

Public Comment

Code Interpretation CI-24-01

P.O. Box 2604
Lebanon, OR 97355
June 23, 2025

Lebanon City Council
Lebanon Community Development Department
925 Main Street
Lebanon, OR 97355



Planning Case No. CI-24-0 Applicant: Laura LaRoque
Request: Administrative Review

History: The question of trails being allowed in Z-RL, residential low-density zones, was originally addressed by Alyssa Boles, the Planning Manager with Linn County Planning and Building Department in October of 2024. After a thorough evaluation, she awarded BLT a Conditional Use Permit (CUP) to build what we are calling the Georgia Pacific Mill Race Trail (GPMRT) with the condition that the City of Lebanon agrees in writing to accept ownership of the trail before it is opened to the public. The trail will be built entirely with donated funds on land that is privately owned by BLT as the result of a generous donation from the Georgia Pacific Corporation.

NIMBY appealed Linn County Planner's initial ruling to the Linn County Planning Commission. At a special hearing in January the CUP was, again, approved, this time by a unanimous vote of the Linn County Planning Commission.

NIMBY subsequently appealed the Planning Commission's ruling to the Linn County Board of Commissioners. The commissioners reviewed the voluminous printed information that had been submitted and then at their hearing on 6/3/25 listened to live testimony. At the conclusion of the hearing the Commissioners voted unanimously to approve the CUP.

While Linn County was going through their review process, NIMBY submitted a request to the Lebanon Community Development Department for formal clarification on the question of building a Recreational Trail in a Residential Low-Density Zone. The City Planner's decision was appealed by NIMBY to the Lebanon Planning Commission where the case was heard on 2/19/25. They agreed with the Community Development Director's decision.

Build Lebanon Trails (BLT) agrees with Linn County and the City of Lebanon that building trails in this (and other) Residential Low-Density Zone is an approved use of the properties.

The guiding document Build Lebanon Trails uses in the planning and development of trails in Lebanon is the City Council Adopted, Lebanon Trails Strategic Plan.

BLT agrees with the following decision as stated by City Planning Staff in the December 27, 2024, Code Interpretation on file #CI-24-01:

“Trails that implement the trails master plan and are maintained as part of the City of Lebanon park system are to be interpreted as categorized as “parks and recreational facilities, open space and pedestrian amenities” as listed in Table 16.05-5 in Section 16.05.070 of the Lebanon Development Code. As such, trails are not strictly prohibited in the residential low-density zone.”

Build Lebanon Trails wishes to address City Council at the 7/9/2025 meeting and reserve the right to future comment and appeal.

Sincerely,

Rodney W. Sell, Board President
Build Lebanon Trails (BLT)