



CITY OF
West Linn

PLANNING DIRECTOR DECISION

DATE: March 11, 2026

FILE NO.: EXT-26-01

REQUEST: Approval of a two-year extension to a Water Resource Area Permit at 19679 Wildwood Drive (WAP-22-02/AP-23-01)

PLANNER: Darren Wyss, Principal Planner

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GENERAL INFORMATION

OWNER/APPLICANT: Alex Kalmanson
19679 Wildwood Drive
West Linn, OR 97068

SITE LOCATION: 19679 Wildwood Drive
West Linn, OR 97068

SITE SIZE: 29,258 sq. ft.

LEGAL DESCRIPTION: Lot 25 of Plat 2521, Tax lot 21E23AC04600

COMP PLAN DESIGNATION: Low Density Residential

ZONING: Residential, R-10

APPROVAL CRITERIA: Community Development Code (CDC):
Chapter 11: Residential, R-10
Chapter 99: Procedures for Decision Making: Quasi-Judicial.

120-DAY RULE: The application became complete on February 11, 2026. The 120-day period therefore ends on June 11, 2026.

PUBLIC NOTICE: Notice was mailed to property owners within 300 feet of the subject property and to the affected neighborhood association on February 13, 2026. A sign was placed on the property on February 13, 2026. The notice was posted on the City's website on February 13, 2026. Therefore, public notice requirements of CDC Chapter 99 have been met.

EXECUTIVE SUMMARY

The applicant requests approval of a two-year extension of a Water Resource Area permit at 19679 Wildwood Drive (WAP-22-02/AP-23-01). The extension would extend the expiration of the permit from May 9, 2026, to May 9, 2028. The applicant is requesting an extension, pursuant to CDC 99.325, to complete their proposed project and has not requested any modifications to the original application. The applicant submitted a letter from a natural resource professional that the site conditions have not changed since the approval of the original application, and no new analysis is warranted. Because no modification to the original approval is proposed, there is no basis for changes to the conditions of approval from the original approval.

PUBLIC COMMENTS

Three public comments were submitted (see Exhibit PD-2) by Russ Axelrod, Gary Walvatne, and David Schwartz. The identified issues are summarized below along with staff responses.

Russ Axelrod letter dated February 27, 2026

Expressed concerns: the comments submitted by Mr. Axelrod address the previous approval of WAP-22-02/AP-23-01.

Staff Response: The current application for an extension must meet the criteria of West Linn Community Development Chapter 99.325(E) (see Staff Findings 2 to 12). These comments do not address these criteria.

Gary Walvatne letter dated February 27, 2026

Expressed concerns: the comments submitted by Mr. Walvatne address the previous approval of WAP-22-02/AP-23-01.

Staff Response: The current application for an extension must meet the criteria of West Linn Community Development Chapter 99.325(E) (see Staff Findings 2 to 12). These comments do not address these criteria.

David Schwartz email dated February 26, 2026

Expressed concerns: the comments submitted by Mr. Schwartz note that the original agreement included planning trees/vegetation and hasn't occurred; the property is a mess; proposes to build an ADU; diminished property values; would like to build an ADU to recoup loss and move out of the neighborhood.

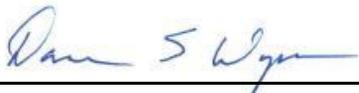
Staff Response: The applicant was approved for a Water Resource Area permit (WAP-22-02/AP-23-01). The current application for an extension must meet the criteria of West Linn Community Development Chapter 99.325(E) (see Staff Findings 2 to 12). If development of the property occurs, the revegetation plan, as conditioned, will be implemented. Construction of an ADU is permitted on all single-family properties within the West Linn city limits. Property values are not approval criteria.

DECISION

The Planning Director (designee) approves this application (EXT-26-01), based on: 1) the findings submitted by the applicant, which are incorporated by this reference, 2) supplementary staff findings included in the Addendum below, and 3) the conditions of approval from WAP-22-02/AP-23-01 below. With these findings, the applicable approval criteria are met. The conditions are as follows:

1. **Mitigation Plan.** The applicant has submitted a mitigation and planting plan that conforms to the provisions of CDC Chapter 32. The applicant shall submit a final report documenting the mitigation measures were completed within 30 days following completion of the measures.
2. **Site Plan and Narrative.** Planting and mitigation shall conform to applicant's mitigation plan (Table 2 and Figure 2, Exhibit PD-1, Planning Manager Decision WAP-22-02 dated January 17, 2023).
3. **Stormwater Plan.** The applicant shall submit a stormwater management plan at time of permit submittal for future development that demonstrates its compliance with the applicable provisions of Chapters 32 and 92.
4. **Construction Management Plan.** The applicant shall provide a construction management plan at time of permit submittal for future development that demonstrates its compliance with the applicable provisions of Chapter 32.

The provisions of the Community Development Code Chapter 99 have been met.



Darren Wyss, Principal Planner

March 11, 2026

Date

Appeals to this decision must be filed with the West Linn Planning Department within 14 days of mailing date listed below. The cost of an appeal is \$400. The appeal must be filed by an individual who has established standing by submitting comments prior to the date identified in the public notice. Appeals will be heard by City Council.

This city-level approval does not guarantee compliance with other laws, such as the federal and state Endangered Species Acts (ESA). All applicants are responsible for ensuring their actions comply with all applicable regulations.

Mailed this 11th day of March 2026.

Therefore, the 14-day appeal period ends at 5:00 p.m., on March 25, 2026.

**ADDENDUM
APPROVAL CRITERIA AND FINDINGS
EXT-26-01**

This decision adopts the findings for approval contained within the applicant's submittal, with the following exceptions and additions:

I. CDC CHAPTER 11: RESIDENTIAL, R-10

11.030 PERMITTED USES

The following are uses permitted outright in this zoning district:

- 1. Single-family attached or detached residential unit.*
 - a. Duplex residential units.*

Staff Finding 1: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. The property has an existing single-family detached house, and the proposal is to construct another residential unit on the property to create a detached duplex. The criteria are met.

II. CDC CHAPTER 99: PROCEDURES FOR DECISION MAKING: QUASI-JUDICIAL

99.325 EXTENSIONS OF APPROVAL

A. Purpose. The purpose of this chapter is to provide an appropriate and efficient review process for extending the time period during which land use approvals are valid and may be utilized.

Staff Finding 2: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. The criteria are met.

B. Applicability. This chapter applies to all approved land use applications that are subject to expiration but have not yet expired.

Staff Finding 3: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. The approved application has not yet expired but will expire on May 9, 2026 (see Staff Finding 13). The criteria are met.

C. General provisions.

- 1. An approved land use application is eligible for one extension.*

Staff Finding 4: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. This is the first and only eligible extension request. The criteria are met.

2. To be effective, an extension application must be approved by the decision-making authority prior to the expiration date of the original approval.

Staff Finding 5: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. The approved application expires on May 9, 2026. The Planning Director is the decision-making authority and issued the decision on March 11, 2026, before the expiration date (May 9, 2026) of the original approval. The criteria are met.

3. If an extension is approved, the expiration date for the original approval is extended an additional two years from the effective date of the original approval.

Staff Finding 6: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. The approved extension will extend the expiration date for two years, from May 9, 2026, to May 9, 2028. The criteria are met.

D. Approval process.

1. *If the extension application does not propose modification to the original approval, the assigned approval authority is the Planning Director, as provided in CDC 99.060(A). If no modifications are proposed to the original approval, no neighborhood meeting is required.*

Staff Finding 7: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. No modifications are proposed to the original approval. No neighborhood meeting was required. The Planning Director is issuing the decision as the assigned approval authority. The criteria are met.

2. *If the extension application proposes modifications of the original approval or any conditions of approval, the extension application shall comply with amendment procedures set forth in CDC 55.050, 85.085 and 99.120, when applicable.*

3. *An application for extension of approval with modifications to the original approval shall satisfy the neighborhood meeting requirements of CDC 99.038, if a neighborhood meeting was required of the original application.*

Staff Finding 8: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. No modifications are proposed to the original approval, and no neighborhood meeting is required. The criteria do not apply.

4. *If the original approval included multiple applications and does not propose modifications, a single extension application may include all applications associated with the original approval.*

Staff Finding 9: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. No modifications are proposed to the original approval, which did not include multiple applications. The criteria do not apply.

E. Approval criteria. The approval authority will approve an extension application when all of the following criteria are met:

1. *The applicant has provided evidence that a good faith effort was made to utilize the approval within the specified time period or the need for the extension is the result of conditions or circumstances outside the control of the applicant or property owner; and*

Staff Finding 10: Staff accepts the applicant findings:

“Delay in moving forward with the project was caused by the combination of spending too much money on the legal fees to defend this project back in 2023, and my business slowing down and eventually shutting down completely. That resulted in a need to find a new job, which I did. I am expecting to move forward with the project in 2026 as originally planned”.

In sum, the appeal costs and closing of the applicant’s business were the result of circumstances outside the control of the applicant. There is no opposing evidence in the record. The criteria are met.

2. *If the original application included a transportation impact study, a natural resources report, geotechnical report, and/or tree inventory report an updated report must be provided with the extension application that shows no significant changes on or near the development site have occurred that would affect the conclusions and recommendations of the existing report(s). A letter from a recognized professional satisfies this criterion if it states that conditions have not changed since the approval of the original application and no new analysis is warranted.*

Staff Finding 11: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. The original application included a Natural Resource Assessment completed by Kim Cartwright of Schott & Associates, Ecologists & Wetlands Specialists. The applicant has submitted a letter from Ms. Cartwright (see Exhibit PD-1) stating conditions have not changed since the approval of the original application and no new analysis is warranted. There is no opposing evidence in the record. The criteria are met.

3. *For purposes of this section, a “recognized professional” is defined as:*
- a. *CDC [85.170\(B\)\(2\)\(f\)\(1\)](#) for transportation impact studies.*
 - b. *CDC [32.050\(K\)\(4\)\(a\)](#) for natural resources reports.*
 - c. *CDC [85.170\(C\)\(3\)](#) for geotechnical reports.*

Staff Finding 12: CDC 32.050(K)(4)(a) defines a “recognized professional” as “*a qualified natural resource professional, such as a wildlife biologist, botanist, or hydrologist*”. The letter (see Staff Finding 11) was submitted by Kim Cartwright, Wetland Ecologist & GIS Analyst. The criteria are met.

99.330 REVOCATIONS OF APPROVALS – FAILURE TO FULFILL CONDITIONS

A. *Conditions of approval shall be fulfilled within the time limit set forth in the decision, or by specific provisions in this code or, if no time limit is set forth, within three years unless an extension is granted per CDC [99.325](#). Failure to fulfill any condition of approval within the time limitations provided will be grounds for revocation of approval after notice and an opportunity to be heard as an administrative action as provided in this section. Alternately, the Planning Director shall pursue compliance through Chapter [106](#).*

Staff Finding 13: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. The effective date of the approved application was May 9, 2023; therefore, the expiration date is May 9, 2026. The Planning Director is the decision-making authority and issued the decision on March 11, 2026, before the expiration date (May 9, 2026) of the original approval. The criteria are met.

99.060 APPROVAL AUTHORITY

This section explains the authority of the Planning Director, Planning Commission, City Council, and Historic Review Board as it relates to quasi-judicial and legislative action.

- A. *Planning Director authority. The Planning Director, or designee, shall have the authority to:*
- 1. *Approve, deny, or approve with conditions the following applications:*
 - ...
 - u. *Extension of approval without modifications.*
 - ...

Staff Finding 14: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. No modifications are proposed to the original approval. The Planning Director is issuing the decision as the assigned approval authority. The criteria are met.

99.080 NOTICE

Notice shall be given in the following ways:

B. *Class B Notice.* Notice of a proposed action on a development application pursuant to CDC 99.060 shall be given by the Director in the following manner:

1. At least 14 days prior to the decision date, a notice shall be sent by mail to:
 - a. The applicant or their agent;
 - b. The affected recognized neighborhood association or citizens advisory committee; and
 - c. All property owners of record within 300 feet of the site perimeter;

Staff Finding 15: A notice of upcoming Planning Director decision (see Exhibit PD-5) was sent by mail to the applicant, Alex Kalmanson, the Hidden Springs Neighborhood Association, and all property owners of record within 300 feet of the site perimeter on February 13, 2026. The notice identified the 14-day comment period that ended on February 27, 2026. The criteria are met.

2. At least 10 days prior to the earliest date that the approval authority can take action on the application, the applicant shall place a sign, provided by the Community Development Department, on the subject property in plain view. The sign shall state, "This property is the subject of a land use decision," with the type of use or request indicated.

Staff Finding 16: A sign with "This property is the subject of a land use decision", along with the notice, was placed on the subject property on February 13, 2026 (see Exhibit PD-5). The criteria are met.

3. The Director shall cause an affidavit of mailing of notice and posting of notice to be filed and made part of the administrative record.

Staff Finding 17: An affidavit of mailing and posting notice can be found in Exhibit PD-5 and is part of the administrative record. The criteria are met.

4. At the conclusion of the land use action the signs shall be removed.

Staff Finding 18: The posted sign was removed on March 3, 2026. The criteria are met.

...

E. *Table of notices.* The following notice summary identifies the appropriate type of notice for the various land use applications of CDC 99.060:

Land Use Action	Type of Notice
Extension of Approval - No Modification	B
Extensions of Approval - Proposed Modification	Same notice as original application

Staff Finding 19: The applicant is requesting an extension of approval WAP-22-02/AP-23-01. No modifications are proposed to the original approval. The City used the Class B Notice requirements (see Staff Findings 15 to 18). The criteria are met.

EXHIBIT PD-1: APPLICANT SUBMITTAL

DEVELOPMENT REVIEW APPLICATION

For Office Use Only

STAFF CONTACT Darren Wyss	PROJECT NO(S). EXT-26-01	PRE-APPLICATION NO.
NON-REFUNDABLE FEE(S) \$1,760.00	REFUNDABLE DEPOSIT(S) \$0	TOTAL \$1,760.00

Type of Review (Please check all that apply):

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

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

Site Location/Address:

19679 Wildwood dr
West Linn, OR 97068

Assessor's Map No.:

Tax Lot(s): **2S 1E 23AC tax lot 4600**

Total Land Area: **0.67 acre**

Brief Description of Proposal:

Water Resource Area Permit request - attached Naturalist Report

Applicant Name*: Alex Kalmanson
 Address: 19679 Wildwood dr.
 City State Zip: West Linn, OR 97068

Phone: 510 912 8575
 Email: akalmans12@gmail.com

Owner Name (required): Same as Applicant
 Address:
 City State Zip:

Phone:
 Email:

Consultant Name: Kim Cartwright
 Address: Wetland Ecologist & GIS Analyst
 City State Zip: Schott & Associates Inc.

Phone: 503 678 6028
 Email: kim@schottandassociates.com

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

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

Alex Kalmanson

Applicant's signature

01/28/2026

Date

Alex Kalmanson

 Owner's signature (*required*)

01/28/2026

Date

DEVELOPMENT REVIEW CHECKLIST

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

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

Submission requirement to upload through the web form:

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

A complete application must include the following:

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

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

Wyss, Darren

From: alex kalmanson <akalmans12@gmail.com>
Sent: Monday, February 9, 2026 4:09 PM
To: Wyss, Darren
Subject: Re: Project on Wildwood - Alex Kalmanson

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

Hello Darren,

Delay in moving forward with the project was caused by the combination of spending too much money on the legal fees to defend this project back in 2023, and my business slowing down and eventually shutting down completely. That resulted in a need to find a new job, which I did. I am expecting to move forward with the project in 2026 as originally planned.

Happy to answer any further questions you may have.

Best Regards
Alex Kalmanson

On Mon, Feb 9, 2026 at 1:29 PM Wyss, Darren <dwyss@westlinnoregon.gov> wrote:

Alex,

Please provide a response to approval criteria 1 below. The second approval criteria is met with the report you submitted from Schott & Associates. Lete me know if you have questions.

1. The applicant has provided evidence that a good faith effort was made to utilize the approval within the specified time period or the need for the extension is the result of conditions or circumstances outside the control of the applicant or property owner; and

2. If the original application included a transportation impact study, a natural resources report, geotechnical report, and/or tree inventory report an updated report must be provided with the extension application that shows no significant changes on or near the development site have occurred that would affect the conclusions and recommendations of the existing report(s). A letter from a recognized professional satisfies this criterion if it states that conditions have not changed since the approval of the original application and no new analysis is warranted.



Schott & Associates

Ecologists & Wetland Specialists

P.O. Box 589 | Aurora, OR 97002 | (503) 678-6007

January 27, 2025

Alex Kalmanson
19679 Wildwood Drive
West Linn, OR 97068
510-912-8575
akalmans12@gmail.com

Re: Verification of site conditions, 19679 Wildwood Drive, West Linn, Clackamas County, Oregon (T2S, R1E, Section 23AC, Tax Lot 4600)

Dear Mr. Kalmanson,

Schott & Associates (S&A) was contracted to conduct a site visit to verify conditions of natural resources on the property. S&A completed a natural resource assessment report in 2022 which was reviewed and approved of by The City West Linn in their Notice of Final Decision (AP-23-01). The purpose of the assessment was to establish the flow duration of the onsite drainage as “ephemeral” and reduce the associated Water Resource Area buffer to 15 feet in width. The City has requested verification that site conditions have not changed since that time to grant a permit extension.

S&A visited the property on January 22, 2026, and walked the drainage and surrounding area. Ground level photographs were collected (attached).

No changes were observed to the drainage or surrounding vegetation and no revisions to the 2022 natural resource assessment report are indicated based on site observations. The channel was dry and no evidence of recent flow was observed. According to the U.S. Army Corps Antecedent Precipitation Tool (APT), precipitation conditions were within normal range for the wet season at the time of the site visit (attached), though no precipitation was recorded in the preceding two weeks according to the West Linn 0.7 NW weather station. Given the lack of recent rainfall, the ephemeral drainage was expected to be dry.

Please let me know if you have further questions or concerns.

Sincerely,

Kim Cartwright

Kim Cartwright
Wetland Ecologist & GIS Analyst
kim@schottandassociates.com
503-678-6028

Attachments: Site Photographs
APT Summary



From the lower end of the drainage facing north, downslope toward the storm drain. No surface water is present.



From the lower end of the drainage facing south, upslope. No defined stream channel is present, and no surface water is present.



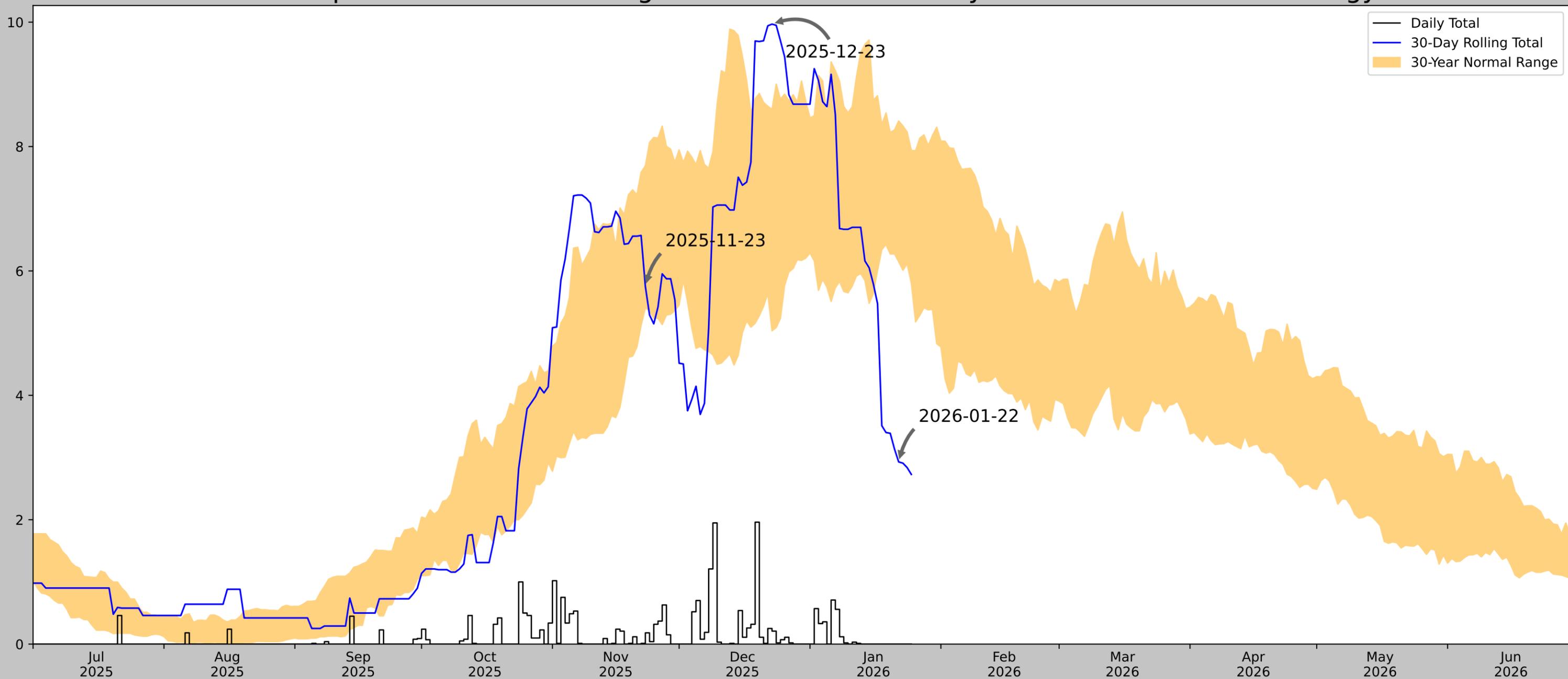
From the midpoint of the drainage facing south, upslope, at section of defined channel. No surface water is present.



From the upper section of the drainage facing south, upslope at section of undefined channel. No surface water is present

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network

Rainfall (Inches)



Coordinates	45.38519, -122.64969
Observation Date	2026-01-22
Elevation (ft)	460.039
Drought Index (PDSI)	Not available
WebWIMP H ₂ O Balance	Wet Season

30 Days Ending	30 th %ile (in)	70 th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2026-01-22	6.149213	8.412205	2.929134	Dry	1	3	3
2025-12-23	5.037008	8.598032	9.968504	Wet	3	2	6
2025-11-23	5.407087	7.690945	5.751969	Normal	2	1	2
Result							Normal Conditions - 11

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
PORTLAND KGW-TV	45.5181, -122.6894	159.121	9.383	300.918	7.046	11124	71
PORTLAND 2.3 SW	45.52, -122.6951	208.005	0.306	48.884	0.153	1	0
PORTLAND 1.1 SE	45.5261, -122.6419	166.995	2.365	7.874	1.083	4	0
PORTLAND 2.1 SE	45.5136, -122.6307	155.84	2.859	3.281	1.296	1	0
PORTLAND 0.8 ENE	45.5416, -122.6401	158.136	2.886	0.985	1.302	47	19
PORTLAND 2.5 SE	45.5116, -122.6201	163.058	3.385	3.937	1.537	57	0
PORTLAND 7 SW	45.4681, -122.6813	323.163	3.477	164.042	2.135	2	0
NATURE PARK-BEAVERTON	45.4981, -122.8394	185.039	7.393	25.918	3.518	11	0
PORTLAND INTL AP	45.5958, -122.6092	21.982	6.624	137.139	3.889	106	0

Figures and tables made by the
Antecedent Precipitation Tool
Version 3.0



US Army Corps
of Engineers.



ERDC
U.S. Army Corps of Engineers Research and Development Center

Developed by:
U.S. Army Corps of Engineers and
U.S. Army Engineer Research and
Development Center

EXHIBIT PD-2: PUBLIC COMMENTS

Wyss, Darren

From: David Schwartz <daveschwartz87@gmail.com>
Sent: Thursday, February 26, 2026 9:50 AM
To: Wyss, Darren
Subject: 19679 Wildwood Dr

You don't often get email from daveschwartz87@gmail.com. [Learn why this is important](#)

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

To whom it may concern:

I live next door to this property and am concerned with letting this go any further. I believe part of the original agreement was that several trees and other vegetation would be planted within a short time period after approval. None of that has occurred and the property is a mess. This is all in hopes of building an ADU, which is another concern. If this goes through, my property value will be diminished. I'd likely build an ADU as well to recoup some of the loss and then move out of the neighborhood. No one wants this. Let's end it here.

-David Schwartz
19687 Wildwood Dr. Owner

February 27, 2024

To: West Linn Community Development Director

From: Russ Axelrod, Former Planning Commissioner and Mayor, Retired Geologist, and 35-yr Resident of West Linn

Copy: West Linn City Council and City Manager

Subject: Basis for denying inappropriately approved Water Resource Area (WRA) Permit and Extension, File No. EXT-26-01, (WAP-22-02/AP-23-01) at 19679 Wildwood Drive

BACKGROUND

This document summarizes why a WRA permit extension should not be allowed for a previously permitted use that did not meet substantial code criteria. As the record shows on this matter, I eventually secured legal counsel and filed an appeal on the original WRA permit decision in 2023, but had to withdraw that appeal because of an incorrect filing date (deadline) provided to the community by the West Linn City Attorney, and case law rulings on such dating errors. Based on the previous and existing conditions, and related testimony below, it is an inappropriate action and precedent for the City to extend this permit under CDC 99.325E.2. The basis for denial on this matter has the full support of the Wildwood Drive neighborhood community as well as the Hidden Springs Neighborhood Association.

The previously approved permit was premised entirely on the incorrect/unsupported characterization of Robin Creek as being an “ephemeral” drainage by the Applicant and City. The applicant claims to characterize the drainage as “ephemeral,” and the City approved this interpretation because of a lack of surface channel flow in fill material through/along the subject property. As I testified with evidence in the record previously as a professional geologist with more than 40-years of experience, the applicant (and City) failed, and continue to fail, to recognize that the creek drainage is not “ephemeral.” The creek along the subject property has been highly altered and the lower drainage at this location was significantly disturbed and partially infilled which resulted in the burial of the original creek channel (and its flow) beneath the surface along the property. The drainage alteration occurred during past stormwater system installation by the City when the neighborhood was originally platted and roads built, and from construction of two homes immediately above Wildwood Drive along the subject property.

Because of these alterations, the creek flow is buried below the surface along the property boundary and therefore may appear dry at the surface most of the time except during and following notable rainfall events or periods. I checked the creek drainage again on February 20, 2026 and found low creek/channel flow above (upstream) and below (downstream) of the subject property while the flow was absent through the disturbed subject property/area. I have included at the end of this document a few short videos and a pic from this recent visit showing these continued creek flow conditions above and below the subject property further demonstrating the applicant’s incorrect/inappropriate interpretation. Prior to my February visit, West Linn had experienced no appreciable rain for well over a month, and has been experiencing perhaps its driest rainfall record ever this winter.

CRITERIA/BASES FOR DENIAL

Summarized below are four key criteria/findings for denying this application/extension based on the actual field conditions and West Linn's WRA code and Comprehensive Plan goals, policies and guidelines.

Error 1. The City erred when it approved a WRA permit that was not part of an application for a permit to develop the property.

Error 2. The proposed re-classification of Robin Creek as "ephemeral" must comply with the definition of 'Ephemeral streams' in West Linn's Community Development Code (CDC).

Error 3. Re-classification of streams and other substantive changes to WRA features on the Official WRA Map require a legislative hearing process through the West Linn Planning Commission.

Error 4. The City never followed Goal 5 procedures when making substantive changes to designated WRA features on the City's Official WRA Map.

Error 1

Facts and Related Arguments:

CDC 32.020(A) addresses applicability of the WRA Protection program and Chapter 32 code requirements. It states (underline emphasis added): *"This chapter applies to all development, activity or uses within WRAs identified on the WRA Map."*

The City dismissed all comments from the community regarding WRA code concerns related to future development of the property (Fig 2 of Application showing "proposed conditions") by claiming it was not a development application. The City further approved the WRA permit conditionally by relying on "*conditions of approval,*" which are inadequate because they do not put conditions on any future development. Based on the definition of "*conditional use*" in the CDC (Chapter 2), such uses can only be permitted "*...upon findings by the authority that the approval criteria have been met or will be met upon satisfaction of conditions of approval.*"

In order to establish accurate and complete conditions of approval for a project, the future development or actual use of the property should be known or detailed. A property development plan is fundamental to determining whether the approval criteria are appropriate, let alone being met. Without an application for "development" or "use," neither of which existed, this WRA permit is not applicable to an undefined conditional use.

Since the WRA permit application is/was not a development application, a WRA permit cannot be issued because no such permit exists independent of a permit for development. For context, CDC 32.040 provides that "The following development, activities or uses are exempt from a WRA permit but must conform to any applicable requirements of this section.

- A. Vegetation maintenance, planting and removal.
2. Removal of plants identified as nuisance, invasive or prohibited plants; provided, that after plant removal, re-vegetation of disturbed areas is performed pursuant to CDC 32.100."

The Applicant did not/does not need a WRA permit to implement the limited vegetation enhancement plan proposed in the original agreement, which, absent a development plan, is the principal permit action or condition of approval proposed on the subject property. Further, the WRA permit, granted erroneously, also inappropriately removes all protections for the *Significant Riparian Corridor*, a separate WRA feature [CDC 32.060(D) Table 32-2 B and D and Figures 32-4 thru 32-6] on the Official WRA Map (see also Error 4).

The City's approach to approve the WRA permit without a development plan also violated West Linn's Comprehensive Plan Goals 1 (Citizen Involvement) and 2 (Land Use Planning) and their Policies and Action Measures requiring fair and objective review involving public engagement in important land use decision-making, a cornerstone of the City's land use process in CDC Chapters 98 and 99.

By the City pre-approving the WRA permit based on conditional uses before the project is/was actually conceived, the City preemptively made any decisions on future development in the streamside buffer a ministerial action, removing the review from the proper Goal 1 process. The applicability standard (CDC 32.020(A)) addresses this concern by requiring that a WRA permit application be submitted with an actual land use development plan to ensure commensurate WRA assessment and protections. This applicability standard further ensures that development projects follow City code (CDC Chapters 32, 98 and 99), and are consistent with West Linn's Comprehensive Plan Policies, Goals and Action Measures.

Error 2

Facts and Related Arguments:

Chapter 2 of the West Linn CDC defines Ephemeral streams as follows: "*Ephemeral streams. A stream or reach of a stream which flows only in direct response to precipitation and whose channels are always above groundwater or water table levels. Ephemeral streams typically drain sub basins of under 20 acres, have slopes of less than 10 percent as measured laterally from the stream thread and often traverse surficially with no recognizable drainage channel.*"

The City's action re-classifies Robin Creek based on results from a rapid assessment technique or tool that does not reflect actual stream and environmental conditions. Ephemeral streams are defined in the CDC (Chapter 2) by three fundamental criteria: 1) source of the water; 2) slope of the terrain; and 3) lack of a defined channel. These are the basic criteria under which a stream is determined to be ephemeral under the City's Water Resource Area (WRA) Protection program (Chapter 32), and are discussed below in relation to Robin Creek:

1. Source of Water: Ephemeral streams receive water only from rainfall. Robin Creek, including the approximate 150-foot reach along the Applicant's property, receives water from rainfall AND from seeps and springs. These seeps and springs are from shallow groundwater that discharges at varied and different locations from fractured basalts and interflow zones in the bedrock which underly the Robin Creek drainage and the entire upland area of West Linn. As a result of West Linn's local hydrogeology, all drainages in the steep *Ravines* draining the upland terrain of West Linn receive a component of their base flow from seeps and springs. This is even reflected in the name "Hidden Springs" designated for this specific area of West Linn where Robin Creek is located. As further documented on the Official WRA Map and described in my 3/10/23 testimony (pgs 1 and 4 item B) to the West Linn City Council, there are 17 intermittent/perennial streams draining the relatively small upland area of West Linn. These streams would not exist if not for their base flow provided from seeps and springs.

Based on no substantial evidence in the record, the City falsely claimed in their Final Decision and Order, or FDO (2.E.8.), that the stream is ephemeral because there is no groundwater contributing to the creek. In their assessment of groundwater seepage, the Applicant provided a photograph of a single, small, shallow (16-inch deep) hole somewhere on the subject property not identified by its actual location (City West Linn 3/23/23 memo). The photograph shows clay-rich soils that appear to be typical slump deposits common along the lower side slopes of our *Ravines*. This single 16-inch deep hole is not an adequate assessment of groundwater seepage in this geologic setting. Seeps and springs are typically below ground features except where they might intercept the actual channel, and they can occur on either side of the *Ravine* and at multiple locations and elevations. The single shallow probe on the Applicant's side of the *Ravine*, is wholly insufficient evidence to claim there are no seeps and springs contributing to the creek. This inadequate site characterization and flawed interpretation conflicts with all other expert testimony and field evidence of the drainage and area. As a professional licensed geologist and hydrogeologist with 40 years' experience, the very limited assessment of groundwater performed by the Applicant would not be accepted as being adequate by any qualified geological/hydrogeological professionals.

2. Slope of Terrain: According to West Linn's code definition, ephemeral streams are located in areas of "*less than 10% slope*" measured perpendicular to the channel flow. This is consistent with and confirmed by the Official WRA Map (CDC 32.120) which shows a limited number of ephemeral reaches that are located only in relatively flat lying terrain on the hill top area of West Linn, topographically above the mapped Corridors/Ravines (See dashed-blue lines on the Official WRA Map). In significant contrast, as indicated in my previous 3/10/23 testimony (pg 4, Factor A), the side slopes of the Robin Creek *Corridor/Ravine* along the subject property are greater than 40% as calculated from the City's Atlas Map with Contours, Map No. 4932.

3. Lack of a Defined Channel: The West Linn code definition characterizes ephemeral streams as having "*no recognizable drainage channel.*" As observed in the field and documented in the record, Robin Creek has a defined drainage channel typical of West Linn's intermittent streams in *Ravines*. It is also acknowledged in the record that the drainage channel area along a portion of the subject property has been highly disturbed, including: 1) the installation of a rip-rap dam in the channel near the southeast (upstream) corner of the property; and, 2) storm drain/lines near the northeast (downstream) corner of the property (Fig 2 in original application). The City historically placed rocky fill in this reach of Robin Creek during past storm drain/line construction projects and during roadway construction. Additional fill placement, drainage alteration, and burial of the old creek channel occurred during past roadway building and during construction of two homes very close to the creek line at this lower reach immediately adjacent (south) to Wildwood Drive. These local disturbances collectively created a "French-drain" type effect causing base creek flow to move below ground level and migrate in the subsurface. The creek drainage channel is clearly evident upstream and downstream of this short, disturbed reach of Robin Creek. In fact as shown in the record, the creek is beginning to establish a new channel on top of the City's coarse fill during higher flow events/periods. Because of these disturbed conditions the creek can exhibit ephemeral characteristics in terms of surface flow duration in the fill material along the subject property; however, creek/drainage flow continues all year or nearly year-round beneath the disturbed reach. This localized disturbance/condition is not a basis for re-classifying Robin Creek.

The City's approach to re-classify this reach of Robin Creek in the steep *Ravine* also conflicts with the key WRA features on the City's Official WRA Map (CDC 32.120). These WRA features, such as ephemeral streams, were previously confirmed by experts during the Goal 5 inventory and standards review process completed for the City's WRA Protection program in accordance with OAR Chapter 660, Division 23. In accordance with the CDC definition of ephemeral streams, and the hydrogeologic characteristics of West Linn's drainages, there are no

ephemeral streams present or shown on the Official WRA Map within any steep Riparian Corridors or Ravines in West Linn, including Robin Creek.

As defined in code (CDC Chapter 2), Robin Creek cannot be defined as an ephemeral stream. The Record indicates that it is an intermittent stream or perennial stream. Intermittent and perennial streams are treated equally in West Linn's WRA Protection program and code (CDC Chapters 2 and 32).

Error 3

Facts and Related Arguments:

The Official WRA Map and features were previously established based on review by technical experts through a Metro Functional Plan and State Goal 5 inventory and standards review process in accordance with OAR Chapter 660, Division 23. West Linn's WRA code allows a property owner to adjust (typically reduce) the protective setback boundaries (or buffer) associated with these WRA features if the proposed adjustment is properly justified and demonstrated to maintain all protective standards under CDC Chapter 32. In this case, the City recommended the Applicant use the Alternate Review Process (ARP) under CDC 32.070. While the ARP allows a property owner to seek a reduction in the buffer width associated with a designated water feature, it does not allow the property owner (or the Planning Manager) to re-classify a stream or fundamentally eliminate protections for other WRA features such as a Significant Riparian Corridor. Stream re-classification or significant changes to other fundamental WRA features on the Official WRA Map can only be made in accordance with CDC 32.120(B) involving a legislative hearing process through the Planning Commission in accordance with CDC Chapters 98 and 99.

As City precedent, the legislative hearing process was appropriately followed by the previous Planning Manager on only one other City project (Project SUB-19-01) where a designated WRA feature on the Official WRA Map was changed or corrected for a development project. In that previous project, a small, shallow drainage swale was appropriately re-classified as an ephemeral stream consistent with the CDC Chapter 2 definition of ephemeral streams, and Metro and the Department of State Lands (DSL) were consulted in the Map correction and re-classification process.

The City's original final decision documentation (notably Sections 2.E.5. and 2.E.8.) illustrate the flawed reasoning of code requirements in the actions taken by the Planning Manager on this decision. Section 2.E.5. states that "No Map Change is Necessary" for their approved action, which again is based entirely on the Consultant's application of an SDAM rapid assessment field tool which indicates only that the stream exhibits ephemeral characteristics of flow on a disturbed portion of the property. Section 2.E.8. indicates the City has accepted the Consultants re-classification by stating "The stream is correctly classified as ephemeral," however, the stream has not been "classified" or "designated" to be "ephemeral" anywhere on the Official WRA Map (not even today three years later), which formally represents West Linn's WRA code features established in CDC 32.120, or by any other regional or State authority or records. Without a change to the City's Official WRA Map, Robin Creek is still recognized as an intermittent and perennial stream according to local (West Linn), regional (Metro) and State (DSL) regulations.

Further, CDC 32.120(C) states: "The Planning Director shall maintain in their office, and available for public inspection, an up-to-date copy of the WRA Map. (Ord. 1623 § 1, 2014)" Because any change in stream classification would constitute a significant revision to the Official WRA Map (32.120), a Map Change is necessary in order to maintain an up-to-date copy of the Map available to the public. And as outlined above,

the correct code procedure to update the Official WRA Map requires a legislative hearing process in accordance with Chapters 98 and 99 (CDC32.120(B)), and coordination with Metro; however, none of these actions have been taken or completed by the City.

Such stream re-classifications must follow the appropriate scientific, planning, and legal steps under the CDC and State Goal 5 and Metro regulations. In West Linn these WRA steps must be triggered by a proposed land use application (in this case a property development application) that initiates a review of the WRA status and conditions, and would contain any proposal to reclassify the water feature with proper justification. The development application and WRA permit application are procedurally addressed together through a legislative hearing process by the Planning Commission in compliance with CDC Chapters 98 and 99. The hearing process is necessary to confirm the appropriate application of WRA code standards and requirements, including any changes needed to WRA features on the Official WRA Map which represents the code status of the WRA Protection program (CDC 32.120). Finally, CDC 32.120(C) requires that the City must maintain an up-to-date copy of the Official WRA Map available for public inspection, and updates to the Map must be coordinated with Metro.

None of these procedural or process steps outlined above occurred in this case. In contrast however, as mentioned above, the record demonstrates that all of these procedures and process steps were completed on the only other City project (SUB-19-01) where corrections to or re-classifications of a designated WRA feature on the City's Official WRA Map occurred as part of a property development project – in that previous project a WRA Map correction involving a drainage classification change to “ephemeral” was appropriately performed and approved.

Error 4

Facts and Related Arguments:

Robin Creek is located within a designated *Significant Riparian Corridor* which has its own protective slope and setback criteria in the code [CDC 32.060(D) and Table 32-2] regardless of stream type – criteria and protections dismissed or otherwise not accounted for or addressed by the City's approval action.

Since Robin Creek may not be re-classified as an ephemeral stream without legislative due process (Error 3), the Planning Manager or property owner may not approve a fundamental reduction or elimination of the WRA protection boundary that is contingent upon a change in stream classification – and especially a buffer reduction that effectively eliminates the protective code criteria for West Linn's *Significant Riparian Corridors* which are designated WRA features that provide other protective functions under the City's WRA Protection program.

I submitted previous testimony demonstrating that the Applicant misrepresented the slope conditions on the proposed future development area. The Applicant characterized the property slope conditions as “plus or minus 25%” when in fact the actual *Ravine* slope shown for the “proposed” future building structure (Fig 2 of Application) is greater than 40% (based on City Atlas Map with Contours, Map No. 4932). The Planning Manager decision reduced the protection boundary for the stream to within 15 ft of the creek channel by claiming he has re-classified the stream as “ephemeral.” Not only is this interpretation and justification incorrect (Error 2), and the action not allowed by 32.070 (Error 3), the decision effectively eliminated the protective slope and setback criteria (CDC 32.060(D), Table 32-2 and Figures 32-4 thru 32-6) for the steep *Significant Riparian Corridor* and *Ravine*, even though by definition, and the City's Official WRA Map, there are

no “ephemeral” streams designated in any steep *Corridors* or *Ravines* in West Linn. The Planning Manager justified his approach to eliminate all *Corridor/Ravine* protections by re-classifying the stream and claiming the Alternative Review Process (CDC 32.070) allows such reductions; however, as noted in Error 3, CDC 32.070 only allows a buffer width adjustment, not a stream re-classification. The City’s rationale for this approach is not consistent with adopted WRA standards and legislative intent of the City’s WRA Protection program, including all WRA feature assumptions codified on the Official WRA Map (CDC 32.120).

The *Ravine* property proposed for development through the City’s approval action is also considered a “Significant Environmental Constraint” as defined in the West Linn Comprehensive Plan (Page 17) because of its steep slopes and natural/ecological attributes. The City established its designated *Significant Riparian Corridors*, including Robin Creek, specifically to protect these areas for their many valued functions in its Goal 5 natural resources area program, which is supported by several related land use goals. Comprehensive Plan Goal 2 under *Natural Environment* is particularly relevant where the West Linn community has determined its critically important to “*Protect sensitive environmental features such as steep slopes, wetlands, and riparian lands, including their contributory watersheds.*” The Planning Manager decision on this matter is in conflict with these protections intended under the City’s Goal 5 program, including Policies 2, 6, 10, and 12. The foundation of Goal 6 of the City’s Comprehensive Plan is to “maintain or improve the quality of West Linn’s water resources.” The intent of the permit to allow residential development within the confines of the *Ravine* also is in conflict with the City’s Goal 7 objectives to “protect life and property from flood, earthquake and other geologic hazards...,” including Policies 1 and 4.

Concern for fire protection/hazards posed by the proposed development relate to the code and Comprehensive Plan violations are noted here and in previous testimony on this matter. Wildfire hazards are increasingly recognized as significant safety hazards to address in urban planning along our rural or wildland/vegetated interface, and we should not be approving housing in our steep *Riparian Corridors* such as this location. There is a plethora of guidelines and recommendations for community planning and building structures in wildfire prone areas – for example recent publications from FEMA and the US Fire Administration, Firewise USA (a program of the National Fire Protection Association), the Office of Energy Efficiency and Renewable Energy (Energy.Gov), as well as documentation from established community organizations addressing recent tragic wildfires at the urban interface in California and Oregon especially. Because of the significant number of steep *Riparian Corridors/Ravines* throughout our City, West Linn should be following these wildfire interface recommendations in our planning decisions. Below are example quotes from these sources which demonstrate how dangerous and irresponsible it would be for planning to even consider, yet allow, development in our protected steep *Riparian Corridors/Ravines*:

“Steep ravines can act as funnels or chimneys intensifying and accelerating the upward progression of fires to ridgetops and adjoining canyons or ravines.”

The Energy.Gov organization says the number 1 recommendation to follow when siting a home is: ***“Avoid selecting a building site along a gully or in a narrow canyon.”***

They also recommend: ***“Avoid constructing a home adjacent to or on a steep slope...choose an area that allows minimum 50 ft setback from downslope side.”*** And they also state the need to: ***“Provide two-way access to the house and turn-around space for fire fighting vehicles near the home.”*** All of these critical mitigation measures are violated by the development intended by this WRA permit matter. The wildfire guidelines also require that a ***“defensible space”*** also be established around any new home with trees and

vegetation removed in progressive zones extending to 100 ft from the home. This necessary landscape management approach is in direct conflict with the subject permit plan.

For these collective reasons I urge you to deny the extension of this WRA permit that should never have been approved years ago.

Respectfully,

Russell B. Axelrod, RG/LG-LHG (Retired)
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Active drainage above (upstream of) subject property_2-20-26



2nd view active drainage above (upstream of) subject property_2-20-26



Active drainage below (immediately downstream of) subject property_2-20-26



Dry "false" channel in fill along subject property_2-20-26

February 27, 2026

Subject: Written Comments provided pursuant to the Notice of Upcoming Director Decision, File No. EXT-26-01, Regarding a Request for a 2-Year Extension of a Water Resource Area Permit (WAP-22-01/AP-23-01) for 19679 Wildwood Drive

Community Development Director Steven Koper, and Planning Manager Darren Wyss:

As a resident of West Linn, I have taken an interest in our City's government and, in particular, our land use process and decisions. I have been a member of the City's Planning Commission for over eleven years, including six years as its Chair. That said, I am providing written comments regarding a request for a 2-year extension (EXT-26-01) for a Water Resource Area (WRA) Permit (WAP-22-02/AP-23-01). As the 2023 WRA Permit was issued under a Planning Manager Decision, I am following up on the Notice of Director Decision for EXT-26-01 with comments similar to those submitted on March 20, 2023 to the West Linn City Council in regard to their consideration of Appeal AP-23-01. My comments regard the underlying Community Development Code (CDC) in Chapter 32, Water Resource Areas, which does not support WAP-22-02 and AP-23-01, nor the current EXT-26-01.

I am submitting my comments as a City resident, not as a current member of the West Linn Planning Commission. Also, my statement does not represent any previous consideration of AP-23-01 or WAP-22-02 by the Planning Commission, nor will the Planning Commission consider EXT-26-01 or any subsequent appeal that would be considered by the City Council in accordance with CDC Chapter 99.240(A). This request for a WRA extension cannot be remanded to the Planning Commission. Bearing this in mind, my comments present no conflict with my role as a Planning Commissioner.

I am professionally qualified to comment on EXT-26-01 as an Oregon Registered Geologist (R.G.), a Washington Licensed Geologist (L.G.), and a California Professional Geologist (P.G.). I have worked for 40 years as an environmental consultant and practicing geologist, with substantial experience with groundwater and stormwater that is applicable to and supportive of my comments below. I also serve on the Steering Committee of the Washington Hydrogeology Symposium (2005 to present) and have previously served on the planning committee, as well as a moderator, for the NEBC's Managing Stormwater in Oregon Conference. In addition, I have a solid grounding in West Linn's Community Development Code, which I will reference in my comments.

CDC 32.120, Water Resource Area (WRA) Map

For easy reference, the applicable code from the City's website is provided below. Bolding and underlining of text were added.

32.120 WRA MAP

*A. The WRA Map, dated May 2014, is adopted as the official WRA Map. **It is intended to identify WRA water features (wetlands, streams, ephemeral streams and riparian corridors).** It is not intended to delineate the exact WRA boundaries or water feature alignment. That task will be carried out by staff in the course of site visits where the provisions of Table 32-2 shall apply.*

*B. **Amendments to the WRA Map may be made in accordance with the provisions of Chapters 98 and 99 CDC.** Copies of all map amendments shall be dated with the effective date of the document adopting the map amendment and shall be maintained without change, together with the adopting documents, on file in the Planning Department.*

C. The Planning Director shall maintain in their office, and available for public inspection, an up-to-date copy of the WRA Map. (Ord. [1623](#) § 1, 2014)

As the above code indicates, the City WRA Map identifies water features per CDC 32.120(A). Further, the WRA Map itself is part and parcel of the WRA code in CDC Chapter 32 and can only be amended through a legislative hearing before the Planning Commission per CDC 32.120(B). These points are very clear and cannot be misconstrued. Robin Creek is identified as a "Stream" on the WRA Map and cannot be changed to an "Ephemeral Stream" without a legislative hearing in accordance with CDC Chapter 98 before the Planning Commission. Consequently, the Planning Manager Decision for WAP-22-02 does not have the authority to revise the water feature classification of Robin Creek.

As the WRA Map "is not intended to delineate the exact WRA boundaries or water feature alignment" per CDC 32.120(A), the Planning Manager may approve changes in the WRA boundary and alignment. However, since Robin Creek may not be reclassified as an ephemeral stream without legislative due process, the Planning Manager Decision may not approve a change in the WRA boundary that is contingent upon any change in stream classification.

As required under CDC 32.120(C), the WRA Map shall be up-to-date and available for the public inspection. The City has been served well by the May 2014 WRA Map, as required by Ordinance 1623, and there have been no legislative hearings since its initial development to alter the identification of Goal 5 Significant Riparian Corridors and Goal 5 Wetland Inventory.

CDC 32.060, Approval Criteria (Standard Process)

Without a legislative hearing to reclassify the subject reach of Robin Creek as ephemeral, the Applicant did not demonstrate, in WAP-22-02 or AP-23-01, the applicability of the Alternate Review Process under CDC 32.070. Accordingly, the Applicant must address the standard approval criteria per CDC 32.060.

The WRA Map indicates that Robin Creek is a “Significant Riparian Corridor.” Whatever the applicant proposes must be as good as the WRA boundary for a riparian corridor listed in CDC 32, Table 32-2, Line D, which requires having a 100-foot width on each side of the water resource. To determine equivalency to the riparian corridor boundary, the Applicant must consider the ecological functions listed in CDC 32, Table 32-4.

The Applicant indicated the ecological functions were considered for equivalency in Table 1 of the Natural Resource Assessment. The text on pages 6-7 of the Applicant’s Natural Resource Assessment recognized steep slopes and hazardous conditions, but Table 1 did not address the steep slope conditions. In the paragraph just prior to Table 1 (page 6), the Natural Resource Assessment states: *“Stormwater runoff from steep slopes and development above is unmitigated.”* At the bottom of page 7, the Assessment discusses site design that is contingent upon a 15-foot WRA boundary and states: *“Site design utilized the only developable area onsite that avoided steep, hazardous slopes and avoided impacts to the 15-foot WRA.”* Table 1 and the quoted text did not demonstrate ecological function equivalency for steep slope conditions that would support a 15-foot WRA boundary, but rather suggest that the water resource should meet the WRA width for a Ravine that includes the slope plus an additional 50 feet (CDC 32, Table 32-2, Line B).

Also, the Natural Resource Assessment states (page 7) *“the applicant proposes voluntary enhancement of the WRA along the west side of the stream,”* which indicates that no enhancement will occur on the neighboring property to the east. By their application to reduce the WRA from 100 feet on each side of Robin Creek to only 15 feet, apparently on both sides of the stream, they provide no assessment of or proposed mitigation in the WRA on the east side of the stream, i.e., on the neighboring property. Also, WAP-22-02 and AP-23-01 do not account for this discrepancy, thereby reducing the WRA on the neighboring property without supporting evidence.

Existing Upstream City Storm Infrastructure

The Natural Resource Assessment addressed the recent stormwater infrastructure construction at the Applicant’s property, adjacent to Wildwood Drive, but it does not address stormwater lateral discharge structures located upstream of the Applicant’s property. The as-built drawing sets for Hidden Springs Ranch No. 6 and Hidden Springs Summit No. 1 show the stormwater from Derby Court, Carriage Way, and Lexington Terrace are conveyed for discharge into Robin Creek. The as-built drawing sets may be viewed at the following links to the City’s website:

<https://westlinnoregon.gov/sites/default/files/gis/asbuilts/HiddenSpringsRanch6.pdf>

<https://westlinnoregon.gov/sites/default/files/gis/asbuilts/HiddenSpringsSummit.pdf>

Below is a screenshot of a portion of Sheet 3/25 from the Hidden Springs Ranch No. 6 as-built drawing set. The storm lateral from the end of Derby Court runs along the east and north sides of Lot 5 to Robin Creek. The approximate centerline of the creek is illustrated on the as-built drawing. The highlighted note on the upper left-hand portion of the screenshot references the installation of the velocity dissipator and rip-rap at the northwest corner of Lot 5. This location also corresponds to the southeast corner of the Applicant's property.

Further upstream on Robin Creek (i.e., to the south), a second velocity dissipator and rip-rap structure was installed for the discharge of stormwater from Carriage Way and Lexington Terrace. See the highlighted note on the lower left-hand portion of the figure below.

None of the Applicant's documentation presented in regard to WAP-22-02 and AP-23-01 addressed these velocity dissipators and rip-rap structures, either as site visit observations or as references to the as-built drawing sets. Consequently, the impact of heavy stormwater discharge from Derby Court, Carriage Way, and Lexington Terrace to the reach of Robin Creek running through the Applicant's property has not been considered.

Although WAP-22-02 and AP-23-01 were approved by the Planning Manager and City Council, respectively, the Applicant did not adequately address the requirements of CDC 32, as discussed above. Accordingly, the Applicant's request for a 2-Year Extension, EXT-26-01, also does not demonstrate compliance with the requirements for development within a Water Resource Area.

I respectfully submit the above comments to the West Linn City Council.

Gary Walvatne, RG, LG, PG
West Linn, Oregon

EXHIBIT PD-3: CITY COUNCIL FINAL DECISION AND ORDER (AP-23-01)

WEST LINN CITY COUNCIL
FINAL DECISION AND ORDER
AP-23-01

**IN THE MATTER OF AN APPEAL OF THE PLANNING MANAGER APPROVAL OF A
WATER RESOURCE AREA PERMIT AT 19679 WILDWOOD DRIVE (WAP-22-02)**

I. Overview

Alex Kalmanson (Applicant) filed a land use application on October 6, 2022, and it was deemed complete on October 31, 2022. The proposal was for an Alternate Review of the required water resource area (WRA) buffer on a portion of Robinwood Creek contained within their property. The approval criteria for the application are West Linn Community Development Code (CDC) Chapters 32 and 99. Public notice was mailed December 13, 2022 and provided a 20-day comment period before the Planning Manager decision.

The proposal was based on the CDC 32.070 which provides for use of the Alternate Review process where “there is reason to believe that the width of the WRA prescribed under the standard process (CDC 32.060(D)) is larger than necessary to protect the functions of the water resource at a particular site.” The Applicant has lived on his property for 17 years. In his 17 years on the property, he had not seen evidence that the watercourse on his property was a perennial stream. The City’s “standard process” had yielded a 100-foot setback on either side of the watercourse on the basis that the watercourse was perennial. Therefore, the Applicant had reason to believe that the WRA was wider than necessary to protect the “functions of the water resource” at the particular site – his residential lot. Accordingly, the Applicant obtained a professional evaluation of the WRA and that professional evaluation demonstrated that the associated stream within the property met the CDC definition of an ephemeral stream and that a 15-foot buffer with proposed mitigation would better protect the functions of the water resource on the subject site than the 100-foot buffer in its degraded state. The proposal included mitigation and plantings in compliance with CDC requirements to enhance the degraded stream corridor and improve its ecological function. The Applicant indicated he may pursue future development on the property with the additional buildable area created by the WRA reduction, but no development was proposed as part of the application. Fourteen public comments were submitted prior to the deadline, and included the following general concerns:

- Future development may not match the character of their neighborhood
- Future development may not be adequately maintained
- The Applicant did not meet the intent or application of CDC Chapter 32
- Future development may adversely affect drainage
- Future development may make the neighborhood more crowded and less attractive to buyers
- Future development may adversely affect the water resource
- Future development may increase traffic in the area

- Future development that increases population density will adversely affect property values
- Future development may adversely affect neighborhood infrastructure quality
- Future development may lead to tree removals that detract from neighborhood character
- Future development may adversely impact views and nearby hiking trails

While some of the comments provided reference to certain provisions within CDC Chapter 32, none of them identified any applicable criteria the application, as presented, failed to meet. The Planning Manager approved the application on January 17, 2023, based on the applicable CDC criteria and the evidence submitted by the Applicant.

On January 31, 2023, Russell Axelrod (Appellant) filed a timely appeal of the Planning Manager decision. A 30-day extension to the 120-day period was granted by the Applicant on January 31, 2023, in light of the appeal.

The appeal hearing was held by the City Council on March 13, 2023. Written testimony was submitted prior to the comment deadline by the Applicant, Appellant, and the public. The meeting commenced with the legal proceedings read by Mayor Bialostosky and the City Attorney, Bill Monahan. After the legal proceedings were complete, Assistant Planner Ben Gardner presented as the staff planner, followed by oral argument from the Appellant. This was followed by oral argument from the Applicant and then public testimony. Members of the public expressed general opposition to the application, and support for the appeal. The Applicant then had an opportunity for rebuttal, followed by a sur-rebuttal by the Appellant. The Applicant then had an opportunity for a final rebuttal.

During the public testimony portion of the hearing, a member of the public in attendance requested a continuance of the hearing. Council passed a motion of continuance that established:

1. The public hearing is closed, but the record will remain open for the following:
 - a. Additional written testimony in response to what was heard at the public hearing would be accepted by Council by the deadline of noon on March 20, 2023;
 - b. Written rebuttal in response to additional written testimony received by March 20th would be accepted by Council with a deadline of noon on March 27, 2023 (with the restriction of it containing no new evidence); and
 - c. Council would accept the Applicant final written argument with a deadline of noon on April 3, 2023.
2. Council deliberations continued to a date-certain of April 10, 2023, at 6:00pm.

Council also requested an extension of the 120-day clock to May 10, 2023, from the Applicant. The Applicant agreed and provided an extension in writing on March 14, 2023.

Additional written testimony and written rebuttal (items 1a and 1b above) were submitted by the Applicant, Appellant, and the public within the established deadlines. The Applicant final

written argument (item 1c) was subsequently submitted within the established deadline. The information was provided to Council and entered into the record.

Council held the continued appeal hearing on April 10, 2023. The meeting commenced with the legal proceedings read by Mayor Bialostosky and the City Attorney, Bill Monahan. As part of the legal proceedings, there is an opportunity for anyone to challenge the impartiality of any member of the City Council. A member of the public, Ms. Karie Oakes, challenged Mayor Bialostosky's impartiality, based on his disclosure that during the period that the hearing was continued he asked the Planning Manager some questions about the application. Following Mayor Bialostosky's explanation, Ms. Oakes challenged his impartiality. The Council then followed Council Rules Section D.4, Ex-parte Contacts and Disqualifications to address the challenge. Council President Baumgardner took over as presiding officer and allowed Mayor Bialostosky to explain the contact. Mayor Bialostosky explained that he was seeking clarity on portions of the involved code, as this was a highly technical application, and his discussions did not affect his impartiality on the matter. Council President Mary Baumgardner put forth a motion to deny the challenge, and it was seconded by Councilor Relyea. The motion passed 2-0 with both voting to deny the challenge. Council President Baumgardner then gave control of the meeting back to Mayor Bialostosky. Deliberation then proceeded, and after a brief discussion, Council President Baumgardner made a motion to tentatively deny the appeal, thus upholding the Planning Manager decision, and for staff to return with final findings on April 17, 2023, for adoption. Mayor Bialostosky seconded the motion and the motion passed with two votes in favor (Baumgardner, Bialostosky) and one opposed (Relyea).

II. The Record

The record was finalized with the submittal of the Applicant's final written rebuttal on April 3, 2023. The record includes the entire file for WAP-22-02 and AP-23-01.

III. 120-Day Period

The Applicant extended the 120-day period in ORS 227.178(1) from February 28, 2023, to March 30, 2023, in writing on January 31, 2023. The Applicant extended the 120-day period in ORS 227.178(1) from March 30, 2023, to May 10, 2023, in writing on March 14, 2023. The City Council final decision was issued within the extended 120-day period.

IV. Scope of Review

The Appellant and Applicant agreed that the scope of the hearing was de novo.

V. Findings of Fact

- 1) The Overview set forth above is true and correct.
- 2) The Applicant is Alex Kalmanson.
- 3) The Appellant is Russell Axelrod.

- 4) The Council finds that it has received all information necessary to make a decision based on the agenda reports, appeal application, the Appellant’s oral argument, the Applicant’s oral argument, oral argument by the public, and evidence in the whole record.

1. Procedural issues raised in public comment and City Council hearings

- A. The Hidden Springs Neighborhood Association and The Appellant claimed that the Association did not receive written notice of the original staff decision (WAP-22-02). Contrary to this claim, a Class A written notice was prepared and mailed via the United States Postal Service (USPS) to the Hidden Springs Neighborhood Association on December 13, 2022, along with all other required parties. A signed affidavit of mailing was produced and is included in the original decision. Per CDC 99.100(B-C), personal notice is deemed given when the notice is deposited with the USPS. Regardless, the City Council conducted a de novo review and no person argued that notice of the de novo review was inadequate. All persons were provided a full and fair opportunity to submit evidence and argument to the City Council. Therefore, even if the notice of the original staff decision was inadequate, the subsequent de novo council review cured any such issue.
- B. The impartiality of Mayor Bialostosky was challenged by a resident during the continued hearing on April 10, 2023. Councilors found that the challenge had no merit and the Mayor acted as allowed by both applicable standards and direction from the City Attorney. The challenge was denied.

2. City Council Findings of Fact Approving the Application and Rejecting the Appeal

City Council hereby adopts the following Findings supporting approval of the Application and rejecting the Appeal based on the Incorporated Findings and the Application’s Substantial Evidence.

- A. The City Council incorporates the Staff Report to the City Council (the “City Council Staff Report”) prepared in advance of the March 13, 2023, appeal hearing and the Planning Department Power Point presentation (the “Power Point”) presented at the March 13, 2023, appeal hearing.
- B. The City Council incorporates the Planning Manager decision dated January 17, 2023.
- C. The City Council incorporates the Applicant Final Written Argument, as well as the three reports of the Applicant’s consultant, as its supplemental findings of approval.
- D. The staff report, Planning Manager Decision and Applicant Final Written Argument are referred to in these supplemental findings as “Incorporated Findings”.

If there is a conflict between these Supplemental Findings and the Incorporated Findings, these findings shall control.

E. Supplemental Findings in Response to the Substantive Appeal Issues

1. The “Site”

Some objectors claimed that the CDC 32.070 and 080 analysis was required to evaluate an entire water shed and some argued for greater consideration beyond the Applicant’s property. The Council finds that both are mistaken. CDC 32.070 provides an “Alternate Review process” to determine the appropriate width of a WRA “at a particular site.” The Council finds that the reference to “particular site” refers to the applicant’s property. This is evident from the express words used as well as the surrounding context. The standard may only be invoked by an “applicant.” CDC 99.030 requires applicants to be the property owners or property owner’s agent to file applications. This demonstrates that the standard refers only to the applicant’s property. Further, the applicant only has authority to enter his own property to undertake the required evaluations. Moreover, the applicant can only offer mitigation that he has authority to carry out and to maintain over time, which means the mitigation must be on the applicant’s property.

2. Degraded WRA

The Council finds that the WRA on the subject property is significantly degraded.

3. All standards are met

The Council finds that:

- a. The application meets all required standards to include that the reduced WRA together with the proposed mitigation will result in better performance of WRA functions than the standard WRA without mitigation.
- b. CDC 32.060(D) and its associated Table 32-2 does not apply as a relevant approval standard to the alternate approval process.

4. WRA Reductions

The City Council finds that the record demonstrates compliance with the CDC applicable criteria and the Metro Urban Growth Management Functional Plan it implements. Both expressly contemplate WRA reductions in such circumstances as presented in the application.

5. No Map Change is Necessary

The City Council finds the Applicant pursued the correct process allowed by the Community Development Code based on the plain language of CDC Chapter 32. The Council finds that a legislative map change process is not required to be approved for a WRA reduction under CDC 32.070 and 080. City Council also finds that substantial evidence in the record demonstrates the stream on the property classifies as ephemeral and there was reason to believe that the default 100-foot

width of the WRA was larger than necessary to protect the functions of the water resource at the site in question. The Council finds that the WRA on the Applicant's property was demonstrated to be significantly degraded, and the CDC expressly contemplates that the property owner, the Applicant, could apply for a WRA reduction in such circumstances and have a reasonable expectation that an application will be approved where all standards are met.

6. After the fact recollections

The City Council also finds that per ORS 227.173(1) only the City's codified standards may be applied to the application. The Council also finds that the after the fact statements of persons involved in the adoption of CDC 32 provisions is not legislative history that is persuasive or capable of undermining the proper interpretation of the meaning of CDC 32.070 and 080.

7. The Applicant properly evaluated the functions of the stream

The City Council finds that CDC 32.070 and 080 only require a functional evaluation of the WRA be performed for the reach of the water course on the Applicant's subject property. The City Council also finds that substantial evidence in the record demonstrates the functional evaluation submitted by the Applicant, prepared by a professional wetland specialist, establishes that the default 100-foot WRA on either side of the watercourse is far larger than necessary to protect WRA functional values.

8. The stream is correctly classified as ephemeral

The City Council finds that the reach of stream on the Applicant's property is ephemeral as the CDC defines an ephemeral stream as one that only flows in response to precipitation and is above groundwater or water table levels.

9. The Applicant's natural resource assessment was appropriate

The City Council finds that the Applicant's natural resource assessment, including the functional analysis, prepared by a professional wetland specialist, is the most credible and persuasive evidence in the record. The Council finds that the most credible and persuasive evidence in the record demonstrates that a 15-foot buffer with the proposed mitigation plantings will improve the function of the WRA as opposed to the existing conditions on site with the 100-foot WRA. City Council also finds the record demonstrates that the evidence submitted by the Applicant contains adequate information as required by the Alternate Review process in CDC Chapter 32 to make a decision.

10. The Planning Manager and Council decisions do not defer a determination of compliance with any relevant standard

The City Council finds that all standards are met and that no findings of compliance have been deferred. The Council further finds the Planning Manager and Council have authority under the CDC to approve the application (CDC 99.060.A.1.r) and can

impose reasonable conditions of approval to assure compliance. Here, the first condition of approval for a mitigation plan submittal has already been met. In this regard, the Council finds that the Applicant submitted an adequate mitigation plan in the open record period. The Council finds that the only remaining task under Condition 1 is for the Applicant to submit to the City a final report documenting completion of the required mitigation. Condition 2 requires that the plantings on the property comply with that mitigation plan – as it was expressed in the Applicant’s expert’s narrative Exhibit PD-1 Table 2 and Figure 2. Conditions 3 and 4 are informational only and require what the code already requires; (i.e.) that the Applicant will be required to submit a stormwater and construction management plan if and when development is proposed in the future.

VI. Conclusion.

For the reasons contained herein, the City Council hereby rejects the appeal, affirms the Planning Manager decision, and approves the Application.

- 1. Mitigation Plan. The applicant has submitted a mitigation and planting plan that conforms to the provisions of CDC Chapter 32. The applicant shall submit a final report documenting the mitigation measures were completed within 30 days following completion of the measures.**

- 2. Site Plan and Narrative. Planting and mitigation shall conform to applicant’s mitigation plan (Table 2 and Figure 2, Exhibit PD-1, Planning Manager Decision WAP-22-02 dated January 17, 2023).**

- 3. Stormwater Plan. The applicant shall submit a stormwater management plan at time of permit submittal for future development that demonstrates its compliance with the applicable provisions of Chapters 32 and 92.**

- 4. Construction Management Plan. The applicant shall provide a construction management plan at time of permit submittal for future development that demonstrates its compliance with the applicable provisions of Chapter 32.**

VII. Order

The Council concludes that AP-23-01 is denied. The Council upholds the Planning Manager approval of WAP-22-02 based upon consideration of the entire Record, Findings of Fact, and Findings above.



RORY BIALOSTOSKY, INTERIM MAYOR
WEST LINN CITY COUNCIL

April 17th, 2023

DATE

This decision may be appealed to the Land Use Board of Appeals in accordance with the applicable rules and statutes.

Mailed this 18 day of April, 2023.

Therefore, this decision becomes effective 21 days from the date of approval at 5 p.m.,
May 9, 2023.

EXHIBIT PD-4: COMPLETENESS LETTER



CITY OF
West Linn

February 11, 2026

Alex Kalmanson
19679 Wildwood Dr.
West Linn, OR 97068

Subject: EXT-26-01 Completeness Determination

Dear Mr. Kalmanson:

The City has reviewed your application, submitted February 5, 2026, for a Two-Year Extension of an approved Water Resource Area Permit (WAP-22-02/AP-23-01) at 19679 Wildwood Drive and has determined the application is **complete**. The City has 120 days to exhaust all local review; that period ends June 11, 2026.

Please note a completeness determination does not guarantee approval of your application. It signals that staff believes you have provided the necessary information for the Planning Director to render a decision.

A 14-day public notice will be prepared and mailed. This notice will identify the earliest potential decision date by the Community Development Director.

Please contact me at 503-742-6064, or by email at dwyss@westlinnoregon.gov if you have any questions about the process.

Sincerely,

A handwritten signature in blue ink that reads "Darren Wyss".

Darren Wyss
Principal Planner

EXHIBIT PD-5 AFFIDAVIT AND NOTICE PACKET



NOTICE OF UPCOMING DIRECTOR DECISION FILE NO. EXT-26-01

The West Linn Community Development Director is considering a proposal for a two-year extension of a Water Resource Area Permit (WAP-22-02/AP-23-01) at 19679 Wildwood Drive. The proposal would extend the permit expiration date to May 9, 2028.

You have been notified of this proposal because County records indicate that you own property within 300 feet of the property (Clackamas County Assessor's Map 21E23AC04600), or as otherwise required by CDC Chapter 99.080.

The Director will make a decision on the application based on criteria in Chapter 99.325 of the Community Development Code (CDC). The CDC approval criteria are available for review on the City website <http://www.westlinnoregon.gov/cdc> or at City Hall and the City Library.

The application is posted on the City's website, <https://westlinnoregon.gov/projects>. The application, all documents or evidence relied upon by the applicant and applicable criteria are available for inspection at City Hall at no cost. Copies may be obtained at reasonable cost.

A public hearing will not be held for this decision. **Anyone wishing to submit comments for consideration must submit all material before 4:00 p.m. on Friday, February 27, 2026 to dwyss@westlinnoregon.gov or mail them to City Hall. All comments must be received by the deadline.**

It is important to submit all testimony in response to this notice. All comments submitted for consideration of this application should relate specifically to the applicable criteria. Failure to raise an issue in a hearing, in person, or by letter, or failure to provide sufficient specificity to afford the decision-maker an opportunity to respond to the issue, precludes appeal to the Oregon Land Use Board of Appeals based on that issue (CDC Section 99.090).

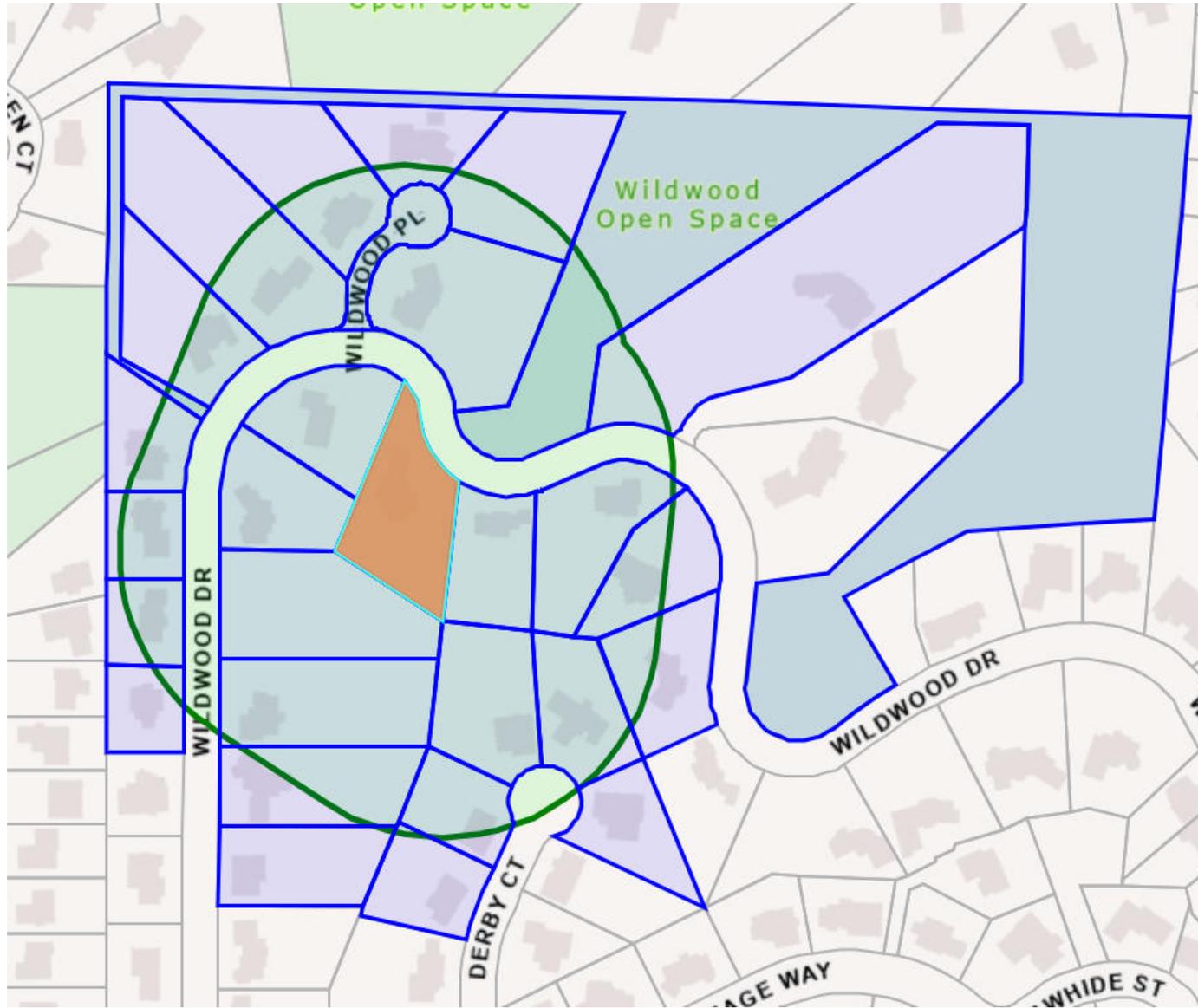
The final decision will be posted on the website and available at City Hall. Persons with party status may appeal the decision by submitting an appeal application to the Planning Department within 14 days of mailing the notice of the final decision pursuant to CDC [99.240](#).

For additional information, please contact Darren Wyss, Principal Planner, City Hall, 22500 Salamo Rd., West Linn, OR 97068, 503-742-6064

Scan this QR Code to go to Project Web Page:



EXT-26-01 – Notified Properties within 300 feet of 19679 Wildwood Drive





**NOTICE OF UPCOMING
PLANNING DIRECTOR DECISION**

**PROJECT # EXT-26-01
MAIL: 02/13/2026 TIDINGS: N/A**

CITIZEN CONTACT INFORMATION

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