

October 6, 2021

**Michael C. Robinson**

Admitted in Oregon  
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**PRIVILEGED AND CONFIDENTIAL**

**VIA E-MAIL**

Mr. Kelly O'Neill, Jr., Director  
City of Sandy Development Services Department  
Sandy City Hall  
39250 Pioneer Blvd.  
Sandy, OR 97055

RE: City of Sandy File No. 21-014 SUB/TREE; Applicant's Extension of the 120-Day Period in ORS 277.178(1)

Dear Mr. O'Neill:

This office represents the Applicant. The Applicant has authorized me to extend the 120-day period in ORS 227.178(1) as allowed by ORS 227.178(5).

The Applicant submitted the application on March 31, 2021. The City deemed the application incomplete. The Development Services Director asked the Applicant to delay making the application complete because he was taking an extended vacation and did not want the 120-day period to begin during this period. The Applicant agreed to do so as a courtesy and agreed to start the 120-day period on July 27, 2021 (**Exhibit 1**) and end the 120-day period on November 24, 2021.

Prior to the conclusion of the initial evidentiary hearing on September 27, 2021, the Applicant requested that the Sandy Planning Commission close the public hearing but leave the written record open on the following schedule:

1. Until Monday October 11, 2021 at 4 p.m. for anyone to submit argument and evidence as those terms are defined in ORS 197.763(9);
2. Until Monday, October 18, 2021 at 4 p.m. for anyone to rebut argument and evidence submitted during the first open record period with argument and evidence; and
3. Until Monday, October 25, 2021 at 4 p.m. for the applicant only to submit final written argument without new evidence.

The Planning Commission adopted the above schedule and closed the public hearing.

The Planning Commission scheduled a special meeting on November 8, 2021 to deliberate to a tentative decision on the application.

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The Applicant extended the 120-day period by 42 days, the period of its open record period, and 14 days, the period from the end of the open record period and the special meeting date, for a total of 42 days. The Applicant extends the 120-day period from November 24, 2021 to January 5, 2022.

Please place this letter in the official Development Services Department file for this application and before the Planning Commission prior to its meeting on November 8, 2021.

Very truly yours,



Michael C. Robinson

MCR:jmhi  
Enclosure

cc: Mr. Dave Vandehey (*via email*) (*w/enclosure*)  
Mr. Carey Sheldon (*via email*) (*w/enclosure*)  
Mr. Alex Reverman (*via email*) (*w/enclosure*)  
Mr. Ray Moore (*via email*) (*w/enclosure*)  
Mr. Tyler Henderson (*via email*) (*w/enclosure*)  
Mr. Tracy Brown (*via email*) (*w/enclosure*)  
Mr. Garrett H. Stephenson (*via email*) (*w/enclosure*)  
Ms. Erin Forbes (*via email*) (*w/enclosure*)  
Mr. David Doughman (*via email*) (*w/enclosure*)

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June 11, 2021

**VIA E-MAIL**

Mr. Kelly O'Neill, Jr., Director  
City of Sandy Development Services Department  
Sandy City Hall  
39250 Pioneer Blvd.  
Sandy, OR 97055

**Michael C. Robinson**

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RE: City of Sandy File No. 21-014 SUB/TREE

Dear Mr. O'Neill:

This office represents the Applicant for the above-referenced Application. This letter confirms the discussion that you and I had on June 1, 2021 regarding your request that the Applicant consider an initial extension of the 120-day period as authorized by ORS 227.178(5).

The Applicant will submit its completeness response on or about June 14, 2021. Rather than have the 120-day period start on the date of submittal when all missing materials are provided in accordance with state law, the Applicant will extend the 120-day period from the submittal date through July 27, 2021. The 120-day period will start on July 27, 2021 and the 120-day period will end on November 24, 2021. The Applicant is not required to further extend the 120-day period.

The extension is conditioned upon your scheduling the initial evidentiary hearing before the Sandy Planning Commission on September 27, 2021. The final decision must be issued by November 24, 2021 based on this extension.

The Applicant hereby extends the 120-day period from the submittal date through July 27, 2021. Please place this letter in the official Development Services Department file for this Application.

Very truly yours,



Michael C. Robinson

MCR:jmhi

cc: Mr. Dave Vandehey (*via email*)  
Mr. Carey Sheldon (*via email*)  
Mr. Alex Reverman (*via email*)  
Mr. Tracy Brown (*via email*)

Mr. Kelly O'Neill, Jr., Director

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Mr. Ray Moore (*via email*)

Mr. Mike Ard (*via email*)

Ms. Shelley Denison (*via email*)

Mr. David Doughman (*via email*)

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