and maintained to provide adequate intersection sight distance per applicable City requirements."

The applicant's site plan illustrates conceptual sight triangles at the proposed driveways but does not demonstrate that adequate sight distance will actually be available under the proposed roadway, landscaping, parking, and access conditions. This falls short of the required analysis to determine whether the proposed access points can safely operate.

Under West Linn requirements, sight distance is not merely a construction-level design detail. It is a threshold transportation safety criterion that must be evaluated during land use review because it determines whether an access point can be safely approved.

This omission is particularly significant because the proposed access locations are affected by several geometric constraints, including horizontal and vertical curvature, roadway grades, angled parking, and multiple closely spaced access points. Without a quantitative sight distance evaluation, the applicant has failed to demonstrate that the proposed access locations meet applicable safety requirements or that they will not create operational conflicts.

Angled Parking with Backing

The proposed angled on-street parking on Tannler Drive located between horizontal curves introduces an additional operational concern that is not addressed in the TIA. Angled parking

requires vehicles to back into an active travel lane, creating conflict points with through traffic that warrant evaluation. These backing maneuvers are inherently more complex than forward movements because drivers must reverse into the roadway while simultaneously observing approaching traffic, identifying acceptable gaps, and avoiding conflicts with other roadway users.

The proposed parking area is located between horizontal curves on Tannler Drive and is also affected by roadway grade changes. This combination of horizontal and vertical curvature may limit visibility for both drivers backing from parking spaces and motorists approaching the parking area. In addition, adjacent parked vehicles may further restrict sight lines. This creates the potential for approaching motorists to have limited opportunity to detect and react to vehicles entering the travel lane.

Similarly, drivers backing from angled parking spaces may have difficulty determining whether sufficient gaps exist in approaching traffic before beginning a maneuver. The ability to safely complete these movements depends on adequate visibility between the backing vehicle and approaching motorists, particularly given the constrained roadway geometry.

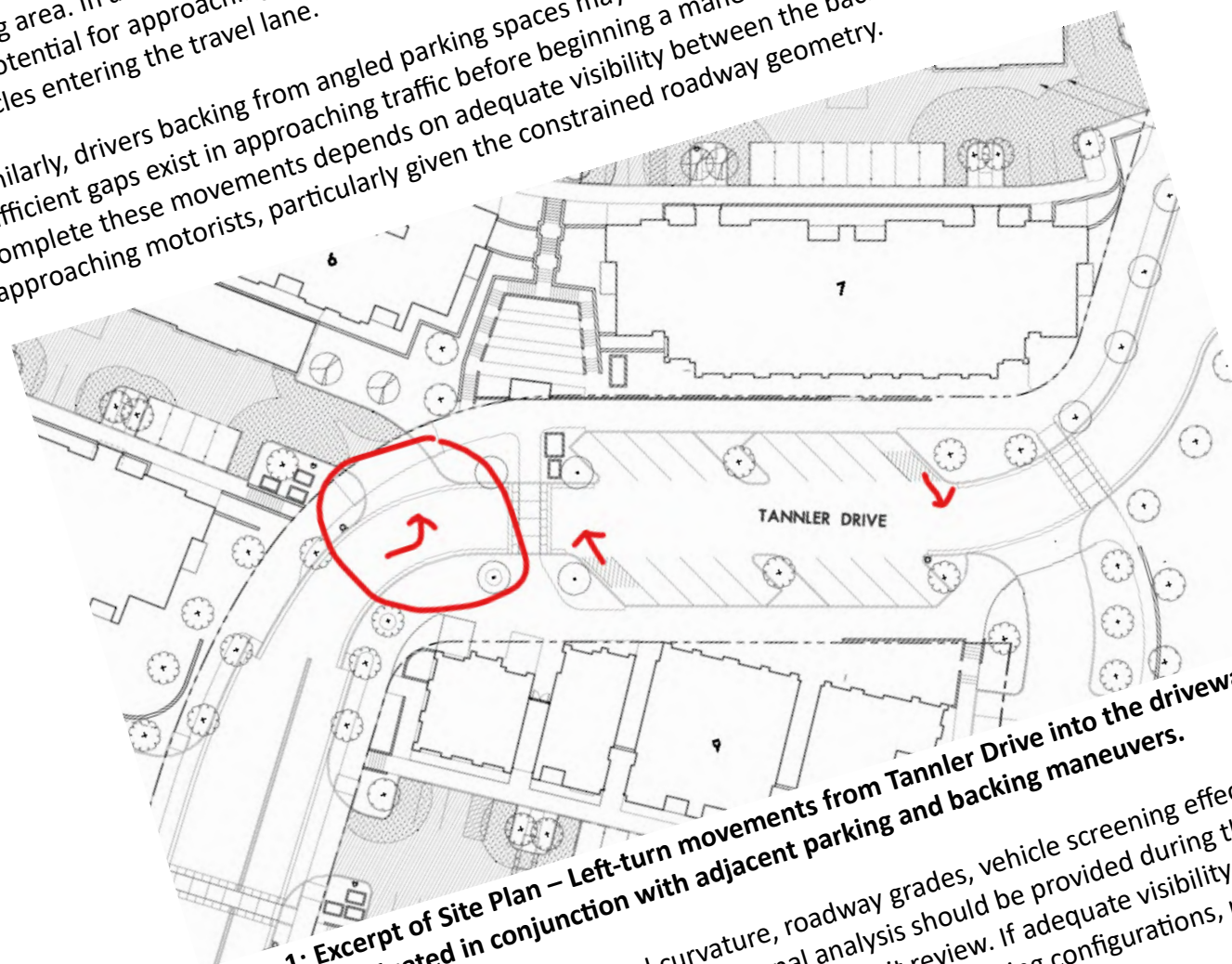


Figure 1: Excerpt of Site Plan – Left-turn movements from Tannler Drive into the driveway should be evaluated in conjunction with adjacent parking and backing maneuvers.

Given the combination of horizontal curvature, roadway grades, vehicle screening effects, and backing movements into a travel lane, additional analysis should be provided during the land use review process rather than addressed during permit review. If adequate visibility cannot be demonstrated, consideration should be given to alternative parking configurations, relocation of

parking stalls outside the curved roadway segment, or other design modifications that reduce conflicts between backing vehicles and through traffic.

Tannler Drive Realignment Is Not Demonstrated to Be Necessary to Comply with the Transportation System Plan

The applicant asserts that the proposed Tannler Drive realignment is necessary to comply with the City's Transportation System Plan (TSP). However, the TSP does not require realignment of Tannler Drive. Rather, the TSP identifies multiple strategies for addressing a potential future operational concern at the Blankenship Road/Salamo Road/10th Street intersection. The TSP identifies the following improvement:

"Add a second exclusive right-turn lane to the eastbound approach to the 10th Street/Blankenship-Salamo Road intersection if necessary to address queuing; however, the need for this improvement would be eliminated by realigning Tannler Drive with the commercial driveway located approximately 350 feet west of its current alignment."

This language does not establish roadway realignment as a required transportation improvement. Instead, it identifies realignment as one possible alternative to constructing additional intersection capacity. The transportation objective identified in the TSP is addressing potential eastbound right-turn queuing, not necessarily relocating Tannler Drive.

The TSP separately identifies Project M23 – 10th Street/Blankenship Road, which includes "Widen Blankenship-Salamo Road to provide dual left-turn lanes at the westbound and northbound approaches to the intersection. Also, add a second exclusive right-turn lane at the eastbound approach to the intersection to address queuing."

By including Project M23 as an adopted transportation improvement, the City has already identified a conventional intersection improvement (a second exclusive right-turn lane) that addresses the same operational issue cited as the basis for the Tannler Drive realignment. Therefore, the TSP does not establish that relocation of Tannler Drive is necessary. Rather, it recognizes multiple potential solutions.

The need for either Project M23 or Tannler Drive realignment is based on the potential for inadequate eastbound right-turn queuing at the Blankenship Road/Salamo Road/10th Street intersection. However, the applicant's TIA does not evaluate queuing conditions under the existing Blankenship Road/Tannler Drive configuration.

Because the TIA does not provide a queuing analysis for the existing roadway configuration, the applicant has failed to establish whether existing or future queues at this location are acceptable, whether storage capacity is exceeded, or whether the operational concern identified in the TSP would occur with the existing Tannler Drive alignment.

Even if future conditions were determined to require additional capacity, the applicant has not demonstrated why relocating Tannler Drive is necessary or preferable to the other solution identified in the TSP. Specifically, the applicant has not evaluated whether Project M23 would adequately address any identified queuing concern, nor has the applicant demonstrated that the additional eastbound right-turn lane is infeasible.

The proposed Tannler Drive realignment represents a major modification to the transportation system. Unlike an intersection improvement that directly addresses the identified operational location, the realignment would:

- Relocate the existing Tannler Drive/Blankenship Road intersection;
- Remove approximately 280 feet of existing public roadway;
- Modify established access and circulation patterns; and
- Require additional roadway construction, grading, retaining walls, utilities, and stormwater facilities.

These impacts extend beyond the operational issue identified in the TSP. Before approving such a significant modification to the transportation system, the applicant should demonstrate that the change is necessary and provides transportation benefits that cannot reasonably be achieved through other TSP consistent improvements.

ODOT correspondence further confirms that the proposed realignment is not required by ODOT (see Appendix A). ODOT indicated that the Tannler Drive/Blankenship Road intersection is not under ODOT ownership or access control and that ODOT's review interest is limited to ensuring that adjacent improvements do not adversely affect the operation of the I-205 interchange and the Blankenship Road/Salamo Road/10th Street intersection.

Therefore, the proposed Tannler Drive realignment is not an ODOT requirement.

Traffic Signal Warrant Analysis

The TIA concludes that the MUTCD Four-Hour Vehicular Volume Warrant is satisfied at the Blankenship Road/Tannler Drive intersection. However, the documentation contained in the TIA does not contain sufficient evidence to support that conclusion.

The traffic data collection described in the TIA consisted of one weekday AM peak period turning movement count (two hours) and one weekday PM peak period turning movement count (two hours), resulting in a total of four hours of observed traffic data. No 24-hour intersection counts, continuous hourly traffic counts, or other traffic data are provided.

The MUTCD Four-Hour Vehicular Volume Warrant requires that the applicable traffic volume thresholds be satisfied during four separate hours of an average day. Demonstrating compliance with this warrant requires documented hourly traffic volumes for each qualifying hour.

Although the TIA includes an hourly volume table concluding that the warrant is met, the report does not identify the source of the hourly volumes presented or explain how they were developed. No methodology is provided describing whether these volumes were derived from observed counts, extrapolated from peak-hour data, or estimated using another analytical approach.

Analysis Traffic Volumes					
Hour		Major Street		Minor Street	
Begin	End	EB	WB	NB	SB
5:00 PM	6:00 PM	892	433	17	178
2nd Highest Hour		882	428	17	176
3rd Highest Hour		802	389	15	160
4th Highest Hour		722	350	14	144
5th Highest Hour		601	292	11	120
6th Highest Hour		591	287	11	118
7th Highest Hour		561	272	11	112
8th Highest Hour		501	243	10	100
9th Highest Hour		491	238	9	98
10th Highest Hour		481	234	9	96
11th Highest Hour		461	224	9	92
12th Highest Hour		451	219	9	90
13th Highest Hour		441	214	8	88
14th Highest Hour		441	214	8	88
15th Highest Hour		361	175	7	72
16th Highest Hour		311	151	6	62
17th Highest Hour		261	126	5	52
18th Highest Hour		200	97	4	40
19th Highest Hour		180	88	3	36
20th Highest Hour		120	58	2	24
21st Highest Hour		60	29	1	12
22nd Highest Hour		50	24	1	10
23rd Highest Hour		30	15	1	6
24th Highest Hour		30	15	1	6

Figure 2: Volume Table from TIA

Comparison of the hourly volume table with the AM turning movement counts demonstrates that the weekday AM count period does not represent the highest traffic volumes shown in the warrant analysis. Because the AM peak period itself does not correspond to the qualifying hours presented in the table, it is evident that those higher hourly volumes were not directly observed during the traffic counts documented in the TIA. The only observed count period documented in the TIA that appears capable of supporting the warrant analysis is the two-hour weekday PM peak period.

Accordingly, the TIA provides documented traffic data for, at most, the two PM peak hours. The remaining qualifying hours shown in the warrant analysis are not supported by observed traffic counts or any documented methodology explaining how those hourly volumes were developed. Without that supporting information, there is insufficient evidence to verify that the MUTCD Four-Hour Vehicular Volume Warrant has been satisfied.

If traffic signal installation is being relied upon as a mitigation measure or transportation system improvement, the applicant bears the burden of demonstrating that the applicable MUTCD warrant is met. That demonstration should be supported by the underlying traffic data and a documented methodology that allows the warrant analysis to be independently verified. The standard practice for evaluating the Four-Hour Vehicular Volume Warrant is to collect 24-hour intersection turning movement counts or otherwise provide continuous hourly traffic data identifying the four qualifying hours. In the absence of that information, the applicant's conclusion that the Four-Hour Vehicular Volume Warrant is satisfied is not adequately supported.

Bicycle Transition and Multimodal Safety (CDC 85.170(B)(2)(a)(1)(C)(2))

The proposed development includes a multi-use path along the north and east side of the proposed development along Tannler Drive intended to accommodate bicycle and pedestrian travel. However, the TIA does not provide a complete analysis of how users will safely transition between facilities or navigate crossings along Tannler Drive to the north of the site.

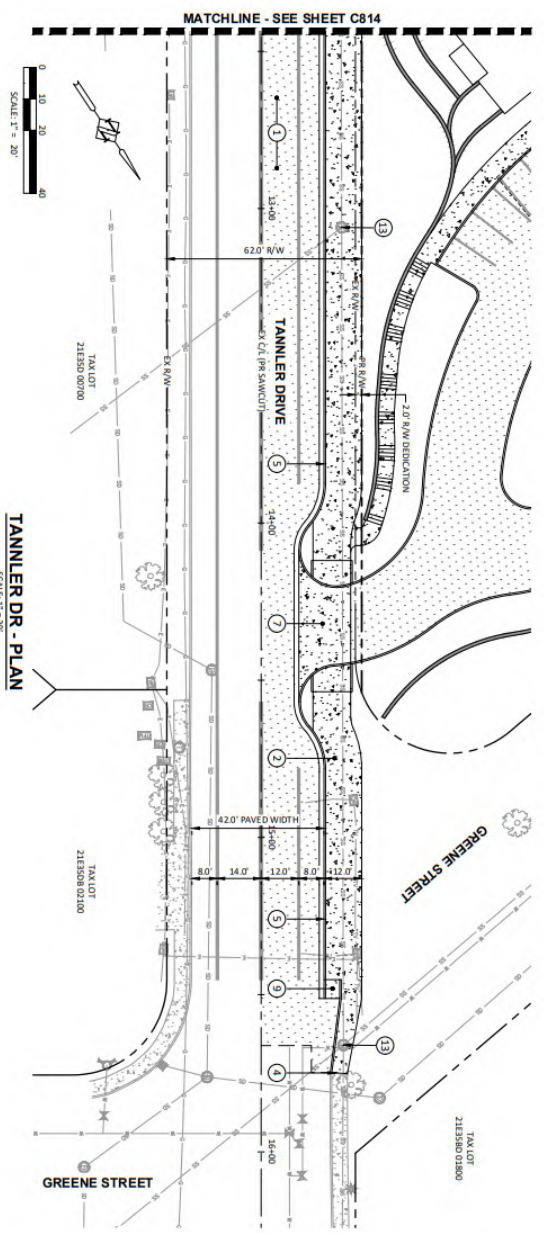


Figure 3: Tannler Drive Improvements on north end of project illustrating multiuse path on west side of Tannler Drive.

The applicant should be required to demonstrate how the proposed facility integrates with the existing bicycle and pedestrian facilities north of the project and how users are expected to transition between facilities in a safe and intuitive manner that will not result in wrong way travel or crossing Tannler Drive at unsafe locations.

In particular, the analysis does not explain how bicyclists traveling northbound on Tannler Drive will safely transition to the east side of Tannler Drive where paved and marked shoulders

already exist. The proposed shared-use path does not appear to provide a logical continuation for bicyclists beyond the northern project limits, yet the TIA does not explain the intended transition to the existing facilities. The TIA does not evaluate whether formal crossing treatments are warranted to support these movements. It also does not assess the cumulative effect of multiple driveway crossings along the shared-use path, where users would be required to interact repeatedly with vehicular traffic entering and exiting the site and numerous driveway drops. Bicyclists traveling uphill or downhill may be less likely to use a shared-use path interrupted by numerous driveway crossings. The TIA does not evaluate whether continuous on-street bicycle facilities would provide a safer or more practical alternative. It is unclear why continuous bicycle facilities that better match the existing Tannler Drive bicycle facilities are not proposed.

With eight proposed curb cuts intersecting the frontage, the frequency of potential conflicts between vehicles, pedestrians, and bicyclists is significant. CDC 85.170 requires that the site design accommodate and encourage non-motorized transportation to the extent practicable and provide safe, direct, and convenient circulation. The current analysis does not demonstrate how these standards are achieved in practice or how conflict points will be managed to maintain safety.

Planned Developments Not Included

The City of West Linn Public Works Design Standards require that traffic impact analyses include, at a minimum:

- “a. Approved in-process developments and funded transportation improvements within the study area;
- b. Traffic growth assumptions; and
- c. Trip generation from other planned developments.”

The submitted TIA states that no in-process developments were identified during the scoping process with City and ODOT staff. A percentage growth rate has also been considered. These appear to address items (a) and (b).

However, item (c) does not appear to have been addressed. The analysis does not clearly identify or incorporate trips associated with other planned or reasonably foreseeable developments within the study area. At a minimum, the West Linn Operations Complex (CUP-25-02/DR-25-02/WRA-25-01) appears to constitute a planned development within the meaning of the Public Works Design Standards and should either be incorporated into the background traffic assumptions or expressly documented as excluded with supporting justification.

Given the requirement in the Public Works Design Standards to account for trips from other planned developments, the applicant should be required to coordinate with the City of West Linn and ODOT to confirm whether any additional planned or approved developments exist

within the study area that may contribute to background traffic conditions. Without this confirmation, the completeness of the background traffic assumptions remains uncertain.

Conclusion

The submitted Traffic Impact Analysis does not provide substantial evidence demonstrating compliance with CDC 85.170(B)(2), the City of West Linn Public Works Design Standards, or the applicable transportation planning assumptions reflected in the Transportation System Plan.

The deficiencies identified in this review are not limited to isolated technical omissions. Rather, they involve fundamental components of transportation safety, access management, and operational analysis that are necessary for the Planning Commission to evaluate compliance with applicable approval criteria. These include the lack of access analysis for all driveways, absence of required sight distance evaluations, insufficient evaluation of driveway placement on curved roadway segments, unaddressed backing and parking conflicts, incomplete multimodal transition analysis, and unsupported traffic signal warrant conclusions.

Each of these issues bears directly on the Planning Commission's ability to make the required findings under CDC 85.170(B)(2)(g) and related provisions. Based on the application materials, those findings cannot be supported with substantial evidence.

Accordingly, based on the information currently before the Planning Commission, the application does not contain substantial evidence demonstrating compliance with the applicable transportation requirements of the Community Development Code and Public Works Design Standards. Additional analysis and supporting documentation are necessary before the Planning Commission can make the findings necessary for approval.

The deficiencies identified throughout this review are not isolated technical issues. Rather, they collectively relate to the applicant's burden of demonstrating compliance with the CDC which requires that transportation improvements be designed to minimize negative impacts to the transportation system, provide safe and efficient circulation for all users, and accommodate pedestrian and bicycle travel to the extent practicable.

The absence of operational analyses for all proposed access points, required sight distance evaluations, analysis of backing maneuvers associated with angled parking, adequate multimodal transition analysis, and supporting documentation for the traffic signal warrant leaves the Planning Commission without substantial evidence to conclude that these approval criteria have been satisfied. Until these deficiencies are addressed, the application does not demonstrate that the proposed transportation system has been designed in a manner that minimizes transportation hazards while providing safe, efficient, and multimodal access consistent with the Community Development Code and the City of West Linn Public Works Design Standards.

Sincerely,

Rick Nys, P.E.
Principal Traffic Engineer



Schroder, Lynn

From: Roberta Schwarz <roberta.schwarz@comcast.net>
Sent: Wednesday, August 5, 2026 1:40 PM
To: Schroder, Lynn
Cc: Leonard and Linda Grill; Schwarz, Ed
Subject: FW: Additional testimony

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

Hi Lynn,

We just talked to Leonard and Linda Grill today. They sent us a copy of an email they had sent to you on August 3rd. Please see below.

They never received acknowledgement from you that the below email they sent on August 3rd at 1:25:01pm had been received.

Please accept this re-sent email and issue acknowledgement of receipt today to the Grills and to us.

Thank you,
Roberta and Ed

From: Len & Linda Grill <2lgrills@gmail.com>
Sent: Monday, August 3, 2026 1:36 PM
To: Roberta Schwarz <roberta.schwarz@comcast.net>
Subject: Fwd: Additional testimony

Begin forwarded message:

From: Len & Linda Grill <2lgrills@gmail.com>
Subject: Additional testimony
Date: August 3, 2026 at 1:25:01 PM PDT
To: lschroder@westlinnoregon.org
Cc: andrew@mulkeylegal.com

We, Leonard and Linda Grill, adopt and agree with the comments submitted by or on behalf of Roberta and Ed Schwarz before, on, or after August 5th in reference to DR-25-04/LLA-25-02. Please add this to the Public Record and acknowledge receipt to us.

Respectfully,
Leonard and Linda Grill

Schroder, Lynn

From: John Watt <nhojaw@yahoo.com>
Sent: Wednesday, August 5, 2026 11:28 AM
To: Schroder, Lynn
Subject: Testimony submitted by John Watt regarding Tannler Application DR-25-04/LLA-25-02

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

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Hello,

This testimony was submitted before August 5th deadline of 4 pm

Please add this testimony to the Public Record and email me a confirmation of receipt.

Regards,

John Watt

----- Forwarded Message -----

From: John Watt <nhojaw@yahoo.com>
To: citycouncil@westlinnoregon.gov <citycouncil@westlinnoregon.gov>
Sent: Sunday, June 28, 2026 at 08:55:17 AM PDT
Subject: Opposition to the closing/rerouting of Tannler Dr.

Hello,

I wish to express my strong opposition to the closure/rerouting of Tannler Drive for the proposed Tannler Drive redevelopment.

This would essentially be a diversion of a public good for the benefit of a private developer. While I am in favor of more housing, it must respect the needs of the community at large. They can adapt their plans in a manner that leaves Tannler drive as-is. Tannler drive is an important street for those of us who live down the hill. I personally use it many times a week not only when driving, but also for walking and exercise.

I also believe that the density of the project needs to be evaluated and possibly scaled back to conform with the ability of the area to accommodate the numbers of additional cars that will be added to daily traffic, not to mention the aesthetics of multi-story apartment buildings.

Regards,

John Watt
1190 Swiftshore Circle, West Linn, OR 97068

Dear Lynn Schroder

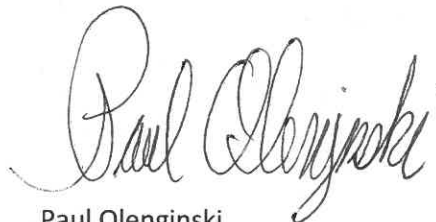
This testimony is submitted by Paul Olenginski on Application DR-25-04/LLA-25-02. This testimony was submitted before August 5th, 2026 by the 4PM deadline. Please add this testimony to the Public Record and email us confirmation of receipt.

I strongly oppose the application. There are numerous reasons that I oppose this application, but I will focus on one glaring problem, and that is the vacation/realignment of Tannler Drive. By rerouting Tannler Drive through the development, travel times will slow, especially between Greene Street and Blankenship Road in both directions, which would impede morning and afternoon people commuting to work. Also, the stores and restaurants located in that area presently would be negatively affected. The neighbors in the area have not been allowed to vote on this takeover of our street. Clearly, this is not in the public interest.

This rerouting of Tannler also has a personal component to our family. My wife is a physician, and when we bought our house in 2011, one of the selling factors was the ease to get onto I-205, going north to Clackamas and the hospital. Sometimes she is called in and must be at the hospital in minutes. It turns out our next door neighbor is also a physician and needs to get to the hospital quickly when called in.

I wholeheartedly oppose the application and ask the planning commission to deny the application

Sincerely,

A handwritten signature in black ink that reads "Paul Olenginski". The signature is written in a cursive style with a large, looped "P" and "O".

Paul Olenginski

2425 Remington Drive

West Linn, OR 97068

Schroder, Lynn

From: MATT EVANS <MATT2NDWIND@msn.com>
Sent: Wednesday, August 5, 2026 2:04 PM
To: Schroder, Lynn
Subject: Proposed development at Blankenship & Tannler
Attachments: Matt Evans Development Testimony 2026_08_04.docx.pdf

You don't often get email from matt2ndwind@msn.com. [Learn why this is important](#)

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Hi Lynn,

I'm extremely concerned about the proposed development by Jeff Parker at Blankenship & Tannler. Attached is my testimony AGAINST approval of the applicant's request. I plan to attend the Planning Commission meeting on 8/10.

Thanks,
Matt Evans

August 4, 2026

I am respectfully requesting that this letter be included in public testimony regarding the proposed commercial and residential development at Blankenship and Tannler. I along with hundreds (if not thousands) of West Linn residents and constituents are strongly opposed to it for the numerous reasons noted below. I am not opposed to development provided that the density is aligned with location and traffic. Please note that the proposed development density of residential is similar to Cascade Summit apartments, but with approximately half the acreage, and 25% less parking.

The proposed area is one of the most congested in West Linn, and adding an estimated 600 to 800 vehicles a day (commercial and apartments) is absolutely crazy. Proposing to close/reroute Tannler (one of two North/South thorough fares) will only compound the 10th Street traffic problems. Additionally, I'm disappointed that the city is reneging on what they originally proposed back in 1998 when I first moved here: 5 stop lights on/about 10th Street including:

- 2 on/off ramps for 205 (complete)
- 1 at 10th Street and Salamo (complete)
- 1 at Willamette Falls Drive and 10th Street (revised to a round about that has compounded traffic problems)
- 1 at Blankenship and Tannler. Now you are proposing to reroute this through the proposed development? In prior hearings you indicated that ODOT is requiring this, which is entirely false. According to ODOT, this is governed by the city.

While this letter is focused on the Commercial aspect of the proposed development, it is difficult to not reference the residential component as both will impact parking and traffic. In the application, Jeff Parker states "As proposed, the development would provide 385 standard parking stalls, 6 compact parking stalls, and 9 ADA accessible parking stalls on-site for a total of 400 parking stalls which does not exceed the maximum number of spaces allowed. There will also be on-street parking along Tannler Drive where allowed by the City. The on-street parking is shown on sheets C202, C204, and C206." He also notes that "a maximum of 640 off-street spaces are allowed to be provided." That is absolutely ridiculous! You couldn't fit that many cars if they converted the entire property to parking only. My question is how much parking is dedicated to Commercial only and is it sufficient without adversely impacting traffic in the area?

With many of your constituents in opposition to the proposed development, we have retained experts on the subject. They have underscored many of our concerns. First, they believe that the applicant's Traffic Impact Analysis (TIA) and associated transportation-related materials for the proposed mixed-use development do not contain substantial evidence to demonstrate compliance with the City of West Linn Community Development Code (CDC) and the City of West Linn Public Works Design Standards, particularly with respect to traffic impact evaluation, access management, sight distance, driveway design, and safe multimodal circulation. The TIA does not provide adequate operational or safety analysis for all proposed access points,

including eight curb cuts along Tannler Drive, associated on-street parking, and does not evaluate whether access consolidation or alternative circulation configurations would reduce conflicts and improve safety as required by CDC 85.170.

Required intersection sight distance and stopping sight distance analyses are not provided for any proposed driveway locations, despite explicit CDC requirements that access points demonstrate adequate sight distance as a threshold safety condition for approval. This is especially important given the significant number of driveways with several located very close to horizontal curves. The proposed angled on-street parking between curved roadway segments is not evaluated for backing operations, sight distance adequacy, or conflicts with through traffic, or driveway movements. The Manual on Uniform Traffic Control Devices (MUTCD) four-hour volume warrant conclusion for a potential traffic signal is not supported by sufficient data. The multimodal circulation analysis is incomplete, including lack of evaluation of pedestrian and bicycle transitions between facilities, inadequate assessment of crossing operations across multiple driveway conflicts, and insufficient consideration of user safety along the proposed shared-use path.

Collectively, the application does not demonstrate that the proposed design minimizes transportation hazards, provides safe and efficient circulation, or meets the multimodal accommodation requirements of CDC 85.170(B)(2)(g)(1)(C). Based on these deficiencies, the applicant has failed to provide substantial evidence necessary for the Planning Commission to make the findings required for approval. Failure to Analyze All Access Points CDC 85.170 requires that a traffic impact analysis evaluate whether the transportation system can accommodate the proposed development, including a full assessment of access points to the public street system. This requirement is not limited to general capacity discussion but extends to operational performance, safety, and access configuration. CDC 85.170(B)(2)(d) requires: "Traffic impact analysis (dwellings). For development applications that propose new dwelling units, an applicant must submit a traffic impact analysis unless the application is exempt from this requirement pursuant to subsection (B)(2)(d)(6) of this section. Failure to submit the analysis will result in an incomplete application. The applicant shall prepare the analysis in accordance with the following: 1) At a minimum, the analysis area must include: (A) All points of access onto the public street system; (B) All intersections of arterials, collectors, and neighborhood routes within 1,000 linear feet from all points of access onto the public street system; and (C) All intersections where the traffic generated by the proposed development exceeds five percent of existing a.m. or p.m. peak hour total intersection traffic volumes. Trip generation shall be determined by using Institute of Transportation Engineers Trip Generation Manual (11th Edition)." In this case, the proposed development includes eight curb cuts along Tannler Drive, yet the TIA does not provide adequate analysis of how each of these access points will operate under projected traffic conditions as required. Without the analysis of each of the proposed driveways, the application does not satisfy the minimum traffic impact analysis requirements of CDC 85.170(B)(2)(d). The applicant is required to provide a level of service analysis of each proposed driveway. The report does not evaluate expected performance of these driveways or potential queuing interactions between closely spaced driveways. The TIA does appear to address spacing standards. CDC 85.170(B)(2)(g)(1)(C) requires that site design

minimize negative impacts to the transportation system and make efficient use of public facilities. Without analysis of whether access consolidation is feasible, whether shared access could reduce conflict density, or whether internal circulation could better distribute traffic, the applicant has failed to demonstrate that this standard has been met.

Missing Sight Distance Analysis (CDC 85.170(B)(2)(c)(1)(C)(3)) CDC 85.170 explicitly identifies inadequate sight distance at access points as a condition requiring evaluation in a traffic impact analysis. Sight distance is a fundamental safety element because it directly governs a driver's ability to perceive, react to, and safely execute turning movements. The City of West Linn Public Works Design Standards also state that "The following information shall be included in each TIA submitted to the City...Intersection and stopping sight distance related to new and impacted driveways and intersections." Despite these requirements, the TIA does not provide any quantitative intersection sight distance or stopping sight distance calculations for the proposed driveways along Tannler Drive. Instead, the TIA states: "Intersection sight distance documentation at the site access points and along the site frontage will be documented on the civil engineering plans provided through the site plan application process. We recommend that on-site landscaping, signage, and any new above-ground utilities be appropriately located and maintained to provide adequate intersection sight distance per applicable City requirements." The applicant's site plan illustrates conceptual sight triangles at the proposed driveways but does not demonstrate that adequate sight distance will actually be available under the proposed roadway, landscaping, parking, and access conditions. This falls short of the required analysis to determine whether the proposed access points can safely operate. Under West Linn requirements, sight distance is not merely a construction-level design detail. It is a threshold transportation safety criterion that must be evaluated during land use review because it determines whether an access point can be safely approved. This omission is particularly significant because the proposed access locations are affected by several geometric constraints, including horizontal and vertical curvature, roadway grades, angled parking, and multiple closely spaced access points. Without a quantitative sight distance evaluation, the applicant has failed to demonstrate that the proposed access locations meet applicable safety requirements or that they will not create operational conflicts. Angled Parking with Backing The proposed angled on-street parking on Tannler Drive located between horizontal curves introduces an additional operational concern that is not addressed in the TIA. Angled parking requires vehicles to back into an active travel lane, creating conflict points with through traffic that warrant evaluation. These backing maneuvers are inherently more complex than forward movements because drivers must reverse into the roadway while simultaneously observing approaching traffic, identifying acceptable gaps, and avoiding conflicts with other roadway users.

The proposed parking area is located between horizontal curves on Tannler Drive and is also affected by roadway grade changes. This combination of horizontal and vertical curvature may limit visibility for both drivers backing from parking spaces and motorists approaching the parking area. In addition, adjacent parked vehicles may further restrict sight lines. This creates the potential for approaching motorists to have limited opportunity to detect and react to vehicles entering the travel lane. Similarly, drivers backing from angled parking spaces may have difficulty determining whether sufficient gaps exist in approaching traffic before beginning a

maneuver. The ability to safely complete these movements depends on adequate visibility between the backing vehicle and approaching motorists, particularly given the constrained roadway geometry.

Given the combination of horizontal curvature, roadway grades, vehicle screening effects, and backing movements into a travel lane, additional analysis should be provided during the land use review process rather than addressed during permit review. If adequate visibility cannot be demonstrated, consideration should be given to alternative parking configurations, relocation of parking stalls outside the curved roadway segment, or other design modifications that reduce conflicts between backing vehicles and through traffic.

Tannler Drive Realignment Is Not Demonstrated to Be Necessary to Comply with the Transportation System Plan The applicant asserts that the proposed Tannler Drive realignment is necessary to comply with the City's Transportation System Plan (TSP). However, the TSP does not require realignment of Tannler Drive. Rather, the TSP identifies multiple strategies for addressing a potential future operational concern at the Blankenship Road/Salamo Road/10th Street intersection. The TSP identifies the following improvement: "Add a second exclusive right-turn lane to the eastbound approach to the 10th Street/Blankenship-Salamo Road intersection if necessary to address queuing; however, the need for this improvement would be eliminated by realigning Tannler Drive with the commercial driveway located approximately 350 feet west of its current alignment." This language does not establish roadway realignment as a required transportation improvement. Instead, it identifies realignment as one possible alternative to constructing additional intersection capacity. The transportation objective identified in the TSP is addressing potential eastbound right-turn queuing, not necessarily relocating Tannler Drive. The TSP separately identifies Project M23 – 10th Street/Blankenship Road, which includes "Widen Blankenship-Salamo Road to provide dual left-turn lanes at the westbound and northbound approaches to the intersection. Also, add a second exclusive right-turn lane at the eastbound approach to the intersection to address queuing." By including Project M23 as an adopted transportation improvement, the City has already identified a conventional intersection improvement (a second exclusive right-turn lane) that addresses the same operational issue cited as the basis for the Tannler Drive realignment. Therefore, the TSP does not establish that relocation of Tannler Drive is necessary. Rather, it recognizes multiple potential solutions. The need for either Project M23 or Tannler Drive realignment is based on the potential for inadequate eastbound right-turn queuing at the Blankenship Road/Salamo Road/10th Street intersection. However, the applicant's TIA does not evaluate queuing conditions under the existing Blankenship Road/Tannler Drive configuration. Because the TIA does not provide a queuing analysis for the existing roadway configuration, the applicant has failed to establish whether existing or future queues at this location are acceptable, whether storage capacity is exceeded, or whether the operational concern identified in the TSP would occur with the existing Tannler Drive alignment. Even if future conditions were determined to require additional capacity, the applicant has not demonstrated why relocating Tannler Drive is necessary or preferable to the other solution identified in the TSP. Specifically, the applicant has not evaluated whether Project M23 would

adequately address any identified queuing concern, nor has the applicant demonstrated that the additional eastbound right-turn lane is infeasible. The proposed Tannler Drive realignment represents a major modification to the transportation system. Unlike an intersection improvement that directly addresses the identified operational location, the realignment would:

- Relocate the existing Tannler Drive/Blankenship Road intersection; Remove approximately 280 feet of existing public roadway;
- Modify established access and circulation patterns; and
- Require additional roadway construction, grading, retaining walls, utilities, and stormwater facilities. These impacts extend beyond the operational issue identified in the TSP. Before approving such a significant modification to the transportation system, the applicant should demonstrate that the change is necessary and provides transportation benefits that cannot reasonably be achieved through other TSP consistent improvements. ODOT correspondence further confirms that the proposed realignment is not required by ODOT (see Appendix A). ODOT indicated that the Tannler Drive/Blankenship Road intersection is not under ODOT ownership or access control and that ODOT's review interest is limited to ensuring that adjacent improvements do not adversely affect the operation of the I-205 interchange and the Blankenship Road/Salamo Road/10th Street intersection. Therefore, the proposed Tannler Drive realignment is not an ODOT requirement.

Traffic Signal Warrant Analysis: The TIA concludes that the MUTCD Four-Hour Vehicular Volume Warrant is satisfied at the Blankenship Road/Tannler Drive intersection. However, the documentation contained in the TIA does not contain sufficient evidence to support that conclusion. The traffic data collection described in the TIA consisted of one weekday AM peak period turning movement count (two hours) and one weekday PM peak period turning movement count (two hours), resulting in a total of four hours of observed traffic data. No 24-hour intersection counts, continuous hourly traffic counts, or other traffic data are provided. The MUTCD Four-Hour Vehicular Volume Warrant requires that the applicable traffic volume thresholds be satisfied during four separate hours of an average day. Demonstrating compliance with this warrant requires documented hourly traffic volumes for each qualifying hour. Although the TIA includes an hourly volume table concluding that the warrant is met, the report does not identify the source of the hourly volumes presented or explain how they were developed. No methodology is provided describing whether these volumes were derived from observed counts, extrapolated from peak-hour data, or estimated using another analytical approach. Figure 2: Volume Table from TIA Comparison of the hourly volume table with the AM turning movement counts demonstrates that the weekday AM count period does not represent the highest traffic volumes shown in the warrant analysis. Because the AM peak period itself does not correspond to the qualifying hours presented in the table, it is evident that those higher hourly volumes were not directly observed during the traffic counts documented in the TIA. The only observed count period documented in the TIA that appears capable of supporting the warrant analysis is the two-hour weekday PM peak period. Accordingly, the TIA provides documented traffic data for, at most, the two PM peak hours. The remaining qualifying hours shown in the warrant analysis are not supported by observed traffic counts or any documented

methodology explaining how those hourly volumes were developed. Without that supporting information, there is insufficient evidence to verify that the MUTCD Four-Hour Vehicular Volume Warrant has been satisfied. If traffic signal installation is being relied upon as a mitigation measure or transportation system improvement, the applicant bears the burden of demonstrating that the applicable MUTCD warrant is met. That demonstration should be supported by the underlying traffic data and a documented methodology that allows the warrant analysis to be independently verified. The standard practice for evaluating the Four-Hour Vehicular Volume Warrant is to collect 24-hour intersection turning movement counts or otherwise provide continuous hourly traffic data identifying the four qualifying hours. In the absence of that information, the applicant's conclusion that the Four-Hour Vehicular Volume Warrant is satisfied is not adequately supported.

With eight proposed curb cuts intersecting the frontage, the frequency of potential conflicts between vehicles, pedestrians, and bicyclists is significant. CDC 85.170 requires that the site design accommodate and encourage non-motorized transportation to the extent practicable and provide safe, direct, and convenient circulation. The current analysis does not demonstrate how these standards are achieved in practice or how conflict points will be managed to maintain safety.

The submitted TIA states that no in-process developments were identified during the scoping process with City and ODOT staff. A percentage growth rate has also been considered. These appear to address items (a) and (b). However, item (c) does not appear to have been addressed. The analysis does not clearly identify or incorporate trips associated with other planned or reasonably foreseeable developments within the study area. At a minimum, the West Linn Operations Complex (CUP 25-02/DR-25-02/WRA-25-01) appears to constitute a planned development within the meaning of the Public Works Design Standards and should either be incorporated into the background traffic assumptions or expressly documented as excluded with supporting justification. Given the requirement in the Public Works Design Standards to account for trips from other planned developments, the applicant should be required to coordinate with the City of West Linn and ODOT to confirm whether any additional planned or approved developments exist within the study area that may contribute to background traffic conditions. Without this confirmation, the completeness of the background traffic assumptions remains uncertain. Conclusion The submitted Traffic Impact Analysis does not provide substantial evidence demonstrating compliance with CDC 85.170(B)(2), the City of West Linn Public Works Design Standards, or the applicable transportation planning assumptions reflected in the Transportation System Plan. The deficiencies identified in this review are not limited to isolated technical omissions. Rather, they involve fundamental components of transportation safety, access management, and operational analysis that are necessary for the Planning Commission to evaluate compliance with applicable approval criteria. These include the lack of access analysis for all driveways, absence of required sight distance evaluations, insufficient evaluation of driveway placement on curved roadway segments, unaddressed backing and parking conflicts, incomplete multimodal transition analysis, and unsupported traffic signal warrant conclusions. Each of these issues bears directly on the Planning Commission's ability to make the required findings under CDC 85.170(B)(2)(g) and related provisions. Based on the

application materials, those findings cannot be supported with substantial evidence. Accordingly, based on the information currently before the Planning Commission, the application does not contain substantial evidence demonstrating compliance with the applicable transportation requirements of the Community Development Code and Public Works Design Standards. Additional analysis and supporting documentation are necessary before the Planning Commission can make the findings necessary for approval. The deficiencies identified throughout this review are not isolated technical issues. Rather, they collectively relate to the applicant's burden of demonstrating compliance with the CDC which requires that transportation improvements be designed to minimize negative impacts to the transportation system, provide safe and efficient circulation for all users, and accommodate pedestrian and bicycle travel to the extent practicable. The absence of operational analyses for all proposed access points, required sight distance evaluations, analysis of backing maneuvers associated with angled parking, adequate multimodal transition analysis, and supporting documentation for the traffic signal warrant leaves the Planning Commission without substantial evidence to conclude that these approval criteria have been satisfied. Until these deficiencies are addressed, the application does not demonstrate that the proposed transportation system has been designed in a manner that minimizes transportation hazards while providing safe, efficient, and multimodal access consistent with the Community Development Code and the City of West Linn Public Works Design Standards.

In summary, I believe the application for the commercial development should be denied, or sufficient documentation should be provided by the applicant.

Matt Evans
West Linn

Schroder, Lynn

From: Elaine Pelletier <elaine@hathawaylarson.com>
Sent: Wednesday, August 5, 2026 2:14 PM
To: lschroder@westlinnoregon.gov
Cc: Greg Hathaway
Subject: Modera Mixed-Use Development – File No. DR-25-04/LLA-25-02
Attachments: West Linn Planning Commission ltr re Written Testimony 01.pdf

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

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

Good afternoon,

On behalf of Greg Hathaway, please find attached written testimony for submission in the above-referenced matter. We would appreciate confirmation of receipt.

Thank you,

Elaine Pelletier | Legal Assistant

Hathaway Larson LLP | 1125 NW Couch St., Ste. 550, Portland, OR 97209

Direct: +1.503.303.3113 | Main: +1.503.303.3101

elaine@hathawaylarson.com | www.hathawaylarson.com



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HATHAWAY LARSON

August 5, 2026

VIA EMAIL

City of West Linn Planning Commission

Kathryn Schulte-Hillen, Chair

David D. Jones, Vice Chair

Gary Walvatne, Commissioner

Tom Watton, Commissioner

Dan Saltee, Commissioner

Kris Kachirisky, Commissioner

Elizabeth Dietz, Commissioner

c/o Lynn Schroder

22500 Salamo Road

West Linn, OR 97068

lschroder@westlinnoregon.gov

Re: Written Testimony

Modera Mixed-Use Development – File No. DR-25-04/LLA-25-02

Dear Chair Schulte-Hillen and Commissioners:

I represent Ed and Roberta Schwarz and other members of the West Linn community who oppose the proposed realignment of Tannler Drive. The proposed realignment would require vacation of a portion of Tannler Drive and would adversely affect White Oak Savanna Park and its entrances. As of July 28, 2026, the neighbors opposing the proposed realignment and vacation have obtained more than 350 signatures supporting their position.

Gregory S. Hathaway

1125 NW Couch Street, Suite 550

Portland, OR 97209

greg@hathawaylarson.com

(503) 303-3103 Direct

(503) 303-3101 Main

I understand that if the Commission approves the above-entitled development, the approval would be conditioned on either the Applicant filing a petition under ORS 271.080 through ORS 271.160 to vacate a portion of Tannler Drive or the City Council initiating vacation proceedings under ORS 271.130.

I also understand that City staff may conclude that formal vacation of a portion of Tannler Drive is unnecessary. Even if that approach would not technically constitute a “vacation,” it would have the same practical effect. The public would lose an important segment of Tannler Drive used to access White Oak Savanna Park and travel efficiently to Blankenship Road, while traffic would be redirected through the proposed development – which on its face will create unnecessary traffic impacts. The City also would retain an abandoned portion of Tannler Drive that would no longer be usable or maintained. That result would constitute a de facto vacation.

I reviewed the Applicant’s materials, including the TIA prepared by Kittelson and Associates, as well as the Transportation Impact Review prepared by Rick Nys, Principal Traffic Engineer, on behalf of Mr. and Mrs. Schwarz. Based on that review, it is my opinion that any petition to vacate would likely be denied because realigning Tannler Drive and vacating a portion of it would harm or prejudice the public interest.

If no formal vacation is proposed, the practical effect would remain the same: a functional portion of Tannler Drive that serves the public would be removed from public use for the Applicant’s benefit. The Commission therefore should not approve the above-entitled development subject to a condition that would permit that portion of Tannler Drive to be vacated or functionally removed when doing so would harm or prejudice the public interest.

The following findings support the Commission's rejection of the proposed realignment and the resulting vacation or de facto vacation of a portion of Tannler Drive.

PROPOSED FINDINGS OF DENIAL

The following findings support the Commission's rejection of the proposed realignment and the resulting vacation or de facto vacation of a portion of Tannler Drive.

1. The Applicant has not demonstrated that the proposed realignment of Tannler Drive is necessary to comply with the City's Transportation System Plan. Mr. Nys' Transportation Impact Review states that the TSP neither establishes a required roadway alignment nor requires relocation of Tannler Drive.
2. The Applicant's Traffic Signal Warrant Analysis does not demonstrate that the MUTCD Four-Hour Vehicular Volume Warrant is satisfied at the proposed realigned Blankenship Road/Tannler Drive intersection.
3. The Applicant's TIA does not evaluate queuing under the existing Blankenship Road/Tannler Drive configuration. Without that evaluation, the TIA does not establish whether inadequate eastbound right-turn queuing at the Blankenship Road/Salamo Road/10th Street intersection justifies realigning Tannler Drive.

As Mr. Nys states in his Transportation Impact Review: "[B]ecause the TIA does not provide a queuing analysis for the existing roadway configuration, the applicant has failed to establish whether existing or future queues at this location are

acceptable, whether storage capacity is exceeded, or whether the operational concern identified in the TSP would occur with the existing Tannler Drive alignment.”

4. The Applicant has not demonstrated that relocating Tannler Drive is necessary or preferable to the other solutions identified in the TSP. That omission is critical because the proposed realignment would result in the vacation or de facto vacation of a portion of Tannler Drive and will harm or prejudice the public interest. At a minimum, the City should require the Applicant to evaluate all alternatives and demonstrate that the realignment of Tannler Drive is necessary.

Mr. Nys summarized his concern in his Transportation Impact Review: “Before approving such a significant modification to the transportation system, the applicant should demonstrate that the change is necessary and provides transportation benefits that cannot reasonably be achieved through other TSP-consistent improvements.”

5. ODOT does not require the proposed realignment of Tannler Drive or the resulting vacation or de facto vacation of a portion of the roadway. The proposed realignment therefore primarily benefits the proposed development and has not been shown to advance the public’s best interests.
6. The proposed realignment would remove approximately 275 feet of Tannler Drive frontage adjacent to White Oak Savanna Park and close one of the park’s three entrances. The Applicant has not demonstrated that closing a public park entrance for the benefit of the proposed development would serve the public interest.

CONCLUSION

Based on the foregoing, Mr. and Mrs. Schwarz and other members of the West Linn community respectfully request that the Commission require the Applicant to redesign the proposed project so that it does not require realignment of Tannler Drive, or the vacation or de facto vacation of any portion of Tannler Drive.

Very truly yours,

HATHAWAY LARSON LLP

/s/ Gregory S. Hathaway

Gregory S. Hathaway

GSH/ep

cc: Clients

Schroder, Lynn

From: Lloyd Hill <lloyd.hill@hillarchitects.com>
Sent: Wednesday, August 5, 2026 11:33 AM
To: Koper, Steve; Schroder, Lynn; Smith, Erica
Cc: Wyss, Darren; Brad Kilby; Carrie Richter; Jeff Parker; 26019 Tannler
Subject: Re: Tannler Development - Video to include in Staff presentation.

Follow Up Flag: Follow up
Flag Status: Flagged

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

Steve, Lynn, Erica,

We have added a second lower resolution video to the cloud folder. This video is a little shorter and moves through the Mixed-Use district a little faster. Is this something you can incorporate into the Staff presentation to the Planning Commission? Let's discuss options for presenting the video and illustrative views into the presentation.

Best Regards,

Lloyd Hill

Sent from my iPad

On Jul 31, 2026, at 4:13 PM, Lloyd Hill <Lloyd.Hill@hillarchitects.com> wrote:

Darren,

THIS VIDEO RENDERING HAS BEEN SUBMITTED AS PART
OF THE OFFICIAL RECORD. The public can view the
rendering here: <https://youtu.be/VVIm8yHV2sQ>

You can download a short video showing a view driving down from upper Tannler between Buildings 7 and 9, down to lower Tannler.

Here's a link to the video: <https://youtu.be/VVIm8yHV2sQ>
<https://nextcloud.hillarchitects.com/index.php/s/BM5dzaEbCf8SK8o>

Push the Download button in the upper right corner to download to your computer and view.

Let me know if you have any trouble.

Best Regards,

Lloyd



HILL ARCHITECTS

1750 BLANKENSHIP ROAD, SUITE 200
WEST LINN, OREGON 97068

LLOYD W HILL AIA

President

tel 503-305-8033

cel 503-781-5197

www.hillarchitects.com

lloyd.hill@hillarchitects.com

Schroder, Lynn

From: Lloyd Hill <lloyd.hill@hillarchitects.com>
Sent: Wednesday, August 5, 2026 11:41 AM
To: Koper, Steve; Schroder, Lynn; Smith, Erica
Cc: Brad Kilby; Jeff Parker; Carrie Richter; 26019 Tannler
Subject: Fwd: Tannler : Illustrative Site Plan REVISED

Follow Up Flag: Follow up
Flag Status: Flagged

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Sent from my iPad

Here's a link to a revised 2.1 illustrative Site Plan
:: <https://nextcloud.hillarchitects.com/index.php/s/RyS8j6YpAqfNQzw>

The site plan and all of the details have not been modified, but the revised illustrative site plan removes some of the old property lines where Tannler Drive is realigned to cross the property. In addition the graphics in the ROW have been modified to make the trees transparent so the curbs and other details can be seen through the tree canopy.

Let me know if you have questions.

Best Regards,

Lloyd



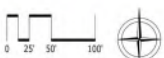


PROJECT STATISTICS			
	SF	Acre	%
Lot Areas			
Existing Lot Area	494,712	11.36	
Lot Line Adjustment Added Area	35,272	0.70	
Tannier ROW - Dedication	39,212	0.90	
Blankenship ROW - Dedication	145	0.00	
Blankenship ROW - Dedication	4,018	0.09	
Net Lot Area - North	427,833	9.82	
Net Lot Area - South	57,589	1.33	
Total Net Lot Area	485,423	11.16	
Lot Coverage			
Buildings	105,059	2.42	21.7%
Garages	21,528	0.49	4.4%
Car Ports	20,072	0.47	4.2%
Total Lot Coverage	146,659	3.38	30.3%
Landscape Area	152,526	3.50	31.3%
Commercial Area			
11,839			
Recreation Area			
Drop Park	14,701		
Plaza Area	1,120		
Clubhouse	6,445		
Pool Area	2,833		
Amphitheater	2,053		
Plaza & Patio	2,789		
Total Recreation Area	30,821		
Residential Units			
1 bedroom	134		41.9%
2 bedroom	134		41.9%
3 bedroom	52		16.2%
Total Residential Units	320		100.0%
Onsite Parking			
Surface - Standard	147		36.6%
Surface - Compact	6		1.6%
Carports	152		36.6%
Garages	86		21.5%
Handicapped standard	5		1.2%
Handicapped Van	1		0.2%
Handicapped Compact	1		0.2%
Handicapped Garage	2		0.5%
Total Onsite Parking	492		153.8%

MODERA WEST LINN
WEST LINN, OREGON

HILL ARCHITECTS

ILLUSTRATIVE SITE PLAN **2.1**
AUGUST 4, 2026

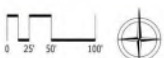




MODERA WEST LINN
WEST LINN, OREGON

HILL ARCHITECTS

ILLUSTRATIVE SITE PLAN **2.1**
AUGUST 4, 2026



Schroder, Lynn

From: Lloyd Hill <lloyd.hill@hillarchitects.com>
Sent: Wednesday, August 5, 2026 11:51 AM
To: Koper, Steve; Schroder, Lynn; Smith, Erica
Cc: Jeff Parker; Brad Kilby; Carrie Richter; 26019 Tannler; Wyss, Darren
Subject: Fwd: Tannler : Illustrative Views Cloud Link

Follow Up Flag: Follow up
Flag Status: Flagged

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

Steve, Lynn, Erica,

We previously sent a link to 11 perspective views of the Tannler Development. The following is a link to the same illustrative views formatted onto sheets with drawing titles and numbers.

Here's a cloud link to the Illustrative Views
: <https://nextcloud.hillarchitects.com/index.php/s/2DEG3wZ8fDZoC6z>

Click the Download button in the upper right to download the files to your local computer system.

Best Regards,

Lloyd



UPPER TANNER DRIVE LOOKING SOUTH

MODERA WEST LINN
WEST LINN, OREGON
HILL ARCHITECTS

ILLUSTRATIVE VIEW 8.1
JULY 31, 2026



TANNER DRIVE LOOKING WEST

MODERA WEST LINN
WEST LINN, OREGON
HILL ARCHITECTS

ILLUSTRATIVE VIEW 8.2
JULY 31, 2026



BUILDING 9 OUTDOOR DINING

MODERA WEST LINN
WEST LINN, OREGON

HILL ARCHITECTS

ILLUSTRATIVE VIEW **8.3**
JULY 31, 2026



BUILDING 9

MODERA WEST LINN
WEST LINN, OREGON

HILL ARCHITECTS

ILLUSTRATIVE VIEW 8.4
JULY 31, 2026



BUILDINGS 6,7 & 9 FROM TANNER DRIVE

MODERA WEST LINN
WEST LINN, OREGON
HILL ARCHITECTS

ILLUSTRATIVE VIEW 8.5
JULY 31, 2026



BUILDING 6 & 7 FROM TANNER DRIVE

MODERA WEST LINN
WEST LINN, OREGON
HILL ARCHITECTS

ILLUSTRATIVE VIEW 8.6
JULY 31, 2026



LOWER TANNER DRIVE LOOKING NORTH

MODERA WEST LINN
WEST LINN, OREGON
HILL ARCHITECTS

ILLUSTRATIVE VIEW **8.7**
JULY 31, 2026



TANNER DRIVE & BUILDING 7 & 9

MODERA WEST LINN
WEST LINN, OREGON
HILL ARCHITECTS

ILLUSTRATIVE VIEW 8.8
JULY 31, 2026



MULTIUSE PATH & AMPHITHEATER LOOKING EAST

MODERA WEST LINN
WEST LINN, OREGON
HILL ARCHITECTS

ILLUSTRATIVE VIEW **8.10**
JULY 31, 2026



AMPHITHEATER & BUILDINGS 5,6 & 7

MODERA WEST LINN
WEST LINN, OREGON

HILL ARCHITECTS

ILLUSTRATIVE VIEW **8.11**
JULY 31, 2026

Schroder, Lynn

From: Kim Spiehler <kspiehler@batemanseidel.com>
Sent: Wednesday, August 5, 2026 2:51 PM
To: lschroder@westlinnoregon.gov
Cc: Carrie Richter
Subject: FW: City File No: 2025-04 - Tannler Holdings LLC Multi-Unit Housing Application
Attachments: 8-5-26 Ltr and attachments to Planning Commission.pdf

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

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

Hi,
I am resending this to you as I received a bounce-back for your email and see that Mr. Wyss is out until the 24th. Would you please include this in the record and confirm receipt?
Thanks

From: Kim Spiehler <kspiehler@batemanseidel.com>
Sent: Wednesday, August 5, 2026 2:36 PM
To: jschroder@westlinnoregon.gov; dwyss@westlinnoregon.gov
Cc: Ashleigh Dougill <ashleigh.dougill@behlaw.com>; Carrie Richter <crichter@batemanseidel.com>
Subject: City File No: 2025-04 - Tannler Holdings LLC Multi-Unit Housing Application

Good afternoon,

Please find our submission to be included in the record of City File No: 2025-04. If you would be so kind as to confirm receipt and that this will be placed in the record, I'd appreciate it.

Kind regards,
Kim

Kim Spiehler, LEGAL ASSISTANT

Bateman Seidel

1000 SW Broadway, Suite 1910
Portland, Oregon 97205
(503) 972-9909 (direct phone)
(503) 972-9921 (fax)

kspiehler@batemanseidel.com

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August 5, 2026

VIA EMAIL to jschroder@westlinnoregon.gov and dwys@westlinnoregon.gov

Chair Shulte-Hillen and Planning Commission
c/o Darren Weiss, Planner
City of West Linn
22500 Salamo Rd.
West Linn, OR 97068

Re: Tannler Holdings LLC Multi-Unit Housing Application
City File No: 2025-04 – Response to Opposition Testimony

Dear Chair Shulte-Hillen and Planning Commission,

The purpose of this letter is to respond to a number of legal issues raised by the opposition to date. The application before you for evaluation is a quasi-judicial application for the development of housing. State laws with respect to housing have changed significantly in recent years in response to a housing shortage, not just for low-income subsidized housing, but for all housing. According to the City's adopted 2024 housing needs study, West Linn currently has a severe shortage of affordable housing i.e. housing available to those at rents costing less than 30% of their income. According to the recently adopted West Linn Housing Production Strategy, 30% of the units currently needed within the City are for low and moderate income households (those making \$46,000 - \$110,000). This application directly responds to that shortage by providing market rate, rental housing with one-bedroom to family-sized units that will be available at monthly rents between \$1,988-\$3,200 which will directly serve middle-income workers, seniors, or veterans who struggle to find a place in West Linn to call home.

Background

This property has been zoned for development for a long time. No zoning is being changed to allow this use. Development on this property in close proximity to retail, services, recreation and employment opportunities makes this land a suitable place to locate housing. See attached statement providing more detail on this issue. By zoning these lands for development, including housing, the City formally concluded that this land is suitable for this purpose, and, as part of this planning effort, the City has identified the public infrastructure necessary to serve this anticipated growth. The City's Transportation System Plan (TSP) identifies road improvements that will be necessary to accommodate development consistent with zoning including the realignment of Tanner Drive at page 93:

M2	Tannier Street Realignment	Realign Tannier Street at Blankenship Road to align with the driveway located approximately 350 feet west	Medium	\$900
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Chair Shulte-Hillen and Planning Commission
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As a result, the decision before the Planning Commission is not whether this land should be developed with housing or whether Tannler should be realigned. These decisions have already been made. The only question for the Planning Commission is the design and configuration of this housing as triggered by the applicable sections of the West Linn Community Development Code (CDC), primarily the Design Review standards of CDC 55. Deciding which CDC criteria are applicable is determined by the language of the code, subject to any requirements set forth in state law. For example, opponents' traffic engineer objections are directed at failures to comply with CDC Chapter 85.170 which, by its terms, identifies "requirements for tentative subdivision or partition plan." No subdivision or partition of land is proposed here and thus, these standards, the focus of the objections identified by the opponents' traffic engineer, do not apply. That said, a response to the opponents' traffic concerns are attached.

Similarly, opponents have identified concerns that are not recognized as requirements for new development. For example, there is no minimum level of parking required for multifamily uses or commercial uses. Rather than providing no off-street parking, which would be permitted under the CDC, the applicant is providing 400 spaces. This is a business choice rather than a one required by city regulation. Similarly, preferences for lower density limits, greater protection of lands for commercial development or for Savannah White Oak Park protection, concerns about adverse impacts, such as traffic congestion, or mitigation are not standards applicable to this development.

Another critical point is that over the past 10 years, the state legislature has adopted significant and sweeping changes in state law eliminating city-adopted regulations that are perceived to stand in the way of the development of housing on lands that are zoned to accommodate residential development. The idea is to make it easier, less expensive and more efficient to build housing everywhere and at all income levels, including market rate housing. As applied to this project, these significant changes require:

- The application of only "clear and objective standards regulating" the "development of housing." ORS 197A.400. Housing includes all housing and not just low income or subsidized housing. Standards that are not clear and objective cannot be applied.
- The City is prohibited from applying any standard or procedures that "have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay." ORS 197A.400(1)(b)(B).
- Approval of a limited number of deviations or "mandatory adjustments" to identified housing development and design standards. 2024 SB 1537, Section 38.

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- Where review requires application of “clear and objective” standards in ORS 197A.400, the City may not require a public hearing prior to making an initial decision and only the applicant can seek further review at the local level and on appeal at LUBA.

Violation of these laws can result in the Housing and Accountability Production Office proceeding with a Land Conservation and Development Commission order or court order that could suspend or replace local zoning authority. ORS 197A.805.

Mandatory Adjustment to Eliminate Ground Floor Commercial as a Disqualifying Mixed Use

Within the OBC zone, the following use is permitted under prescribed conditions:

“Multiple-family units only above the first floor of the structure, as a mixed use in conjunction with commercial development that utilizes the entire first floor.” CDC 21.050(2).

Importantly, what creates “mixed use” is the provision of “commercial development that utilizes the first floor.” There is no requirement to otherwise create “mixed use” by locating commercial development in other areas of the building above the first floor.

One of the state laws put in place to encourage a greater provision of housing - SB 1537, Section 38(4)(g) provides:

“A local government shall grant an adjustment to the following development standards:

- (D) Prohibitions, for the ground floor of a mixed-use building, against:
- (i) Residential uses except for one face of the building that faces the street and is within 20 feet of the street.”

This means that local governments must allow ground floor residential where standards would otherwise require ground-floor commercial, except for those areas that are facing and within 20 feet of the street. Again, a “mixed use” building is created only by virtue of the ground-floor commercial. SB 1537 allows the elimination of this ground-floor commercial in certain circumstances and the result is that some of the buildings are all residential. These mandatory waiver standards serve to eliminate the local requirement such as building height, windows, materials, and ground-floor commercial. In all of these cases, just like the ground-floor commercial, the development would not meet the regulation unless it is waived as is unambiguously required by SB 1537.

HAPO was quite clear that the SB 1537 mandatory adjustment allowing for ground-floor residential is a development standard and not a use. The language “shall” is mandatory and there is no ambiguity in the legislative intent. ORS 174.020(2) (when a general provision and a particular provision are inconsistent, the particular provision controls.)

Prerequisite Qualifications for SB 1537 Waiver are Satisfied

At pages 70-73, the Applicant explains how all of the prerequisites necessary to qualify for an SB 1537 waiver are satisfied. Regarding the need for the adjustment, (2)(g) requires, in relevant part:

“The application states how at least one of the following criteria apply:

(A) The adjustments will enable development of housing that is not otherwise feasible due to cost or delay resulting from the unadjusted land use regulations;

(B) The adjustments will enable development of housing that reduces the sale or rental prices per residential unit;

(C) The adjustments will increase the number of housing units within the application;”

An applicant seeking a waiver need only “state” that “at least one” of the identified circumstances exists. They are not under any obligation to produce substantial or any evidence to support this conclusion. Nor is an applicant required to identify a reason for every waiver requested but rather need include only “one”. However, out of an abundance of caution, as noted, the additional building height and adding ground-floor residential will allow an increase in the number of units that would otherwise not be possible but for the waiver. Reducing the amount of bicycle parking, eliminating façade articulation, reducing the total façade glazing requirements, building orientation and eliminating balconies and porches will reduce the cost of providing housing.

Tannler Drive Vacation

This Application does not include, nor does it require, the vacation of any portion of Tannler Drive. See Plan page C202. Rather, the existing Tannler Drive will be rebuilt within the existing right-of-way as a fully-functioning, local, public street including parking and sidewalks providing direct and safe access to White Oak Savanna Park. The Applicant will have no ability to close or otherwise regulate use of this public road and as such, no public benefit is constrained. This new public road within the old Tannler Drive right-of-way will terminate just short of the current intersection with Blankenship. What the City will do with this remaining public right-of-way is not known but it could be improved for additional parking to serve the park.

Constitutionality of Foreshortened Appeal Rights

The limitation in opponents' challenge to SB 1537 and HB 4037 as unconstitutional is that they assume that the Land Use Board of Appeals (LUBA) is the sole avenue for providing this review. Rather, the circuit court retains jurisdiction to grant declaratory, injunctive or mandatory relief in proceedings arising from ministerial decisions. ORS 197.825(3). Ministerial decisions include housing decisions subject only to clear and objective standards as they do not require "interpretation or the exercise of policy or legal judgment." ORS 197.015(10)(b). As there is no subjective decision-making available in this case, requiring review through the circuit court is the only avenue available to opponents. Further, in the event that policy judgment is exercised, such that the ministerial exception does not apply, then writ of review would be available pursuant to ORS 34.020, which provides for review in cases where a LUBA appeal is not available.

Required Mixed Use and Commercial Components Are "Development of Housing" that May Be Subject Only to Clear and Objective Standards

There is no authority in Oregon law for excluding a mixed use project from the "development of housing" protections where the development includes housing.¹ To the contrary, a "housing law" is defined to include requirements, set forth in ORS 197A, where the law "applies to residential development" including SB 1537 and HB 4037. ORS 197A.800(5)(a). "Residential" is defined to include "mixed-use residential development." ORS 197A.800(5)(b).

Further, the "development of housing," triggering the clear and objective standard limitation, includes applications that require compliance with identified standards, conditions and procedures as a condition for allowing a housing development. *Icon Development v. City of Oregon City*, LUBA No 2022-100 (May 19, 2023). Here, the provision of ground-floor commercial is not an election by the Applicant but rather a requirement as a condition to building housing, which is subject to waiver only because state law allows as much under SB 1537. City staff has concluded that the commercial design standards of CDC 55.100 must be satisfied in order to develop housing, the standards applicable to the commercial development, but those standards must also be clear and objective. Otherwise, there is no clear and objective path to obtaining approval for the development of housing.

A majority of the concerns raised by opponents are directed at standards that are not clear and objective. A "clear and objective" standard is one that is quantifiable, objective or not ambiguous.

¹ Opponents' reliance on *Roberts v. City of Cannon Beach* is misguided. 375 Or 396 (2026). *Roberts* deals with an evaluation of a public road improvement request that would serve a planned residence but the road was not required as a criterion or condition for approving the house. This case is entirely distinguishable from *Roberts* as all of the applicable criteria identified here are pre-conditions to the development of housing.

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Land use regulations are ambiguous where they “can plausibly be interpreted in more than one way.” See *Richmond Neighbors v. City of Portland*, 66 Or LUBA 464, 466 (2012) (citing *Tirumali v. City of Portland*, 169 Or App 241, 246, 7 P3d 761 (2000), rev den, 331 Or 674, 21 P3d 96 (2001)). More specifically, opponents have questioned whether the engineering and hazard evaluation work related to the grading design, stormwater drainage design, and steep slope analysis is sufficient relying on CDC 55.105(N)(2) which requires that an applicant “demonstrate that the proposed methods of rendering known or potential hazard sites safe for development” along with CDC 55.130(C), which provides “there is sufficient factual data to support the conclusions of the [grading and drainage] plan.”

These standards are not “clear and objective” as they require the city to make a subjective decision in determining whether the engineering analysis set forth in the grading and drainage plan materials along with any construction and engineering methods “will render known or potential hazard sites safe for development.” The standard provides no guidance regarding the level of safety necessary, for determining the degree to which the engineering evidence must support underlying assumptions, or the meaning of the term “safe;” all of which require the exercise of judgment and are not “clear and objective.” See *Parkview Terrace Development LLC v. City of Grants Pass*, 70 Or LUBA 37 (2014) (standard requires a finding that public facilities “will not cause service delivery shortages to existing development is not “clear and objective) and *Home Builders Association of Lane County v. City of Eugene*, 41 Or LUBA 370, 410, 414 (2002) (code requirement to provide “adequate” drainage is not “clear and objective.” As such, CDC 55.105(N)(2) and CDC 55.130(C) and (E) do not apply.

All this said, the Applicant has completed detailed engineering and conducted geologic hazard analysis of the proposed development as explained by the HHPR civil engineer as follows:

“Just within the HHPR engineering department alone, nearly 900 hours of labor have gone into this project thus far with 3 civil engineers (and 2 additional engineers providing further roadway design expertise) working together on stormwater management, grading, roadway vertical and horizontal design, utilities, and other design elements in coordination with city staff, TVF&R, service providers, and other consultants on the project team. The documents produced are roughly 30% plans and reports which is an industry standard for preliminary land use level. Although, they are further along than many other projects at this stage because we wanted to be sure we could make things work as we move forward. The project has been designed in accordance with all applicable codes and standards and meets or exceeds the industry standard of care for similar projects at this stage in the lifecycle of the project.” See attached testimony.

This Application, most particularly the grading and civil engineering plan sheets set forth at C300-319, establish the grades and slopes taken from licensed, surveyor established topographic lines

which fully complies with CDC 55.110(B) and 55.130(A) and (B). These plan sheets show that a design where all driveway grades are below the 15% maximum and the fire marshal has reviewed these plans finding compliance. The access spacing and internal circulation standards have been determined by a civil engineer, whose license and reputation rests on satisfaction of those standards.

Building 10 Maximum Setback and SB 1573 Ground Floor Commercial

An opponent misapprehends CDC 21.080 in alleging that Building 10 exceeds the maximum 20-foot setback from Blankenship Road. First, the section that the opponent intended to cite was likely 21.070.A.4.d, which states, in relevant part:

“Front yard, no minimum and a 20-foot maximum. The front setback area between the street and the building line shall consist of landscaping or a combination of non-vehicular hardscape areas (covered with impervious surfaces) and landscaped areas.”

Sheet A2.2 of the architectural plan set shows that the building line, defined as, “a line running parallel to a lot line that is the same distance from the lot line as the closest portion of the building on site,” “is 20-feet or less back from both the east and west corners of proposed building 10 at the building line which satisfies this requirement. Maximum setbacks establish a boundary to ensure the massing of a building engages the street. They do not require a flat, continuous wall without articulation. Portions of the building that step back further than 20 feet (recesses, balconies, or design articulation) represent standard architectural design permitted by right and do not constitute a setback violation.

Secondly, The West Linn Community Development Code includes the following definition for **Lot Line – Front** “*For a corner lot, the shortest lot line along a street (other than an alley) that separates the lot from the street. If two or more street lot lines are of equal length, then the applicant or property owner can choose which lot line is to be the front.*” Building 10 is located on a corner lot. The West property line along Tannler Drive is approximately 190 feet long, and the South property line along Blankenship Road is approximately 300 feet long. Since the West Property line is shortest lot line the West Lot Line facing Tannler Drive is the Front Lot Line. The Opponent claims that the city has misapplied the set-back and adjustment requirements for building 10, claiming that the applicants drawings show portions of the building 10 set back greater than 20 feet. Apparently the opponent has assumed that the Front yard faces Blankenship Road, however, per the CDC definition of Front Lot Line, the Front of the lot faces west toward Tannler Drive, and building 10 is setback less than 20 feet from Tannler Drive as required by the CDC.

Thirdly, Section 38(4)(g)(D)(i), the standard in SB 1537 which states, “Prohibitions on ground floors of mixed use buildings against residential uses except for one face of the building facing the street and within 20 feet of the street,” requires the jurisdiction to provide for a full adjustment. The standard only requires “one” face of the building facing the street and within 20 feet of the

street to provide for a commercial use. In this development, that face is the west face of building 10 which provides for approximately 2,050 square feet of commercial space within 20-feet of Tannler Drive. Building 10, as proposed, is consistent with both provisions.

Finally, proposed building 10 is located at the bottom of the site and located 5-16 feet above the grade of the Blankenship right-of-way. That area will be landscaped and developed with a stormwater treatment facility to manage stormwater from the public improvements provided along Blankenship Road. See sheets C830 and L2.4 for details associated with the Blankenship Road right-of-way. The proposed building not only satisfies the clear and objective requirements, it also demonstrates a design that has been well thought out to respond to competing interests within the development regulations.

Feasibility and Conditions of Approval

Opponents have challenged that the Applicant's engineering and geologic evidence is not sufficiently certain and improperly defers to a later time determinations that must be decided now. In *Meyer v. City of Portland*, LUBA and the Court of Appeals considered a city-imposed condition of approval requiring that the applicant submit satisfactory evidence that development would not create geological hazards and that satisfactory drainage consistent with the city's adopted standards. 7 Or LUBA 184, 196 (1983), *aff'd*, 67 Or App 274, 678 P2 741, 276, 297 Or 82 (1984). In affirming the approval, LUBA reasoned that while the feasibility of the planned development must be shown at the preliminary plan stage, technical matters that require expert evaluation may be deferred to administrative review and approval. *Id* at 280. With respect to the required geotechnical information, LUBA held that the city properly concluded, based on information in the record, including geotechnical studies, that the project was geotechnically feasible and that detailed geotechnical information for individual building sites was not required at the preliminary plan stage. *Meyer*, 7 Or LUBA 184, 197. In affirming LUBA's decision, the court clarified:

"[B]y 'feasibility' LUBA means more than feasibility from a technical engineering perspective. It means that substantial evidence supports findings that solutions to certain problems (for example, landslide potential) posed by a project are possible, likely and reasonably certain to succeed."

What the Application provides is evidence in the form of civil-engineer designed development plans and geologic engineering evaluation that compliance with the City's standards are feasible.

Opponents have further expressed concerns that compliance with certain engineering standards, geologic evaluation recommendations, reciprocal easements and traffic improvements will not be assured as part of this development. The best way to deal with those future looking obligations is through conditions of approval. For example, with respect to engineering standards, Condition of Approval 2, as recommended by City staff provides:

“All public improvements and facilities associated with the approved site design, including but not limited to street improvements, driveway approaches, curb cuts, utilities, grading, onsite and offsite stormwater, street lighting, easements, easement locations, and connections for future extension of utilities are subject to conformance with the City Municipal Code and Community Development Code. These must be designed, constructed, and completed prior to final building certificate of occupancy. The City may partner with the applicant to fund additional improvements as part of the project.”

Should the Planning Commission conclude that particular criteria are not satisfied, state housing law demands that the Applicant be given an opportunity to offer reasonable conditions of approval that will satisfy the standard before making any decision to deny the project. ORS 197A.402(3). In this spirit and without waiving any right to pursue this opportunity before the Planning Commission makes a final decision, the Applicant has identified additional revisions to the conditions of approval that could be responsive to the opponents’ concerns with respect to identified reciprocal easements and geologic concerns:

“12. Final Geotechnical Report. The applicant shall submit a final geotechnical report for review prior to issuance of public improvement permits and building permits (Finding 140). This Final Geotechnical Report will respond to the items identified in the Preliminary Report for further study, including an evaluation of over-steepened rock cuts and retaining wall options and design parameters, and where physical improvements are identified, incorporate them as part of the development.”

“16. Reciprocal Easement. Prior to obtaining occupancy permits, the Applicant shall record a reciprocal easement providing access from / to the Willamette 205 commercial development to the subject property.”

Conclusion

In summary, this is a design review application for multifamily, mixed use housing that the City has planned for the subject property. Only those standards set forth in the CDC, largely related to siting and design standards, can be considered in evaluating this matter. All these standards must be clear and objective, meaning that the Planning Commission has no opportunity to find them insufficient where the Applicant has provided evidence that compliance is feasible and likely to be achieved. The Applicant has worked diligently, consistently with City staff instruction, to present a responsive application that exceeds the level of specificity that is customary for these types of projects. The City needs additional housing and the proposed development responds directly to this need. For these reasons, this application should be approved.

Chair Shulte-Hillen and Planning Commission
City of West Linn
August 5, 2026
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Please place this letter in the record and provide me notice of the Planning Commission's final decision.

Very truly yours,

A handwritten signature in black ink, appearing to read "Carrie Richter", with a long horizontal flourish extending to the right.

Carrie A. Richter

Attachments

cc: Ashleigh Dougill via email
Client

Job No.: MCR-01-A
Date: August 3, 2026
To: West Linn Planning Commission
From: Ryan Mosher, PE
Project/Subject: Modera West Linn – Design Rationale



Dear Planning Commissioners,

Please find below a synopsis of the design rationale for the Modera West Linn project along with a short background on my credentials as a licensed professional engineer with over 15 years of experience.

Professional Background

I am a highly experienced Civil Engineering Project Manager and Consultant who specializes in a variety of project types, including residential, industrial, educational, institutional, and commercial. I have specific expertise in site and land development and have completed numerous projects for developers within jurisdictions such as the cities of Portland, Tigard, Oregon City, Wilsonville, Salem, Eugene, Vancouver WA, as well as for agencies such as Clackamas County, ODOT, and the US Army Corps of Engineers. HHPR has specific experience in West Linn working with the City on numerous projects throughout the years.

I have a broad knowledge base and experience working across multiple jurisdictions throughout Oregon (and SW Washington), and coordinate effectively with a range of professionals, including engineers, architects, developers, contractors, construction managers, and other disciplines to ensure successful project outcomes that meet or exceed client expectations.

My Experience includes:

- Real Estate and Land Development with most recent focus on multi-family, commercial, industrial, manufactured housing, low-income and workforce housing.
- Remote Sensing and Automated Data Acquisition
- Construction Materials Testing and Inspection

Project Substantiality, Feasibility, and Reasonableness

The claim that not enough engineering has gone into this project is false. The preliminary civil engineering plans and preliminary stormwater report stand alone as proof of substantial engineering effort and project feasibility. To be clear, technical feasibility means that the project can be constructed with known materials, means, and methods. Furthermore, the plans and reports have been reviewed for initial consistency with City standards by experienced City engineering and planning staff and found to be substantially feasible enough to issue conditions of approval.

Just within the HHPR engineering department alone, nearly 900 hours of labor have gone into this project thus far with 3 civil engineers (and 2 additional engineers providing further roadway design expertise) working together on stormwater management, grading, roadway vertical and horizontal design, utilities, and other design elements in coordination with City staff, TVF&R, service providers, and other consultants on the project team. The documents produced are roughly 30% plans and reports which is an industry standard for preliminary land use level. Although, they are further along than many other

projects at this stage because we wanted to be sure we could make things work as we move forward. The project has been designed in accordance with all applicable codes and standards and meets or exceeds the industry standard of care for similar projects at this stage in the lifecycle of the project. As engineers, we take seriously our duty to provide safe and efficient designs that meet the needs of our clients and comply with jurisdictional standards.

Grading and Roadway Design

All design is based on factual, objective, measurable data collected by a licensed professional surveyor. Based on that topographic data, a detailed 3D model was built using Autodesk Civil 3D. Roadways were designed per City and AASHTO standards. Due to steep existing grades, Lower Tannler and the mixed-use commercial area were designed with 10 mph design speeds to minimize the amount of cut required. Proper traffic calming measures such as signage and RRFBs may be utilized in this area and along Tannler to ensure multi-modal safety. The specifics will be coordinated with the city engineer as the project moves forward into engineering permitting and plan review, as ultimately Tannler will be maintained by the city. During preliminary design, we coordinated with City engineering staff to ensure we met their requirements.

Where design exceptions are requested, they have been discussed with city engineering staff to ensure the design is feasible and approvable.

- a) Tannler section with multi-use path was designed this way to allow for additional on-street parking for residents to be able to access the park and the commercial area. A separated sidewalk and bike lane would eliminate this additional on-street parking. By foregoing the separate landscape strip and locating it behind the sidewalk, we were able to reduce the amount of necessary grading and cut into the land.
- b) Angled parking within public right-of-way is not unusual in West Linn, as is the case on Willamette Drive (which HHPR also designed).

In multi-family site design, ADA pathways, vehicular parking areas, drainage, and emergency vehicle access are the main driving factors in how a site is designed. This site is tiered with multiple levels required due to steep terrain. Existing grades along Tannler set the elevations for each tier. Those existing grades in combination with the above-mentioned requirements were the main factors in the on-site grading design. The site's steep grades require split level buildings with site features such as retaining walls and stairs to make up the grade differential between each tier. Walls are to be designed by licensed geotechnical and structural engineers and constructed by licensed and bonded contractors. Please see memo written by Columbia West for pertinent information on walls. The city's building department will review the wall design as part of the engineering permitting process. Structural design is not a requirement at the land use stage but is a requirement of building permits. Private drives through the site are required to be 15% or less (as shown on the grading plans) and we worked with TVF&R reviewers to ensure the site meets all emergency access requirements, including aerial truck access.

Stormwater Management

One opponent has challenged the pre-development and post-development impervious and pervious surface areas set forth in the preliminary stormwater report. Further, there is concern that the impervious surfaces including the clubhouse, amphitheater or pool area were not included. We believe he may have reviewed a prior version of the report. However, the post-development basin map (Exhibit 3), clearly shows the clubhouse, pool, and amphitheater are included. Design is an iterative process, and in a preliminary stormwater report, there may be discrepancies. As we continue to hone the design and the contributing areas to each stormwater facility, numbers and figures will continue to evolve and change. Whether a basin area is 8.121 acres, or 8.233 acres is irrelevant at this preliminary stage, and we tend

towards more conservative estimations early on to ensure we are accounting for worst case scenarios as we move forward.

Different site layouts require different engineering solutions. The stormwater report from Otak for this property in 2015/2016 was based on a different site layout and a different design code (i.e. Portland SWMM) that no longer applies since the City of West Linn updated their stormwater design code in 2025. It is also important to note that there has been an increase of roughly 66% in construction costs from 2016 to present, so a site that may have worked financially 10 years ago almost certainly doesn't work well now. The stormwater decision hierarchy for this current proposal is as follows:

1. Per West Linn Stormwater Management Manual standards section 1.4.3., item 2, this site has a significant portion of existing grades over 20%, therefore infiltration is infeasible.
2. Above-ground filtration facilities could theoretically be used uphill, but site constraints for placement of other utilities limits where facilities can go and, furthermore, storage of large volumes of stormwater higher in elevation than buildings is not a best design practice, as in the event of facility failure the buildings could be flooded and water would be directed downhill through the site. Thus, above-ground filtration solutions were not chosen for basins higher in elevation. However, there are vegetated filtration facilities proposed in areas downhill where facility failure could not result in property damage.
3. Underground detention and proprietary treatment were chosen as the most practicable uphill onsite stormwater management solution for the above-mentioned reasons. In the event of facility failure, water would spill out of the manholes and catch basins in the parking lot and be routed through the parking area out to Tannler and away from buildings. This is a best design practice and fully consistent with the City's stormwater design standards.

Below ground storage of stormwater is not an unusual practice when proceeding with development on a steep site. According to the Ferguson Waterworks website, the R-Tank product is a versatile system that is perfect for steep, terraced sites and they even include a case study for installation on a hillside, which is why it was selected for storage. The selected approach for proprietary treatment, the Contech Stormfilter, is a widely known and accepted product. The Stormfilter is on the Washington DOE TAPE list and listed as an acceptable Manufactured Stormwater Treatment Technology by the City of Portland, as mentioned in the West Linn Stormwater Management Manual, section 3.10. Maintenance of the cartridges occurs every 1-5 years and is accomplished by removing the filters, vacuuming out sediment, and installing new replacement filters. This replacement can be achieved with a typical utility service/vac-ex truck and crew and accomplished within one day. There is no reason to believe that this effort will cause any disruption to traffic conditions on-site.

Finally, a question has been raised about where the water from the retaining wall stormwater collection pipes will be directed. Although the final utility plans have not been fully developed yet, the preliminary utility plans clearly show private storm mains extending through the site. There is plenty of depth on the piping for retaining wall drainage to reasonably be connected downstream of the flow control manholes, as typically building footing drains and wall drains are not connected to flow control and treatment systems since their purpose is to handle subsurface drainage.

Water and Sanitary Sewer

There are two pressure levels required to serve this site due to elevation change. The upper portion of the site will connect into an existing main in Greene Street right-of-way. We will extend a public main from Blankenship partially up the lower portion of Tannler to serve the lower portion of the site. Private onsite water mains have been extended into the site to serve both domestic water and fire service needs along with meters, backflows, hydrants, and FDCs. The preliminary design has been reviewed and approved by



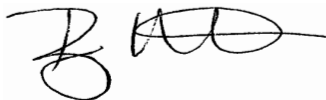
TVF&R for compliance with their fire and life safety standards. Public services will meet city requirements and private services will meet OPSC requirements.

An existing public sanitary sewer main runs along Tannler Drive. Private sanitary sewer services will extend through the site from each building and connect into this public main. The lower portion of the public sanitary sewer that exists in the Tannler right-of-way will be realigned down the new alignment. This is to allow a new public stormwater facility to be constructed along Blankenship at the natural low point of the project without conflicting with any sanitary sewer.

Conclusion

According to the American Society of Civil Engineers, design professionals must exercise the ordinary skill and care of reasonably prudent members of their profession, practicing under similar circumstances and in the same or similar locality. This means that the industry standard of care does not require perfection, but reasonableness. As the above memo has demonstrated, clear reasoning and substantial design rationale has gone into the preliminary civil engineering plans and reports. My stamp below certifies that, to the best of my knowledge, the preliminary design meets (or can reasonably meet) all applicable standards and codes. We have followed industry best practices and met (or exceeded) the industry standards for similar projects.

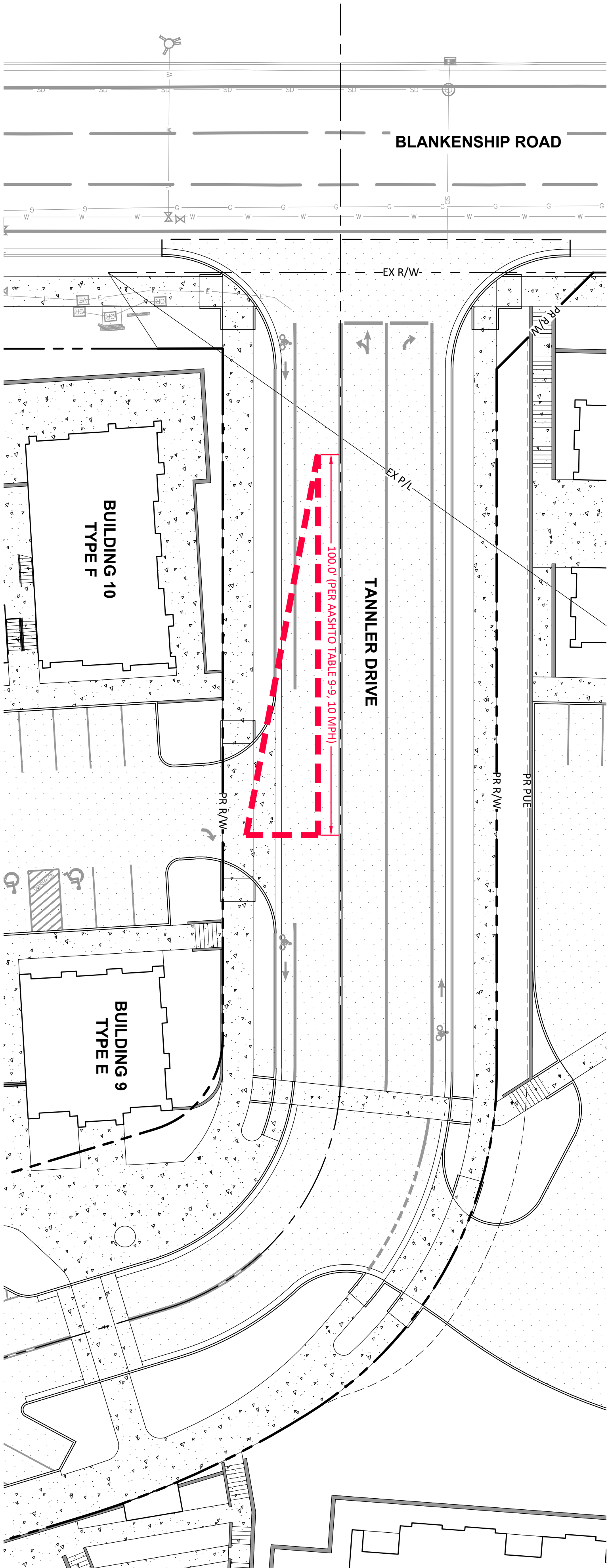
Best regards,



Ryan Mosher, PE
Project Manager/Associate

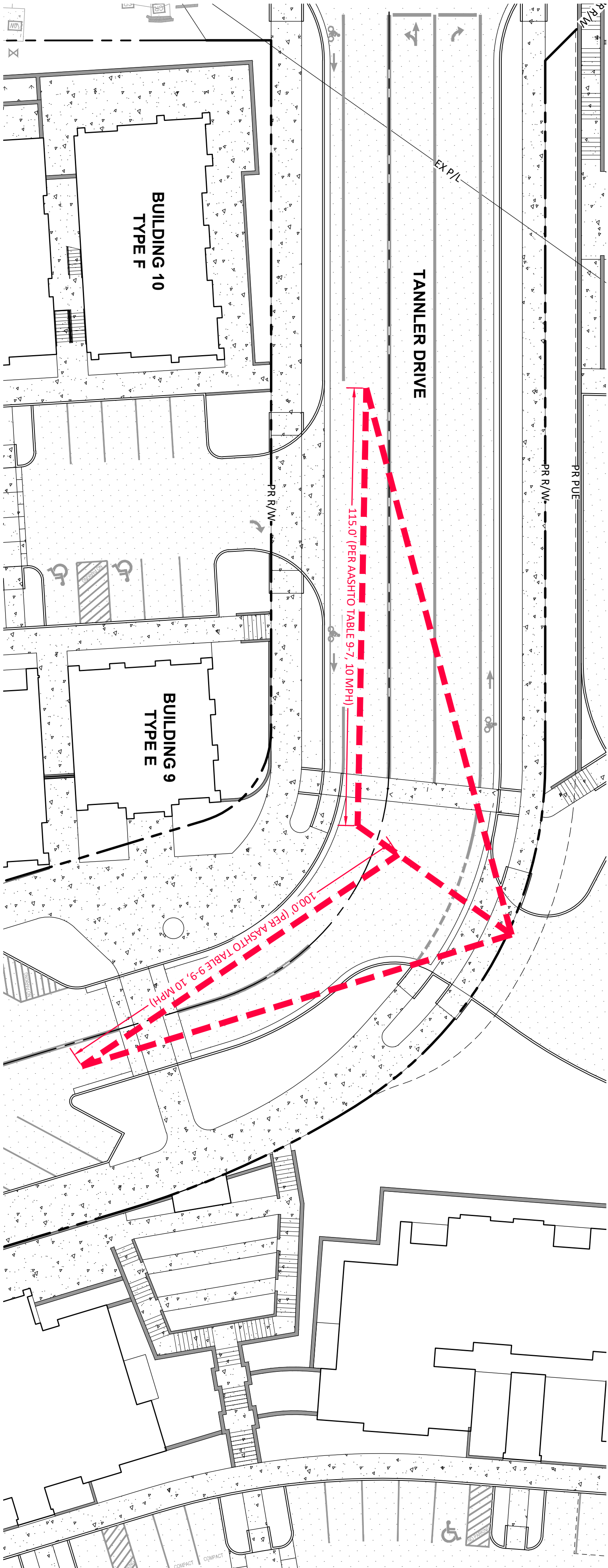


EXPIRES: 12/31/26



INTERSECTION 1

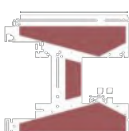
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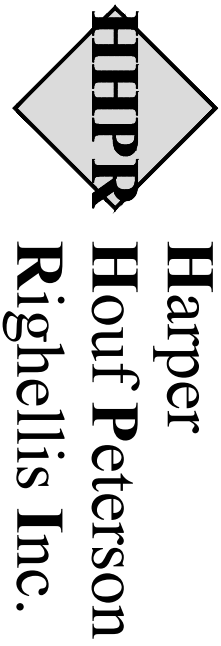
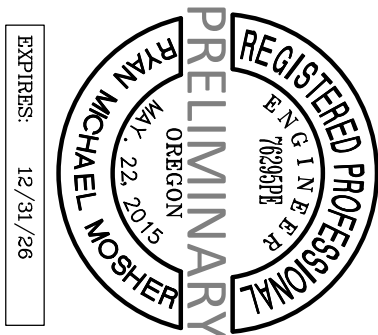
INTERSECTION 2

SCALE: 1" = 20'

NOTE:
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HILL ARCHITECTS
1750 BLANKENSHIP ROAD
SUITE 200
WEST LINN, OREGON 97068
TEL. 503.305.8033

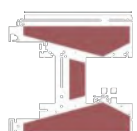
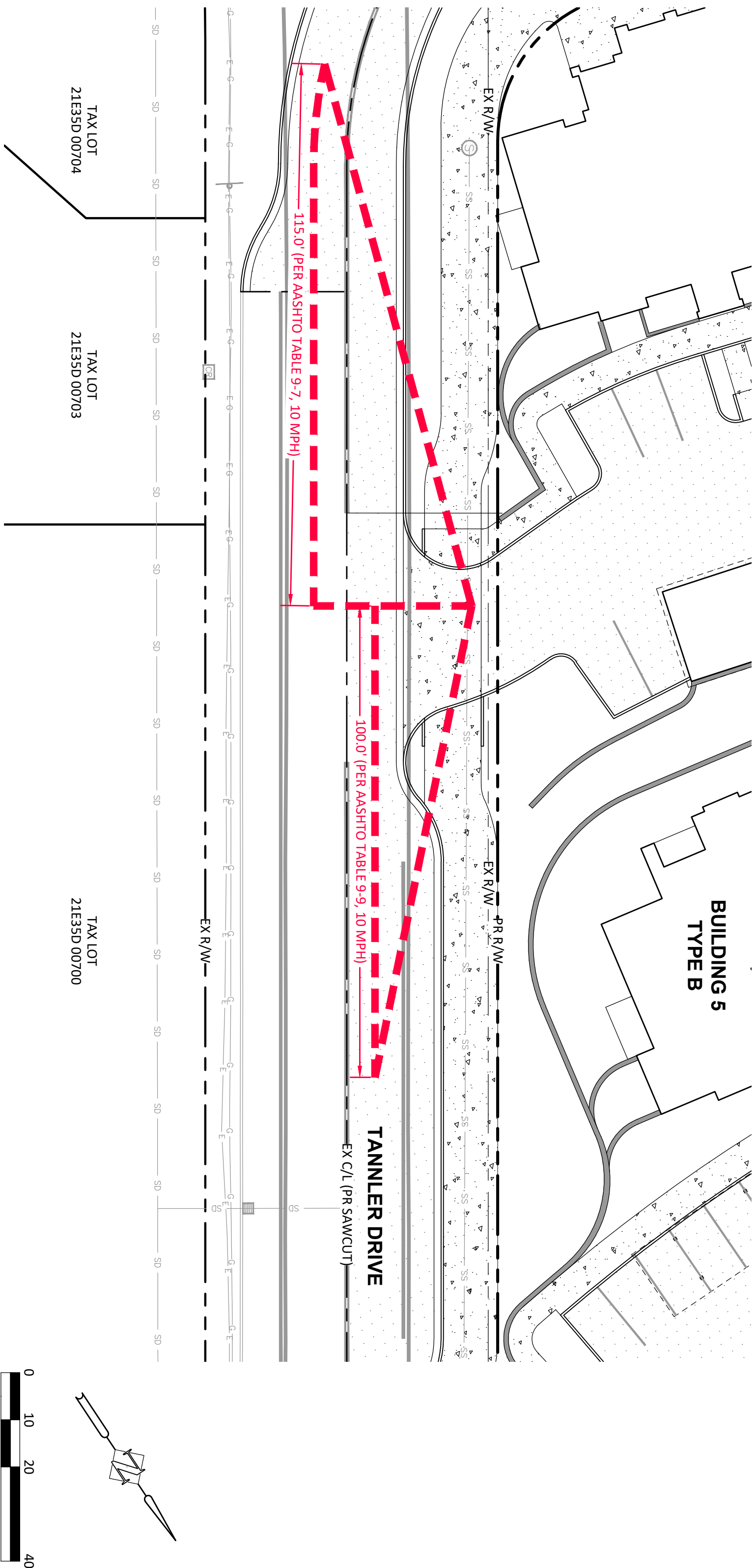
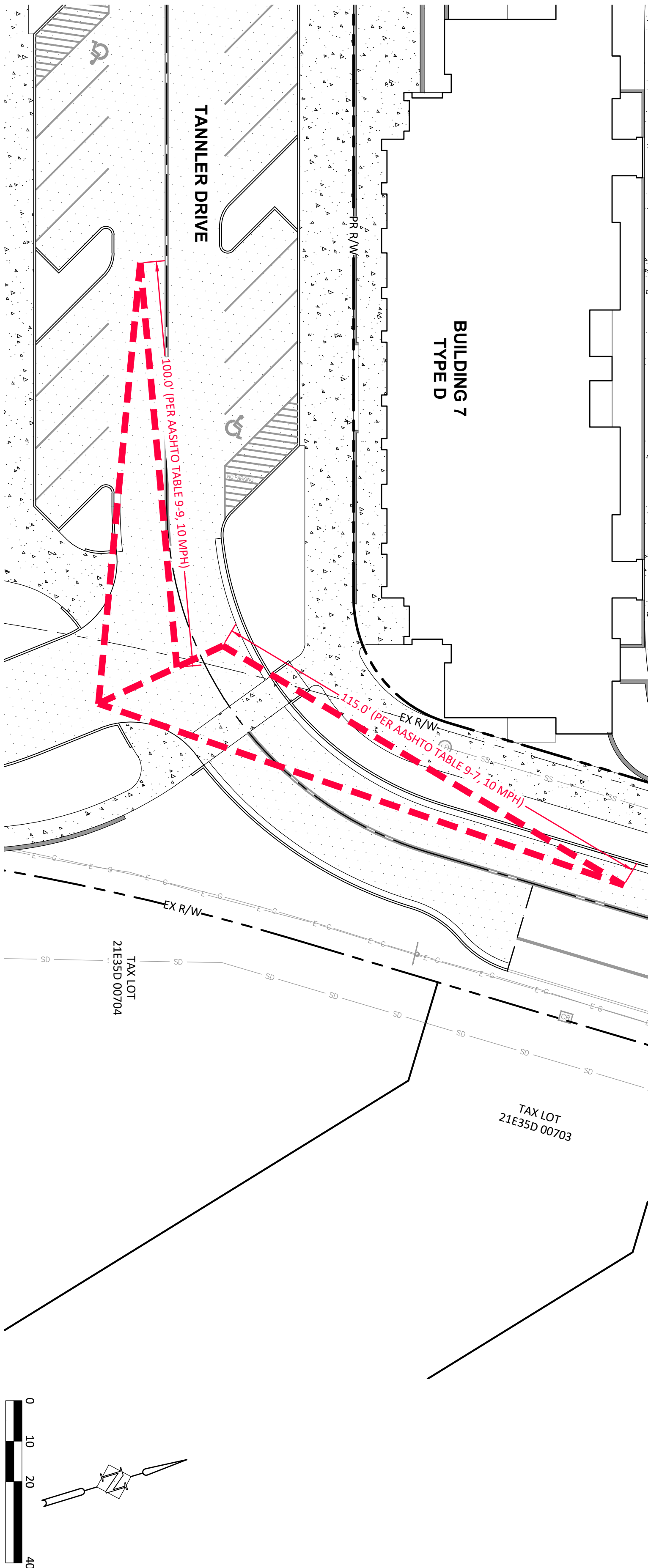


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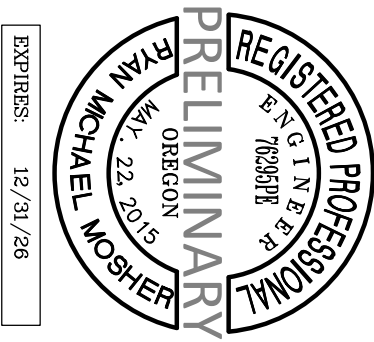
Modera
West Linn

West Linn, Oregon
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SIGHT DISTANCE
TRIANGLE EXHIBITS
EX. 1



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West Linn

West Linn, Oregon
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05/22/2026		LAND USE SUBMITTAL	
Mark	Date	Revised/Issue	
25006	Project Number	Drawn by	Checked by
		HHPR	RPM

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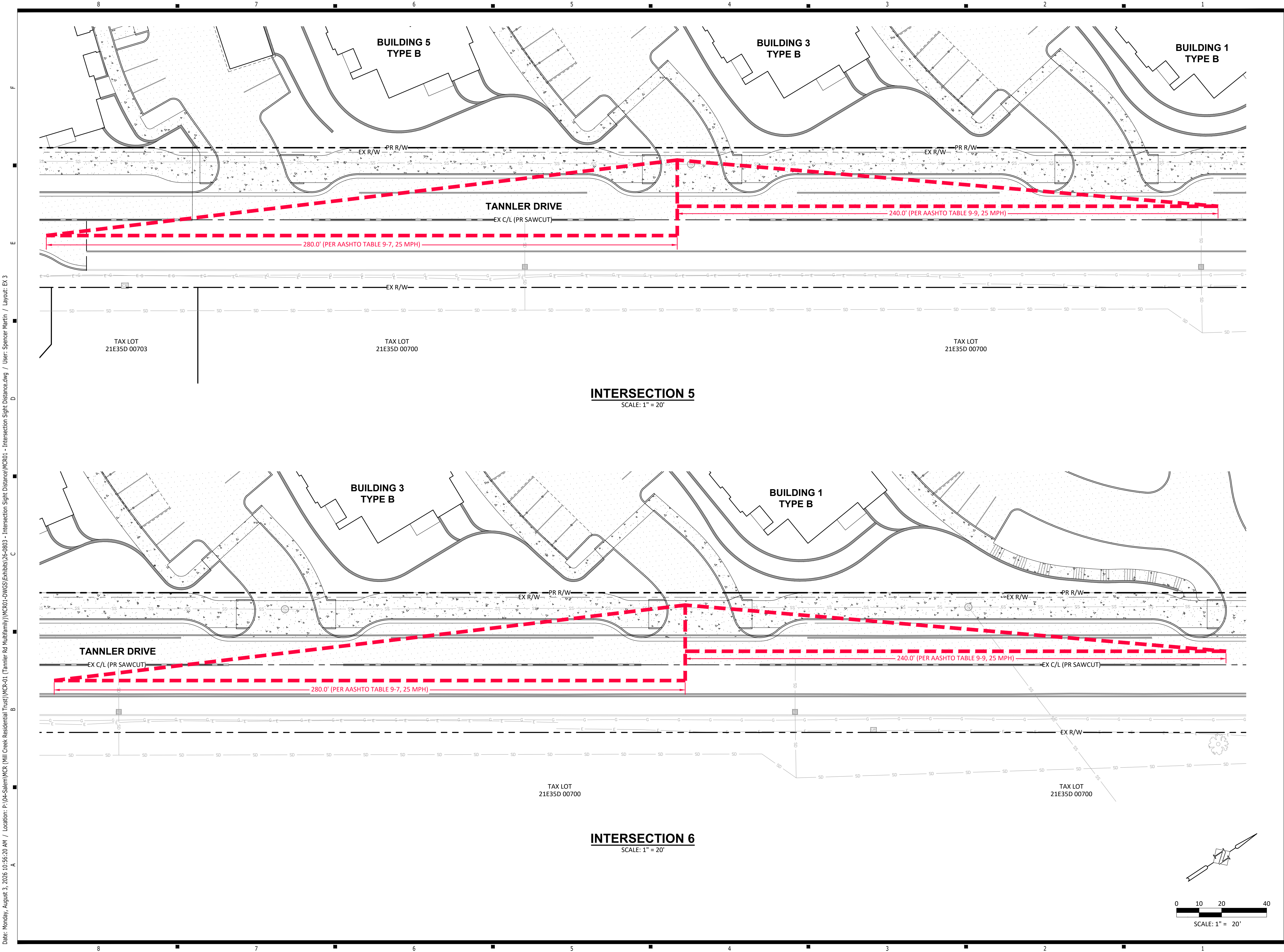
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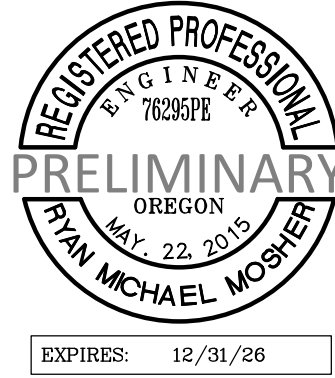
SIGHT DISTANCE
TRIANGLE EXHIBITS

EX. 2

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Modera West Linn

West Linn, Oregon

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05/22/2026 LAND USE SUBMITTAL

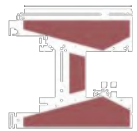
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Project Number	25006	Drawn by HHPR
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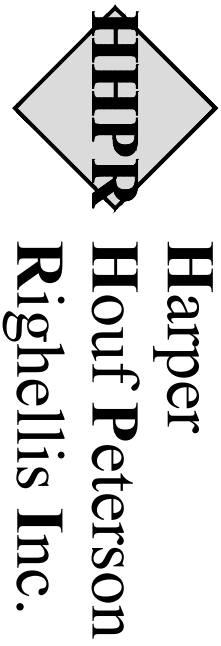
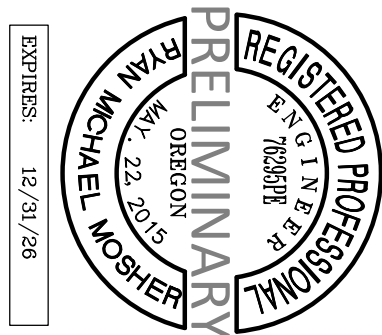
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← SIGHT DISTANCE TRIANGLE EXHIBITS

EX. 3



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West Linn

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Mark	Date	Revision Issue	
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25006	HHPR		RPM

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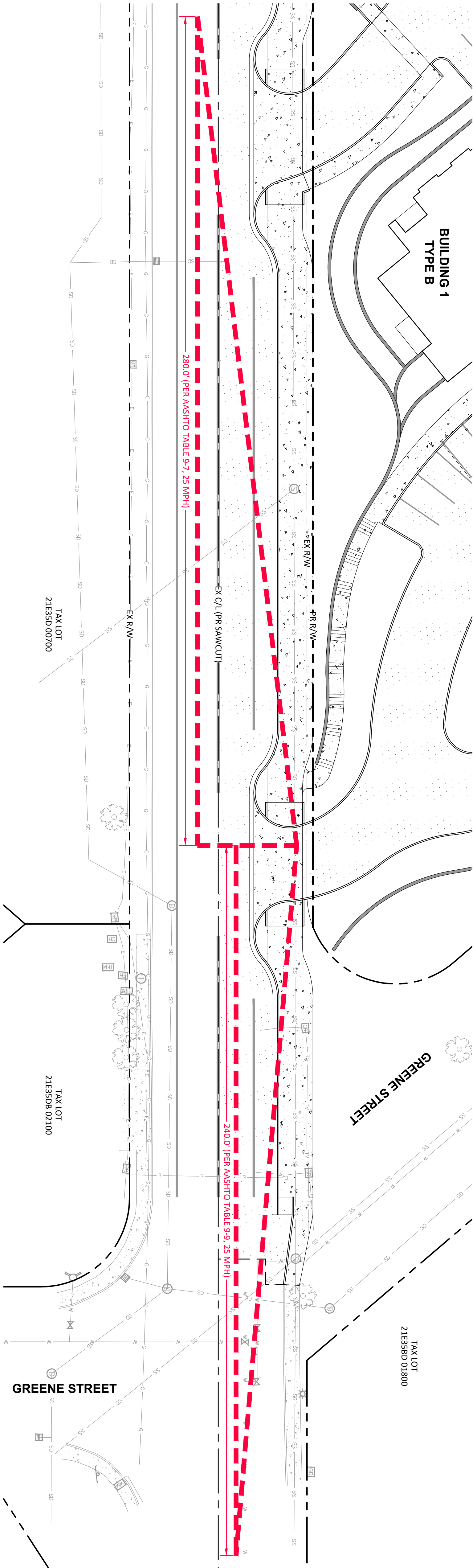
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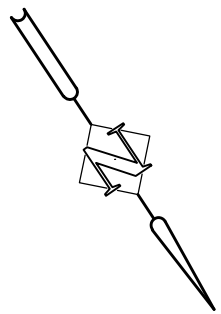
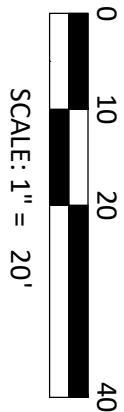
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SIGHT DISTANCE
TRIANGLE EXHIBITS

EX. 4



INTERSECTION 7
SCALE: 1" = 20'



August 4, 2026

West Linn Planning Commission

**Re: Geotechnical Report - Review Comments
Modera West Linn
Tannler Drive and Blankenship Road
West Linn, Oregon**

INTRODUCTION

This letter is in response to the written review comments that pertain to the geotechnical engineering report:

- Columbia West 2025. *Report of Geotechnical Engineering Services; Modera West Linn; Tannler Drive and Blankenship Road; West Linn, Oregon, dated September 16, 2025.* CWE Project: MCRT-1-01-1.

COMMENT # 1

"All three reports find the soil to be of low permeability and is useable as fill only if properly dried (GD 2005) (section 4.4.2, page 5). GD 2014 (page 7) states "silty soil will be difficult if not impossible to adequately compact at all times of year, except the dry summer months". CW 2025 states "project stakeholders should understand that wet weather construction is risky and costly" (page 13) (appendix page 2).

As a consequence, I recommend that respondents to this application demand that if approved that all excavation, grading, filling foundation and retaining wall work be limited to the five driest months of the year. Basis for this demand would be supported by CDC 55.105(N)(2) and CDC 55.130(A)(C) (E) (2,4)."

RESPONSE

The geotechnical report recommends that site earthwork be performed during the dry weather season to optimize construction efficiency and reduce overall grading costs. Based on the anticipated soil conditions, the on-site soils are expected to be suitable for use as structural fill primarily during the dry season, when moisture contents are more favorable for achieving the required compaction.

Although earthwork can be performed during the wet weather season, doing so will likely require additional measures, including the importation of granular structural fill and implementation of enhanced construction procedures to address unsuitable moisture conditions. Consequently, wet weather grading is expected to increase construction costs but does not preclude development of the site.

COMMENT # 2

"If there is any discussion in the application of how retaining walls of 15, 20, 25, or 30 feet are to be constructed, reinforced, stabilized and consequently made structurally safe I was unable to find it. The CW 2025 way of addressing this problem seems to be to state, "we recommend that a qualified geotechnical engineer perform design calculations for the larger on-site walls once the wall type and geometry has been determined" (page 8, appendix page 3)."

RESPONSE

The site development plans were preliminary at the time of our geotechnical report. As stated in our report, for proposed rock cuts and retaining walls exceeding 15 feet in height, final design will include additional subsurface exploration, including rock coring, to characterize the bedrock, evaluate the presence and orientation of bedding planes and other discontinuities, and assess the feasibility of constructing tall, over-steepened rock cuts and retaining walls. All aspects of the project will be designed and constructed in accordance with applicable building codes and engineered to be stable and protect life safety.

Retaining wall systems will be selected and designed on a case-by-case basis based on the results of the supplemental geotechnical investigation, anticipated wall heights, loading conditions, and final site geometry. Potential retaining wall and rock stabilization systems may include:

- Rock bolts with wire mesh
- Soil nail walls with shotcrete facing
- Anchored cast-in-place concrete walls
- Mechanically Stabilized Earth (MSE) walls

COMMENT # 3

"...Also of note is that the setbacks from very tall retaining walls are very close to structures, parking spaces and internal driveways. As can be seen in site diagram C312 where a 20-foot retaining wall directly abuts a garage, or C311 where a 25-foot wall abuts garages. Also note C314 where a 30-foot wall is within 10 feet of parking spaces and directly abuts the internal street (since they are not public right of way, perhaps, they should be identified as internal driveways). Diagrams C315 and C317 show retaining walls that, should they fail, have the potential to directly impact the Tannler Drive ROW. Not to be redundant, I think a very good argument can be made that there is a glaring insufficiency of information for a decision-making body to determine that the grading plan is safe and structurally sound."

RESPONSE

We acknowledge the concern regarding the proximity of the proposed retaining walls to adjacent improvements. As stated in the geotechnical report, retaining walls exceeding 15 feet in height will require supplemental geotechnical exploration, including rock coring, to characterize the bedrock and evaluate the feasibility of the proposed rock cuts and wall systems.

Following completion of the supplemental subsurface investigation, the final retaining wall type, geometry, and foundation design will be selected based on the site-specific geologic and geotechnical conditions. Comprehensive engineering analyses, including global stability analyses, will be performed to evaluate the stability of the wall systems, adjacent slopes, and nearby improvements under both static and seismic loading conditions. These analyses will also evaluate the effects of the retaining walls on adjacent infrastructure and will establish the appropriate wall configuration, reinforcement, setbacks, and construction requirements.

The proximity of retaining walls to adjacent improvements is a common engineering condition that is routinely addressed through detailed geotechnical investigation and structural design. If the supplemental investigations or engineering analyses indicate that modifications are warranted, the retaining wall type, alignment, height, or other design elements will be adjusted accordingly to satisfy applicable engineering standards and provide the required level of safety and performance.

COMMENT # 4

"Apparently as a consequence of this need for excavation it is vital to determine whether the bedrock is solid throughout the entire depth of excavation. It is possible, apparently, that the bedrock exists in layers, with bands of solid bedrock separated by a layer of looser material, or as stated in CW 2025 (page 8) "however, we recommend additional exploration via rock coring to evaluate the presence of bedding planes to assess the feasibility of constructing large, over-steepened cuts into the rock..."

RESPONSE

The presence of bedding planes or other discontinuities within basalt bedrock does not necessarily preclude the construction of deep rock cuts; however, their orientation, spacing, persistence, condition, and infilling can significantly influence rock mass behavior and the stability of exposed rock faces. Depending on their characteristics and orientation relative to the proposed excavation, bedding planes may create potential failure mechanisms such as planar sliding, wedge failure, or toppling.

As stated in our geotechnical report, supplemental subsurface exploration, including rock coring, is recommended for proposed rock cuts and retaining walls exceeding 15 feet in height. The purpose of the investigation is to characterize the bedrock, identify and evaluate bedding planes and other discontinuities, and obtain the information necessary to perform detailed rock slope and global stability analyses.

The results of the supplemental investigation will be used to determine whether the proposed rock cuts can be safely constructed at the desired inclinations or whether rock stabilization measures or retaining structures are warranted. Potential stabilization measures may include rock bolts, wire mesh, shotcrete, anchored retaining walls, or other systems selected based on the site-specific geologic conditions. Final design recommendations will be developed following completion of the supplemental exploration and engineering analyses.

COMMENT # 5

"The application seems to view this as a technical issue presumably to be addressed as a building code standard. I would suggest that the method of excavation and potential offsite impacts (see proximity of the 30-foot retaining wall on site diagrams C316 and C317 to the Falcon Street residential properties) should absolutely be addressed as part of the land use approval process as per CDCSS.105(N)(2) and CDC 55.130(C) (E) (2,4)."

RESPONSE

We acknowledge the concern regarding rock excavation in proximity to existing residential structures. The methods used to excavate bedrock will be determined during final design and by the contractor's means and methods. Depending on the bedrock conditions, excavation may be accomplished using mechanical methods (e.g., hydraulic breakers or rock saws), controlled blasting, or a combination thereof.

If controlled blasting is determined to be necessary, it will be performed in accordance with applicable federal, state, and local regulations and accepted industry practices. Blasting operations would be designed by qualified blasting professionals to minimize ground vibrations and air overpressure at nearby structures. Typical vibration control measures include limiting the charge weight per delay, sequencing blast initiation, monitoring vibrations at nearby structures, and adjusting blast designs as necessary to maintain vibration levels below established damage thresholds.

Prior to final design, supplemental geotechnical investigations will be completed to better characterize the bedrock conditions and evaluate excavation requirements. The findings of these investigations will help determine the most appropriate excavation methods and any additional mitigation measures necessary to protect adjacent structures. If required by the permitting agency or project specifications, pre-construction condition surveys and vibration monitoring of nearby residences may also be implemented during construction.

Accordingly, while excavation of basalt bedrock in proximity to existing residences requires careful planning and execution, it is a routine construction activity that can be successfully completed using appropriate engineering design, controlled construction techniques, and vibration monitoring where warranted.

CLOSING

The geologic and geotechnical investigation, including the subsurface explorations (test pits) and the recommendations presented in the report, was performed in accordance with generally accepted geologic and geotechnical engineering practice and applicable industry standards. The investigation, analyses, and recommendations are consistent with established engineering methods routinely used for the evaluation and development of steep hillside sites. When implemented as part of the final design and construction, the recommendations provide a technically sound basis for development and are intended to reduce geologic and geotechnical risks to a level that is considered acceptable under prevailing engineering standards.



We appreciate the opportunity to submit this letter. Please do not hesitate to contact us if you have questions or require additional information.

Sincerely,

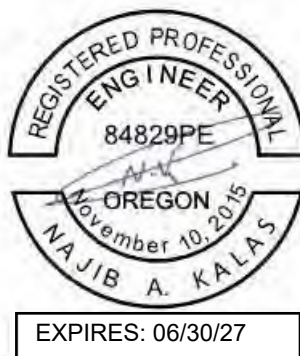


Najib A. Kalas, PE
Principal Engineer

NAK

Attachments

Document ID: TannlerH-1-01-1-080426-geol-response



Why the Tanner Drive and Blankenship Road Property Is Well Suited for Multifamily Mixed-Use Development

The approximately 11.5-acre property at the intersection of Tanner Drive and Blankenship Road (DR-25-04/LLA-25-02) is particularly well suited for multifamily residential mixed-use development. The site combines access to transit, employment, public services, shopping, recreation, schools, and existing infrastructure in a location already designated for urban development. Developing housing at this location would expand the range of housing choices available in West Linn while making efficient use of land within the urban growth boundary.

1. West Linn Needs a Broader Range of Housing Choices

West Linn's housing supply is dominated by detached single-family homes, many of which are increasingly difficult for working households, younger residents, seniors, and people with disabilities to afford or maintain. A multifamily development at this location would provide rental housing for people who want or need to live in West Linn but may not be able to purchase a detached home.

Potential residents could include:

- Teachers, police officers, firefighters, health care workers, retail employees, restaurant workers, and others employed in or near West Linn.
- Seniors who want to sell a larger home but remain close to friends, family, medical providers, and familiar community services.
- Adult children who grew up in West Linn and want to establish their own households without leaving the community.
- Young families seeking access to West Linn schools.
- Single-person households and couples who do not need or want a large detached home.
- Veterans, including veterans who benefit from living close to the nearby VA clinic.
- People with mobility limitations or other disabilities who need accessible, adaptable, and lower-maintenance housing.

The development would not solve every housing need, but it would meaningfully expand the types of homes available in a community where rental and multifamily choices are limited.

2. The Property Is Served by Public Transit

Transit service along or near Blankenship Road (Trimet Bus Line 153) gives residents an alternative to relying exclusively on private automobiles. Locating multifamily housing near an existing bus route is consistent with sound land-use and transportation planning because it places more residents within convenient reach of transit.

Why the Tanner Drive and Blankenship Road Property Is Well Suited for Multifamily Mixed-Use Development

Transit access is especially valuable for seniors, people with disabilities, younger residents, lower-income households, and households with only one vehicle. It can also help reduce vehicle trips, household transportation costs, traffic congestion, and demand for parking.

3. Important Public Services Are Immediately Nearby

The property is exceptionally close to services that are important to seniors, veterans, people with disabilities, and other community members.

The VA clinic at 1750 Blankenship Road is located within convenient walking or rolling distance of the property. This could make the development an especially practical location for veterans who need regular access to medical care, including veterans with limited mobility.

The Social Security office at 1800 Blankenship Road is also immediately adjacent or nearby. Residents would be able to reach these services without making a lengthy automobile trip.

Other potential housing sites in West Linn cannot offer comparable proximity to federal health and benefit services.

4. Residents Would Have Walkable Access to Shopping, Restaurants, and Daily Needs

The site is located across Blankenship Road from the River Falls Shopping Center, an established shopping center containing restaurants, shops, and services. The Willamette commercial district is also nearby, on the opposite side of Interstate 205.

Residents could walk or bicycle to restaurants, stores, personal services, employment, and other destinations rather than driving for every trip. The proposed ground-floor commercial space would add further opportunities for neighborhood-serving businesses and could provide additional services directly within the development.

This combination of housing, commercial uses, transit, and nearby services supports a more walkable and connected neighborhood.

5. The Location Provides Convenient Access to the Willamette District

The property is close to West Linn's historic Willamette district and its concentration of restaurants, businesses, community activities, and services. The district is within a relatively short walking or bicycling distance, with an existing pedestrian route beneath Interstate 205.

Adding housing near an existing commercial district can strengthen local businesses by placing more customers nearby. Residents of the development would help support restaurants, shops, and services in both the Willamette district and the commercial area along Blankenship Road.

6. Families Would Have Access to West Linn Schools

Why the Tanner Drive and Blankenship Road Property Is Well Suited for Multifamily Mixed-Use Development

West Linn's schools are an important community asset. Multifamily housing at this location would allow more families to live in West Linn and give their children the opportunity to attend schools in the West Linn-Wilsonville School District.

Housing diversity is important to maintaining a healthy school community. When housing choices are limited primarily to higher-priced detached homes, many teachers, young families, single parents, and working households are effectively excluded from living in the community.

7. Recreational Opportunities Are Immediately Available

Savanna Oaks Park is located directly across from or adjacent to the property. Residents would therefore have convenient access to open space, trails, natural areas, and outdoor recreation.

Immediate access to a public park is particularly beneficial for children, families, seniors, apartment residents, and people who do not have large private yards. The proximity of the park also helps connect the development to the surrounding community and provides a significant recreational amenity without requiring additional driving.

8. The Site's Topography Supports an Attractive, Site-Responsive Design

The property's sloping terrain creates an opportunity for buildings to step up the hillside rather than appearing as a single large, flat development. A stepped design can respond to the natural grade, reduce the apparent scale of the buildings, and create varied rooflines, courtyards, terraces, and landscaped areas.

Because of the site's orientation, the majority of the homes can have southern exposure, winter sunlight, and territorial views toward the surrounding hillsides, river corridor, and distant landscape. These qualities can make the development an attractive and desirable place to live.

The hillside setting also allows the project to incorporate the architecture and landscaping into the terrain while concentrating development in a location already intended for urban use.

9. Mixed-Use Development Makes Efficient Use of the Property

Combining housing with appropriately scaled ground-floor commercial space would make efficient use of the site and create a more complete neighborhood. Commercial space can provide convenient services for residents, contribute activity at the street level, and create opportunities for small businesses.

The residential and commercial uses can support one another: residents provide customers for nearby businesses, while nearby businesses make the housing more convenient and reduce the need for automobile trips.

10. The Property Is Already Within the Urban Growth Boundary and Intended for Development

Why the Tanner Drive and Blankenship Road Property Is Well Suited for Multifamily Mixed-Use Development

The property is located within West Linn's urban growth boundary and is zoned and otherwise designated for urban development. It is therefore a more appropriate place to accommodate housing growth than farmland, forestland, wildlife habitat, or rural land outside the urban growth boundary.

Developing housing on land already committed to urban use helps:

- Protect farms, forests, and natural areas outside the urban growth boundary.
- Reduce pressure to expand the urban growth boundary.
- Make better use of existing streets, utilities, schools, parks, transit, and public services.
- Limit scattered development and longer vehicle trips.
- Accommodate population growth in a planned urban location.

Using this property efficiently is consistent with Oregon's broader land-use objective of directing growth to areas where urban infrastructure and services are already available.

11. Existing Infrastructure Can Serve the Development

The property is located along established urban streets and near existing water, sanitary sewer, stormwater, electrical, communications, and transportation systems. Although improvements may be needed as part of the project, development at this location can build upon existing public infrastructure rather than requiring an entirely new network of roads and utilities in an undeveloped rural area.

The proposed realignment and improvement of Tanner Drive can also create a safer and more functional intersection, add transportation capacity, and improve pedestrian and vehicular circulation in the area.

12. The Development Can Improve Transportation and Pedestrian Conditions

A coordinated development provides an opportunity to improve the Tanner Drive and Blankenship Road intersection, complete sidewalks, establish safer pedestrian crossings, improve bicycle connections, and create a more orderly street system.

Rather than leaving the site vacant or underdeveloped, the project can deliver transportation improvements that benefit residents, neighboring businesses, park users, transit riders, pedestrians, and the broader community.

13. The Location Can Reduce Dependence on Automobiles

Residents would be able to reach transit, parks, restaurants, shops, public offices, medical services, and portions of the Willamette district without driving long distances. Even residents who own vehicles may be able to complete some daily trips on foot, by bicycle, or by transit.

Why the Tanner Drive and Blankenship Road Property Is Well Suited for Multifamily Mixed-Use Development

Locating housing close to multiple destinations is one of the most effective ways to reduce vehicle miles traveled and the traffic impacts associated with regional growth. The alternative is often to place housing farther from jobs and services, resulting in longer automobile trips through West Linn and surrounding communities.

14. The Development Would Support West Linn Businesses and Employers

New residents would become customers of nearby restaurants, stores, professional services, and other local businesses. They could also provide an important source of employees for businesses that currently have difficulty recruiting workers who can afford to live nearby.

Housing employees closer to their workplaces can reduce commute times, improve employee retention, and strengthen the local economy. A community functions better when at least some of the people who teach in its schools, provide emergency services, staff its businesses, and care for its residents can also live there.

15. The Project Would Support an Inclusive, Multigenerational Community

A healthy community needs homes for people at different stages of life and with different physical and financial needs. Multifamily rental housing can serve young adults, families with children, working households, retirees, veterans, and people with disabilities.

Providing these choices allows people to remain connected to West Linn as their circumstances change. A child raised in West Linn should have a reasonable opportunity to establish a household there. A longtime homeowner should have an option to downsize without leaving friends and family. A teacher, police officer, firefighter, or service worker should have at least some opportunity to live near the community they serve.

Conclusion

The Tanner Drive and Blankenship Road property offers a combination of characteristics rarely found in one West Linn location: transit service, nearby shopping and restaurants, direct access to public services, proximity to a VA clinic and Social Security office, access to parks and schools, established infrastructure, attractive views, and convenient connections to the Willamette district.

Its location within the urban growth boundary makes it an appropriate place to accommodate housing while helping protect farms, forests, wildlife habitat, and rural land elsewhere. Its size and topography allow for a thoughtfully designed community in which buildings can step with the hillside and incorporate landscaping, open space, commercial services, and pedestrian connections.

For these reasons, the property is well suited for multifamily mixed-use development and represents an important opportunity to expand West Linn's housing choices, support local businesses, improve transportation infrastructure, and provide homes for a broader cross-section of the community.

PETITION IN SUPPORT OF THE TANNER DEVELOPMENT

Tanner Holdings LLC | City of West Linn Applications DR-25-04 / LLA-25-02

By signing below, I support approval of the Tanner Holdings LLC applications for a 320-unit multifamily development with approximately 12,000 square feet of ground-level commercial space.

I respectfully ask the City of West Linn to approve the applications as proposed, subject to reasonable conditions, for the following reasons:

1. A safer and more functional street connection.

The proposed Tanner realignment is intended to create an intersection that functions more safely and efficiently than the existing configuration. Once constructed and opened, it will add transportation capacity and on-street parking while preserving the planned roadway width and pedestrian facilities.

2. More housing for people who work in and contribute to West Linn.

The project will add 320 rental homes and expand housing choices for working households, including employees and customers of West Linn businesses who would like the opportunity to remain in or closer to the community.

3. A balanced amount of commercial space that reflects actual market conditions.

West Linn already has vacant storefronts and existing commercial space seeking tenants. The proposal still provides approximately 12,000 square feet of ground-level commercial space, while avoiding an unrealistic requirement that the site be developed primarily for office or retail uses for which market demand has not materialized.

4. Support for existing local businesses and community vitality.

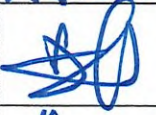
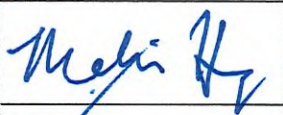
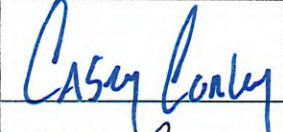
New residents will become customers of nearby shops, restaurants, services, and other West Linn businesses. The mixed-use project will bring new activity to the area and make productive use of the property.

Please approve Applications DR-25-04 / LLA-25-02 and allow the Tanner development to move forward.

SIGNATURES IN SUPPORT OF THE TANNER DEVELOPMENT

Tanner Holdings LLC | Applications DR-25-04 / LLA-25-02

Please print clearly. Email and phone are optional. Information submitted to the City may become part of the public record.

Printed Name	Home or Business Address	Phone (optional)	Signature	Date
Samantha Cropper	1895 Blankenship West Linn OR SUBWAY			7/26/26
Adam Dreher	21500 Salamo Rd West Linn OR Killer Burger			7/31/26
Denise Hughes	2115 8th Ct West Linn, OR Ueli's Chevron			8/3/26
ANITA	21550 Salamo road West Linn OR 97068 Scan Blas			8/3/26
Eric VanVoda	21530 Salamo Rd West Linn OR 97068 Computers iPhones iPads			8/3/26
Melissa Hane	21100 Salamo Rd. West Linn OR 97068 Cascade Summit Pro Cleaners			8/3/26
Wyatt Moyer	21100 Salamo Rd Five Guys 2050 8th Ave West Linn OR 97068			8/3/26
Sustin Dang	2000 8th Ave Ste A, West Linn OR 97068 Kee Lani			8/3/26
Cathy Conley	11945 SE 20th Milwaukee OR 97222 Senior taco	503 358 4625		8/3/26
Sofie Steger	22100 Horizon Dr West Linn OR 97068			8/3/26

*Examples: resident, business owner, employee, property owner, customer, or other community member.

Schroder, Lynn

From: ed.schwarz@gmail.com
Sent: Wednesday, August 5, 2026 3:23 PM
To: Schroder, Lynn
Cc: Greg Hathaway; Roberta Schwarz
Subject: Testimony for DR-25-04/LLA-25-02
Attachments: West Linn Planning Commission ltr re Written Testimony.pdf

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

Lynn,

Please find attached a letter from our attorney, Greg Hathaway, which is being submitted before the deadline of 4 PM today for DR-25-04/LLA-25-02.

Please place this letter in the public record for the subject application.

Please acknowledge receipt of this email.

Thank you,

Ed and Roberta Schwarz
West Linn



HATHAWAY LARSON

July 30, 2026

VIA EMAIL

City of West Linn Planning Commission

Kathryn Schulte-Hillen, Chair

David D. Jones, Vice Chair

Gary Walvatne, Commissioner

Tom Watton, Commissioner

Dan Saltee, Commissioner

Kris Kachirisky, Commissioner

Elizabeth Dietz, Commissioner

c/o Darren Wyss, Principal Planner

22500 Salamo Road

West Linn, OR 97068

dwyss@westlinnoregon.gov

Re: Written Testimony

Modera Mixed-Use Development – File No. DR-25-04/LLA-25-02

Dear Chair Schulte-Hillen and Commissioners:

I represent Ed and Roberta Schwarz and other members of the West Linn community who oppose the proposed realignment of Tannler Drive. The proposed realignment would require vacation of a portion of Tannler Drive and would adversely affect White Oak Savanna Park and its entrances. As of July 28, 2026, the neighbors opposing the proposed realignment and vacation have obtained more than 350 signatures supporting their position.

Gregory S. Hathaway

1125 NW Couch Street, Suite 550

Portland, OR 97209

greg@hathawaylarson.com

(503) 303-3103 Direct

(503) 303-3101 Main

I understand that if the Commission approves the above-entitled development, the approval would be conditioned on either the Applicant filing a petition under ORS 271.080 through ORS 271.160 to vacate a portion of Tannler Drive or the City Council initiating vacation proceedings under ORS 271.130.

I also understand that City staff may conclude that formal vacation of a portion of Tannler Drive is unnecessary. Even if that approach would not technically constitute a “vacation,” it would have the same practical effect. The public would lose an important segment of Tannler Drive used to access White Oak Savanna Park and travel efficiently to Blankenship Road, while traffic would be redirected through the proposed development—which on its face will create unnecessary traffic impacts. The City also would retain an abandoned portion of Tannler Drive that would no longer be usable or maintained. That result would constitute a de facto vacation.

I reviewed the Applicant’s materials, including the TIA prepared by Kittelson and Associates, as well as the Transportation Impact Review prepared by Rick Nys, Principal Traffic Engineer, on behalf of Mr. and Mrs. Schwarz. Based on that review, it is my opinion that any petition to vacate would likely be denied because realigning Tannler Drive and vacating a portion of it would harm or prejudice the public interest.

If no formal vacation is proposed, the practical effect would remain the same: a functional portion of Tannler Drive that serves the public would be removed from public use for the Applicant’s benefit. The Commission therefore should not approve the above-entitled development subject to a condition that would permit that portion of Tannler Drive to be vacated or functionally removed when doing so would harm or prejudice the public interest.

The following findings support the Commission's rejection of the proposed realignment and the resulting vacation or de facto vacation of a portion of Tannler Drive.

PROPOSED FINDINGS OF DENIAL

The following findings support the Commission's rejection of the proposed realignment and the resulting vacation or de facto vacation of a portion of Tannler Drive.

1. The Applicant has not demonstrated that the proposed realignment of Tannler Drive is necessary to comply with the City's Transportation System Plan. Mr. Nys' Transportation Impact Review states that the TSP neither establishes a required roadway alignment nor requires relocation of Tannler Drive.
2. The Applicant's Traffic Signal Warrant Analysis does not demonstrate that the MUTCD Four-Hour Vehicular Volume Warrant is satisfied at the proposed realigned Blankenship Road/Tannler Drive intersection.
3. The Applicant's TIA does not evaluate queuing under the existing Blankenship Road/Tannler Drive configuration. Without that evaluation, the TIA does not establish whether inadequate eastbound right-turn queuing at the Blankenship Road/Salamo Road/10th Street intersection justifies realigning Tannler Drive.

As Mr. Nys states in his Transportation Impact Review: "[B]ecause the TIA does not provide a queuing analysis for the existing roadway configuration, the applicant has failed to establish whether existing or future queues at this location are

acceptable, whether storage capacity is exceeded, or whether the operational concern identified in the TSP would occur with the existing Tannler Drive alignment.”

4. The Applicant has not demonstrated that relocating Tannler Drive is necessary or preferable to the other solutions identified in the TSP. That omission is critical because the proposed realignment would result in the vacation or de facto vacation of a portion of Tannler Drive and will harm or prejudice the public interest. At a minimum, the City should require the Applicant to evaluate all alternatives and demonstrate that the realignment of Tannler Drive is necessary.

Mr. Nys summarized his concern in his Transportation Impact Review: “Before approving such a significant modification to the transportation system, the applicant should demonstrate that the change is necessary and provides transportation benefits that cannot reasonably be achieved through other TSP-consistent improvements.”

5. ODOT does not require the proposed realignment of Tannler Drive or the resulting vacation or de facto vacation of a portion of the roadway. The proposed realignment therefore primarily benefits the proposed development and has not been shown to advance the public’s best interests.
6. The proposed realignment would remove approximately 275 feet of Tannler Drive frontage adjacent to White Oak Savanna Park and close one of the park’s three entrances. The Applicant has not demonstrated that closing a public park entrance for the benefit of the proposed development would serve the public interest.

City of West Linn Planning Commission
July 30, 2026
Page 5

CONCLUSION

Based on the foregoing, Mr. and Mrs. Schwarz and other members of the West Linn community respectfully request that the Commission require the Applicant to redesign the proposed project so that it does not require realignment of Tannler Drive, or the vacation or de facto vacation of any portion of Tannler Drive.

Very truly yours,

HATHAWAY LARSON LLP

/s/ Gregory S. Hathaway

Gregory S. Hathaway

GSH/ep

cc: Clients

Schroder, Lynn

From: Ben Hemson <benh@hbapdx.org>
Sent: Wednesday, August 5, 2026 3:23 PM
To: Wyss, Darren
Cc: Schroder, Lynn
Subject: Testimony for 8/10 PC Meeting
Attachments: Joint Letter 2410-2422-2444 Tannler Drive Residential 08052026.pdf

You don't often get email from benh@hbapdx.org. [Learn why this is important](#)

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

Hi Darren,

Please find a joint letter from our org. along with some partners attached. Hoping this is the correct way to file testimony with the Planning Commission, but if not please let me know.

Thanks again for your help,

Ben

Ben Hemson
Government Affairs Director | Home Building Association of Greater Portland
t 503.603.4505 | m 503.805.1120 | hbapdx.org

From: Wyss, Darren <dwyss@westlinnoregon.gov>
Sent: Monday, August 3, 2026 12:25 PM
To: Ben Hemson <benh@hbapdx.org>
Cc: Schroder, Lynn <LSchroder@westlinnoregon.gov>
Subject: RE: Deadline for Submitting Testimony for 8/10 PC Meeting?

Ben,
Yes, comments on the residential component of the proposal are due by 4:00pm on Wednesday, August 5, 2026. Comments on the commercial component were due last Thursday. Hope this helps. Thanks.

From: Ben Hemson <benh@hbapdx.org>
Sent: Monday, August 3, 2026 12:04 PM
To: Wyss, Darren <dwyss@westlinnoregon.gov>
Subject: Deadline for Submitting Testimony for 8/10 PC Meeting?

You don't often get email from benh@hbapdx.org. [Learn why this is important](#)

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Hi Darren,

We're planning on submitting testimony ahead of next Monday's PC hearing on the Tannler Drive project, I've been told the deadline to submit any comments is this Wednesday but also see on the website that they're accepted until noon on the day of the meeting. Can you let me know which is the correct deadline.

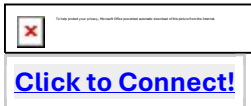
Thanks for your help!

Ben

Ben Hemson
Government Affairs Director | Home Building Association of Greater Portland
t 503.603.4505 | m 503.805.1120 | hbapdx.org

Darren Wyss
Principal Planner
Planning

22500 Salamo Rd.
West Linn, Oregon 97068
dwyss@westlinnoregon.gov
westlinnoregon.gov
503-742-6064



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August 5, 2026

Dear Chair Schulte-Hillen and members of the Planning Commission,

The undersigned organizations represent members engaged in housing production across the Portland Metro region and the state. We urge you to approve the proposed 320-unit multifamily residential development at Tannler Drive scheduled for discussion at your meeting on Monday, August 10. As detailed below, we also request that the public hearing for the commercial component of this project be cancelled.

The proposed development is aligned with the local comprehensive plan, provides easy access to significant transportation infrastructure, has access to parks, and meets West Linn's clear and objective criteria for approval. This is exactly the type of project that HB 4037 sought to bring to market more quickly when adopted during the 2026 Oregon legislative session.

While West Linn's historic development pattern has largely focused on detached single family homes, the city's own adopted 2025 Housing Production Strategy clearly identifies the community need for multifamily development, stating:

"A range of housing types are needed to meet the range of household sizes and incomes. Approximately one-third of new needed homes are projected to be attached housing – this includes about 23% as middle housing units (townhomes and "plexes" with two to four units) and about 14% as multi-family housing (e.g., apartments)."

The 320 homes proposed for this site will serve as vital housing for individuals who already work in West Linn and those to come. They'll provide market-rate housing options in a community where demand continues to outpace supply.

While our comments are focused on the residential portion of the project, we want to express serious concerns about the public hearing being held on the commercial components of the project. HB 4037 expressly prohibits a jurisdiction from requiring a public hearing prior to the approval of *an application* subject to review under ORS 197A.400(1) clear and objective standards. The Tannler Drive application is subject to review under ORS 197A.400(1) clear and objective standards, and therefore the City is in violation of HB 4037 by requiring a public hearing. HB 4037 applies to *all applications* subject to ORS 197A.400(1), regardless of whether a portion of the *project* contains commercial development. Moreover, because the local zoning

code requires ground-floor commercial to allow for multifamily development, the residential and commercial components are legally and physically the same application for the purpose of design review. We urge you to cancel the public hearing because it is in violation of Oregon law.

Concerns and misinformation about the realignment of Tannler Drive, parking, and traffic, amplified by social media, continue to generate public comment in opposition to the project. By allowing these comments to slow down or water down the commercial component, the timeline and viability of the entire project, including the 320 homes our region urgently needs, are jeopardized. We urge the Commission to consider these implications during your discussion and to move forward with approving the project at your August 10 meeting.

Thank you for consideration of our feedback, we look forward to continued partnership as we seek to provide housing options that allow community members of all incomes to have a place to call home.

Sincerely,

Michele Gila
Director Realtor® Advocacy
Portland Metropolitan Association of Realtors

Jodi Hack
CEO
Oregon Home Builders Association

Marc Farrar
Chair, Government Affairs Committee
Home Building Association of Greater
Portland

Jeremy Rogers
General Counsel & Director of Government
Affairs
Oregon Realtors®

Ben Hemson
Director of Government Affairs
Home Building Association of Greater
Portland

Schroder, Lynn

From: Gregg Swanson <gregg@sterling.net>
Sent: Wednesday, August 5, 2026 3:39 PM
To: Schroder, Lynn
Cc: Gregg Swanson
Subject: Submission to Planning Commission (DR-25-04/LLA-25-02)

You don't often get email from gregg@sterling.net. [Learn why this is important](#)

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To: Lynn Schroder

Subject: Public Comment on Tannler development (DR-25-04/LLA-25-02)

(Please acknowledge receipt of this email, and please include in the public record for DR-25-04/LLA-25-02.)

To members of the Planning Commission:

My wife and I live in Madison Heights, West Linn, not far above Interstate 205. We use Blankenship, Salamo, and 10th Street nearly every day for almost everything: groceries, appointments, church, going to the many fine parks in West Linn, events, and more. To us, the idea of adding 320 housing units and commercial space so close to the critical and busy intersections on 10th Street (and Tannler Drive) seems to be very unwise, adding a great deal of traffic and affecting the lives and patterns of a large part of West Linn.

We are not the experts, nor have we studied the hundreds of pages of documents relating to this proposal. And we commend you for undertaking the study of the many complex factors, including traffic.

Please take time to read some key submissions, including: the letters from Andrew Mulkey, attorney, published under Public Comments (pages 230-234 in the pdf file), as well as the excellent report by Greenlight Engineering (beginning on page 196), which highlights many gaps and uncertainties in the applicant's traffic analysis and risks in the plan that could not be remedied after the development is complete. The consequences to local businesses, residents, and travelers and trucks getting on and off Interstate 205 are likely to be severe.

Please also see the comments submitted on behalf of former mayor David Dodds (beginning on page 105 of the pdf) and by Engineering Solutions, Inc. (ESI) beginning on page 161 of the pdf.

Also, please read Brenda Perry's article in last week's West Linn Tidings.

We understand that Oregon needs more housing, but this seems to be a singularly bad place for an ambitious development of this sort. Please give yourselves sufficient time to study all factors carefully.

Respectfully,

Gregg and Doris Swanson
West Linn

Schroder, Lynn

From: Teri Cummings <teric518@gmail.com>
Sent: Wednesday, August 5, 2026 3:48 PM
To: Schroder, Lynn
Subject: Testimony for the record of Application DR-25-04/LLA-25-02
Attachments: Teri Cummings 8_5_26_ testimony for the record of DR_25_04_LLA_25_02.docx

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Dear Ms. Schroder, please add my testimony, attached below, to the record of Application DR-25-04/LLA-25-02.

Thank you,

Teri Cummings

2190 Valley Ct, West Linn, OR 97068

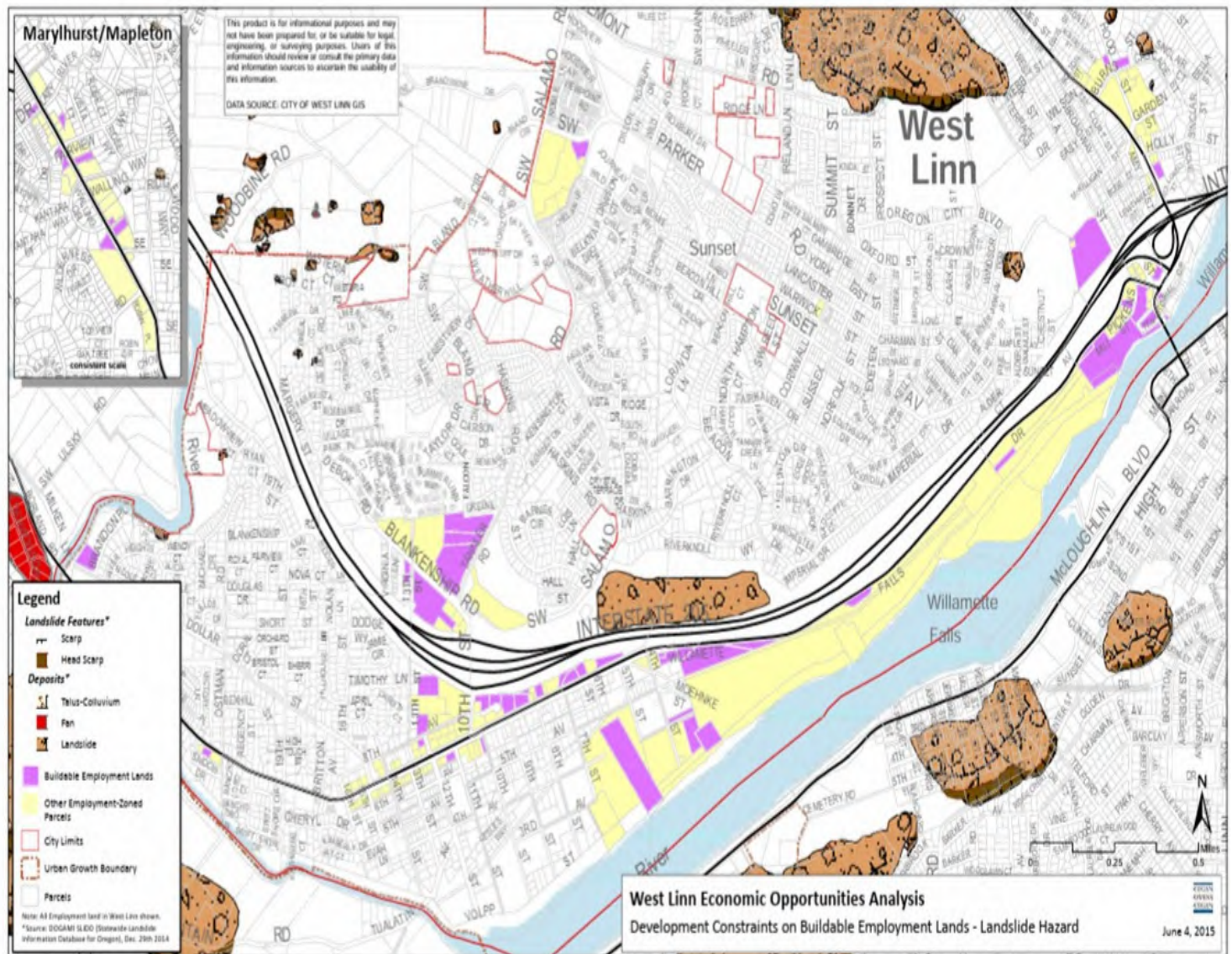
Land Use Application DR-25-04/LLA-25-02

Testimony for the record, submitted by Teri Cummings on August 5, 2026

Dear West Linn Planning Commissioners,

If you believe that livable wage jobs and affordable housing are deeply interdependent, inseparable needs, and you are also aware of West Linn's longstanding colossal imbalance of employment land vs. housing, then I trust you will agree that it would definitely not make sense to sacrifice the only commercially-zoned undeveloped parcel of buildable land, larger than 5 acres in West Linn to produce housing when almost the entire City of West Linn is zoned for housing.

In West Linn's Economic Opportunity analysis map below, the tiny purple parcels are "Buildable Employment Lands" and "Other Employment-Zoned Parcels" are in yellow. West Linn is primarily zoned for Residential Use (white parcels).



In 2015 West Linn adopted an Economic Opportunity Analysis (EOA) that specifically identifies this land subject to the application, at the intersection of Blankenship and Tannler roads, approximately 8.3 buildable acres (11.0 gross acres) as a key component of the I-205/10th Street interchange commercial office business area. This was then incorporated into West Linn’s Comprehensive Plan, 2016 Goal 9- Economic Development Update.

Every West Linn Comprehensive Plan from 1983 to 2025 has identified the need to develop the “I-205/10th Street interchange area as a commercial business area” essential towards meeting West Linn’s need for employment opportunities.

West Linn’s 2025 Comprehensive Plan, GOAL 9- ECONOMIC DEVELOPMENT policies and goals:

- *“Encourage the retention and expansion of existing business and industry¹*
- *Encourage development of new commercial and industrial centers²*

¹ 1983-93 West Linn Comprehensive Plan Goal 9, Economic Development, GENERAL POLICY 1

² 1983-93 Comp Plan, Goal 9, GENERAL POLICY 2

- *Protect existing commercial and industrial development areas from the encroachment of incompatible uses.”³*
- *“Zone sufficient vacant and developed lands to accommodate the expansion of existing businesses.”⁴*

The chart below from West Linn’s July 2015 Economic Opportunity Analysis (EOA), indicates that West Linn barely has enough land to meet current and future employment needs.

Overall Employment Land Need Requirements

After accounting for the level of expected redevelopment activity, the amount of vacant land demand in West Linn for employment uses over the next 20-years is expected to range from 45 to 52 acres. Preliminary estimates for vacant lands needs in West Linn by general building type are provided in Exhibit 26.

Exhibit 26: Vacant Land Needs by General Land Use Classification, West Linn, 2035 Forecast (buildable acres)

Land Use Classification	Scenario A	Scenario B
Commercial/Retail/Office	25	27
Mixed Use	4	5
Institutional	12	10
Industrial	11	3
Total	52	45

Assumptions by FCS Group based on Metro Urban Growth Report assumptions and local observations.

Inventory of Suitable Sites (Land Supply)

Buildable Land Inventory Methodology In accordance with OAR 660-009-0015(3) and OAR 660-009-0025(3)(a)(C), the existing supply of buildable employment zoned land within the West Linn Urban Service Boundary (USB) was inventoried and evaluated as part of the EOA.

*As indicated in Exhibit 27, the City’s preferred Scenario B estimates a demand for 27 acres of net new commercial vacant land and five (5) acres of vacant mixed use land, for a total demand of 32 acres. With a vacant commercial and mixed use land supply of 15.8 acres, **the City has a deficit of 16.2 acres** to meet the expected level of commercial job growth for West Linn. However, this need may be addressed by the surplus of more than 19 acres of redevelopable commercial and mixed use land.*

In light of the limited amount of land available, EOA identified the following Goal and Policy:

EOA Summary: Goal 3- Promote the efficient use of commercial and industrial land adequate to serve a range of employment opportunities in the City. (EOA page 40)

EOA Policy: 1. Preserve employment (commercial and industrial) land to ensure an appropriate mix of uses and jobs-housing balance.

Bottom line: West Linn definitely does not have a surplus of buildable OBC land available.

³ 1983-93 Comp Plan Goal 9, Existing Land Use POLICY 6

⁴ 1983-93 Comp Plan Goal 9, Existing Land Use POLICY 7

West Linn City Council adopted Ordinance No. 1645 on August 8, 2016 to amend the City's Goal 9 Comprehensive Plan according to State statute requirements as follows:

According to OAR 660-015-0000(9), comprehensive plans for urban areas shall:

- ***Include an analysis of the community's economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends; 2 Contain policies concerning the economic development opportunities in the community;***
- ***Provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies;***
- ***Limit uses on or near sites zoned for specific industrial and commercial uses to those which are compatible with proposed uses.***

EOA Exhibit 12 states, "The ratio of households to jobs shows that West Linn residents tend to commute for work. **The City currently averages 2.4 households for every job in the City, far above the ratio for Clackamas County and the Metro Region** (Exhibit 13). According to the Gamma Forecast, the household-to-jobs ratio is expected to decrease for West Linn and stay relatively constant in the county and region. **This forecasted decrease in the household-to-jobs ratio for West Linn would require the city to attract more jobs than households over the next two decades, which is contrary to past City trends.**"⁵

Most of the following EOA recommended uses identified below for business clusters, seem suitable for the Applicant's property:

Recommended Business Clusters⁶

"In light of these findings, we recommend that West Linn focus on retaining and attracting a mix of existing and emerging business clusters that pay above average wages. This includes a mix of existing established and emerging clusters, such as":

- ***Health Services (e.g., medical offices and ambulatory care center)***
- ***Professional and Business services (finance, insurance, engineering, etc.)***
- ***Accommodations, such as hotel(s) and bed and breakfast(s)***
- ***Recreation/sports (could include major community sports complex that attracts regional and state competitive sporting events)***
- ***Light industrial/flex (with mix of commercial, arts and boutique manufacturing operations)***
- ***Home-based occupations***

⁵ [2025 Comp Plan](#) page 14

⁶ [2025 Comp Plan](#) page 22

Exhibit 23: Potential Target Development Types

Potential Development / Building Types	Market Potential	Potential Revenue Generation for West Linn	Potential Job Creation	West Linn Target Market
Lodging	●	●	●	☑
Specialized Retail	●	●	●	☑
Grocery Store	●	●	●	☐
Restaurants	●	●	●	☑
Micro Brewery	●	●	●	☑
Office (Class A)	●	●	●	☑
Medical Office	●	●	●	☑
Light Industrial/Flex	●	●	●	☑
General Industrial	●	●	●	☐
Assisted Living	●	●	○	☑
Recreation / Sports Complex	●	●	●	☑
Legend: Good: ● Fair: ● Poor: ○				

7

On December 14, 2017, West Linn Economic Development Committee voted unanimously as follows against a prior attempt to circumvent the OBC zoning:

“EDC moves to recommend to the City Council, relative to the Tannler Development Agreement, the OBC zoned land be retained as there is a limited supply of commercially zoned land in the city.”

West Linn City Council also rejected Mr. Parker’s proposal for the same reasons.

In Summary: It is critically important to honor the OBC zoning of this property and deny this application and direct the City to encourage the applicant to pursue one or more of the potential development opportunities identified above.

The application must be denied because sacrificing this OBC land to residential use fails to meet the current and future employment needs of the City. We must “Preserve employment (commercial and industrial) land to ensure an appropriate mix of uses and jobs-housing balance” and to “Promote the efficient use of commercial and industrial land adequate to serve a range of employment opportunities in the City” according to West Linn’s adopted 2015 EOA and 2025 Comprehensive Plan.

I think it would be wonderful for West Linn to have a boutique hotel and restaurant at this site which is conveniently located within walking distance to restaurants and other businesses, the White Oak Savanna Park and the Historic Willamette District.

Thank you for your service to the community,

Teri Cummings

Resident of West Linn since 1992 (Address on file)

Schroder, Lynn

From: Scott Zurschmit <scott.zurschmit@verizon.net>
Sent: Wednesday, August 5, 2026 3:49 PM
To: Schroder, Lynn
Subject: Independent Review of the Applicant's Demonstration of Compliance DR-25-04 / LLA-25-02
Attachments: Independent Technical Review of the Applicant's Demonstration of Compliance_.pdf

You don't often get email from scott.zurschmit@verizon.net. [Learn why this is important](#)

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Please submit this as written testimony for the record.

Please confirm receipt and thanks for all you do to keep our city a great place to live.

Scott Zurschmit
Scott.Zurschmit@verizon.net
+1-813-446-8423

Independent Review of the Applicant's Demonstration of Compliance DR-25-04 / LLA-25-02

2410, 2422, and 2444 Tannler Drive and 1800 Blankenship Road

Submitted by: Scott Zurschmit, West Linn resident

To: West Linn Planning Commission

Re: Tannler Drive residential and commercial development applications

Submitted for the planning commission record

I. The Executive Summary

This review does not recommend a particular outcome. Rather, it identifies areas where the record may benefit from additional clarification before the Commission determines whether the applicant has demonstrated compliance with the approval criteria applicable to this application. My hope is that this review assists the Commission in evaluating the record in a fair, objective, and well-informed manner.

II. Framework for Review

Purpose

The purpose of this document is to assist the Planning Commission in evaluating whether the applicant has demonstrated compliance with the approval criteria applicable to this application.

This review is based upon the application materials submitted by the applicant, the applicable provisions of the West Linn Community Development Code and related public improvement standards, and other publicly available planning and engineering references where identified.

This document is not intended to provide legal opinions, engineering opinions, or expert testimony.

Rather, it identifies questions that may assist the Commission in determining whether the evidence presently before it is sufficient to support the affirmative findings required for approval.

Guiding Principles

This review is based upon four guiding principles.

1. The Applicant's Responsibility

The applicant is responsible for demonstrating compliance with the approval criteria applicable to this application through substantial evidence contained within the record.

2. The Commission's Responsibility

The Planning Commission's responsibility is not to redesign the project, nor to evaluate whether different development concepts might also be reasonable.

Rather, its responsibility is to determine whether the applicant has demonstrated compliance with the standards the Commission is required to apply.

3. Distinguishing Private Objectives from Public Responsibilities

The applicant is appropriately entitled to pursue a development that satisfies its operational, financial, and site-planning objectives.

The Planning Commission's responsibility is different.

Its responsibility is to determine whether the proposed development satisfies the applicable public approval criteria.

Private development objectives, standing alone, do not establish compliance with those criteria.

4. Focus of this Review

Accordingly, this review does not attempt to determine whether the proposed development represents good planning policy or whether residential development should occur at this location.

Instead, it focuses on a single question.

Has the applicant demonstrated compliance with the approval criteria applicable to this application through substantial evidence sufficient to support the affirmative findings required of the Planning Commission?

The community code review included with my materials identifies CDC Chapter 92 stormwater standards and concerns regarding the vacation or relocation of Tannler Drive as subjects requiring particular scrutiny.

III. Perspective of the Reviewer

I am a 27-year U.S. Army veteran and have spent nearly two decades leading business development and

preparing technical proposals supporting complex U.S. Government acquisition programs. Throughout my career, I have been responsible for evaluating whether technical submissions provide sufficient evidence to support government decision-making and whether proposed solutions satisfy established evaluation criteria.

That experience has shaped the approach taken in this review. Rather than advocating for a particular outcome, I have attempted to evaluate whether the applicant's submitted materials demonstrate compliance with the approval criteria applicable to this application and to identify areas where additional clarification may assist the Planning Commission in making the affirmative findings required by law. I recognize that the Planning Commission—not the public—is responsible for making those findings. My objective is not to substitute my judgment for that of the Commission, but rather to provide an organized review of the applicant's demonstration of compliance that I hope will assist the Commission in evaluating the record before it.

Although I am not a land use attorney, planner, or professional engineer, my professional background has consistently required me to evaluate complex technical and regulatory submissions against established evaluation criteria and to identify areas where additional information is needed before government decisions are made.

IV. The Residential and Commercial Components Must Be Evaluated as an Integrated Development

The City has chosen to conduct a public hearing on the commercial components while separately deliberating on the residential components. The City's current project page nevertheless continues to describe a single proposal consisting of a 320-unit multifamily development with ground-floor commercial space. It also schedules consideration of both components for August 10, 2026. ([City of West Linn](#))

I object to any review process that separates the applications for decisional purposes while relying on supporting studies prepared for the combined project.

The applicant's June 12, 2026 narrative expressly describes the properties as being developed with a single **mixed-use development**, including residential units and ground-floor commercial space. ([City of West Linn](#)) The project overview describes:

- 320 residential units in ten multifamily buildings;
- garages, a clubhouse, and accessory uses;
- approximately 11,630 square feet of commercial mixed-use space;
- a shared roadway and access system;
- shared internal driveways and walkways;
- connection to the Willamette 205 office development;
- common parking and circulation areas;
- property-line adjustments and lot consolidation; and
- the realignment of Tannler Drive through the development site. ([City of West Linn](#))

The applicant further states that the project's driveway and walkway system will connect with the Willamette 205 office development and that a reciprocal access agreement will be amended after project approval. ([City of West Linn](#)) These are not two physically or operationally

independent developments. They are components of one integrated site plan.

The impacts will likewise not occur separately. Residents and surrounding businesses will experience the combined effects of:

- residential traffic;
- commercial traffic;
- traffic associated with the existing office center;
- relocated existing traffic;
- parking demand;
- pedestrian and bicycle circulation;
- emergency access;
- stormwater runoff;
- utility demand; and
- construction and long-term maintenance.

The Commission should therefore require a clear explanation of what exactly is being approved in each decision and how the City will ensure that the cumulative impacts of the complete development are considered.

Requested findings

Before approving either component, the Commission should require findings addressing:

1. Whether each application can independently satisfy all applicable approval criteria without relying on approval or construction of the other component.
2. Whether the residential application relies on the commercial component for zoning compliance, access, circulation, parking, stormwater management, frontage improvements, utility service, or financing of public improvements.
3. Whether the commercial component relies on residential improvements for access, parking, stormwater detention, utility service, or compliance with frontage and design standards.
4. Whether any approval of one component could effectively predetermine or constrain the City's decision concerning the other component.
5. Whether the supporting studies remain valid when the applications are considered independently.
6. Whether the combined impacts have been evaluated even though the decisions are being processed separately.

Administrative separation cannot change the physical reality that both components occupy the same consolidated site and rely on the same transportation, stormwater, access, and utility systems.

V. The Transportation Analysis Was Prepared for the

Combined Project

The revised Traffic Impact Analysis was not prepared for a stand-alone residential development. Its original scope describes a development of approximately **320 apartments and 15,000 square feet of neighborhood retail space**, with access provided through Blankenship Road and a realigned Tannler Drive. ([City of West Linn](#))

The trip-generation assumptions identified in the study include both:

- 320 mid-rise housing units; and
- 15,000 square feet of retail space. ([City of West Linn](#))

The study therefore confirms that the transportation system was analyzed as a combined residential-commercial project.

This creates an important inconsistency in the City's present review process. The City should not simultaneously:

- rely on a traffic analysis prepared for the combined development;
- treat the realignment, signalization and access modifications as part of that combined development; and
- maintain that the residential and commercial decisions can be considered in isolation.

At minimum, the Commission should identify which transportation improvements are attributable to each component, when each improvement will be constructed, who will fund it, and whether either component can operate safely before the other is completed.

A. The TIA assumes major transportation improvements will occur with development

The TIA states that under background conditions, two City intersections would operate at LOS F and that those conditions would be mitigated through a combination of:

- Tannler Drive realignment;
- turn-lane improvements; and
- signalization assumed to occur in conjunction with site development. ([City of West Linn](#))

This is significant. The project is not merely adding traffic to an adequate transportation system. The analysis acknowledges failing background conditions and relies on a package of assumed improvements to obtain acceptable modeled results.

The Commission should therefore require binding evidence—not merely assumptions—that:

1. All required improvements have been approved by the responsible agencies.
2. Funding is secured.
3. The improvements will be operational before occupancy creates the traffic demand.

4. The improvements remain feasible if the residential and commercial components proceed at different times.
5. Approval of the residential component will not create interim conditions that fail applicable transportation standards.

A model showing acceptable operations after assumed signalization and roadway reconstruction is not equivalent to proof that those improvements will be authorized, funded, constructed and operational when needed.

VI. The Salamo Road Operations Complex Must Be Included in Future Traffic Conditions

The City Operations Complex at 23800 and 23834 Salamo Road is no longer speculative. The Planning Commission made a decision on that application on March 4, 2026, the decision was appealed, and the City's project materials include a transportation assessment and revised Traffic Impact Analysis. ([City of West Linn](#))

The City has also publicly announced that early site work began June 22, 2026. The facility will consolidate Public Works, Streets, Water, Environmental Services, Parks Maintenance, Facilities Maintenance and Fleet Maintenance functions at the Salamo Road location. It will include offices, workshops, storage yards, truck movements, fleet activity, fueling and material storage. ([Your West Linn](#))

Those functions will generate employee, fleet, service, delivery and heavy-vehicle trips in the same broader corridor used by the Tannler development.

I found no explicit reference to the "Operations Center" or "Operations Complex" in the text of the revised Tannler TIA. The only Salamo references I located concern existing transportation facilities, bicycle improvements, study intersections and roadway diagrams. ([City of West Linn](#))

That does not conclusively establish that the Operations Complex trips were omitted; they could be embedded in a generalized growth factor or background-volume calculation. However, the record should not leave this material issue unclear.

Requested requirement

The Commission should require the applicant's traffic engineer and City transportation staff to state on the record:

1. Whether the approved and now-under-construction Operations Complex was specifically included in the 2029 background traffic forecast.

2. How many employee, visitor, fleet, delivery and heavy-vehicle trips were assigned to the study network.
3. Which intersections and roadway movements received those trips.
4. Whether the Operations Complex TIA and the Tannler TIA use compatible baseline counts, growth assumptions and horizon years.
5. Whether the cumulative queue lengths at Blankenship Road, Salamo Road, 10th Street and the I-205 ramps have been evaluated.
6. Whether heavy-vehicle turning movements and slower acceleration were reflected in the analysis.
7. Whether construction traffic from both projects could overlap.

If the Operations Complex was not expressly included, the Commission should require a revised cumulative transportation analysis before approving the Tannler development.

VII. Existing Congestion and I-205 Access Are Material to Code Compliance

My concern regarding traffic is based on regular firsthand use of Blankenship Road, Salamo Road, 10th Street and the I-205 interchange.

The route is already heavily congested during peak periods. Traffic routinely backs up as vehicles approach 10th Street and the interstate ramps. The practical effect of the project will not be limited to the immediate site. Hundreds of new households, commercial customers, delivery vehicles, service vehicles and existing Tannler traffic will move toward the same constrained corridor.

Traffic congestion affects:

- emergency response;
- travel reliability;
- access to neighborhoods and businesses;
- pedestrian safety;
- driver behavior;
- vehicle queuing across driveways and intersections; and
- the feasibility of evacuation or emergency operations.

The TIA's findings depend heavily on assumed lane configurations, signal timing, trip distribution and intersection improvements. Because it recognizes LOS F background conditions at City intersections, the Commission should not approve the project on the basis of generalized assurances that later improvements will solve the problem. ([City of West Linn](#))

The applicant must demonstrate that the required facilities will be adequate at the time the impacts occur.

VIII. Relocation or Vacation of Tannler Drive Requires Independent Code Findings

The proposed development would fundamentally alter the existing public street system. Tannler Drive would no longer connect to Blankenship Road at its present location. Instead, traffic would be redirected through the development and the roadway would meet Blankenship Road opposite the existing Parkrose Hardware access.

The TIA states that, at the direction of City staff, it assumes Tannler Drive will be realigned opposite the Parkrose Hardware/office intersection. It further assumes relocation of the existing office driveway, rerouting of existing office-related traffic and installation of a signal at the new intersection. ([City of West Linn](#))

The analysis therefore does not merely evaluate traffic generated by new housing. It assumes a wholesale reconfiguration of existing public and private travel patterns.

A. The application treats realignment as a settled assumption

The applicant's narrative repeatedly states that Tannler Drive "is required to be realigned" or "is realigned through the site to meet" the Transportation System Plan. ([City of West Linn](#))

The TIA similarly states that the realignment is assumed at the direction of City staff. ([City of West Linn](#))

Those statements do not substitute for findings under the applicable approval criteria. The Commission should determine whether the proposed alignment is actually required, whether it is the only feasible means of implementing the TSP, and whether the public benefits outweigh the impacts of abandoning the current connection.

B. A Transportation System Plan concept is not necessarily a mandate to approve this design

The community code analysis notes that the TSP includes other potential transportation improvements and questions whether relocating Tannler Drive is necessary or primarily facilitates the private development. It also raises code concerns associated with street vacation and the disposition of existing right-of-way.

The Commission should distinguish among:

- a conceptual project shown in the TSP;
- a mandatory approval criterion;
- an engineered and funded public improvement;
- a private development proposal that uses the TSP concept to facilitate its site plan; and
- a formal vacation or disposition of the existing public right-of-way.

The record should establish the legal and procedural mechanism by which the existing street will be closed, relocated or vacated.

C. Required questions regarding Tannler Drive

The Commission should require answers to the following:

1. Is the existing Tannler Drive right-of-way being vacated, partially vacated, abandoned, conveyed or retained?
2. Which decision-making body has authority to approve that action?
3. Is the required street action included in the application presently before the Commission?
4. Have all statutory and City procedures for vacation been initiated and completed?
5. What public need requires removal of the existing connection?
6. What alternatives were evaluated?
7. Why can intersection improvements be made only by routing the public street through private development?
8. Who will own and maintain each segment of the realigned roadway?
9. Will the public retain continuous and permanent access rights?
10. What happens to the residential approval if the street vacation, signal or associated ODOT approval is denied?
11. Can either the residential or commercial development operate independently without the complete realignment?
12. Are the dedication, vacation and property-line actions conditions precedent to development, or are they being deferred until after approval?

Unless the necessary street action is properly before the City and all applicable criteria are satisfied, the Commission should not approve a site plan that depends on it.

IX. The Traffic Study Assumes Rerouting of Existing Traffic Through the Development

The TIA states that its full-buildout analysis reroutes trips to reflect both the Tannler Drive realignment and relocation of office-related trips. ([City of West Linn](#))

This supports my personal concern that existing members of the public will be redirected into or immediately alongside a dense residential and commercial development.

The Commission should require evidence addressing:

- conflicts between through traffic and residents entering parking areas;
- pedestrian crossings across the realigned collector;
- bicycle conflicts;
- sight distance;
- delivery and service vehicle movements;
- emergency access;
- queuing at internal access points;
- impacts of six proposed access points along the realigned road;
- nighttime security and visibility;
- traffic calming; and
- the risk that drivers will seek alternate neighborhood routes when congestion develops.

The project should not be approved merely because modeled intersection delay is acceptable after traffic is reassigned. The access, circulation and safety standards must be satisfied throughout the site and adjoining street system.

X. Stormwater Compliance Has Not Been Adequately Demonstrated

The applicant proposes extensive underground stormwater infrastructure. Its narrative states that:

- underground detention will be installed beneath paved parking areas;
- Contech StormFilter vaults will provide upstream treatment;
- runoff will be routed to R-Tank underground containment systems;
- site runoff will be mechanically treated and detained underground; and
- public right-of-way runoff will be directed to a separate public stormwater planter along Blankenship Road. ([City of West Linn](#))

This approach warrants close review under CDC Chapter 92 and the City's Public Works design requirements.

The community review identifies the City's stated preference for surface stormwater facilities, including vegetated facilities that provide treatment, infiltration, environmental benefit, easier inspection and more accessible maintenance. It notes that underground facilities should not be accepted simply because they allow more of the property to be devoted to buildings and parking.

A. Preference for surface facilities

The applicant should be required to demonstrate why surface facilities are infeasible—not merely less convenient for the proposed site plan.

A development of approximately 11 acres should not be permitted to maximize building and parking coverage by placing major stormwater systems underground unless the applicant proves that:

1. Surface detention and treatment were fully evaluated.
2. Feasible surface alternatives cannot satisfy applicable standards.
3. Underground facilities provide equivalent or superior treatment.
4. Long-term maintenance and inspection are assured.
5. Failure modes and emergency overflow routes are safe.
6. The underground system will not create adverse downstream impacts.

A statement that underground detention is proposed is not an alternatives analysis.

B. Mechanical treatment and long-term maintenance

The proposed system relies on proprietary mechanical treatment vaults and subsurface storage chambers beneath parking areas.

The Commission should require evidence regarding:

- inspection frequency;
- sediment removal;
- filter replacement;
- expected service life;
- access for vacuum trucks and maintenance equipment;
- structural loading from vehicles and fire apparatus;
- procedures when a unit clogs or fails;
- ownership and financial responsibility;
- maintenance during tenant occupancy;
- documentation and reporting to the City;
- replacement costs;
- safe access without removing extensive parking areas; and
- enforceable maintenance obligations running with the land.

Mechanical systems generally require active maintenance. The Commission should not assume that future owners will perform that maintenance without a binding and enforceable program.

C. Failure and overflow conditions

The preliminary design should identify what occurs when:

- rainfall exceeds the design event;
- an inlet is blocked;
- a treatment vault clogs;
- an underground chamber loses capacity;
- a pipe fails;
- power or mechanical systems are unavailable;
- maintenance is delayed; or
- earthquake settlement damages underground facilities.

The site slopes toward Blankenship Road. The Commission should require clear identification of emergency overflow routes and confirmation that overflow will not endanger buildings, sidewalks, parked vehicles, adjoining properties, public streets or downstream systems.

D. Decoupling raises additional stormwater questions

Because the plans were prepared for a single mixed-use development, the Commission should determine whether the residential and commercial components share:

- detention chambers;
- treatment vaults;
- conveyance pipes;
- overflow routes;
- public stormwater facilities;
- grading;
- utility easements;
- access for maintenance; or
- impervious-area calculations.

If one component is constructed without the other, the approved stormwater system must remain complete, functional, maintainable and code-compliant.

The Commission should not approve a residential phase whose drainage design depends upon future commercial construction, nor approve a commercial component that depends upon facilities authorized only through the residential decision.

XI. Integrated Infrastructure Review Applicant's Demonstration

The applicant has submitted multiple technical reports addressing transportation, parking, utilities, grading, stormwater management, public improvements, and related engineering disciplines.

Each report evaluates a specific aspect of the proposed residential development and is intended to demonstrate compliance with the applicable approval criteria.

Collectively, these reports form the technical basis upon which the Commission is being asked to make the affirmative findings required for approval.

Review

Complex developments do not function as independent engineering systems.

Transportation influences site circulation.

Site circulation influences parking.

Parking influences emergency access.

Roadway geometry influences grading.

Grading influences stormwater collection.

Stormwater infrastructure influences utility placement.

Each discipline relies, to some degree, upon assumptions made within the others.

Accordingly, the Commission may benefit from considering not only whether each individual report demonstrates compliance within its own discipline, but also whether the assumptions shared across those reports remain internally consistent and continue to represent the residential application presently before the Commission.

This observation is particularly relevant because the applicant originally proposed an integrated mixed-use development, while the residential and commercial components are now proceeding through separate review processes.

This review does not suggest that separating those applications necessarily invalidates the supporting analyses.

Rather, it recognizes that where technical studies were originally prepared to evaluate an integrated development concept, the Commission may benefit from understanding whether those analyses—and the assumptions upon which they rely—continue to provide an appropriate basis for evaluating the residential application independently.

Similarly, the Commission may benefit from understanding whether other reasonably foreseeable changes within the surrounding transportation corridor, including the planned City Operations Center, were considered where they materially influence the assumptions supporting the submitted analyses.

These observations are not intended to question the professional judgment of the applicant's consultants.

Rather, they reflect the Commission's responsibility to determine whether the evidence presently before it provides a sufficient basis for the affirmative findings required by the applicable approval criteria.

Topics That May Benefit From Additional Clarification

- Were assumptions shared among the various technical reports reviewed for consistency?
- Do the submitted technical reports continue to represent the residential application

- presently before the Commission?
- How were changes in surrounding public infrastructure incorporated into the analyses?
- Were assumptions updated following the separation of the residential and commercial applications?

Question Before the Commission

Has the applicant demonstrated that the technical reports supporting this application remain internally consistent and continue to provide substantial evidence supporting the affirmative findings required for the residential application presently before the Commission?

XII. Parking Adequacy and Foreseeable Spillover

My second major personal concern is parking and public safety.

The residential proposal reportedly provides approximately 1.2 parking spaces per dwelling unit. For 320 units, that amount of parking may not reflect the actual number of vehicles associated with one-, two- and three-bedroom apartments, residents working from home, visitors, delivery vehicles, service contractors and leasing or maintenance staff.

The problem is compounded by the commercial uses, existing office development and shared circulation system.

The TIA states that the relocated office access will also serve Building 8, its surface parking and overflow parking associated with the project. ([City of West Linn](#)) That description reinforces that parking and access are integrated across the development and neighboring office site.

The Commission should determine:

1. How many residential spaces are actually proposed.
2. How many are assigned, reserved or unassigned.
3. How many commercial spaces are required and proposed.
4. Whether residential and commercial parking demand occurs at overlapping times.
5. Whether any shared-parking reduction is being claimed.
6. Whether parking for the existing office center is being removed or relocated.
7. Whether “overflow parking” is formally authorized.
8. Whether tenants will be charged separately for parking, which could discourage use of on-site spaces.
9. Where guests, delivery vehicles and service providers will park.
10. Whether nearby private businesses are expected to absorb excess demand.

I recognize that speculation that a development will “cause crime” is not itself an approval criterion. My concern is more specific: inadequate parking can place large numbers of vehicles in isolated, poorly supervised or unauthorized locations far from their owners. That creates foreseeable security concerns, increases the opportunity for vehicle break-ins and shifts burdens onto surrounding businesses and neighborhoods.

At minimum, the parking and circulation plan should demonstrate that the project will not depend on unauthorized use of nearby streets or private business lots.

XIII. Deferral of Essential Evidence Until After Approval Is Inappropriate

The applicant's narrative frequently states that standards can or will be met through later engineering, construction documents, agreements or permit review.

Some construction details may appropriately be finalized after land-use approval. However, the Commission must have enough evidence now to determine that compliance is feasible and not merely aspirational.

The Commission should distinguish between:

- final engineering details that implement an approved and demonstrated concept; and
- unresolved fundamental issues that determine whether the proposal can comply at all.

The following should not be deferred if they are essential to the approval decision:

- legal authority to relocate or vacate Tannler Drive;
- approval and timing of signalization;
- independent operation of separated project components;
- cumulative transportation impacts;
- inclusion of the Salamo Operations Complex;
- feasibility of required right-of-way improvements;
- adequacy of stormwater treatment and detention;
- safe overflow routes;
- enforceable maintenance access;
- complete parking calculations; and
- ownership and maintenance responsibility for shared facilities.

Conditions of approval should not be used to cure the absence of evidence necessary to find compliance.

XIV. Requested Action

For the reasons discussed throughout this review, I respectfully request that the Planning Commission carefully evaluate whether the applicant has demonstrated compliance with the approval criteria applicable to this application through substantial evidence contained within the record.

Where the Commission determines that additional clarification would assist in making the affirmative findings required for approval, I respectfully request that such clarification be obtained before final action is taken.

This request should not be interpreted as opposition to residential development or to the provision of additional housing within West Linn.

Rather, it reflects my belief that significant public infrastructure decisions—including transportation improvements, relocation of an existing public roadway, stormwater management systems, parking and circulation design, and other long-term public improvements—should be supported by a complete and well-documented demonstration of compliance with the standards applicable to the application before the Commission.

Thank you for your consideration and for your service to the City of West Linn.

XV. Conclusion

I support responsible growth and recognize the need for additional housing. However, responsible growth requires honest evaluation of infrastructure capacity, cumulative impacts and code compliance.

Closing or relocating Tannler Drive and rerouting existing traffic through this development will permanently change how residents access Blankenship Road and I-205. The surrounding transportation system is already heavily burdened. The City is simultaneously constructing a major Operations Complex on Salamo Road that will add employee, fleet, delivery and heavy-vehicle traffic. These projects will not operate in isolation.

Similarly, the residential and commercial components of the Tannler development will not operate in isolation merely because the City processes them separately. They remain physically, functionally and analytically interconnected.

The applicant's own narrative and Traffic Impact Analysis describe one mixed-use development, one realigned roadway system and shared access, parking, circulation and infrastructure. The City should evaluate the project as it will actually function—not as artificially separated pieces.

The applicant has the burden of establishing compliance with the Community Development Code. On the issues of cumulative transportation impacts, the Salamo Operations Complex,

Tannler Drive vacation or realignment, underground stormwater detention and parking adequacy, I do not believe that burden has been met.

I respectfully request denial. At minimum, the Commission should require complete and coordinated evidence addressing these deficiencies before issuing any approval.

This review respectfully recognizes the Planning Commission's responsibility to apply Oregon law and the West Linn Community Development Code while ensuring that the required findings are supported by substantial evidence contained within the record.

Respectfully submitted,

Scott Zurschmit
West Linn, Oregon

I appreciate the considerable time and effort invested by the applicant, City staff, Planning Commission, and members of the public in reviewing this application. It is my hope that this review contributes constructively to that process.

Appendix A

Questions That May Assist Commission Deliberations

Transportation

- Do the transportation analyses continue to represent the residential application following separation of the mixed-use proposal?
 - How were cumulative transportation impacts evaluated?
-

Tannler Drive

- Why was relocation selected over other feasible alignments?
 - How does the applicant demonstrate that the relocated alignment best satisfies the applicable transportation and public improvement criteria?
-

Parking

- How were visitor parking demands estimated?
 - Were CPTED or comparable design principles considered in developing the parking and circulation layout?
-

Stormwater

- How will long-term stormwater performance be verified?
 - How will downstream water-quality objectives continue to be achieved throughout the life of the development?
-

Integrated Infrastructure

- Do assumptions remain consistent across all technical reports?
 - Were assumptions updated following separation of the residential and commercial applications?
-

REFERENCES SUPPORTING WRITTEN TESTIMONY

Tannler Drive Development — DR-25-04 / LLA-25-02

1. [City of West Linn — Tannler Drive project page and complete application record](https://westlinnoregon.gov/planning/2410-2422-2444-tannler-drive-class-2-design-review-and-lot-line-adjustment)
2. [Applicant Submittal — Revised Narrative and Code Findings \(June 12, 2026\)](https://westlinnoregon.gov/sites/default/files/fileattachments/planning/project/57445/001_tannler_drive_narrative_1.pdf)
3. [Applicant Submittal — Revised Traffic Impact Analysis](https://westlinnoregon.gov/sites/default/files/fileattachments/planning/project/57445/008_traffic_study_reduced.pdf)
4. [Applicant Submittal — Revised Preliminary Stormwater Report](https://westlinnoregon.gov/sites/default/files/fileattachments/planning/project/57445/006_prelim_stormwater_report_reduced.pdf)
5. [Applicant Submittal — Revised Civil Plans](https://westlinnoregon.gov/sites/default/files/fileattachments/planning/project/57445/009_civil_plans_reduced.pdf)
6. [City of West Linn — City Operations Complex land-use application, 23800 and 23834 Salamo Road](https://westlinnoregon.gov/planning/23800-23834-salamo-road-conditional-use-permit-class-2-design-review-and-water-resource)
7. [City of West Linn — Operations Complex project information and construction updates](https://yourwestlinn.com/wloc)
8. [Tannler Development Facts — Community information and code-review materials](https://www.tannlerdevfacts.org/)

Note: The hyperlinks above are active in the electronic version. The full web addresses are also printed so reviewers using a paper copy can locate each source. City project pages should be treated as the primary location for the most current application materials and public record.

Schroder, Lynn

From: Andrew Mulkey <andrew@mulkeylegal.com>
Sent: Wednesday, August 5, 2026 3:56 PM
To: Wyss, Darren; Schroder, Lynn
Subject: Fwd: Development Application DR-25-04/LLA-25-02
Attachments: 20260730 FINAL Tannler Apts Comment Ltr.pdf; 20260721 Filed Tannler Apts Adjustment Ltr.pdf; 20260709 Response Ltr to Change in Hearing Process re Tannler Holdings.pdf; 20260805 FINAL Residential Component Comments Tannler.pdf

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

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

Ms. Schroder,

Please accept the attached comments for the record in the residential part of the proceeding for the Tannler apartments. This email includes a proposed findings letter, dated today August 5, and three additional letters from July 30, July 21, and July 9. Please include all the letters in the record, but if these letters are already included, there is no need to include duplicates.

Thank you and please confirm receipt.

Andrew

Andrew Mulkey, OSB 171237
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----- Forwarded message -----

From: Andrew Mulkey <andrew@mulkeylegal.com>
Date: Thu, Jul 30, 2026 at 3:47 PM
Subject: Development Application DR-25-04/LLA-25-02
To: Wyss, Darren <dwyss@westlinnoregon.gov>
Cc: Roberta Schwarz <roberta.schwarz@comcast.net>, Ed Schwarz <ed.schwarz@gmail.com>

Dear Mr. Wyss,

Please accept the following letters for the record in the Tannler Drive Apartment applications, DR-25-04/LLA-25-02 for today's deadline. Please confirm receipt.

As I explain in my letter, I believe the planning staff are wrong to have limited the public's ability to testify and that staff have erred by failing to comply with the requirements in ORS 197.797 for the components of the decision that are separate from the adjustment request and decision.

I am attaching my two prior submissions as well. If these are already considered submitted for the commercial component of the Tannler Drive proceedings, then there's no need to include a second copy in the record. If not, I am providing copies again.

Please let me know if you have any difficulty opening the attached files.

Andrew

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July 30, 2026

Via Email

Darren Wyss, Planner
City of West Linn
22500 Salamo Rd.
West Linn, OR 97068
dwyss@westlinnoregon.gov

Re: Tannler Holdings LLC applications, DR-25-04/LLA-25-02
City File No: 2025-04

Dear Mr. Wyss:

On behalf of Ed Schwarz and Roberta Schwarz and other members of the West Linn Community, please accept the following letter for the record in the proceedings for the Tannler Holdings applications. Please confirm receipt, and please include me, in addition to my clients, in any notice of decision.

The City has decided to split the hearing process between the commercial and residential components of the application. For the reasons explained below, the City staff are misinterpreting and misapplying the law, including ORS 197A.400, SB 1537 (Oregon Laws 2024, chapter 110, section 38, compiled as a note after ORS 197A.395 (2025)), HB 4037, Section 17(5), and ORS 197.195. The applicant must proceed under the design review process required for commercial, mixed-use development, and is not entitled to the clear and objective standards required by ORS 197A.400 or the amendments to the typical land use procedure required by ORS 197.797 and ORS 227.175.

1. Provisions that remove any ability to review the City's decisions in SB 1537, Section 38 and HB 4037, Section 17(5) are unconstitutional.

SB 1537, subsection 38(3) limits "appeal" to the applicant only. HB 4037, subsection 17(5) eliminates a hearing, limits "local appeal only to the applicant," and states that "only the applicant may appeal a decision made under subsection (5)... to the Land Use Board of Appeals." These provisions violate the remedy clause of the Oregon Constitution, and violate participant's right to due process and judicial review.

In *Fasano v. Board of County Commissioners*, the Oregon Supreme Court, explained the basic level of due process afforded to participants in quasi-judicial proceedings. Notably, the Court explained:

“It is not part of the legislative function to grant permits, make special exceptions, or decide particular cases. Such activities are not legislative but administrative, quasi-judicial, or judicial in character. To place them in the hands of legislative bodies, whose acts as such are not judicially reviewable is to open the door completely to arbitrary government.”

Fasano, 264 Or 574, 580 (1973) (quoting *Ward v. Village of Skokie*, 26 Ill2d 415, 186 NE2d 539, 533 (1962)). In this case, the Oregon Legislature has implemented a quasi-judicial decision-making process that seeks to place certain local decisions above judicial review at the expense of the public and nearby property owners. In *Fasano*, the Oregon Supreme Court went on to determine that “[p]arties at [a] hearing before the [local] governing body are entitled to an opportunity to be heard, to an opportunity to present and rebut evidence, to a tribunal which is impartial in the matter... and to a record made and adequate findings executed.” *Id.* at 588.

In this case, the City’s implementation of the adjustment process and HB 4037 seek to change the local zoning code while removing the right to a hearing and the right to judicial review. This represents an attempt by the state legislature to modify the required quasi-judicial components of the land use permitting process. As the Supreme Court explained in *Fasano*, to place permit decisions “in the hands of legislative bodies, whose acts are not judicially reviewable” “open[s] the door to completely arbitrary government.” If, by its own hand, a local government cannot remove its actions beyond judicial review, neither can the state legislature come in to force the local government’s hand to commit actions that the Oregon Supreme Court has determined violate the basic principles of separation of powers and procedural due process.

I have already argued in prior letters (attached below) why the decision to strip away the right to a local appeal hearing and the right to judicial review by HB 4037, subsection 17(5) violates the Oregon Constitution. Those arguments and the holdings in *Fasano* apply with equal force to the City’s attempt to remove the hearings process for the commercial aspects of the application. As explained below, it appears that City staff has misinterpreted and misapplied SB 1537, subsection 38(3). On the basis of upholding the public’s constitutional rights to procedurally fair quasi-judicial land use proceedings, the Planning Commission can remove the state legislature’s thumb on the scale and proceed with the regular hearings process for the application provided by ORS 197.797. The Planning Commission has the authority needed to cure the procedural errors, explained in greater detail below, that have already occurred.

2. The Development of a Mixed-Use Residential and Commercial Development does not Qualify as “Development of Housing” within the Meaning of ORS 197A.400, as amended.

The City’s decision to remove the hearing requirement based on HB 4037, subsection 17(5) and apply only clear and objective criteria misapplies the term “housing development.” In this case, the applicable Office Business Center zone only allows “mixed-use” buildings, which means the structure must contain both residential *and* commercial uses. Within that context, and

by its terms, ORS 197A.400 does not apply. The record shows that HAPO was not willing to state whether the mixed-use buildings allowed in the OBC zone qualify as “development of housing” within the meaning of ORS 197A.400.

The application seeks a commercial, mixed-use development. The OBC zone only allows multi-family housing when in conjunction with and within the same structure as commercial development. For that reason, the proposal does not qualify as the “development of housing” for the purposes of ORS 197A.400 (as amended) and related statutes. Nor is the proposed mixed-use application strictly “an application for housing development.” ORS 227.175(4). Because a required component of those buildings includes a commercial use, the proposed use and application do not fall within the scope of the phrase “development of housing” in ORS 197A.400 or “an application for a housing development” in ORS 227.175(4). *See Roberts v. City of Cannon Beach*, 375 Or 396 (2026). Although the proposed development includes housing, the zone requires commercial development within the proposed structures. Rather than “an application for a housing development,” the applicant has sought an application for mixed-use residential and commercial development. The requirements of ORS 197A.400 as amended, do not apply.

3. The City Misapplies and Misconstrues the Adjustment Process and the Office Business Center Zone

First, and as I have explained in earlier letters, the OBC zone only allows multi-family residential use when that use is included within or combined with the same structure as an allowed commercial use. The Office Business Center (OBC) zone specifically allows “mixed-use” development only, and explains that multiple-family units are allowed “in conjunction with commercial development that utilizes the entire first floor.” CDC 21.050.2. In contrast to the applicant’s proposal, the OBC zone does not allow multi-family residential buildings. *See* CDC 21.030, 21.050, 21.060 (listing the full extent of permitted and conditional uses as well as other development allowed under prescribed conditions).

The non-mixed-use multi-family structures that the applicant proposes are not allowed in the zone because they are not “mixed-use” buildings allowed by the zone. CDC 21.050.2. As the name and purpose of the zone implies, the *Office Business Center* zone does not permit multi-family residential development that does not qualify as “mixed-use.” At most the adjustment process would allow the applicant to adjust CDC 21.050 so that the resulting use remains “mixed use” but removes the requirement that the commercial development portion of the building “utilizes the *entire* first floor.” Reducing, but not eliminating, the commercial use component of the buildings is the only way an applicant could adjust a mixed-use building without running afoul of SB 1537, Section 38 and the provisions of CDC chapter 21.

For that reason, even if the City determined it could grant the applicant’s proposed adjustment to remove all commercial uses from the first floor of a majority of the buildings, the City cannot thereafter approve the resulting multi-family residential proposal because it violates CDC chapter 21. *See* CDC 21.030, 21.050, 21.060 (listing the full extent of permitted and conditional uses as well as other development allowed under prescribed conditions). The resulting residential buildings in the applicant’s adjusted proposal no longer qualify as

mixed-use. Therefore the buildings are not an allowed use within the *Office Business Center* zone. Notably, the adjustment process in Section 38 does not allow the applicant to amend the scope of the uses allowed by CDC chapter 21.

Second, I have explained that the applicant's proposal to completely remove all commercial uses from the first floor of mixed-use violates the adjustment process itself. SB 1537, Section 38. The adjustment process does not allow an applicant to obtain approval for a use not otherwise allowed in the zone. Or Laws 2024, ch 110, § 38(1)(b)(A) (explaining that an adjustment does not include "[a] request to allow a use of property not otherwise permissible under applicable zoning requirements."). On this point, the correspondence from HAPO submitted to the record demonstrates that the agency agrees.

Here, the applicant seeks to obtain a use of the property for multifamily residential structures, which the *Office Business Center* zone does not allow. Subsection 38(1)(b)(A) does not allow the applicant to remove all commercial development within the buildings because the resulting use would no longer qualify as "mixed use." CDC 21.050.2. By completely removing the commercial development from the structure, the applicant's proposed adjustments would result in a residential use that CDC chapter 21 does not allow. Within the meaning of Section 38, the City's OBC zone only allows "mixed-use residential." CDC 21.050.2. The adjustment process does not allow the applicant to completely adjust away the mixed-use component of the building if the zone only allows for mixed-use commercial/residential.¹ For that reason, the applicant's proposal violates Oregon Laws 2024, ch 110, § 38(1)(b)(A) and CDC chapter 21. The City must deny that portion of the applicant's amendment request, and thereafter deny the application.

Third, the City has misapplied the "adjustment process" for the additional following reasons, and the City must deny the applicant's adjustment request. Subsection 38(3) explains that "[a] decision on an application for an adjustment made under this section is a limited land use decision." Oregon Laws 2024, ch 110, § 38(3). The subsection allows a local government to "[d]irectly apply the process set forth in this subsection." *Id.* The City appears to have chosen to directly apply the adjustment process pursuant to the provisions for "limited land use decisions." ORS 197.195.

However, the City has misapplied the limited land use decision process to the application. Subsection 38(3) of SB 1537 only allows a City to apply the limited land use decision process to the adjustment decision. In contrast, here the City has completely removed participating parties' statutory right under ORS 197.797 to participate in a hearing on other, non-adjustment aspects of the application, which are not subject to the limited land use decision process or ORS 197.195.

Those rights include the opportunity for a hearing for a land use permit decision (ORS 227.175) in compliance with ORS 197.797 (ORS 197.797(5), (10)); the right to notice 20 days before an evidentiary hearing (ORS 197.797(3)); the right to a staff report 7 days before a

¹ For example, Subsection 38(2)(e) distinguishes between a "multifamily" development and a "mixed-use residential." Many of the buildings proposed by the applicant have no "mixed-use" component and would be characterized as simply "multifamily." Although Subsection 38 allows an applicant to apply to adjust a mixed-use development, it does not allow an applicant to change that development into "multifamily" when the underlying zone does not allow the merely multifamily use.

hearing (ORS 197.797(3), (4)); the right to raise issues and submit testimony prior to, during, and after the hearing (ORS 197.797(1), (6)); the right to meaningfully rebut evidence (ORS 197.797(6)), and the right to have a hearing notice (and/or staff report) explain the nature of the application, list the applicable criteria, and the applicable procedural requirements (ORS 197.797(3)(b), (3)(j)), and the right to have these materials with sufficient time to provide written comments. These are in addition to the numerous local procedural provisions that the planning staff has violated and failed to implement. CDC 99.080.A.1., E (showing notice requirements for Class II Design Review); CDC 99.090.A and B (stating contents of notice); CDC 99.170 (hearing requirements) (allowing for parties to request to leave the record open).

By increasing the number of procedural arguments, artificially condensing the time to comment on the merits of the site design review to just 14 days with no opportunity to respond in writing, and truncating the parties' hearing rights, the City has improperly and impermissibly violated the parties' substantial rights to participate in the hearing process required by ORS 227.175 and ORS 197.797. *See JIPR v. City of Carlton*, (LUBA 2025-088, July 22, 2026) (slip op at 25) (explaining that a procedural error that "places [a party] in a more difficult posture with a more difficult burden" prejudices that party's substantial rights.). Here, the shortened time-frame for comments, lack of a staff report during the comment period, and the inability to submit additional comments on the site design and other applicable criteria at the hearing or in the days leading up to the hearing deprives the Schwarzes of the ability to fully coordinate their comments among various legal and subject matter experts they have retained. The City also appears to have substituted much of applicable criteria with state law, but failed to provide notice of the applicable criteria or procedural requirements, with no ability for participating parties to tailor their comments to those criteria, procedural standards, or the planning staff's understanding of whether the applicant has met those requirements. ORS 197.797(3)(b), (3)(j), (4)(b). These errors have hampered the Schwarzes' ability to prepare and coordinate their comments.

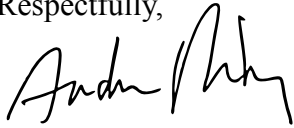
In sum, by applying the limited land use decision to the site design review process and the application as a whole, as opposed to just the adjustment decision, the city has violated the public's substantial rights to participate in the quasi-judicial land use process. The Schwarzes hereby object to the City's misapplication of SB 1537 subsection 38(3) and the limited land use process in ORS 197.195, and request that the Planning Commission continue the hearing for the purpose of correcting the staff's misapplication of state law and local law.

Fourth, the applicant failed to meet the adjustment requirements by providing the information required by SB 1537, subsection 38(2)(g). On the basis of the requirements in subsection 38(2)(g), the applicant only attempts to justify the ground floor commercial use adjustment by stating that "[t]he adjustment[] will increase the number of housing units within the application." Or Laws 2024, ch 110, § 38(2)(g)(C). However, for the remaining six proposed adjustments, the applicant fails to demonstrate how the particular adjustments at issue—(bicycle parking, building height, facade articulation, total window area, building orientation, balcony requirements)—will meet one or more of the requirements in subsection 38(2)(g). On that basis, the applicant has failed to meet its burden, the Planning Commission must deny the adjustment request.

Fifth, the City has misapplied the set-back and adjustment requirements for building 10, which is the building closest to Blankenship Road. Section 21.080 states that the front yard building setback cannot be more than 20 feet maximum. The applicant's architectural drawings show portions of the building 10 setback greater than 20 feet. Not only does that violate CDC 21.080, it also violates SB 1537, subsection 38(4)(g)(D), which does not allow adjustment on the prohibition of residential uses for the face of a building that is within 20 feet of the street.

For those reasons, I respectfully request that the City deny the applicant's request for an adjustment pursuant to SB 1537, and deny the application based on failure to meet the site design criteria and other applicable criteria.

Respectfully,

A handwritten signature in black ink, appearing to read "Andrew Mulkey", with a stylized flourish at the end.

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July 21, 2026

Via Email

Darren Wyss, Planner
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dwyss@westlinnoregon.gov

Re: Tannler Holdings LLC applications, DR-25-04/LLA-25-02
City File No: 2025-04

Dear Mr. Wyss:

On behalf of Ed Schwarz and Roberta Schwarz, please accept the following letter for the record in the proceedings for the Tannler Holdings applications. Please confirm receipt, and please include me, in addition to my clients, in any notice of decision.

The zone for the Tannler Holdings applications does not allow for stand-alone residential uses. For that reason, the applicant cannot obtain approval for, and the City cannot approve, the adjustment sought by the applicant pursuant to Oregon Laws 2024, chapter 110, section 38, *compiled as a note after* ORS 197A.395 (2025). If the City allows the adjustment, then the applicant's proposal violates the requirements of the Office Business Center Zone ("OBC zone"). Even if the city were to approve the adjustment, it could not thereafter approve a use not allowed in the zone, and the city would need to deny the application for the apartment buildings.

Although the adjustment provisions state that they apply to "lands zoned to allow for residential uses, including mixed-use residential," the OBC zone requirements demonstrate that the zone does not allow stand-alone residential uses and only allows for mixed use when the building contains both residential and commercial uses. Or Laws 2024, ch 110, §38(2)(b). Unlike the City's neighborhood commercial zone, the OBC Zone does not list "residential units" as an outright permitted use. *See* CDC 18.030.6; CDC 21.030. The adjustment process does not allow an applicant to obtain approval for a use not otherwise allowed in the zone. Or Laws 2024, ch 110, § 38(1)(b)(A).

The OBC zone is a commercial zone, not a mixed-use residential zone. The zone allows multiple family units only when those units are "in conjunction with" a commercial use. CDC 21.050.2. By completely removing the commercial use for multiple buildings through the adjustment process, the applicant now proposes a stand-alone residential use that the OBC does

not allow. As a result, the applicant seeks “[a] request to allow a use of property not otherwise permissible under applicable zoning requirements.” Or Laws 2024, ch 110, § 38(1)(b)(A). The applicable OBC zone does not allow for stand-alone residential use of the property. CDC 21.030 - 21.060. For that reason, the adjustment process does not apply, and the applicant cannot rely on an adjustment decision for the purpose of overriding the requirements of the OBC zone.

The OBC zone allows a number of uses only “under prescribed conditions.” CDC 21.050. This includes, “[m]ultiple family units *only* above the first floor of the structure, as a mixed use *in conjunction with* commercial development that utilizes the entire first floor.” CDC 21.050.2 (emphasis added). In other words, the zone does not allow stand-alone multi-family dwelling units or stand-alone residential uses. The zone only allows multi-family when “in conjunction with” commercial development that occurs within the same structure. By completely removing all the commercial development from the structure, the proposed apartment buildings no longer qualify as “a use otherwise permissible under applicable zoning requirements.” Or Laws 2024, ch 110, § 38(1)(b)(A).

Notably, the adjustment process only allows an applicant to adjust “[p]rohibitions, for the ground floor of a mixed-use building, against... [r]esidential uses.” Or Laws 2024, ch 110, §38(4)(g)(D). At most the adjustment process would allow the applicant in this case to add additional residential to the first floor of the structure. But the adjustment process does not allow the applicant to completely remove all commercial uses from the building. By completely removing all commercial use from the structure, the building no longer qualifies as “a mixed-use building,” within the meaning of the statute. And as stated above, that means it no longer qualifies as “a mixed use” allowed by the OBC zone. Therefore, by its terms, the provisions in section 38(4)(g)(D), do not apply to the kind of adjustment sought by the applicant. After the adjustment sought by the applicant, the buildings proposed by the applicant no longer qualify as “mixed-use,” and the proposed use no longer qualifies as “a use otherwise permissible under applicable zoning requirements.” *Id.* §38(1)(b)(A).

Because multiple structures and uses proposed by the applicant are not allowed uses within the zone, the City must deny the application. Here, the applicant has proposed 6 apartment buildings that contain only residential development and no commercial development. In addition, the applicant also appears to propose multiple garage structures for residential use that are not associated with the commercial use. For those reasons, the applicant has failed to demonstrate that it meets the requirements of the zone. None of those uses are allowed by CDC 21.050.

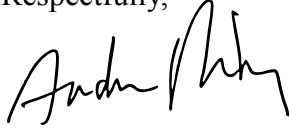
In sum, the OBC zone does not allow stand-alone multi-family residential uses or their accessory structures, it only allows residential use as part of a mixed-use structure. By proposing to completely remove all commercial use from a number of the buildings, the applicant proposes a residential use not allowed in the zone. The applicant’s proposal violates both local code and state law.

Moreover, by limiting participant’s right to appeal, the provisions of Or Laws 2024, ch 110, §38(3) violate participants’ constitutional right to a remedy or the ability to seek judicial review of an unlawful government decision. *Horton v. Oregon Health & Science University*, 359 Or 168,

177-78 (2014) (explaining Smothers and remedy clause, Art. 1, Section 10, Oregon Constitution). For that reason, the city cannot apply those provisions.

For those reasons, I respectfully request that the City deny the applicant's request to approve multiple stand-alone multi-family apartment buildings and their accessory structures in the OBC zone.

Respectfully,

A handwritten signature in black ink, appearing to read "Andrew Mulkey", with a stylized, cursive script.

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July 9, 2026

Via Email

Darren Wyss, Planner
City of West Linn
22500 Salamo Rd.
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dwyss@westlinnoregon.gov

Re: Tannler Holdings LLC applications, DR-25-04/LLA-25-02
City File No: 2025-04

Dear Mr. Weiss:

This letter responds to the applicant's recent letter that requests that the City eliminate its local review and appeal process for the housing portion of the applications for mixed-use commercial and multi-family development as a result of HB 4037, Section 17, which amends ORS 197A.400. The applicant argues that the City can no longer hold a public hearing or provide the public with opportunity for local appeal. The applicant's request would deny the public any ability to comment on a highly controversial mixed-use commercial development. The City is by no means required to comply with the applicant's request, and because the request violates both statute and the Oregon Constitution, the City must deny the request. Applying the amendment's provisions would deprive city residents of any ability to seek judicial review of the City's decision. Such procedures are entirely unnecessary and glaringly unconstitutional.

On behalf of Ed Schwarz and Roberta Schwarz, please accept the following letter for the record in the proceedings for the Tannler Holdings applications. Please confirm receipt, and please include me, in addition to my clients, in any notice of decision.

Applying the provisions of HB 4037, Section 17 to the application at this late stage in the application process violates the statutory requirements for adopting new land use regulations. *See* ORS 197.610 *et seq.* The City cannot create a new review process for the applicant's application without first following the requirements to amend its comprehensive plan and zoning code. Statute prevents the applicant from seeking to create a new set of procedural rules without public notice, public input, or the opportunity for judicial review.

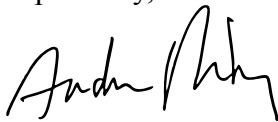
Notably, the applicant's ability provided by the "goal post statute" to request that the city apply newly adopted "standards and criteria" does not apply here. ORS 227.178(3)(a)(B). The provisions in HB 4037 are clearly procedural. The applicant seeks to change the City's notice

requirements, change the hearing procedure, and change the public's appeal rights. However, none of those provisions change any "standards and criteria" that the City must use (pursuant to ORS 227.178(3)) to evaluate whether to approve or deny the application. *See Corporation of the Presiding Bishop v. Klamath County*, 34 Or LUBA 131, 136-37 (1998) (explaining that substantive standards are different from process). For that reason, the goal post statute does not apply to the applicant's request, and the applicant has no ability (much less a right) to demand that the City apply the amendment and change its established rules of procedure.

Finally, the provisions in HB 4037 are blatantly unconstitutional because they deprive members of the public of their right to pursue judicial review of local government decisions. *Horton v. Oregon Health & Science University*, 359 Or 168, 177-78 (2014) (explaining *Smother's* and remedy clause, Art. 1, Section 10, Oregon Constitution). The right to judicial review of government decisions predates the Oregon Constitution, and is currently codified in statute as the writ of review. *See* ORS 34.102 (requiring that local government decisions shall be reviewed "only as provided by" the writ of review process); *Burnett v. Douglas County*, 4 Or 388, 389 (1873) (stating common law origins). The legislature has provided an alternative means of review for land use decisions. *Id.* But the remedy clause of Article 1, Section 10 prevents the legislature from completely eliminating a nearby property owner's rights to judicial review of a land use decision. *Horton*, 359 Or at 177.

If applied in the context of the existing statutory provisions for review HB 4037, Section 17 eliminates an individual's local hearing rights (ORS 197.797) as well as the ability to meet the standing, preservation, and exhaustion requirements needed to maintain a LUBA appeal. That in turn deprives members of the public of their constitutionally guaranteed right to pursue a judicial remedy. For those reasons, the City must deny the applicant's request to change the notice, hearing, and local appeal procedures.

Respectfully,



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August 5, 2026

Via Email

Darren Wyss, Principal Planner
Lynn Schroder, Community Development Analyst
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Re: Tannler Holdings LLC applications, DR-25-04/LLA-25-02
City File No: 2025-04

Dear Mr. Wyss and Ms. Schroder:

On behalf of Ed Schwarz and Roberta Schwarz, and other members of the community, please accept the following letter for the record in the proceedings for the Tannler Holdings applications. Please confirm receipt, and please include me, in addition to my clients, in any notice of decision.

I would like to provide the planning commission with an outline for why the City must deny the application. There are a number of substantive reasons, as well as procedural reasons why the City cannot approve the application.

1. The Planning Commission Has the Authority to Deny the Application Because the Applicant has Proposed a Multi-Unit Residential Use Not Allowed in the Office Business Commercial Zone Pursuant to CDC 21.030, 21.050, and 21.060.

Argument: The applicant's proposed use for buildings ***###—multiple multi-unit residential apartment buildings that do not include any commercial use component—is a residential use. That residential use is *not* allowed in the zone, which at most only allows for “mixed-use” buildings. Instead of mixed-use residential and commercial buildings, the applicant has proposed a residential use only for a number of buildings on the properties. On that basis, the planning commission can deny the application for failure to comply with CDC 21.050(2).

CDC 21.050(2) allows “[m]ultiple-family units only above the first floor of the structure, as a mixed use in conjunction with commercial development that utilizes the entire first floor.”

1. Proposed Findings for CDC chapter 21:

The Office Business Commercial zone does not allow for multi-unit residential buildings unless the buildings contain a commercial component. CDC 21.050.

The applicant has amended its application to completely remove the commercial use component from buildings 1, 2, 3, 4, 5, 6 and 8. Although the applicant relied on provisions in SB 1537, section 38 to amend the code requirement, section 38 does not allow an applicant to use the amendment process to obtain approval for a use that the zone does not otherwise allow. SB 1537 and Oregon Laws 2024, chapter 110, section 38, compiled as a note after ORS 197A.395 (2025). Here, the OBC zone, which is intended for commercial development, does not allow multi-unit residential buildings; the zone only allows “mixed-use” buildings that contain both residential and commercial uses. The zone does not allow stand-alone multi-unit residential buildings. Buildings 1, 2, 3, 4, 5, 6 and 8 are residential only, and are therefore not “mixed-use.” On that basis, the applicant has failed to demonstrate compliance with CDC 21.050, and the Planning Commission must deny the application because the applicant seeks a use that the zone does not allow.

The Planning Commission has the ability to determine—based on the deferential standard allowed to interpret the City’s code—that the applicant’s proposal to completely remove all commercial uses from any part of buildings 1, 2, 3, 4, 5, 6 and 8 results in buildings that no longer qualify as “mixed-use” and therefore results in a residential use that the Office Building Commercial zone does not allow.

Moreover, the Planning Commission can determine that SB 1537 does not allow an applicant to completely eliminate all commercial use from the apartment buildings because the OBC zone only allows, at most, “mixed-use” buildings. The adjustment provisions in state law only allow an applicant to remove a prohibition on first-floor residential use. The Planning Commission can determine that the code in this case does contain a prohibition on first-floor residential use, which the applicant can adjust to allow some first-floor residential use. But in this case, and because the zone only allows, at most, “mixed-use” buildings that contain both commercial and residential components, the applicant cannot completely remove all commercial components from the building as it has proposed and still have a use allowed in the zone.

In addition, and in the alternative, the Planning Commission can determine that CDC 21.050 does not function as a prohibition of residential use on the first-floor subject to adjustment by SB 1537. As written the code allows “multiple-family units” above the first floor of a structure, but only when a commercial development utilizes the entire first floor. As written the code does not allow mixed-use buildings and then prohibit those buildings from including residential use on the first-floor. Instead, the zone only multifamily units on the second floor, subject to the condition that the first floor be entirely commercial. Because the applicant does not meet the condition precedent required for the multiple-family units, the adjusted proposal does not propose a use allowed in the zone.

As the name indicates, the Office Business Commercial zone is not a residential zone. The adjustment process allows the applicant to “adjust” the prohibition on first-floor residential uses,

so long as the underlying zone allows the resulting use. Because the applicant has not preserved any commercial use in any part of buildings 1, 2, 3, 4, 5, 6 and 8, the resulting structures no longer qualify as “mixed-use,” and the OBC zone does not allow standalone, multi-unit apartment buildings.

Because the applicant has proposed purely residential use buildings instead of mixed-use buildings, the Planning Commission must deny the application for failure to propose a use allowed in the OBC zone.

2. The Proposal Does Not Meet the Driveway Requirement in CDC 46.120.

Argument: the applicant proposes a 6,495 square foot clubhouse for use by residents of the various proposed apartment buildings and mixed-use buildings. CDC 46.120 states that “[a]ny school or other meeting place which is designed to accommodate more than 25 people at one time shall provide a 15-foot driveway designed for continuous forward flow of passenger vehicles for the purpose of loading and unloading passengers.”

Here the applicant has proposed a meeting place in the form of a clubhouse (building 11) and community building (building 11) that would be used by residents in the more than 300 apartment units. The application (page 58) explains that the clubhouse is included as part of the “shared recreation space” required for multifamily development. The application (page 14) also describes building 11 as “the Community Building” and explains that it contains a pool.

Based on those facts, the Planning Commission can determine that building 11 contains an “other meeting place,” and therefore must meet the 15-foot driveway loading and drop-off area requirement. The applicant has also failed to provide a description of the use that a building described as a “clubhouse” would not function as a meeting space for more than 25 people. The applicant has not provided any building occupancy codes for the spaces within building 11 to demonstrate that the allowed occupancies for those spaces (1) are not intended for any congregation or grouping of people, and/or (2) that the occupancy limits are less than 25 people for those spaces and the building.

2. Proposed Findings for CDC 46.120:

For the reasons stated above, the applicant has failed to demonstrate that building 11, the pool and clubhouse complies with CDC 46.120. The design plans do not show a 15-foot drive for the building that would allow “for continuous forward flow of passenger vehicles for the purpose of loading and unloading passengers” at building 11. The applicant has also not demonstrated that a building intended to function as a clubhouse and pool for the residents of over 300 apartment units would not function as a “meeting place” for more than 25 people.

That applicant has failed to provide the evidence required to conclude that CDC 46.120 does not apply. And the applicant has not demonstrated compliance with the criterion.

On that basis, the applicant has not met its burden, and the planning commission must deny the application, including the residential component.

3. The Proposal Does Not Meet Design Requirements in CDC 55.130.

The provisions of CDC 55.130 require the applicant to prepare a plan sufficient to indicate that slope stabilization proposals and location and height of retaining walls. CDC 55.130(A). The geologic report required by CDC 55.130(E) must include conclusions and recommendations about the limitations and potential risks of development, including the need for potential future testing and monitoring. Here, the record shows that the Geotech report only evaluates retaining walls less than 10 feet high. Yet the proposal includes retaining walls between 15 and 30 feet in height. The reports indicate that more coring is needed to build retaining walls higher than 10 feet, and that the applicant has not conducted that investigation.

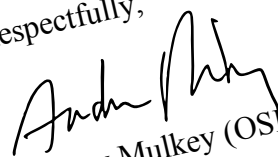
3. Proposed Findings for CDC 55.130:

For the reasons stated above, the applicant has failed to provide information about the limitations and potential risks of development or an assessment of engineering geological conditions and factors required by CDC 55.130(E) because the reports assume lower retaining walls. Because the walls will be higher and more material will be retained behind those walls, and because the applicant has not conducted the additional investigation required, the applicant has failed to demonstrate compliance with CDC 55.130(E).

4. Conclusion.

For those reasons, I respectfully request that the City deny the applicant's request to approve multiple stand-alone multi-family apartment buildings and their accessory structures in the OBC zone.

Respectfully,



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Technical Memorandum

August 5, 2026

Project# 33371

To: Erich Lais, PE & Clark Idle, City of West Linn
John Russell, PE, ODOT Region 1
Jeff Parker, Tannler Holdings, LLC
Lloyd Hill, Hill Architects

From: Julia Kuhn, PE; Jackson Lynch, PE; & Chris Brehmer, PE

RE: Modera West Linn – Public Comment Response Letter

Greenlight Engineering submitted a letter to the City of West Linn Planning Commission dated July 28, 2026 regarding the Modera West Linn Traffic Impact Analysis (herein referred to as the TIA) submitted by Kittelson & Associates, Inc. on June 12, 2026. This memorandum briefly summarizes each of the six primary topics raised in Greenlight Engineering letter in *italic* text followed by our response.

TOPIC 1: ACCESS POINT ANALYSIS

Analysis of public street system site access is needed, including potential access consolidation.

Response: Operations analysis of the eight proposed Tannler Drive motor vehicle access points was prepared to supplement the TIA analysis. Forecast weekday AM and PM peak hour traffic volumes and intersection performance were analyzed for the 2029 full buildout conditions consistent with the TIA methodology and assumptions.

Appendix A to this memorandum includes the following supplemental documentation:

- Figure A-1: Site-Generated Trip Assignment – Tannler Drive Access Points, Weekday AM Peak Hour
- Figure A-2: Site-Generated Trip Assignment – Tannler Drive Access Points, Weekday PM Peak Hour
- Figure A-3: 2029 Total Traffic Conditions – Tannler Drive Access Points, Weekday AM Peak Hour
- Figure A-4: 2029 Total Traffic Conditions – Tannler Drive Access Points, Weekday PM Peak Hour
- Access Operations Worksheets, Weekday AM Peak Hour
- Access Operations Worksheets, Weekday PM Peak Hour

The supplemental analysis demonstrates that the stop controlled approaches at each of the proposed motor vehicle access points operate at level of service (LOS) “B” or better and thus satisfy the City’s LOS standard. Turning and through movements along Tannler Drive are forecast to operate at LOS “A” at each access point during both the weekday AM and PM peak hour analysis periods.

Each of the eight proposed accesses satisfy City of West Linn (City) minimum standard access spacing requirements. Per the Adopted Transportation System Plan (TSP), Tannler Drive is classified as a neighborhood route, which requires a minimum of 50 feet spacing between intersections (TSP Table 15).

The City's Development Code Section 48.060 specifies 75 feet of spacing for collector streets and 30 feet spacing for local streets. As shown in the plans submitted by Harper Houf Peterson Righellis, Inc. (HHPR, Sheet C200) and noted in the Staff Report (Finding 71), all of the proposed access points exceed the minimum collector street spacing standard. We also note that proposed motor vehicle access points are configured in a tiered arrangement reflective of the site topography and provide a minimum of two points of ingress/egress for each building on site.

Further details regarding access configuration design and related sight distance are documented in the civil engineering design plans provided under separate cover by HHPR.

We conclude there is no need to require further consolidation to satisfy City engineering standards and that the City's intersection operational performance metrics are met at each access location. Therefore, no changes to the findings or recommendations in the TIA are needed.

TOPIC 2: SIGHT DISTANCE ANALYSIS

Documentation of intersection sight distance and stopping sight distance analyses is needed.

Response:

As documented on page 25 of the TIA, intersection sight distance documentation at the site access points and along the site frontage will be documented on the civil engineering plans. The TIA recommends that on-site landscaping, signage, and any new above-ground utilities be appropriately located and maintained to provide adequate intersection sight distance per applicable City requirements.

Sight distance documentation has been prepared by HHPR under separate cover.

TOPIC 3: ANGLED PARKING WITH BACKING

Evaluation of the angled parking configuration along Tannler Drive is needed.

Response: This topic is addressed under separate cover by HHPR.

TOPIC 4: TANNER DRIVE REALIGNMENT COMPLIANCE WITH THE TRANSPORTATION SYSTEM PLAN

Tanner Drive realignment is not demonstrated to be necessary to comply with the City's Transportation System Plan (TSP) and is not a requirement of the Oregon Department of Transportation (ODOT).

Response: The realignment of Tanner Drive is identified as a standalone, medium-priority project in Table 24 (Motor Vehicle Plan Projects) of the adopted 2016 West Linn TSP (City Ordinance No. 1646) as shown in Exhibit 1 below.

Exhibit 1. City of West Linn TSP Table 24 Excerpt

Table 24: Motor Vehicle Plan Projects				
Project Number	Location	Description	Priority	Cost (\$1,000)
<i>City of West Linn Facility Projects</i>				
M1	Rosemont Road/ Hidden Springs Road	Install a traffic signal with northbound/southbound left turn lanes on Rosemont Road when warranted	Medium	\$800
M2	Tannler Street Realignment	Realign Tannler Street at Blankenship Road to align with the driveway located approximately 350 feet west	Medium	\$900

Image Source: West Linn TSP, page 93, available on-line at: [Ordinance 1646 West Linn TSP](#)

Further, Figure 16 of the TSP shows the potential realignment of Tannler Drive as part of the list of Motor Vehicle Plan Projects (refer to Exhibit 2 below).

Exhibit 2. City of West Linn TSP Figure 16 Excerpt

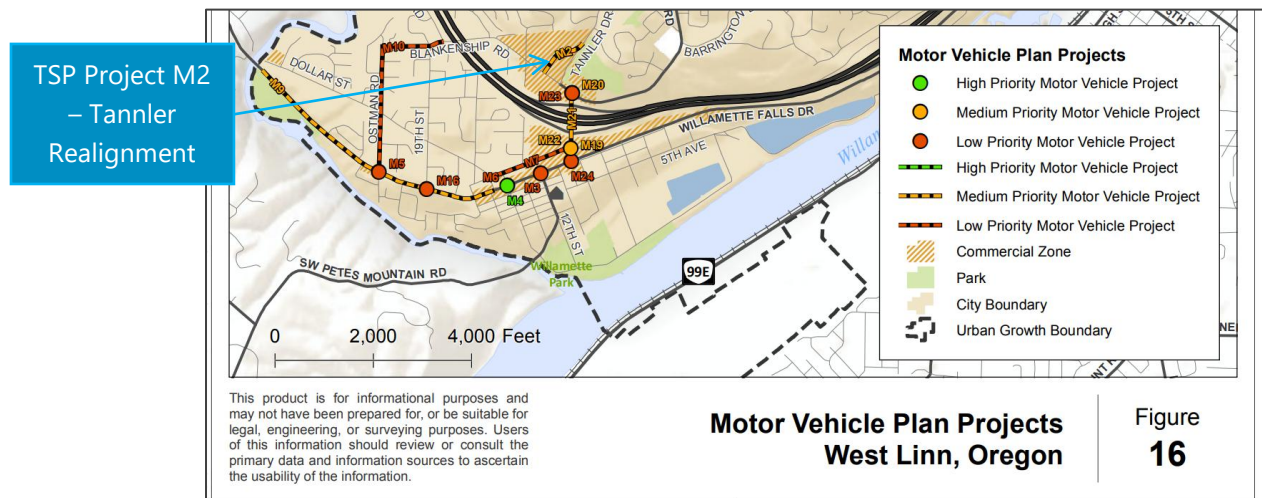


Image Source: West Linn TSP, page 95, available on-line at: [Ordinance 1646 West Linn TSP](#)

There is approximately 190 feet of eastbound travel lane storage between the eastbound right-turn lane stop bar on Blankenship Road at 10th Street and the Tannler Drive intersection. Today, eastbound queues on Blankenship Drive extend to or past the Tannler Drive intersection during both the weekday AM and PM peak hours (95th percentiles queues extend approximately 275 feet west of 10th Street during the weekday AM peak hour and approximately 500 feet west of 10th Street during the weekday PM peak hour as documented in the TIA technical appendix). The eastbound queues impact the ability for drivers southbound on Tannler Drive in its existing alignment to turn left onto Blankenship Road. Further, the southbound Tannler Drive approach at the Blankenship Road/Tannler Drive intersection operates with delays corresponding to LOS "F" during the weekday PM peak hour. The proposed realignment of Tannler Drive and signalization of the realigned Blankenship Road/Tannler Drive intersection in conjunction with site development moves the Tannler Drive intersection west away from the standing queues and mitigates the existing failing southbound LOS "F" condition during the weekday PM peak hour.

The proposed development project represents an opportunity for the City to realize project TSP M2 in the near term and to leverage private delivery of the new roadway as well as related pedestrian and bicycle facilities. City staff have directed the Applicant to incorporate TSP project M2 into the development proposal and the proposed land use application reflects a collaborative effort between the City and Applicant to do so.

TSP Project M23 cited in the Greenlight Engineering letter is another medium priority Motor Vehicle Plan project that involves the addition of dual left-turn lanes on the westbound and northbound approaches to the 10th Street/Blankenship-Salamo Road intersection. TSP Project M23 also includes the potential addition of a second exclusive right turn lane to the eastbound approach to the intersection if necessary to address queuing (the TSP states the need for this second right turn lane would be eliminated by realigning Tannler Drive with the commercial driveway located approximately 350 feet west of its current alignment). Implementation of TSP Project M23 requires changes to Blankenship Road west of 10th Street to accommodate a second northbound left-turn receiving lane, widening of Salamo Road to provide a second westbound left-turn lane, and likely changes to 10th Street south of the intersection to accommodate the two westbound left-turn lanes. These improvements are arguably beyond the ability of the proposed development to reasonably deliver and are unnecessary in conjunction with site development to provide acceptable operations and accommodate forecast queuing at the study intersections. Additionally, changes to Blankenship Road west of 10th Street would not mitigate the existing failing southbound LOS "F" condition during the weekday PM peak hour on Tannler Drive.

The proposed Tannler Drive realignment would deliver a key element of the City of West Linn TSP motor vehicle plan as well as supporting facilities for people walking, biking and rolling. The proposed realignment would:

- Relocate and signalize the existing Tannler Drive approach to Blankenship Road intersection in a manner that:
 - Improves southbound left-turn access from Tannler Drive onto Blankenship Road (mitigates and existing LOS "F" during the weekday PM peak hour);
 - Increases the distance between Tannler Drive and 10th Street, allowing for additional eastbound storage on Blankenship Road between Tannler Drive and 10th Street;
 - Reduces potential turn movement interaction at the existing River Falls Shopping Center access aligned with the existing Tannler Drive by removing the existing north intersection approach;
 - Provides new signalized access to the River Falls Shopping Center;
 - Provides for new signalized pedestrian crossings north-south across Blankenship Road at the re-aligned Tannler Drive; and
 - Per page 91 of the City TSP, eliminates the need for a second exclusive right turn lane to the eastbound approach to the 10th Street/Blankenship-Salamo Road intersection (reduces the potential cost and complexity of TSP Project M23).
- Provides sidewalk and bicycle facilities on Tannler Drive north of Blankenship Road that link to existing sidewalk near Greene Street (introducing new places to walk and bike along Tannler Drive where there no sidewalks or striped bicycle lanes today)

- Allows for continued access to White Oak Savanna Park. Per the plans prepared by HHPR, upon realignment of Tannler Drive, the existing southern section will be rebuilt within the existing right-of-way as a local, public street including parking and sidewalks to provides for access to White Oak Savanna Park. This new public road within the old Tannler Drive right-of-way will terminate just north of the existing intersection with Blankenship Road and will intersect with Tannler Drive per the HHPR plans.

Based on the above, we continue to conclude that the realignment of Tannler Drive is consistent with the TSP adopted project list and supports the near-term and longer-term travel needs for all users. Therefore, no changes to the findings or recommendations in the TIA are required.

TOPIC 5: TRAFFIC SIGNAL WARRANT ANALYSIS

The MUTCD four-hour vehicular volume warrants conclusion is not supported by sufficient data.

Response: The preliminary traffic signal warrant evaluation presented in the TIA is a planning-level analysis to assess whether a traffic signal is anticipated to be warranted in the year 2029 future condition when background growth is realized and site trips are added. Appendix B of this letter contains further documentation of the MUTCD Four-Hour Vehicular Volume Warrants. As shown in the appendix, the forecast minor street southbound approach traffic volumes in conjunction with the major street traffic volumes are projected to satisfy MUTCD Warrant 2 during the hours of 7-8 AM, 8-9 AM, 4-5 PM and 5-6 PM. Therefore, no changes to the findings or recommendations in the TIA are required.

Additional periods of a typical weekday may also satisfy traffic signal warrants. Should the City choose to do so, a condition of approval could be placed on the development to provide additional traffic signal warrant analysis prior to activation of the proposed traffic signal.

TOPIC 5: BICYCLE TRANSITION AND MULTIMODAL SAFETY

Additional documentation is needed to demonstrate how the proposed multi-use path integrates with existing pedestrian and bicycle facilities.

Response: This topic is addressed by HHPR under separate cover.

TOPIC 6: INCLUSION OF PLANNED DEVELOPMENTS

The applicant should be required to coordinate with the City of West Linn and ODOT to confirm whether any additional planned or approved developments exist within the study area that may contribute to background traffic conditions.

Response: The TIA scope and assumptions were coordinated with City of West Linn and ODOT staff. Both agencies confirmed that no in-process trips were approved at the time of scoping. The West Linn Public Works Operations Complex has since been reviewed and approved by the City.

To be responsive to the comment, year 2029 weekday AM and PM peak hour total traffic conditions were re-analyzed to include peak hour trips from the now-approved Operations Complex. This change added

16 trips to the weekday AM peak hour volumes and 5 trips during the weekday PM peak hour¹. Conservatively assuming all of the projected Operations Complex trips traveling to/from the south on Salamo Road are destined to/from the I-205 interchange area, the Blankenship Road/Salamo Road/10th Street intersection continues to satisfy ODOT's mobility target. Appendix C shows the operational results of the AM and PM total traffic conditions with trips from the now-approved Operations Complex.

Based on this supplemental analyses, no changes to the findings or recommendation in the TIA are required.

NEXT STEPS

Based on our review of the topics addressed above, the Modera TIA findings and recommendations remain appropriate.

Please contact us if you have any questions or comments regarding the contents of this memorandum or the analyses performed.



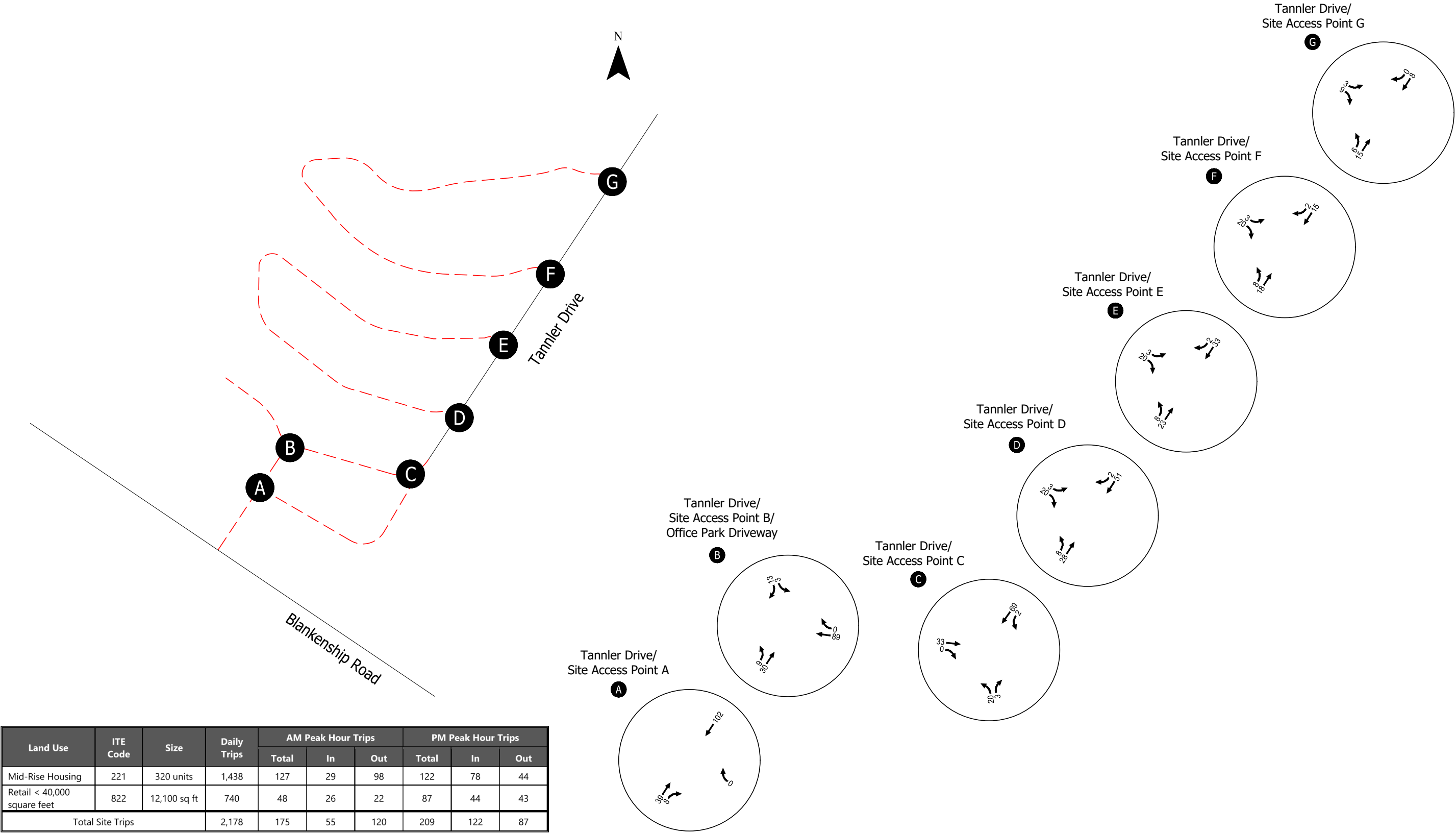
¹ The Operations Complex traffic impact analysis documented analysis at the site access and the intersection directly to the north along Salamo Road. In order to be conservative, all in-process Operations Complex site trips traveling to/from Salamo Road to the south were assumed to travel on 10th Street (and thus demonstrate maximum potential impact to the critical westbound left-turn movement at the intersection). The trips were then assumed to travel southbound along 10th Street.

During the AM peak hour, four vehicles were added traveling north on Salamo Road, and 12 vehicles were added turning south along Salamo Road. During the PM peak hour, one vehicle was added traveling north on Salamo Road and four vehicles were added traveling south on Salamo Road. The additional Operations Complex trips have an incremental impact on study intersection operations and the ODOT mobility targets continue to be satisfied.

Appendix A

Site Access Operational Analysis

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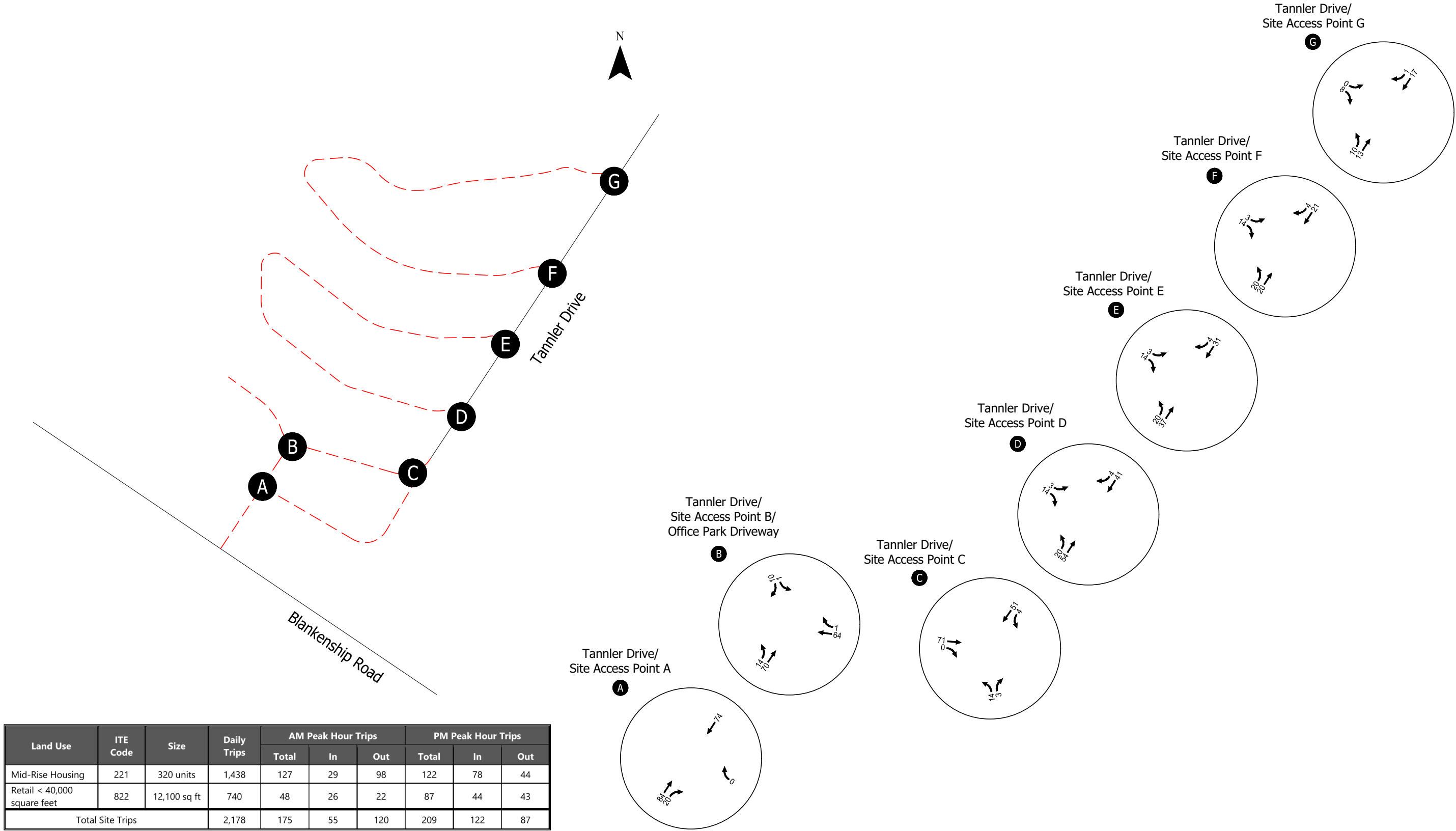


--- FUTURE PROPOSED ROAD REALIGNMENT/DRIVEWAY

Site-Generated Trip Assignment - Tannler Drive Access Points
Weekday AM Peak Hour
West Linn, OR

Figure
A-1

C:\Users\jlynch\appdata\local\temp\AcPublish_30412\33371 Figures.dwg Aug 05, 2026 - 9:46am - jlynch Layout Tab: A-2 Dwy PM Trips

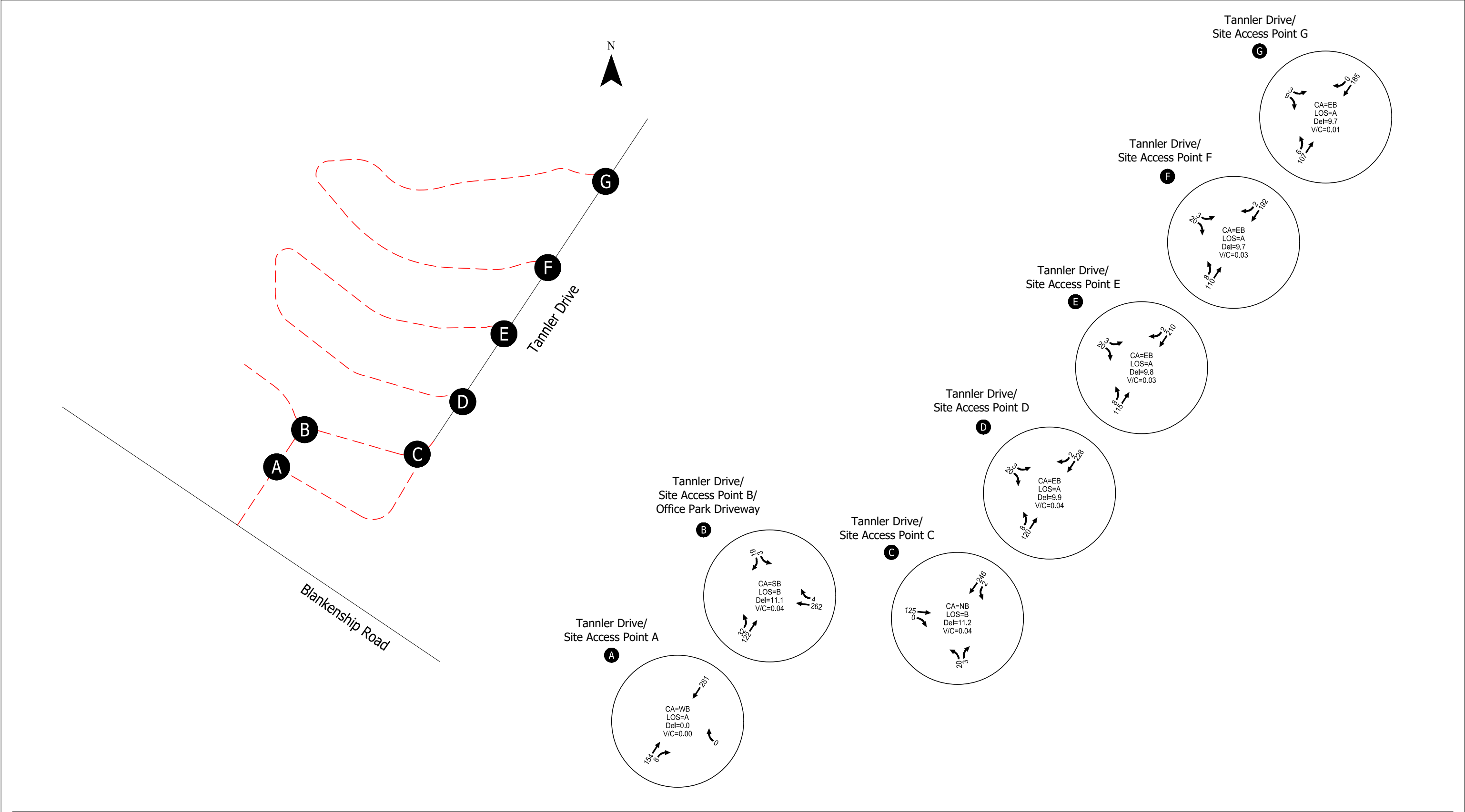


Land Use	ITE Code	Size	Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
				Total	In	Out	Total	In	Out
Mid-Rise Housing	221	320 units	1,438	127	29	98	122	78	44
Retail < 40,000 square feet	822	12,100 sq ft	740	48	26	22	87	44	43
Total Site Trips			2,178	175	55	120	209	122	87

--- FUTURE PROPOSED ROAD REALIGNMENT/DRIVEWAY

Site-Generated Trip Assignment - Tannler Drive Access Points
Weekday PM Peak Hour
West Linn, OR

Figure
A-2

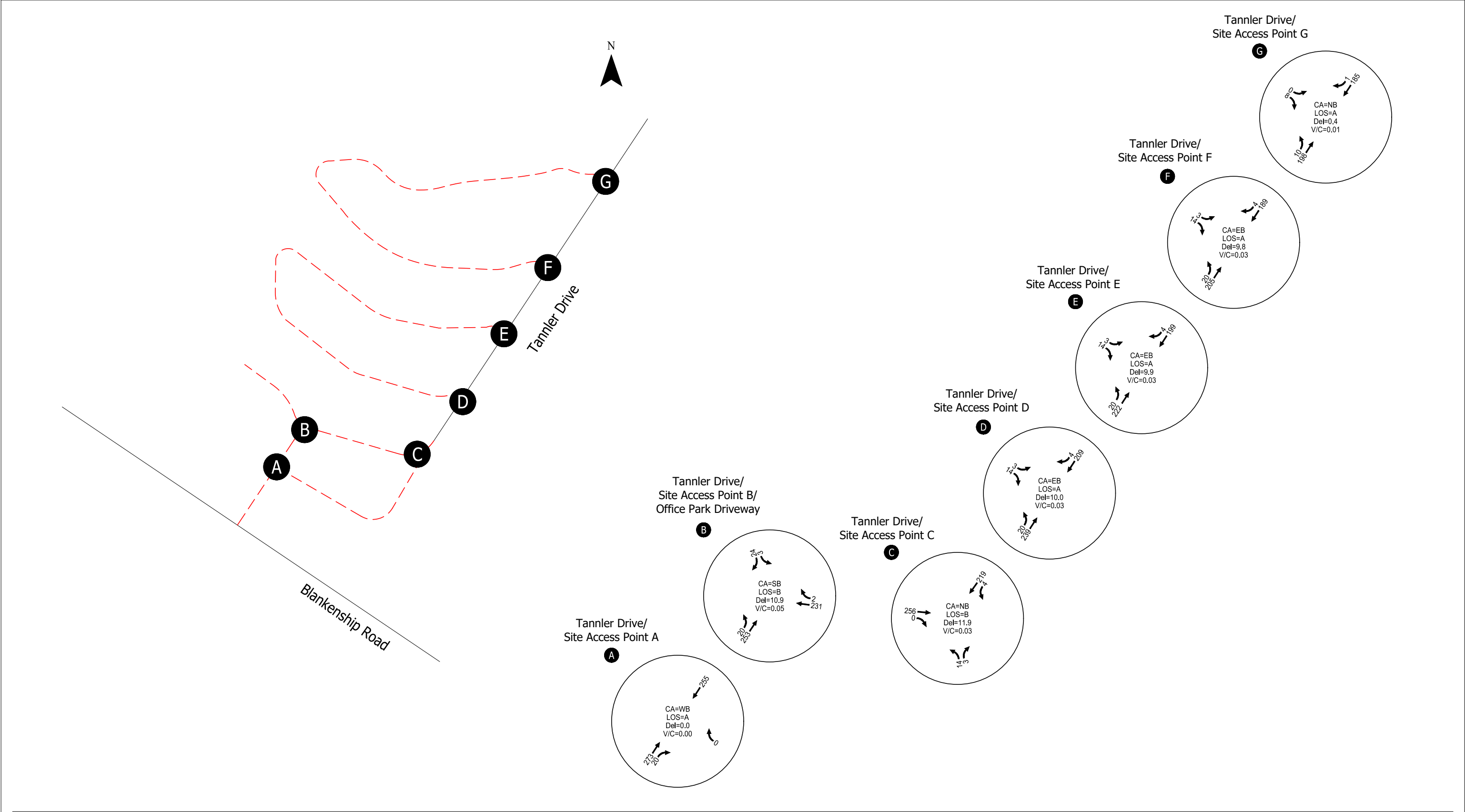


CA = CRITICAL APPROACH (TWSC)
LOS = CRITICAL APPROACH LEVEL OF SERVICE (TWSC)
Del = CRITICAL APPROACH CONTROL DELAY (TWSC)
TWSC = TWO-WAY STOP CONTROL

--- FUTURE PROPOSED ROAD REALIGNMENT/DRIVEWAY

Total 2029 Traffic Conditions - Tannler Drive Access Points
Weekday AM Peak Hour
West Linn, OR

Figure
A-3



CA = CRITICAL APPROACH (TWSC)
LOS = CRITICAL APPROACH LEVEL OF SERVICE (TWSC)
Del = CRITICAL APPROACH CONTROL DELAY (TWSC)
TWSC = TWO-WAY STOP CONTROL

--- FUTURE PROPOSED ROAD REALIGNMENT/DRIVEWAY

Total 2029 Traffic Conditions - Tannler Drive Access Points
Weekday PM Peak Hour
West Linn, OR

Figure
A-4

Intersection Level Of Service Report**Intersection 7: Realigned Tannler Drive/Site Access Point A**

Control Type:	Two-way stop	Delay (sec / veh):	0.0
Analysis Method:	HCM 7th Edition	Level Of Service:	A
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.003

Intersection Setup

Name	Realigned Tannler Drive		Realigned Tannler Drive		Site Access Point A	
Approach	Northbound		Southbound		Westbound	
Lane Configuration						
Turning Movement	Thru	Right	Left	Thru	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	10.00		10.00		10.00	
Grade [%]	15.00		-15.00		0.00	
Crosswalk	No		No		Yes	

Volumes

Name	Realigned Tannler Drive		Realigned Tannler Drive		Site Access Point A	
Base Volume Input [veh/h]	154	8	0	281	0	0
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	2.00	1.00	2.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	154	8	0	281	0	0
Peak Hour Factor	0.8900	0.8900	1.0000	0.8900	1.0000	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	43	2	0	79	0	0
Total Analysis Volume [veh/h]	173	9	0	316	0	0
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.00	0.00	0.00	0.00	0.00	0.00
d_M, Delay for Movement [s/veh]	0.00	0.00	0.00	0.00	0.00	8.77
Movement LOS	A	A		A		A
95th-Percentile Queue Length [veh/ln]	0.00	0.00	0.00	0.00	0.00	0.00
95th-Percentile Queue Length [ft/ln]	0.00	0.00	0.00	0.00	0.00	0.00
d_A, Approach Delay [s/veh]	0.00		0.00		8.77	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.00					
Intersection LOS	A					

Intersection Level Of Service Report

Intersection 8: Tannler Drive/Site Access Point B

Control Type:	Two-way stop	Delay (sec / veh):	11.7
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.005

Intersection Setup

Name	Realigned Tannler Drive		Site Access Point B		Realigned Tannler Drive	
Approach	Northbound		Southbound		Westbound	
Lane Configuration						
Turning Movement	Thru	Right	Left	Thru	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	10.00		10.00		30.00	
Grade [%]	4.00		0.00		-4.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Realigned Tannler Drive		Site Access Point B		Realigned Tannler Drive	
Base Volume Input [veh/h]	32	122	3	19	262	4
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	0.00	0.00	1.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	32	122	3	19	262	4
Peak Hour Factor	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	9	34	1	5	74	1
Total Analysis Volume [veh/h]	36	137	3	21	294	4
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Stop	Free
Flared Lane			
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance		No	
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.03	0.00	0.01	0.03	0.00	0.00
d_M, Delay for Movement [s/veh]	7.90	0.00	11.73	11.06	0.00	0.00
Movement LOS	A	A	B	B	A	A
95th-Percentile Queue Length [veh/ln]	0.47	0.47	0.12	0.12	0.00	0.00
95th-Percentile Queue Length [ft/ln]	11.71	11.71	3.07	3.07	0.00	0.00
d_A, Approach Delay [s/veh]	1.64		11.14		0.00	
Approach LOS	A		B		A	
d_I, Intersection Delay [s/veh]	1.11					
Intersection LOS	B					

Intersection Level Of Service Report
Intersection 9: Tannler Drive/Site Access Point C

Control Type:	Two-way stop	Delay (sec / veh):	11.3
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.037

Intersection Setup

Name	Site Access C		Tannler Drive		Realigned Tannler Drive	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	10.00		30.00		10.00	
Grade [%]	0.00		-4.00		4.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Site Access C		Tannler Drive		Realigned Tannler Drive	
Base Volume Input [veh/h]	20	3	2	246	125	0
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	0.00	1.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	20	3	2	246	125	0
Peak Hour Factor	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	6	1	1	69	35	0
Total Analysis Volume [veh/h]	22	3	2	276	140	0
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Stop	Free	Free
Flared Lane			
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance	No		
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.04	0.00	0.00	0.00	0.00	0.00
d_M, Delay for Movement [s/veh]	11.31	10.02	7.48	0.00	0.00	0.00
Movement LOS	B	B	A	A	A	A
95th-Percentile Queue Length [veh/ln]	0.13	0.13	0.70	0.70	0.00	0.00
95th-Percentile Queue Length [ft/ln]	3.20	3.20	17.62	17.62	0.00	0.00
d_A, Approach Delay [s/veh]	11.15		0.05		0.00	
Approach LOS	B		A		A	
d_I, Intersection Delay [s/veh]	0.66					
Intersection LOS	B					

Intersection Level Of Service Report
Intersection 10: Tannler Drive/Site Access Point D

Control Type:	Two-way stop	Delay (sec / veh):	11.2
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.005

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point D	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	13.00		-13.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point D	
Base Volume Input [veh/h]	8	120	228	2	3	20
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	8	120	228	2	3	20
Peak Hour Factor	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	2	34	64	1	1	6
Total Analysis Volume [veh/h]	9	135	256	2	3	22
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.01	0.00	0.00	0.00	0.01	0.03
d_M, Delay for Movement [s/veh]	7.74	0.00	0.00	0.00	11.19	9.74
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.02	0.02	0.00	0.00	0.10	0.10
95th-Percentile Queue Length [ft/ln]	0.38	0.38	0.00	0.00	2.56	2.56
d_A, Approach Delay [s/veh]	0.48		0.00		9.91	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.74					
Intersection LOS	B					

Intersection Level Of Service Report

Intersection 11: Tannler Drive/Site Access Point E

Control Type:	Two-way stop	Delay (sec / veh):	11.0
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.005

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point E	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	13.00		-13.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point E	
Base Volume Input [veh/h]	8	115	210	2	3	20
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	8	115	210	2	3	20
Peak Hour Factor	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	2	32	59	1	1	6
Total Analysis Volume [veh/h]	9	129	236	2	3	22
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.01	0.00	0.00	0.00	0.00	0.03
d_M, Delay for Movement [s/veh]	7.70	0.00	0.00	0.00	10.98	9.61
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.02	0.02	0.00	0.00	0.10	0.10
95th-Percentile Queue Length [ft/ln]	0.38	0.38	0.00	0.00	2.49	2.49
d_A, Approach Delay [s/veh]	0.50		0.00		9.78	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.78					
Intersection LOS	B					

Intersection Level Of Service Report
Intersection 12: Tannler Drive/Site Access Point F

Control Type:	Two-way stop	Delay (sec / veh):	10.8
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.005

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point F	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	13.00		-13.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point F	
Base Volume Input [veh/h]	8	110	192	2	3	20
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	8	110	192	2	3	20
Peak Hour Factor	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	2	31	54	1	1	6
Total Analysis Volume [veh/h]	9	124	216	2	3	22
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.01	0.00	0.00	0.00	0.00	0.03
d_M, Delay for Movement [s/veh]	7.65	0.00	0.00	0.00	10.78	9.49
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.02	0.02	0.00	0.00	0.10	0.10
95th-Percentile Queue Length [ft/ln]	0.38	0.38	0.00	0.00	2.42	2.42
d_A, Approach Delay [s/veh]	0.52		0.00		9.65	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.82					
Intersection LOS	B					

Intersection Level Of Service Report
Intersection 13: Tannler Drive/Site Access Point G

Control Type:	Two-way stop	Delay (sec / veh):	10.6
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.005

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point G	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	11.00		-11.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point G	
Base Volume Input [veh/h]	6	107	185	0	3	9
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	6	107	185	0	3	9
Peak Hour Factor	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	2	30	52	0	1	3
Total Analysis Volume [veh/h]	7	120	208	0	3	10
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.01	0.00	0.00	0.00	0.00	0.01
d_M, Delay for Movement [s/veh]	7.63	0.00	0.00	0.00	10.58	9.38
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.01	0.01	0.00	0.00	0.05	0.05
95th-Percentile Queue Length [ft/ln]	0.29	0.29	0.00	0.00	1.26	1.26
d_A, Approach Delay [s/veh]	0.42		0.00		9.65	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.51					
Intersection LOS	B					

Intersection Level Of Service Report**Intersection 7: Realigned Tannler Drive/Site Access Point A**

Control Type:	Two-way stop	Delay (sec / veh):	0.0
Analysis Method:	HCM 7th Edition	Level Of Service:	A
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.003

Intersection Setup

Name	Realigned Tannler Drive		Realigned Tannler Drive		Site Access Point A	
Approach	Northbound		Southbound		Westbound	
Lane Configuration						
Turning Movement	Thru	Right	Left	Thru	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	10.00		10.00		10.00	
Grade [%]	15.00		-15.00		0.00	
Crosswalk	No		No		Yes	

Volumes

Name	Realigned Tannler Drive		Realigned Tannler Drive		Site Access Point A	
Base Volume Input [veh/h]	273	20	0	255	0	0
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	1.00	0.00	2.00	1.00	2.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	273	20	0	255	0	0
Peak Hour Factor	0.9300	0.9300	1.0000	0.9300	1.0000	0.9300
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	73	5	0	69	0	0
Total Analysis Volume [veh/h]	294	22	0	274	0	0
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.00	0.00	0.00	0.00	0.00	0.00
d_M, Delay for Movement [s/veh]	0.00	0.00	0.00	0.00	0.00	9.16
Movement LOS	A	A		A		A
95th-Percentile Queue Length [veh/ln]	0.00	0.00	0.00	0.00	0.00	0.00
95th-Percentile Queue Length [ft/ln]	0.00	0.00	0.00	0.00	0.00	0.00
d_A, Approach Delay [s/veh]	0.00		0.00		9.16	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.00					
Intersection LOS	A					

Intersection Level Of Service Report
Intersection 8: Tannler Drive/Site Access Point B

Control Type:	Two-way stop	Delay (sec / veh):	12.4
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.006

Intersection Setup

Name	Realigned Tannler Drive		Site Access Point B		Realigned Tannler Drive	
Approach	Northbound		Southbound		Westbound	
Lane Configuration						
Turning Movement	Thru	Right	Left	Thru	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	10.00		10.00		30.00	
Grade [%]	4.00		0.00		-4.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Realigned Tannler Drive		Site Access Point B		Realigned Tannler Drive	
Base Volume Input [veh/h]	20	253	3	24	231	2
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	1.00	0.00	0.00	1.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	20	253	3	24	231	2
Peak Hour Factor	0.9300	0.9300	0.9300	0.9300	0.9300	0.9300
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	5	68	1	6	62	1
Total Analysis Volume [veh/h]	22	272	3	26	248	2
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Stop	Free
Flared Lane			
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance		No	
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.02	0.00	0.01	0.04	0.00	0.00
d_M, Delay for Movement [s/veh]	7.76	0.00	12.43	10.75	0.00	0.00
Movement LOS	A	A	B	B	A	A
95th-Percentile Queue Length [veh/ln]	0.85	0.85	0.14	0.14	0.00	0.00
95th-Percentile Queue Length [ft/ln]	21.18	21.18	3.57	3.57	0.00	0.00
d_A, Approach Delay [s/veh]	0.58		10.92		0.00	
Approach LOS	A		B		A	
d_I, Intersection Delay [s/veh]	0.85					
Intersection LOS	B					

Intersection Level Of Service Report
Intersection 9: Tannler Drive/Site Access Point C

Control Type:	Two-way stop	Delay (sec / veh):	12.1
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.029

Intersection Setup

Name	Site Access C		Tannler Drive		Realigned Tannler Drive	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	10.00		30.00		10.00	
Grade [%]	0.00		-4.00		4.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Site Access C		Tannler Drive		Realigned Tannler Drive	
Base Volume Input [veh/h]	14	3	4	219	256	0
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	0.00	0.00	1.00	1.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	14	3	4	219	256	0
Peak Hour Factor	0.9300	0.9300	0.9300	0.9300	0.9300	0.9300
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	4	1	1	59	69	0
Total Analysis Volume [veh/h]	15	3	4	235	275	0
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Stop	Free	Free
Flared Lane			
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance	No		
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.03	0.00	0.00	0.00	0.00	0.00
d_M, Delay for Movement [s/veh]	12.12	10.89	7.78	0.00	0.00	0.00
Movement LOS	B	B	A	A	A	A
95th-Percentile Queue Length [veh/ln]	0.10	0.10	0.67	0.67	0.00	0.00
95th-Percentile Queue Length [ft/ln]	2.59	2.59	16.81	16.81	0.00	0.00
d_A, Approach Delay [s/veh]	11.92		0.13		0.00	
Approach LOS	B		A		A	
d_I, Intersection Delay [s/veh]	0.46					
Intersection LOS	B					

Intersection Level Of Service Report

Intersection 10: Tannler Drive/Site Access Point D

Control Type:	Two-way stop	Delay (sec / veh):	12.3
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.006

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point D	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	13.00		-13.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point D	
Base Volume Input [veh/h]	20	239	209	4	3	14
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	1.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	20	239	209	4	3	14
Peak Hour Factor	0.9300	0.9300	0.9300	0.9300	0.9300	0.9300
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	5	64	56	1	1	4
Total Analysis Volume [veh/h]	22	257	225	4	3	15
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.02	0.00	0.00	0.00	0.01	0.02
d_M, Delay for Movement [s/veh]	7.69	0.00	0.00	0.00	12.26	9.53
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.04	0.04	0.00	0.00	0.07	0.07
95th-Percentile Queue Length [ft/ln]	0.93	0.93	0.00	0.00	1.87	1.87
d_A, Approach Delay [s/veh]	0.61		0.00		9.98	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.66					
Intersection LOS	B					

Intersection Level Of Service Report

Intersection 11: Tannler Drive/Site Access Point E

Control Type:	Two-way stop	Delay (sec / veh):	12.0
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.006

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point E	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	13.00		-13.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point E	
Base Volume Input [veh/h]	20	222	199	4	3	14
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	1.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	20	222	199	4	3	14
Peak Hour Factor	0.9300	0.9300	0.9300	0.9300	0.9300	0.9300
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	5	60	53	1	1	4
Total Analysis Volume [veh/h]	22	239	214	4	3	15
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.02	0.00	0.00	0.00	0.01	0.02
d_M, Delay for Movement [s/veh]	7.66	0.00	0.00	0.00	11.98	9.46
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.04	0.04	0.00	0.00	0.07	0.07
95th-Percentile Queue Length [ft/ln]	0.93	0.93	0.00	0.00	1.83	1.83
d_A, Approach Delay [s/veh]	0.65		0.00		9.88	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.70					
Intersection LOS	B					

Intersection Level Of Service Report
Intersection 12: Tannler Drive/Site Access Point F

Control Type:	Two-way stop	Delay (sec / veh):	11.7
Analysis Method:	HCM 7th Edition	Level Of Service:	B
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.005

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point F	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	13.00		-13.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point F	
Base Volume Input [veh/h]	20	205	189	4	3	14
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	1.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	20	205	189	4	3	14
Peak Hour Factor	0.9300	0.9300	0.9300	0.9300	0.9300	0.9300
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	5	55	51	1	1	4
Total Analysis Volume [veh/h]	22	220	203	4	3	15
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.02	0.00	0.00	0.00	0.01	0.02
d_M, Delay for Movement [s/veh]	7.64	0.00	0.00	0.00	11.70	9.39
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.04	0.04	0.00	0.00	0.07	0.07
95th-Percentile Queue Length [ft/ln]	0.93	0.93	0.00	0.00	1.79	1.79
d_A, Approach Delay [s/veh]	0.69		0.00		9.78	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.74					
Intersection LOS	B					

Intersection Level Of Service Report
Intersection 13: Tannler Drive/Site Access Point G

Control Type:	Two-way stop	Delay (sec / veh):	9.3
Analysis Method:	HCM 7th Edition	Level Of Service:	A
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.011

Intersection Setup

Name	Tannler Drive		Tannler Drive		Site Access Point G	
Approach	Northbound		Southbound		Eastbound	
Lane Configuration						
Turning Movement	Left	Thru	Thru	Right	Left	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	0	0	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	30.00		30.00		30.00	
Grade [%]	11.00		-11.00		0.00	
Crosswalk	Yes		Yes		Yes	

Volumes

Name	Tannler Drive		Tannler Drive		Site Access Point G	
Base Volume Input [veh/h]	10	198	185	1	0	8
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	1.00	1.00	0.00	0.00	0.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Total Hourly Volume [veh/h]	10	198	185	1	0	8
Peak Hour Factor	0.9300	0.9300	0.9300	0.9300	0.9300	0.9300
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	3	53	50	0	0	2
Total Analysis Volume [veh/h]	11	213	199	1	0	9
Pedestrian Volume [ped/h]	0		0		0	

Intersection Settings

Priority Scheme	Free	Free	Stop
Flared Lane			No
Storage Area [veh]	0	0	0
Two-Stage Gap Acceptance			No
Number of Storage Spaces in Median	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.01	0.00	0.00	0.00	0.00	0.01
d_M, Delay for Movement [s/veh]	7.61	0.00	0.00	0.00	11.28	9.30
Movement LOS	A	A	A	A	B	A
95th-Percentile Queue Length [veh/ln]	0.02	0.02	0.00	0.00	0.03	0.03
95th-Percentile Queue Length [ft/ln]	0.46	0.46	0.00	0.00	0.81	0.81
d_A, Approach Delay [s/veh]	0.37		0.00		9.30	
Approach LOS	A		A		A	
d_I, Intersection Delay [s/veh]	0.39					
Intersection LOS	A					

Appendix B

Traffic Signal Warrant Analysis Documentation

Growth Rate 1.082

Time of Day	Southbound Left & Through Volumes				East-West Through Volume					
	Existing	Background 2029	Site Trips	Total 2029	Existing			Major Street Background	Site Trips	Total 2029
					EB	WB	EB+WB=Major Street			
7-8 AM	88	95	92	187	331	283	614	665	36	701
8-9 AM	109	118	90	208	382	390	772	836	52	888
4-5 PM	71	77	70	147	830	299	1,129	1,222	84	1,306
5-6 PM	81	88	74	162	812	331	1,143	1,237	104	1,341

Site Trip Generation (TIA Table 8)

Site AM Apartment Out	98
Site PM Apartment Out	44
Site AM Retail Out	22
Site PM Retail Out	43
Site AM Apartment In	29
Site PM Apartment In	78
Site AM Retail In	26
Site PM Retail In	44

Apply Time of Day Profile to Peak Hour Trip Generation

Hourly Distribution of Entering and Exiting Vehicle Trips by Land Use - Mid-Rise Housing Trips				
Source: ITE Trip Generation Manual , 11th Edition				
Land Use Code	221			
Land Use	Multifamily Housing (Mid-Rise)			
Subcategory	Not Close to Rail transit			
Setting	General Urban/Suburban			
Time Period	Weekday			
# Data Sites	6			
	% of 24-Hour Vehicle Trips			
Time	Total	Entering	Exiting	
12:00 - 1:00 AM	0.8%	1.2%	0.4%	
1:00 - 2:00 AM	0.4%	0.6%	0.3%	
2:00 - 3:00 AM	0.2%	0.3%	0.1%	
3:00 - 4:00 AM	0.2%	0.2%	0.2%	
4:00 - 5:00 AM	0.3%	0.1%	0.5%	
5:00 - 6:00 AM	1.2%	0.4%	2.0%	
6:00 - 7:00 AM	4.4%	1.0%	7.8%	
7:00 - 8:00 AM	8.6%	2.5%	14.7%	
8:00 - 9:00 AM	7.8%	3.0%	12.5%	
9:00 - 10:00 AM	4.5%	2.2%	6.9%	
10:00 - 11:00 AM	3.7%	2.7%	4.6%	
11:00 - 12:00 PM	3.7%	3.4%	4.0%	
12:00 - 1:00 PM	4.6%	4.3%	4.8%	
1:00 - 2:00 PM	4.4%	4.4%	4.4%	
2:00 - 3:00 PM	3.9%	4.1%	3.7%	
3:00 - 4:00 PM	4.9%	5.9%	3.8%	
4:00 - 5:00 PM	7.2%	9.2%	5.1%	
5:00 - 6:00 PM	9.4%	13.1%	5.8%	
6:00 - 7:00 PM	9.0%	12.1%	6.0%	
7:00 - 8:00 PM	7.4%	9.4%	5.4%	
8:00 - 9:00 PM	5.4%	7.7%	3.1%	
9:00 - 10:00 PM	4.0%	6.5%	1.5%	
10:00 - 11:00 PM	2.6%	3.7%	1.6%	
11:00 - 12:00 AM	1.4%	2.1%	0.8%	

Hourly Distribution of Entering and Exiting Vehicle Trips by Land Use - Retail Trips			
Source: ITE Trip Generation Manual , 11th Edition			
Land Use Code	822		
Land Use	Strip Retail Plaza		
Setting	General Urban/Suburban		
Time Period	Weekday		
# Data Sites	2		
	% of 16-Hour Vehicle Trips		
Time	Total	Entering	Exiting
12:00 - 1:00 AM	--	--	--
1:00 - 2:00 AM	--	--	--
2:00 - 3:00 AM	--	--	--
3:00 - 4:00 AM	--	--	--
4:00 - 5:00 AM	--	--	--
5:00 - 6:00 AM	--	--	--
6:00 - 7:00 AM	0.5%	--	--
7:00 - 8:00 AM	2.2%	--	--
8:00 - 9:00 AM	4.5%	--	--
9:00 - 10:00 AM	5.8%	--	--
10:00 - 11:00 AM	6.5%	--	--
11:00 - 12:00 PM	6.3%	--	--
12:00 - 1:00 PM	6.1%	--	--
1:00 - 2:00 PM	6.9%	--	--
2:00 - 3:00 PM	6.1%	--	--
3:00 - 4:00 PM	7.4%	--	--
4:00 - 5:00 PM	8.0%	--	--
5:00 - 6:00 PM	8.0%	--	--
6:00 - 7:00 PM	8.0%	--	--
7:00 - 8:00 PM	8.5%	--	--
8:00 - 9:00 PM	8.5%	--	--
9:00 - 10:00 PM	6.7%	--	--
10:00 - 11:00 PM	--	--	--
11:00 - 12:00 AM	--	--	--

Estimate Site Trips at 85% of Trips in and Out via Blankenship Road

Estimate Apartment Site SBLT	Estimate Apartment Site WB
83	25
71	30

Estimate Site Trips at 85% of Trips in and Out via Blankenship Road

Estimate Apartment Site SBLT	Estimate Apartment Site WB
33	47
37	67

Estimate Site Trips at 85% of Trips in and Out via Blankenship Road

Estimate Retail Site SBLT	Estimate Retail Site WB
9	11
19	22

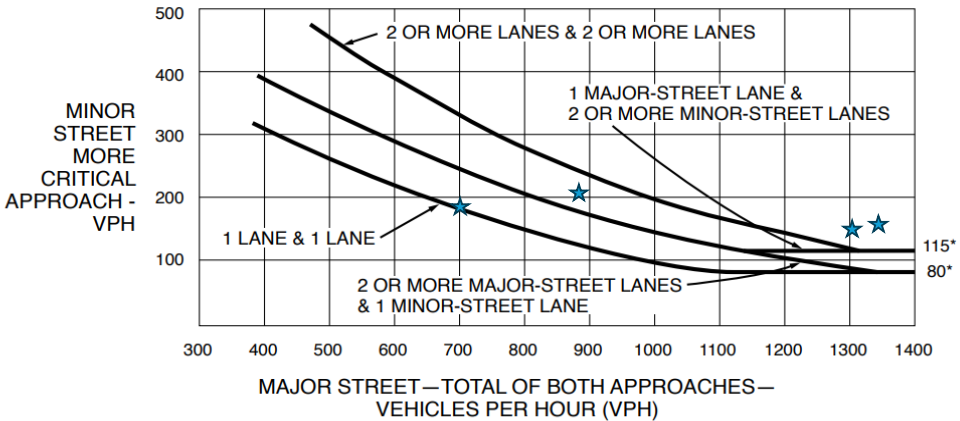
Estimate Site Trips at 85% of Trips in and Out via Blankenship Road

Estimate Retail Site SBLT	Estimate Retail Site WB
37	37
37	37

MUTCD 11th Edition

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Figure 4C-1. Warrant 2, Four-Hour Vehicular Volume



*Note: 115 vph applies as the lower threshold volume for a minor-street approach with two or more lanes and 80 vph applies as the lower threshold volume for a minor-street approach with one lane

Appendix C
Total 2029 Operational Analysis with
Operations Complex

Intersection Level Of Service Report**Intersection 3: Blankenship Road/Salamo Road/10th Street**

Control Type:	Signalized	Delay (sec / veh):	42.9
Analysis Method:	HCM 7th Edition	Level Of Service:	D
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.660

Intersection Setup

Name	10th Street		Blankenship Road		Salamo Road	
Approach	Northbound		Eastbound		Westbound	
Lane Configuration	↵↵		↑↵		↵↑	
Turning Movement	Left	Right	Thru	Right	Left	Thru
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	1	0	1	1	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	250.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00		25.00		35.00	
Grade [%]	7.00		0.00		-3.00	
Curb Present	No		No		No	
Crosswalk	Yes		No		No	

Volumes

Name	10th Street		Blankenship Road		Salamo Road	
Base Volume Input [veh/h]	340	370	68	588	505	106
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	5.00	8.00	5.00	2.00	3.00	1.00
Proportion of CAVs [%]	0.00					
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Right Turn on Red Volume [veh/h]	0	4	0	33	0	0
Total Hourly Volume [veh/h]	340	366	68	555	505	106
Peak Hour Factor	0.9100	0.9100	0.9100	0.9100	0.9100	0.9100
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	93	101	19	152	139	29
Total Analysis Volume [veh/h]	374	402	75	610	555	116
Presence of On-Street Parking	No	No	No	No	No	No
On-Street Parking Maneuver Rate [/h]	0	0	0	0	0	0
Local Bus Stopping Rate [/h]	0	0	0	0	0	0
v_do, Outbound Pedestrian Volume crossing	0		0		0	
v_di, Inbound Pedestrian Volume crossing m	0		0		0	
v_co, Outbound Pedestrian Volume crossing	0		0		0	
v_ci, Inbound Pedestrian Volume crossing mi	0		0		0	
v_ab, Corner Pedestrian Volume [ped/h]	0		0		0	
Bicycle Volume [bicycles/h]	1		0		0	

Intersection Settings

Located in CBD	No
Signal Coordination Group	-
Cycle Length [s]	90
Active Pattern	Free Running (No Pattern)
Coordination Type	<i>Free Running</i>
Actuation Type	<i>Fully actuated</i>
Offset [s]	0.0
Offset Reference	Lead Green - Beginning of First Green
Permissive Mode	SingleBand
Lost time [s]	12.00

Phasing & Timing (Basic)

Control Type	Overlap	Overlap	Permissive	Overlap	Protected	Permissive
Flashing Yellow Arrow						
Signal Group	6	6	4	5	3	8
Auxiliary Signal Groups	5,6,7	3,5,6,7		4,5,7		
Maximum Green [s]	6	6	16	40	35	32
Amber [s]	4.0	4.0	4.0	4.0	4.0	5.0
All red [s]	1.5	1.5	1.5	1.5	1.5	1.0
Walk [s]	0.0	0.0	8.0	7.0	7.0	0.0
Pedestrian Clearance [s]	0.0	0.0	27.0	15.0	10.0	0.0
Delayed Vehicle Green [s]	0.0	0.0	0.0	0.0	0.0	0.0
Rest In Walk	No		No			No
I1, Start-Up Lost Time [s]	2.0	2.0	2.0	2.0	2.0	2.0
I2, Clearance Lost Time [s]	2.0	2.0	2.0	2.0	2.0	2.0
Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0
Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0
I, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00

Phasing & Timing: Free Running (No Pattern)

Split [s]	9.0	9.0	14.0	14.0	9.0	14.0
Lead / Lag	Lag	-	-	-	Lead	-
Minimum Green [s]	2	2	6	10	4	6
Vehicle Extension [s]	0.5	0.5	2.3	5.2	2.3	2.3
Minimum Recall	No	No	No	Yes	No	No
Maximum Recall	No	No	No	No	No	No
Pedestrian Recall	No	No	No	No	No	No

Exclusive Pedestrian Phase

Pedestrian Signal Group	0
Pedestrian Walk [s]	0
Pedestrian Clearance [s]	0

Lane Group Calculations

Lane Group	L	R	C	R	L	C
C, Calculated Cycle Length [s]	128	128	128	128	128	128
L, Total Lost Time per Cycle [s]	4.00	4.00	4.00	4.00	4.00	4.00
l1_p, Permitted Start-Up Lost Time [s]	0.00	0.00	0.00	0.00	0.00	0.00
l2, Clearance Lost Time [s]	0.00	2.00	2.00	0.00	2.00	2.00
g_i, Effective Green Time [s]	60.5	97.0	15.3	70.8	36.5	55.8
g / C, Green / Cycle	0.47	0.76	0.12	0.55	0.28	0.44
(v / s)_i Volume / Saturation Flow Rate	0.25	0.32	0.04	0.38	0.31	0.06
s, saturation flow rate [veh/h]	1476	1263	1825	1589	1767	1885
c, Capacity [veh/h]	662	910	218	841	502	819
d1, Uniform Delay [s]	14.91	0.00	51.92	14.70	45.95	21.86
k, delay calibration	0.39	0.50	0.07	0.50	0.50	0.07
l, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00
d2, Incremental Delay [s]	2.72	1.55	0.57	5.43	72.01	0.05
d3, Initial Queue Delay [s]	0.00	0.00	0.00	0.00	0.00	0.00
Rp, platoon ratio	1.33	1.33	1.00	1.00	1.00	1.00
PF, progression factor	1.00	1.00	1.00	1.00	1.00	1.00

Lane Group Results

X, volume / capacity	0.57	0.44	0.34	0.73	1.11	0.14
d, Delay for Lane Group [s/veh]	17.63	1.55	52.50	20.13	117.96	21.90
Lane Group LOS	B	A	D	C	F	C
Critical Lane Group	Yes	No	No	Yes	Yes	No
50th-Percentile Queue Length [veh/ln]	5.70	0.39	2.28	11.28	25.75	2.11
50th-Percentile Queue Length [ft/ln]	142.52	9.82	57.02	282.11	643.81	52.85
95th-Percentile Queue Length [veh/ln]	9.62	0.71	4.11	16.79	36.25	3.81
95th-Percentile Queue Length [ft/ln]	240.42	17.68	102.63	419.84	906.31	95.13

Movement, Approach, & Intersection Results

d_M, Delay for Movement [s/veh]	17.63	1.55	52.50	20.13	117.96	21.90
Movement LOS	B	A	D	C	F	C
d_A, Approach Delay [s/veh]	9.30		23.67		101.35	
Approach LOS	A		C		F	
d_I, Intersection Delay [s/veh]	42.89					
Intersection LOS	D					
Intersection V/C	0.660					

Emissions

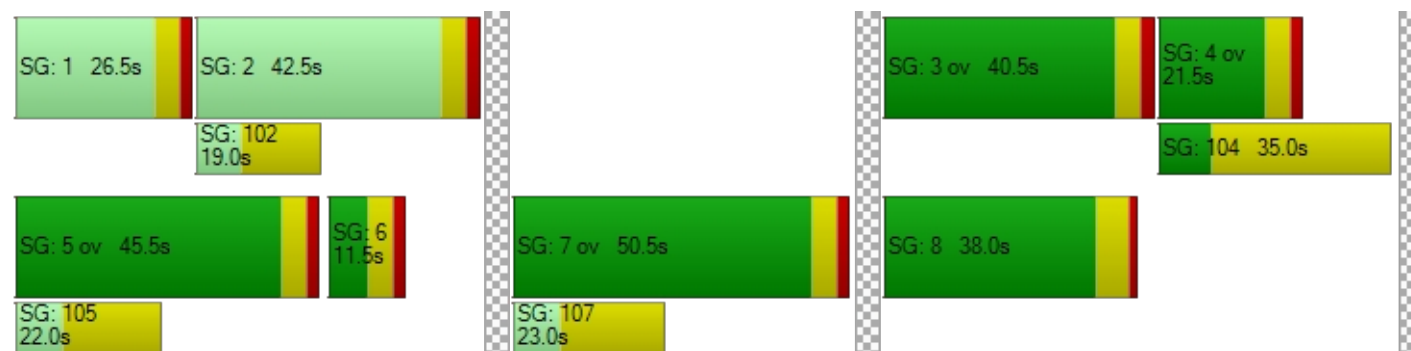
Vehicle Miles Traveled [mph]	18.63	20.03	3.96	32.19	76.90	16.07
Stops [stops/h]	160.00	11.03	64.01	316.71	722.76	59.33
Fuel consumption [US gal/h]	2.79	1.07	1.22	5.16	21.69	1.58
CO [g/h]	195.25	74.80	85.60	360.73	1515.91	110.15
NOx [g/h]	37.99	14.55	16.66	70.18	294.94	21.43
VOC [g/h]	45.25	17.34	19.84	83.60	351.33	25.53

Other Modes

g_Walk,mi, Effective Walk Time [s]	12.0	0.0	0.0
M_corner, Corner Circulation Area [ft ² /ped]	0.00	0.00	0.00
M_CW, Crosswalk Circulation Area [ft ² /ped]	0.00	0.00	0.00
d_p, Pedestrian Delay [s]	52.70	0.00	0.00
I_p,int, Pedestrian LOS Score for Intersectio	2.555	0.000	0.000
Crosswalk LOS	B	F	F
s_b, Saturation Flow Rate of the bicycle lane	2000	2000	2000
c_b, Capacity of the bicycle lane [bicycles/h]	374	249	499
d_b, Bicycle Delay [s]	42.40	49.13	36.13
I_b,int, Bicycle LOS Score for Intersection	1.560	2.744	2.667
Bicycle LOS	A	B	B

Sequence

Ring 1	1	2	-	3	4	-	-	-	-	-	-	-	-	-	-	-
Ring 2	5	6	7	8	-	-	-	-	-	-	-	-	-	-	-	-
Ring 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Intersection Level Of Service Report
Intersection 4: 10th Street/I-205 SB Ramp

Control Type:	Signalized	Delay (sec / veh):	53.6
Analysis Method:	HCM 7th Edition	Level Of Service:	D
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.724

Intersection Setup

Name	10th Street			10th Street			I-205 SB Entry Ramp			I-205 SB Exit Ramp		
Approach	Northbound			Southbound			Eastbound			Westbound		
Lane Configuration												
Turning Movement	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	1	0	0	0	0	0	0	0	0	0	0	1
Entry Pocket Length [ft]	200.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	200.00
No. of Lanes in Exit Pocket	0	0	1	0	0	0	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00			25.00			30.00			45.00		
Grade [%]	9.00			-4.00			0.00			0.00		
Curb Present	No			No						No		
Crosswalk	Yes			No			Yes			Yes		

Volumes

Name	10th Street			10th Street			I-205 SB Entry Ramp			I-205 SB Exit Ramp		
Base Volume Input [veh/h]	165	528	0	0	590	503	0	0	0	133	4	182
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	9.00	7.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	6.00	25.00	4.00
Proportion of CAVs [%]	0.00											
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Right Turn on Red Volume [veh/h]	0	0	0	0	0	122	0	0	0	0	0	73
Total Hourly Volume [veh/h]	165	528	0	0	590	381	0	0	0	133	4	109
Peak Hour Factor	0.9000	0.9000	1.0000	1.0000	0.9000	0.9000	1.0000	1.0000	1.0000	0.9000	0.9000	0.9000
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	46	147	0	0	164	106	0	0	0	37	1	30
Total Analysis Volume [veh/h]	183	587	0	0	656	423	0	0	0	148	4	121
Presence of On-Street Parking	No		No	No		No				No		No
On-Street Parking Maneuver Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
Local Bus Stopping Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
v_do, Outbound Pedestrian Volume crossing	0			0			0			0		
v_di, Inbound Pedestrian Volume crossing m	0			0			0			0		
v_co, Outbound Pedestrian Volume crossing	0			1			2			0		
v_ci, Inbound Pedestrian Volume crossing mi	0			2			1			0		
v_ab, Corner Pedestrian Volume [ped/h]	0			0			0			0		
Bicycle Volume [bicycles/h]	1			3			0			0		

Intersection Settings

Located in CBD	No
Signal Coordination Group	-
Cycle Length [s]	90
Active Pattern	Free Running (No Pattern)
Coordination Type	<i>Free Running</i>
Actuation Type	<i>Fully actuated</i>
Offset [s]	0.0
Offset Reference	Lead Green - Beginning of First Green
Permissive Mode	SingleBand
Lost time [s]	12.00

Phasing & Timing (Basic)

Control Type	ProtPer	Permiss	Permiss	Permiss	Overlap	Overlap	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss
Flashing Yellow Arrow	Yes											
Signal Group	1	5	0	0	2	2	0	0	0	0	7	0
Auxiliary Signal Groups					2,3,4	2,3,4						
Maximum Green [s]	21	40	0	0	37	37	0	0	0	0	45	0
Amber [s]	4.0	4.0	0.0	0.0	4.0	4.0	0.0	0.0	0.0	0.0	4.0	0.0
All red [s]	1.5	1.5	0.0	0.0	1.5	1.5	0.0	0.0	0.0	0.0	1.5	0.0
Walk [s]	0.0	7.0	0.0	0.0	7.0	7.0	0.0	0.0	0.0	0.0	7.0	0.0
Pedestrian Clearance [s]	0.0	15.0	0.0	0.0	12.0	12.0	0.0	0.0	0.0	0.0	16.0	0.0
Delayed Vehicle Green [s]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rest In Walk		No			No						No	
I1, Start-Up Lost Time [s]	2.0	2.0	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0	2.0	0.0
I2, Clearance Lost Time [s]	2.0	2.0	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0	2.0	0.0
Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
I, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Phasing & Timing: Free Running (No Pattern)

Split [s]	9.0	14.0	0.0	0.0	14.0	14.0	0.0	0.0	0.0	0.0	14.0	0.0
Lead / Lag	Lead	-	-	-	-	-	-	-	-	-	-	-
Minimum Green [s]	4	10	0	0	6	6	0	0	0	0	6	0
Vehicle Extension [s]	2.3	5.2	0.0	0.0	3.0	3.0	0.0	0.0	0.0	0.0	3.0	0.0
Minimum Recall	No	Yes			Yes	Yes					No	
Maximum Recall	No	No			No	No					No	
Pedestrian Recall	No	No			No	No					No	

Exclusive Pedestrian Phase

Pedestrian Signal Group	0
Pedestrian Walk [s]	0
Pedestrian Clearance [s]	0

Lane Group Calculations

Lane Group	L	C	C	C		C	R
C, Calculated Cycle Length [s]	118	118	118	118		118	118
L, Total Lost Time per Cycle [s]	4.00	4.00	4.00	4.00		4.00	4.00
l1_p, Permitted Start-Up Lost Time [s]	0.00	0.00	0.00	0.00		0.00	0.00
l2, Clearance Lost Time [s]	2.00	2.00	2.00	2.00		2.00	2.00
g_i, Effective Green Time [s]	19.1	41.5	66.4	66.4		16.0	16.0
g / C, Green / Cycle	0.16	0.35	0.56	0.56		0.14	0.14
(v / s)_i Volume / Saturation Flow Rate	0.14	0.41	0.29	0.34		0.10	0.08
s, saturation flow rate [veh/h]	1344	1441	1869	1609		1454	1564
c, Capacity [veh/h]	218	509	1008	868		199	214
d1, Uniform Delay [s]	47.73	38.04	8.80	9.42		48.94	47.50
k, delay calibration	0.24	0.50	0.40	0.50		0.11	0.11
l, Upstream Filtering Factor	1.00	1.00	1.00	1.00		1.00	1.00
d2, Incremental Delay [s]	16.43	89.86	1.62	3.34		6.04	2.35
d3, Initial Queue Delay [s]	0.00	0.00	0.00	0.00		0.00	0.00
Rp, platoon ratio	1.00	1.00	1.00	1.00		1.00	1.00
PF, progression factor	1.00	1.00	1.00	1.00		1.00	1.00

Lane Group Results

X, volume / capacity	0.84	1.15	0.54	0.62		0.77	0.57
d, Delay for Lane Group [s/veh]	64.17	127.90	10.42	12.76		54.98	49.85
Lane Group LOS	E	F	B	B		D	D
Critical Lane Group	No	Yes	No	Yes		Yes	No
50th-Percentile Queue Length [veh/ln]	6.23	27.20	4.46	5.09		4.51	3.37
50th-Percentile Queue Length [ft/ln]	155.66	680.05	111.52	127.32		112.83	84.22
95th-Percentile Queue Length [veh/ln]	10.32	39.22	7.92	8.79		8.00	6.06
95th-Percentile Queue Length [ft/ln]	257.96	980.38	198.12	219.84		199.93	151.60

Movement, Approach, & Intersection Results

d_M, Delay for Movement [s/veh]	64.17	127.90	0.00	0.00	10.84	12.76	0.00	0.00	0.00	54.98	54.98	49.85
Movement LOS	E	F			B	B				D	D	D
d_A, Approach Delay [s/veh]	112.75			11.59			0.00			52.71		
Approach LOS	F			B			A			D		
d_I, Intersection Delay [s/veh]	53.59											
Intersection LOS	D											
Intersection V/C	0.724											

Emissions

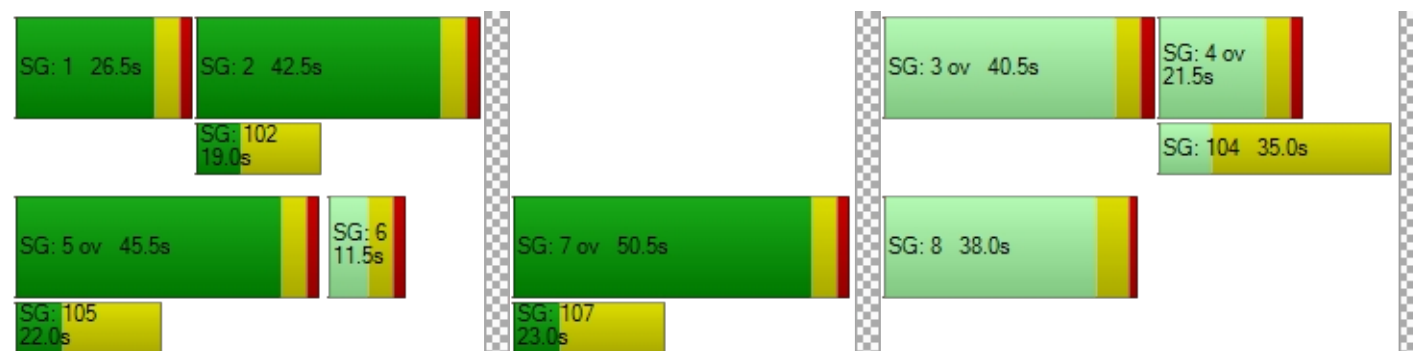
Vehicle Miles Traveled [mph]	19.41	62.25	26.88	26.88		15.25	12.14
Stops [stops/h]	190.73	833.27	136.65	156.00		138.25	103.20
Fuel consumption [US gal/h]	3.99	21.27	2.88	3.21		3.94	2.93
CO [g/h]	279.16	1486.87	201.12	224.23		275.57	204.57
NOx [g/h]	54.31	289.29	39.13	43.63		53.62	39.80
VOC [g/h]	64.70	344.60	46.61	51.97		63.87	47.41

Other Modes

g_Walk,mi, Effective Walk Time [s]	11.0		0.0		11.0		11.0
M_corner, Corner Circulation Area [ft ² /ped]	0.00		1029.89		1009.77		0.00
M_CW, Crosswalk Circulation Area [ft ² /ped]	0.00		0.00		0.00		0.00
d_p, Pedestrian Delay [s]	48.28		0.00		48.28		48.28
I_p,int, Pedestrian LOS Score for Intersectio	2.464		0.000		2.150		2.084
Crosswalk LOS	B		F		B		B
s_b, Saturation Flow Rate of the bicycle lane	2000		2000		2000		2000
c_b, Capacity of the bicycle lane [bicycles/h]	681		579		0		766
d_b, Bicycle Delay [s]	25.58		29.72		58.76		22.38
I_b,int, Bicycle LOS Score for Intersection	2.830		2.550		4.132		2.131
Bicycle LOS	C		B		D		B

Sequence

Ring 1	1	2	-	3	4	-	-	-	-	-	-	-	-	-	-	-
Ring 2	5	6	7	8	-	-	-	-	-	-	-	-	-	-	-	-
Ring 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Intersection Level Of Service Report
Intersection 5: 10th Street/I-205 NB Ramp

Control Type:	Signalized	Delay (sec / veh):	26.9
Analysis Method:	HCM 7th Edition	Level Of Service:	C
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.626

Intersection Setup

Name	10th Street			10th Street			I-205 NB Exit Ramp			I-205 NB Entry Ramp		
Approach	Northbound			Southbound			Eastbound			Westbound		
Lane Configuration												
Turning Movement	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	1	1	0	0	0	0	1	0	0	0
Entry Pocket Length [ft]	100.00	100.00	60.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00			25.00			45.00			30.00		
Grade [%]	0.00			0.00			-4.00			0.00		
Curb Present	No			No			No					
Crosswalk	Yes			No			Yes			Yes		

Volumes

Name	10th Street			10th Street			I-205 NB Exit Ramp			I-205 NB Entry Ramp		
Base Volume Input [veh/h]	0	414	187	291	432	0	279	0	149	0	0	0
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	2.00	6.00	2.00	3.00	4.00	2.00	9.00	0.00	1.00	2.00	2.00	2.00
Proportion of CAVs [%]	0.00											
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Right Turn on Red Volume [veh/h]	0	0	60	0	0	0	0	0	91	0	0	0
Total Hourly Volume [veh/h]	0	414	127	291	432	0	279	0	58	0	0	0
Peak Hour Factor	1.0000	0.8800	0.8800	0.8800	0.8800	1.0000	0.8800	0.8800	0.8800	1.0000	1.0000	1.0000
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	0	118	36	83	123	0	79	0	16	0	0	0
Total Analysis Volume [veh/h]	0	470	144	331	491	0	317	0	66	0	0	0
Presence of On-Street Parking	No		No	No		No	No		No			
On-Street Parking Maneuver Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
Local Bus Stopping Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
v_do, Outbound Pedestrian Volume crossing	0			0			0			0		
v_di, Inbound Pedestrian Volume crossing m	0			0			0			0		
v_co, Outbound Pedestrian Volume crossing	0			0			1			0		
v_ci, Inbound Pedestrian Volume crossing mi	0			1			0			0		
v_ab, Corner Pedestrian Volume [ped/h]	0			0			0			0		
Bicycle Volume [bicycles/h]	1			0			0			0		

Intersection Settings

Located in CBD	No
Signal Coordination Group	-
Cycle Length [s]	90
Active Pattern	Free Running (No Pattern)
Coordination Type	<i>Free Running</i>
Actuation Type	<i>Fully actuated</i>
Offset [s]	0.0
Offset Reference	Lead Green - Beginning of First Green
Permissive Mode	SingleBand
Lost time [s]	12.00

Phasing & Timing (Basic)

Control Type	Permiss	Permiss	Permiss	ProtPer	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss
Flashing Yellow Arrow				No								
Signal Group	0	6	0	5	2	0	5	8	0	0	0	0
Auxiliary Signal Groups												
Maximum Green [s]	0	50	0	45	30	0	45	20	0	0	0	0
Amber [s]	0.0	4.0	0.0	4.0	4.0	0.0	4.0	4.0	0.0	0.0	0.0	0.0
All red [s]	0.0	1.0	0.0	1.0	1.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0
Walk [s]	0.0	7.0	0.0	0.0	7.0	0.0	0.0	7.0	0.0	0.0	0.0	0.0
Pedestrian Clearance [s]	0.0	10.0	0.0	0.0	15.0	0.0	0.0	17.0	0.0	0.0	0.0	0.0
Delayed Vehicle Green [s]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rest In Walk		No			No			No				
I1, Start-Up Lost Time [s]	0.0	2.0	0.0	2.0	2.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0
I2, Clearance Lost Time [s]	0.0	3.0	0.0	3.0	3.0	0.0	3.0	3.0	0.0	0.0	0.0	0.0
Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
I, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Phasing & Timing: Free Running (No Pattern)

Split [s]	0.0	14.0	0.0	9.0	14.0	0.0	9.0	14.0	0.0	0.0	0.0	0.0
Lead / Lag	-	-	-	Lead	-	-	Lead	-	-	-	-	-
Minimum Green [s]	0	10	0	4	10	0	4	6	0	0	0	0
Vehicle Extension [s]	0.0	6.9	0.0	2.3	6.9	0.0	2.3	2.3	0.0	0.0	0.0	0.0
Minimum Recall		Yes		No	Yes			No				
Maximum Recall		Yes		No	No			Yes				
Pedestrian Recall		No		No	No			No				

Exclusive Pedestrian Phase

Pedestrian Signal Group	0
Pedestrian Walk [s]	0
Pedestrian Clearance [s]	0

Lane Group Calculations

Lane Group	C	R	L	C	C	R	
C, Calculated Cycle Length [s]	103	103	103	103	103	103	
L, Total Lost Time per Cycle [s]	5.00	5.00	5.00	5.00	5.00	5.00	
l1_p, Permitted Start-Up Lost Time [s]	0.00	0.00	0.00	0.00	0.00	0.00	
l2, Clearance Lost Time [s]	3.00	3.00	0.00	3.00	3.00	3.00	
g_i, Effective Green Time [s]	50.0	50.0	73.0	73.0	20.0	20.0	
g / C, Green / Cycle	0.49	0.49	0.71	0.71	0.19	0.19	
(v / s)_i Volume / Saturation Flow Rate	0.26	0.09	0.31	0.27	0.18	0.04	
s, saturation flow rate [veh/h]	1810	1556	1070	1840	1809	1602	
c, Capacity [veh/h]	878	755	718	1304	351	311	
d1, Uniform Delay [s]	18.43	15.00	10.98	12.56	43.89	37.79	
k, delay calibration	0.50	0.50	0.66	0.66	0.50	0.50	
l, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00	
d2, Incremental Delay [s]	2.33	0.56	2.78	1.09	28.74	1.55	
d3, Initial Queue Delay [s]	0.00	0.00	0.00	0.00	0.00	0.00	
Rp, platoon ratio	1.00	1.00	0.67	0.67	0.67	0.67	
PF, progression factor	1.00	1.00	1.00	1.00	1.00	1.00	

Lane Group Results

X, volume / capacity	0.54	0.19	0.46	0.38	0.90	0.21	
d, Delay for Lane Group [s/veh]	20.76	15.56	13.76	13.65	72.63	39.35	
Lane Group LOS	C	B	B	B	E	D	
Critical Lane Group	Yes	No	Yes	No	Yes	No	
50th-Percentile Queue Length [veh/ln]	8.22	2.03	5.59	8.35	10.89	1.59	
50th-Percentile Queue Length [ft/ln]	205.55	50.66	139.80	208.70	272.18	39.70	
95th-Percentile Queue Length [veh/ln]	12.92	3.65	9.47	13.09	16.30	2.86	
95th-Percentile Queue Length [ft/ln]	323.11	91.19	236.75	327.16	407.46	71.46	

Movement, Approach, & Intersection Results

d_M, Delay for Movement [s/veh]	0.00	20.76	15.56	13.76	13.65	0.00	72.63	72.63	39.35	0.00	0.00	0.00
Movement LOS		C	B	B	B		E	E	D			
d_A, Approach Delay [s/veh]	19.54			13.70			66.89			0.00		
Approach LOS	B			B			E			A		
d_I, Intersection Delay [s/veh]	26.87											
Intersection LOS	C											
Intersection V/C	0.626											

Emissions

Vehicle Miles Traveled [mph]	27.78	8.51	35.10	52.07	24.33	5.07	
Stops [stops/h]	287.47	70.85	195.51	291.87	380.65	55.52	
Fuel consumption [US gal/h]	4.34	1.11	3.26	4.83	10.25	1.39	
CO [g/h]	303.22	77.64	227.57	337.31	716.58	97.32	
NOx [g/h]	59.00	15.10	44.28	65.63	139.42	18.94	
VOC [g/h]	70.27	17.99	52.74	78.18	166.07	22.56	

Other Modes

g_Walk,mi, Effective Walk Time [s]	11.0	0.0	11.0	11.0
M_corner, Corner Circulation Area [ft ² /ped]	0.00	3150.00	3098.66	0.00
M_CW, Crosswalk Circulation Area [ft ² /ped]	0.00	0.00	7337.18	0.00
d_p, Pedestrian Delay [s]	41.07	0.00	41.07	41.07
I_p,int, Pedestrian LOS Score for Intersectio	2.390	0.000	2.197	2.110
Crosswalk LOS	B	F	B	B
s_b, Saturation Flow Rate of the bicycle lane	2000	2000	2000	2000
c_b, Capacity of the bicycle lane [bicycles/h]	971	583	388	0
d_b, Bicycle Delay [s]	13.63	25.85	33.43	51.48
I_b,int, Bicycle LOS Score for Intersection	2.672	2.916	2.342	4.132
Bicycle LOS	B	C	B	D

Sequence

Ring 1	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 2	5	6	8	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Intersection Level Of Service Report
Intersection 6: 10th Street/8th Avenue/8th Court

Control Type:	Two-way stop	Delay (sec / veh):	57.4
Analysis Method:	HCM 7th Edition	Level Of Service:	F
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.328

Intersection Setup

Name	10th Street			10th Street			8th Avenue			8th Court		
Approach	Northbound			Southbound			Eastbound			Westbound		
Lane Configuration												
Turning Movement	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	1	0	0	0	0	0	0	0	1
Entry Pocket Length [ft]	100.00	100.00	100.00	90.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	60.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00			25.00			25.00			25.00		
Grade [%]	0.00			0.00			0.00			0.00		
Crosswalk	Yes			Yes			Yes			Yes		

Volumes

Name	10th Street			10th Street			8th Avenue			8th Court		
Base Volume Input [veh/h]	1	458	63	129	357	95	3	1	50	29	0	140
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	6.00	3.00	3.00	7.00	2.00	0.00	0.00	4.00	4.00	2.00	3.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Total Hourly Volume [veh/h]	1	458	63	129	357	95	3	1	50	29	0	140
Peak Hour Factor	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900	0.8900	1.0000	0.8900
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	0	129	18	36	100	27	1	0	14	8	0	39
Total Analysis Volume [veh/h]	1	515	71	145	401	107	3	1	56	33	0	157
Pedestrian Volume [ped/h]	1			1			1			0		

Intersection Settings

Priority Scheme	Free	Free	Stop	Stop
Flared Lane			No	
Storage Area [veh]	0	0	0	0
Two-Stage Gap Acceptance			No	No
Number of Storage Spaces in Median	0	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.00	0.01	0.00	0.15	0.00	0.00	0.04	0.01	0.09	0.33	0.00	0.30
d_M, Delay for Movement [s/veh]	8.38	0.00	0.00	9.29	0.00	0.00	55.14	33.64	12.41	57.43	0.00	14.59
Movement LOS	A	A	A	A	A	A	F	D	B	F		B
95th-Percentile Queue Length [veh/ln]	0.00	0.00	0.00	0.52	0.00	0.00	0.49	0.49	0.49	1.27	0.00	1.23
95th-Percentile Queue Length [ft/ln]	0.04	0.04	0.04	12.90	0.00	0.00	12.25	12.25	12.25	31.86	0.00	30.66
d_A, Approach Delay [s/veh]	0.01			2.06			14.90			22.03		
Approach LOS	A			A			B			C		
d_I, Intersection Delay [s/veh]	4.32											
Intersection LOS	F											

Intersection Level Of Service Report**Intersection 3: Blankenship Road/Salamo Road/10th Street**

Control Type:	Signalized	Delay (sec / veh):	39.3
Analysis Method:	HCM 7th Edition	Level Of Service:	D
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.503

Intersection Setup

Name	10th Street		Blankenship Road		Salamo Road	
Approach	Northbound		Eastbound		Westbound	
Lane Configuration	↵↵		↑↵		↵↑	
Turning Movement	Left	Right	Thru	Right	Left	Thru
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	1	0	1	1	0
Entry Pocket Length [ft]	100.00	100.00	100.00	100.00	250.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00		25.00		35.00	
Grade [%]	7.00		0.00		-3.00	
Curb Present	No		No		No	
Crosswalk	Yes		No		No	

Volumes

Name	10th Street		Blankenship Road		Salamo Road	
Base Volume Input [veh/h]	367	314	158	833	403	107
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	1.00	1.00	1.00	2.00	3.00	1.00
Proportion of CAVs [%]	0.00					
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0
Right Turn on Red Volume [veh/h]	0	17	0	18	0	0
Total Hourly Volume [veh/h]	367	297	158	815	403	107
Peak Hour Factor	0.9400	0.9400	0.9400	0.9400	0.9400	0.9400
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	98	79	42	217	107	28
Total Analysis Volume [veh/h]	390	316	168	867	429	114
Presence of On-Street Parking	No	No	No	No	No	No
On-Street Parking Maneuver Rate [/h]	0	0	0	0	0	0
Local Bus Stopping Rate [/h]	0	0	0	0	0	0
v_do, Outbound Pedestrian Volume crossing	0		0		0	
v_di, Inbound Pedestrian Volume crossing m	0		0		0	
v_co, Outbound Pedestrian Volume crossing	0		0		0	
v_ci, Inbound Pedestrian Volume crossing mi	0		0		0	
v_ab, Corner Pedestrian Volume [ped/h]	0		0		0	
Bicycle Volume [bicycles/h]	1		1		0	

Intersection Settings

Located in CBD	No
Signal Coordination Group	-
Cycle Length [s]	90
Active Pattern	Free Running (No Pattern)
Coordination Type	<i>Free Running</i>
Actuation Type	<i>Fully actuated</i>
Offset [s]	0.0
Offset Reference	Lead Green - Beginning of First Green
Permissive Mode	SingleBand
Lost time [s]	12.00

Phasing & Timing (Basic)

Control Type	Overlap	Overlap	Permissive	Overlap	Protected	Permissive
Flashing Yellow Arrow						
Signal Group	6	6	4	5	3	8
Auxiliary Signal Groups	5,6,7	3,5,6,7		4,5,7		
Maximum Green [s]	6	6	16	40	35	32
Amber [s]	4.0	4.0	4.0	4.0	4.0	5.0
All red [s]	1.5	1.5	1.5	1.5	1.5	1.0
Walk [s]	0.0	0.0	8.0	7.0	7.0	0.0
Pedestrian Clearance [s]	0.0	0.0	27.0	15.0	10.0	0.0
Delayed Vehicle Green [s]	0.0	0.0	0.0	0.0	0.0	0.0
Rest In Walk	No		No			No
I1, Start-Up Lost Time [s]	2.0	2.0	2.0	2.0	2.0	2.0
I2, Clearance Lost Time [s]	2.0	2.0	2.0	2.0	2.0	2.0
Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0
Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0
I, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00

Phasing & Timing: Free Running (No Pattern)

Split [s]	9.0	9.0	14.0	14.0	9.0	14.0
Lead / Lag	Lag	-	-	-	Lead	-
Minimum Green [s]	2	2	6	10	4	6
Vehicle Extension [s]	0.5	0.5	2.3	5.2	2.3	2.3
Minimum Recall	No	No	No	Yes	No	No
Maximum Recall	No	No	No	No	No	No
Pedestrian Recall	No	No	No	No	No	No

Exclusive Pedestrian Phase

Pedestrian Signal Group	0
Pedestrian Walk [s]	0
Pedestrian Clearance [s]	0

Lane Group Calculations

Lane Group	L	R	C	R	L	C
C, Calculated Cycle Length [s]	135	135	135	135	135	135
L, Total Lost Time per Cycle [s]	4.00	4.00	4.00	4.00	4.00	4.00
l1_p, Permitted Start-Up Lost Time [s]	0.00	0.00	0.00	0.00	0.00	0.00
l2, Clearance Lost Time [s]	0.00	2.00	2.00	0.00	2.00	2.00
g_i, Effective Green Time [s]	65.7	101.4	17.5	78.4	35.6	57.1
g / C, Green / Cycle	0.49	0.75	0.13	0.58	0.26	0.42
(v / s)_i Volume / Saturation Flow Rate	0.25	0.23	0.09	0.55	0.24	0.06
s, saturation flow rate [veh/h]	1533	1351	1885	1577	1767	1885
c, Capacity [veh/h]	713	970	244	881	467	799
d1, Uniform Delay [s]	14.32	0.00	56.14	19.19	48.22	23.85
k, delay calibration	0.41	0.37	0.21	0.50	0.40	0.07
l, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00
d2, Incremental Delay [s]	2.47	0.67	6.57	26.63	21.76	0.05
d3, Initial Queue Delay [s]	0.00	0.00	0.00	0.00	0.00	0.00
Rp, platoon ratio	1.33	1.33	1.00	1.00	1.00	1.00
PF, progression factor	1.00	1.00	1.00	1.00	1.00	1.00

Lane Group Results

X, volume / capacity	0.55	0.33	0.69	0.98	0.92	0.14
d, Delay for Lane Group [s/veh]	16.79	0.67	62.71	45.82	69.98	23.90
Lane Group LOS	B	A	E	D	E	C
Critical Lane Group	Yes	No	No	Yes	Yes	No
50th-Percentile Queue Length [veh/ln]	5.86	0.18	5.97	25.37	16.68	2.25
50th-Percentile Queue Length [ft/ln]	146.54	4.49	149.24	634.22	417.02	56.34
95th-Percentile Queue Length [veh/ln]	9.83	0.32	9.98	33.63	23.38	4.06
95th-Percentile Queue Length [ft/ln]	245.80	8.09	249.42	840.73	584.47	101.42

Movement, Approach, & Intersection Results

d_M, Delay for Movement [s/veh]	16.79	0.67	62.71	45.82	69.98	23.90
Movement LOS	B	A	E	D	E	C
d_A, Approach Delay [s/veh]	9.57		48.56		60.31	
Approach LOS	A		D		E	
d_I, Intersection Delay [s/veh]	39.30					
Intersection LOS	D					
Intersection V/C	0.503					

Emissions

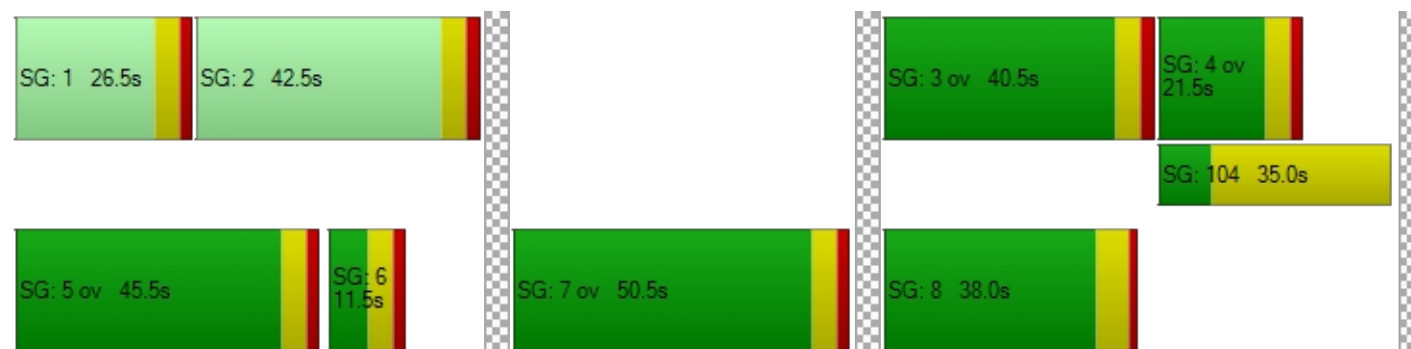
Vehicle Miles Traveled [mph]	19.43	15.74	8.86	45.75	59.44	15.79
Stops [stops/h]	156.44	4.80	159.33	677.08	445.20	60.15
Fuel consumption [US gal/h]	2.81	0.77	3.15	12.74	11.72	1.61
CO [g/h]	196.18	53.78	220.42	890.41	819.39	112.47
NOx [g/h]	38.17	10.46	42.89	173.24	159.42	21.88
VOC [g/h]	45.47	12.46	51.08	206.36	189.90	26.06

Other Modes

g_Walk,mi, Effective Walk Time [s]	12.0	0.0	0.0
M_corner, Corner Circulation Area [ft ² /ped]	0.00	0.00	0.00
M_CW, Crosswalk Circulation Area [ft ² /ped]	0.00	0.00	0.00
d_p, Pedestrian Delay [s]	55.98	0.00	0.00
I_p,int, Pedestrian LOS Score for Intersectio	2.588	0.000	0.000
Crosswalk LOS	B	F	F
s_b, Saturation Flow Rate of the bicycle lane	2000	2000	2000
c_b, Capacity of the bicycle lane [bicycles/h]	356	237	474
d_b, Bicycle Delay [s]	45.60	52.42	39.24
I_b,int, Bicycle LOS Score for Intersection	1.560	3.297	2.456
Bicycle LOS	A	C	B

Sequence

Ring 1	1	2	-	3	4	-	-	-	-	-	-	-	-	-	-	-
Ring 2	5	6	7	8	-	-	-	-	-	-	-	-	-	-	-	-
Ring 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Intersection Level Of Service Report
Intersection 4: 10th Street/I-205 SB Ramp

Control Type:	Signalized	Delay (sec / veh):	26.0
Analysis Method:	HCM 7th Edition	Level Of Service:	C
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.574

Intersection Setup

Name	10th Street			10th Street			I-205 SB Entry Ramp			I-205 SB Exit Ramp		
Approach	Northbound			Southbound			Eastbound			Westbound		
Lane Configuration												
Turning Movement	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	1	0	0	0	0	0	0	0	0	0	0	1
Entry Pocket Length [ft]	200.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	200.00
No. of Lanes in Exit Pocket	0	0	1	0	0	0	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00			25.00			30.00			45.00		
Grade [%]	9.00			-4.00			0.00			0.00		
Curb Present	No			No						No		
Crosswalk	Yes			No			Yes			Yes		

Volumes

Name	10th Street			10th Street			I-205 SB Entry Ramp			I-205 SB Exit Ramp		
Base Volume Input [veh/h]	102	350	0	0	900	336	0	0	0	193	3	331
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	5.00	1.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	0.00	0.00	0.00
Proportion of CAVs [%]	0.00											
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Right Turn on Red Volume [veh/h]	0	0	0	0	0	88	0	0	0	0	0	195
Total Hourly Volume [veh/h]	102	350	0	0	900	248	0	0	0	193	3	136
Peak Hour Factor	0.9500	0.9500	1.0000	1.0000	0.9500	0.9500	1.0000	1.0000	1.0000	0.9500	0.9500	0.9500
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	27	92	0	0	237	65	0	0	0	51	1	36
Total Analysis Volume [veh/h]	107	368	0	0	947	261	0	0	0	203	3	143
Presence of On-Street Parking	No		No	No		No				No		No
On-Street Parking Maneuver Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
Local Bus Stopping Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
v_do, Outbound Pedestrian Volume crossing	0			0			0			0		
v_di, Inbound Pedestrian Volume crossing m	0			0			0			0		
v_co, Outbound Pedestrian Volume crossing	0			2			2			0		
v_ci, Inbound Pedestrian Volume crossing mi	0			2			2			0		
v_ab, Corner Pedestrian Volume [ped/h]	0			0			0			0		
Bicycle Volume [bicycles/h]	0			0			0			0		

Intersection Settings

Located in CBD	No
Signal Coordination Group	-
Cycle Length [s]	134
Active Pattern	Pattern 1
Coordination Type	Time of Day Pattern Isolated
Actuation Type	Fixed time
Offset [s]	0.0
Offset Reference	Lead Green - Beginning of First Green
Permissive Mode	SingleBand
Lost time [s]	12.00

Phasing & Timing (Basic)

Control Type	ProtPer	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss
Flashing Yellow Arrow	Yes											
Signal Group	1	5	0	0	2	2	0	0	0	0	7	0
Auxiliary Signal Groups												
Maximum Green [s]	11	56	0	0	86	86	0	0	0	0	18	0
Amber [s]	4.0	4.0	0.0	0.0	4.0	4.0	0.0	0.0	0.0	0.0	4.0	0.0
All red [s]	1.5	1.5	0.0	0.0	1.5	1.5	0.0	0.0	0.0	0.0	1.5	0.0
Walk [s]	0.0	7.0	0.0	0.0	7.0	7.0	0.0	0.0	0.0	0.0	7.0	0.0
Pedestrian Clearance [s]	0.0	15.0	0.0	0.0	12.0	12.0	0.0	0.0	0.0	0.0	16.0	0.0
Delayed Vehicle Green [s]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rest In Walk		No			No						No	
I1, Start-Up Lost Time [s]	2.0	2.0	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0	2.0	0.0
I2, Clearance Lost Time [s]	2.0	2.0	0.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0	2.0	0.0
Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
I, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Phasing & Timing: Pattern 1

Split [s]	22.0	60.0	0.0	0.0	88.0	88.0	0.0	0.0	0.0	0.0	24.0	0.0
Lead / Lag	Lead	-	-	-	-	-	-	-	-	-	-	-
Minimum Green [s]	5	5	0	0	10	10	0	0	0	0	10	0
Vehicle Extension [s]	3.0	3.0	0.0	0.0	3.0	3.0	0.0	0.0	0.0	0.0	3.0	0.0
Minimum Recall	No	No			No						No	
Maximum Recall	No	No			No						No	
Pedestrian Recall	No	No			No						No	

Exclusive Pedestrian Phase

Pedestrian Signal Group	0
Pedestrian Walk [s]	0
Pedestrian Clearance [s]	0

Lane Group Calculations

Lane Group	L	C	C	C		C	R
C, Calculated Cycle Length [s]	134	134	134	134		134	134
L, Total Lost Time per Cycle [s]	4.00	4.00	4.00	4.00		4.00	4.00
l1_p, Permitted Start-Up Lost Time [s]	0.00	0.00	0.00	0.00		0.00	0.00
l2, Clearance Lost Time [s]	0.00	2.00	2.00	2.00		2.00	2.00
g_i, Effective Green Time [s]	104.5	56.0	84.0	84.0		20.0	20.0
g / C, Green / Cycle	0.78	0.42	0.63	0.63		0.15	0.15
(v / s)_i Volume / Saturation Flow Rate	0.19	0.24	0.32	0.35		0.11	0.09
s, saturation flow rate [veh/h]	562	1531	1869	1734		1811	1615
c, Capacity [veh/h]	474	640	1172	1087		270	241
d1, Uniform Delay [s]	14.07	46.54	5.13	5.28		54.72	53.20
k, delay calibration	0.50	0.50	0.50	0.50		0.50	0.50
l, Upstream Filtering Factor	1.00	1.00	1.00	1.00		1.00	1.00
d2, Incremental Delay [s]	1.10	3.74	1.62	2.05		18.24	10.31
d3, Initial Queue Delay [s]	0.00	0.00	0.00	0.00		0.00	0.00
Rp, platoon ratio	0.33	0.33	1.33	1.33		1.00	1.00
PF, progression factor	1.00	1.00	1.00	1.00		1.00	1.00

Lane Group Results

X, volume / capacity	0.23	0.58	0.52	0.56		0.76	0.59
d, Delay for Lane Group [s/veh]	15.18	50.27	6.75	7.33		72.96	63.51
Lane Group LOS	B	D	A	A		E	E
Critical Lane Group	Yes	No	No	Yes		Yes	No
50th-Percentile Queue Length [veh/ln]	2.82	13.13	4.01	4.14		7.90	5.10
50th-Percentile Queue Length [ft/ln]	70.61	328.15	100.18	103.59		197.53	127.48
95th-Percentile Queue Length [veh/ln]	5.08	19.07	7.21	7.46		12.51	8.80
95th-Percentile Queue Length [ft/ln]	127.10	476.69	180.32	186.46		312.78	220.07

Movement, Approach, & Intersection Results

d_M, Delay for Movement [s/veh]	15.18	50.27	0.00	0.00	6.96	7.33	0.00	0.00	0.00	72.96	72.96	63.51
Movement LOS	B	D			A	A				E	E	E
d_A, Approach Delay [s/veh]	42.37			7.04			0.00			69.09		
Approach LOS	D			A			A			E		
d_I, Intersection Delay [s/veh]	25.95											
Intersection LOS	C											
Intersection V/C	0.574											

Emissions

Vehicle Miles Traveled [mph]	11.35	39.03	30.09	30.09		20.67	14.35
Stops [stops/h]	75.88	352.64	107.66	111.32		212.27	137.00
Fuel consumption [US gal/h]	1.13	6.87	2.60	2.68		6.41	4.04
CO [g/h]	79.12	480.37	181.47	187.40		447.76	282.62
NOx [g/h]	15.39	93.46	35.31	36.46		87.12	54.99
VOC [g/h]	18.34	111.33	42.06	43.43		103.77	65.50

Other Modes

g_Walk,mi, Effective Walk Time [s]	11.0	0.0	11.0	11.0
M_corner, Corner Circulation Area [ft ² /ped]	0.00	752.22	752.22	0.00
M_CW, Crosswalk Circulation Area [ft ² /ped]	0.00	0.00	0.00	0.00
d_p, Pedestrian Delay [s]	56.45	0.00	56.45	56.45
I_p,int, Pedestrian LOS Score for Intersectio	2.480	0.000	1.922	2.409
Crosswalk LOS	B	F	A	B
s_b, Saturation Flow Rate of the bicycle lane	2000	2000	2000	2000
c_b, Capacity of the bicycle lane [bicycles/h]	813	1231	0	276
d_b, Bicycle Delay [s]	23.58	9.90	67.00	49.78
I_b,int, Bicycle LOS Score for Intersection	2.343	2.629	4.132	2.457
Bicycle LOS	B	B	D	B

Sequence

Ring 1	1	2	7	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 2	5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Intersection Level Of Service Report
Intersection 5: 10th Street/I-205 NB Ramp

Control Type:	Signalized	Delay (sec / veh):	23.4
Analysis Method:	HCM 7th Edition	Level Of Service:	C
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.685

Intersection Setup

Name	10th Street			10th Street			I-205 NB Exit Ramp			I-205 NB Entry Ramp		
Approach	Northbound			Southbound			Eastbound			Westbound		
Lane Configuration												
Turning Movement	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	1	1	0	0	0	0	1	0	0	0
Entry Pocket Length [ft]	100.00	100.00	60.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00			25.00			45.00			30.00		
Grade [%]	0.00			0.00			-4.00			0.00		
Curb Present	No			No			No					
Crosswalk	Yes			No			Yes			Yes		

Volumes

Name	10th Street			10th Street			I-205 NB Exit Ramp			I-205 NB Entry Ramp		
Base Volume Input [veh/h]	0	361	514	592	501	0	91	2	49	0	0	0
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	2.00	3.00	2.00	3.00	0.00	2.00	0.00	50.00	2.00	2.00	2.00	2.00
Proportion of CAVs [%]	0.00											
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Right Turn on Red Volume [veh/h]	0	0	63	0	0	0	0	0	35	0	0	0
Total Hourly Volume [veh/h]	0	361	451	592	501	0	91	2	14	0	0	0
Peak Hour Factor	1.0000	0.9700	0.9700	0.9700	0.9700	1.0000	0.9700	0.9700	0.9700	1.0000	1.0000	1.0000
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	0	93	116	153	129	0	23	1	4	0	0	0
Total Analysis Volume [veh/h]	0	372	465	610	516	0	94	2	14	0	0	0
Presence of On-Street Parking	No		No	No		No	No		No			
On-Street Parking Maneuver Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
Local Bus Stopping Rate [/h]	0	0	0	0	0	0	0	0	0	0	0	0
v_do, Outbound Pedestrian Volume crossing	0			0			0			0		
v_di, Inbound Pedestrian Volume crossing m	0			0			0			0		
v_co, Outbound Pedestrian Volume crossing	0			3			4			0		
v_ci, Inbound Pedestrian Volume crossing mi	0			4			3			0		
v_ab, Corner Pedestrian Volume [ped/h]	0			0			0			0		
Bicycle Volume [bicycles/h]	0			0			0			0		

Intersection Settings

Located in CBD	No
Signal Coordination Group	-
Cycle Length [s]	90
Active Pattern	Free Running (No Pattern)
Coordination Type	<i>Free Running</i>
Actuation Type	<i>Fully actuated</i>
Offset [s]	0.0
Offset Reference	Lead Green - Beginning of First Green
Permissive Mode	SingleBand
Lost time [s]	12.00

Phasing & Timing (Basic)

Control Type	Permiss	Permiss	Permiss	ProtPer	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss	Permiss
Flashing Yellow Arrow				No								
Signal Group	0	6	0	5	2	0	5	8	0	0	0	0
Auxiliary Signal Groups												
Maximum Green [s]	0	50	0	45	30	0	45	20	0	0	0	0
Amber [s]	0.0	4.0	0.0	4.0	4.0	0.0	4.0	4.0	0.0	0.0	0.0	0.0
All red [s]	0.0	1.0	0.0	1.0	1.0	0.0	1.0	1.0	0.0	0.0	0.0	0.0
Walk [s]	0.0	7.0	0.0	0.0	7.0	0.0	0.0	7.0	0.0	0.0	0.0	0.0
Pedestrian Clearance [s]	0.0	10.0	0.0	0.0	15.0	0.0	0.0	17.0	0.0	0.0	0.0	0.0
Delayed Vehicle Green [s]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rest In Walk		No			No			No				
I1, Start-Up Lost Time [s]	0.0	2.0	0.0	2.0	2.0	0.0	2.0	2.0	0.0	0.0	0.0	0.0
I2, Clearance Lost Time [s]	0.0	3.0	0.0	3.0	3.0	0.0	3.0	3.0	0.0	0.0	0.0	0.0
Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Location [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Advanced Detector Length [ft]	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
I, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Phasing & Timing: Free Running (No Pattern)

Split [s]	0.0	14.0	0.0	9.0	14.0	0.0	9.0	14.0	0.0	0.0	0.0	0.0
Lead / Lag	-	-	-	Lead	-	-	Lead	-	-	-	-	-
Minimum Green [s]	0	10	0	4	10	0	4	6	0	0	0	0
Vehicle Extension [s]	0.0	6.9	0.0	2.3	6.9	0.0	2.3	2.3	0.0	0.0	0.0	0.0
Minimum Recall		Yes		No	Yes			No				
Maximum Recall		Yes		Yes	Yes			No				
Pedestrian Recall		No		No	No			No				

Exclusive Pedestrian Phase

Pedestrian Signal Group	0
Pedestrian Walk [s]	0
Pedestrian Clearance [s]	0

Lane Group Calculations

Lane Group	C	R	L	C	C	R	
C, Calculated Cycle Length [s]	122	122	122	122	122	122	
L, Total Lost Time per Cycle [s]	5.00	5.00	5.00	5.00	5.00	5.00	
l1_p, Permitted Start-Up Lost Time [s]	0.00	0.00	0.00	0.00	0.00	0.00	
l2, Clearance Lost Time [s]	3.00	3.00	0.00	3.00	3.00	3.00	
g_i, Effective Green Time [s]	50.0	50.0	100.0	100.0	12.3	12.3	
g / C, Green / Cycle	0.41	0.41	0.82	0.82	0.10	0.10	
(v / s)_i Volume / Saturation Flow Rate	0.20	0.29	0.52	0.27	0.09	0.01	
s, saturation flow rate [veh/h]	1855	1589	1181	1900	1104	1589	
c, Capacity [veh/h]	759	650	958	1554	111	159	
d1, Uniform Delay [s]	26.71	30.19	10.73	9.25	54.20	49.92	
k, delay calibration	0.50	0.50	0.50	0.50	0.07	0.07	
l, Upstream Filtering Factor	1.00	1.00	1.00	1.00	1.00	1.00	
d2, Incremental Delay [s]	2.26	6.62	3.23	0.57	11.68	0.14	
d3, Initial Queue Delay [s]	0.00	0.00	0.00	0.00	0.00	0.00	
Rp, platoon ratio	1.00	1.00	0.67	0.67	1.00	1.00	
PF, progression factor	1.00	1.00	1.00	1.00	1.00	1.00	

Lane Group Results

X, volume / capacity	0.49	0.72	0.64	0.33	0.87	0.09	
d, Delay for Lane Group [s/veh]	28.97	36.81	13.96	9.83	65.87	50.07	
Lane Group LOS	C	D	B	A	E	D	
Critical Lane Group	No	Yes	Yes	No	Yes	No	
50th-Percentile Queue Length [veh/ln]	8.58	12.64	11.69	8.86	3.20	0.39	
50th-Percentile Queue Length [ft/ln]	214.48	316.01	292.27	221.53	79.93	9.69	
95th-Percentile Queue Length [veh/ln]	13.38	18.47	17.30	13.74	5.75	0.70	
95th-Percentile Queue Length [ft/ln]	334.57	461.78	432.46	343.57	143.87	17.44	

Movement, Approach, & Intersection Results

d_M, Delay for Movement [s/veh]	0.00	28.97	36.81	13.96	9.83	0.00	65.87	65.87	50.07	0.00	0.00	0.00
Movement LOS		C	D	B	A		E	E	D			
d_A, Approach Delay [s/veh]	33.33			12.07			63.86			0.00		
Approach LOS	C			B			E			A		
d_I, Intersection Delay [s/veh]	23.40											
Intersection LOS	C											
Intersection V/C	0.685											

Emissions

Vehicle Miles Traveled [mph]	21.99	27.49	64.69	54.72	7.37	1.07	
Stops [stops/h]	252.62	372.21	344.25	260.92	94.14	11.41	
Fuel consumption [US gal/h]	4.15	6.15	5.96	4.49	2.71	0.32	
CO [g/h]	290.17	429.64	416.80	314.14	189.42	22.46	
NOx [g/h]	56.46	83.59	81.09	61.12	36.85	4.37	
VOC [g/h]	67.25	99.57	96.60	72.81	43.90	5.21	

Other Modes

g_Walk,mi, Effective Walk Time [s]	11.0	0.0	11.0	11.0
M_corner, Corner Circulation Area [ft ² /ped]	0.00	422.88	413.84	0.00
M_CW, Crosswalk Circulation Area [ft ² /ped]	0.00	0.00	880.77	0.00
d_p, Pedestrian Delay [s]	50.62	0.00	50.62	50.62
I_p,int, Pedestrian LOS Score for Intersectio	2.441	0.000	1.885	2.796
Crosswalk LOS	B	F	A	C
s_b, Saturation Flow Rate of the bicycle lane	2000	2000	2000	2000
c_b, Capacity of the bicycle lane [bicycles/h]	818	491	327	0
d_b, Bicycle Delay [s]	21.35	34.81	42.76	61.13
I_b,int, Bicycle LOS Score for Intersection	3.045	3.418	1.799	4.132
Bicycle LOS	C	C	A	D

Sequence

Ring 1	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 2	5	6	8	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 3	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ring 4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-



Intersection Level Of Service Report
Intersection 6: 10th Street/8th Avenue/8th Court

Control Type:	Two-way stop	Delay (sec / veh):	141.1
Analysis Method:	HCM 7th Edition	Level Of Service:	F
Analysis Period:	15 minutes	Volume to Capacity (v/c):	0.561

Intersection Setup

Name	10th Street			10th Street			8th Avenue			8th Court		
Approach	Northbound			Southbound			Eastbound			Westbound		
Lane Configuration												
Turning Movement	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right	Left	Thru	Right
Lane Width [ft]	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00	12.00
No. of Lanes in Entry Pocket	0	0	0	1	0	0	0	0	0	0	0	1
Entry Pocket Length [ft]	100.00	100.00	100.00	90.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	60.00
No. of Lanes in Exit Pocket	0	0	0	0	0	0	0	0	0	0	0	0
Exit Pocket Length [ft]	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Speed [mph]	25.00			25.00			25.00			25.00		
Grade [%]	0.00			0.00			0.00			0.00		
Crosswalk	Yes			Yes			Yes			Yes		

Volumes

Name	10th Street			10th Street			8th Avenue			8th Court		
Base Volume Input [veh/h]	0	739	51	91	312	147	10	4	239	28	0	126
Base Volume Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Heavy Vehicles Percentage [%]	0.00	2.00	2.00	0.00	1.00	0.00	0.00	0.00	1.00	0.00	2.00	1.00
Growth Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
In-Process Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Site-Generated Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Diverted Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Pass-by Trips [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Existing Site Adjustment Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Other Volume [veh/h]	0	0	0	0	0	0	0	0	0	0	0	0
Total Hourly Volume [veh/h]	0	739	51	91	312	147	10	4	239	28	0	126
Peak Hour Factor	0.9600	0.9600	0.9600	0.9600	0.9600	0.9600	0.9600	0.9600	0.9600	0.9600	1.0000	0.9600
Other Adjustment Factor	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total 15-Minute Volume [veh/h]	0	192	13	24	81	38	3	1	62	7	0	33
Total Analysis Volume [veh/h]	0	770	53	95	325	153	10	4	249	29	0	131
Pedestrian Volume [ped/h]	2			0			5			0		

Intersection Settings

Priority Scheme	Free	Free	Stop	Stop
Flared Lane			No	
Storage Area [veh]	0	0	0	0
Two-Stage Gap Acceptance			No	No
Number of Storage Spaces in Median	0	0	0	0

Movement, Approach, & Intersection Results

V/C, Movement V/C Ratio	0.00	0.01	0.00	0.12	0.00	0.00	0.16	0.03	0.39	0.56	0.00	0.34
d_M, Delay for Movement [s/veh]	8.32	0.00	0.00	10.00	0.00	0.00	72.37	45.08	21.01	141.12	0.00	18.92
Movement LOS	A	A	A	A	A	A	F	E	C	F		C
95th-Percentile Queue Length [veh/ln]	0.00	0.00	0.00	0.39	0.00	0.00	3.60	3.60	3.60	2.17	0.00	1.46
95th-Percentile Queue Length [ft/ln]	0.00	0.00	0.00	9.85	0.00	0.00	89.95	89.95	89.95	54.27	0.00	36.52
d_A, Approach Delay [s/veh]	0.00			1.66			23.33			41.07		
Approach LOS	A			A			C			E		
d_I, Intersection Delay [s/veh]	7.51											
Intersection LOS	F											