

West Linn Waterfront Vision Plan – Comments Received for July 16, 2025, PC Work Session

Commenter	Comment	Project Team Response	Project Team Recommendation
Jennifer Aberg	Revise the Vision Plan to remove depiction of dense housing within the wetland and 100-year floodplain along 5 th Street.	The floodplain boundary data is from FEMA and approximates the location. Development proposals are required to survey the flood elevation height as part of an application, so the site-specific location is known. Wetland delineations are also required to be submitted to the Division of State Lands for review and concurrence.	The FEMA 100-year floodplain elevation is 75 feet on the property containing the wetland, which is approximately the height of the 1996 Flood and the delineated wetland boundary provided by the applicant during the property consolidation process (MIP-23-07). Maps are attached to the Staff Memo. The PC could recommend using the 1996 flood boundary on the Ponds District map, or a disclaimer that site specific surveying will need to identify the exact boundary, or both.
Jennifer Aberg	Proposal conflicts with Vision Plan’s environmental stewardship goals to protect natural assets, ensure appropriate floodplain uses, and restore wetlands and habitat. Including dense housing here sends the wrong signal and violates West Linn’s comprehensive plan and development code.	The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019. Development and environmental protection can co-exist and any future development proposal will need to comply with floodplain regulations, Water Resource Area protections (wetland buffers), and Willamette River Greenway regulations.	Same as above.
Jennifer Aberg	Remove “in planning stages” from Medium Density Residential location.	Staff support removal of this language as it is not necessary or critical to the implementation of the Vision Plan.	Planning Commission recommendation to remove the language.
Jennifer Aberg	Contamination concerns with the former mill settling pond. Cleanup must be completed before any development is considered.	The Oregon Department of Environmental Quality (DEQ) oversees regulations and clean-up efforts for contaminated properties. Any development of the settling pond will need to complete DEQ processes prior to development.	The Pond District Map (pg. 36 of Vision Plan) clearly states for both the Blue Heron and PGE settling ponds that “environmental remediation and other environmental protective measures and rezoning needed”.
Jennifer Aberg	Remove inappropriate housing depiction.	The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019.	No changes recommended.
Shannen Knight	Working Group only provided summary of comments and not full record of comments.	The comment matrix specifically addressed comments related to the Vision Plan document. Many comments received were focused on a pre-application conference proposal for housing development along 5 th Avenue. The intent was to avoid confusion between the future vision and a potential current development	No changes recommended.

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		proposal. All comments have been provided to the Planning Commission.	
Shannen Knight	Working Group used consensus and not a vote in its recommendation to City Council on the Vision Plan.	City of West Linn Working Groups have always used consensus decision-making. The intent of the group is to review documents, comments, and proposed revisions throughout the planning process and provide feedback to ensure a final package is brought before them for a recommendation. The Working Group found consensus to forward the Vision Plan on to City Council with five recommendations.	No changes recommended.
Shannen Knight	Full letters need to be provided to Planning Commission and City Council.	All comments were provided to the Planning Commission at its July 16 th work session and again in the August 20 th work session packet. All comments will be provided to City Council.	No changes recommended.
Terrance Shumaker	Survey was “double-barreled” and should be discarded.	The final survey was intended to gauge support for the Vision Plan, not be scientifically valid as it was self-selecting. Survey responses support the Vision Plan after 10-years of community engagement. City Council will ultimately make the decision to adopt or not adopt the Vision Plan.	No changes recommended.
Terrance Shumaker	Community feedback stressed need to preserve the Ponds District as a natural area (pg. 15, Appendix A). The Plan has no confirmation of this majority concern.	The Pond District Framework Plan shows the protected resource areas, including the wetlands. Preservation and rehabilitation of natural areas with appropriately scaled development is the land use focus of the district. The City’s zoning code currently requires protection of natural resources, including wetlands.	No changes recommended.
Terrance Shumaker	Three land use options shown on pgs. 31-32 of Appendix A ignores preference for wetland trails and viewing platforms. Instead all three options specify high-density residential in the west pond area.	The maps were used during open houses in December 2019 to glean community feedback on the future types of uses that would be supported in each of the three districts. Potential development areas are included, but zoning changes will be addressed in the next phase. The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019. The Vision Plan shows wetland trails and a continuous river front trail.	No changes recommended.
Terrance Shumaker	The former Blue Heron settling pond has not been maintained per DEQ. Burrowing animals may have breached lagoon (based on aerial surveys by Friends of Willamette Wetlands) and	The Oregon Department of Environmental Quality (DEQ) oversees regulations and clean-up efforts for contaminated properties. Any development of the settling pond will need to complete DEQ processes prior to development.	The Pond District Map (pg. 36 of Vision Plan) clearly states for both the Blue Heron and PGE settling ponds that “environmental remediation and other environmental protective measures and rezoning needed”.

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contaminated the wetlands and creek. A thorough study and cleanup must be completed prior to development.

Terrance Shumaker	<p>The property lies within the 100-year floodplain and building on this site violates the Vision Plan principles for environmental stewardship.</p>	<p>The floodplain boundary data is from FEMA and approximates the location. Development proposals are required to survey the flood elevation height as part of an application, so the site-specific location is known. Wetland delineations are also required to be submitted to the Division of State Lands for review and concurrence.</p> <p>Development and environmental protection can co-exist and any future development proposal will need to comply with floodplain regulations, Water Resource Area protections (wetland buffers), and Willamette River Greenway regulations.</p>	<p>The FEMA 100-year floodplain elevation is 75 feet on the property containing the wetland, which is approximately the height of the 1996 Flood and the delineated wetland boundary provided by the applicant during the property consolidation process (MIP-23-07). Maps are attached to the Staff Memo. The PC could recommend using the 1996 flood boundary on the Ponds District map, or a disclaimer that site specific surveying will need to identify the exact boundary, or both.</p>
Terrance Shumaker	<p>Planning Commission should demand a thorough review of flaws in the plan since it ignores public preferences, assumes high-density housing when no proposal has been submitted, and ignores inconsistencies and contradictions in the plan.</p>	<p>The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019.</p>	<p>No changes recommended.</p>
Nicole Jackson	<p>Previous community feedback summarized in Community Engagement Summary feels largely ignored in Ponds District</p> <p>“The overwhelming majority of comments in this area were to retain and enhance this as a natural area with minimal development”</p> <p>“There was limited support for more intense development in the area because of the potential impact on natural areas and wetlands. There was little support and significant opposition to a hotel and to residential development. There were concerns these uses would contribute significant traffic to the narrow streets in the area and would also need to be resilient to flooding in this area”</p>	<p>The Vision Plan shows minimal development opportunities in the Ponds District. Most of the district is shown as ecological corridors, open space, or wetlands, which is consistent with community input and the principles of the district.</p> <p>There is no mention of a hotel in the Ponds District and the land use focus is “lower intensity of uses (pg. 35)”. The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019. All new development, which is a much more detailed process than the Vision Plan, is required to construct public infrastructure that is roughly proportional to its impact, including sidewalks, wider streets, etc. Development and environmental protection can co-exist. The City’s zoning code currently requires protection of natural resources.</p>	<p>No changes recommended.</p>

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Nicole Jackson	Survey was “double-barreled” and should be rewritten and a new survey conducted.	The final survey was intended to gauge support for the Vision Plan, not be scientifically valid as it was self-selecting. Survey responses support the Vision Plan after 10-years of community engagement. City Council will ultimately make the decision to adopt or not adopt the Vision Plan.	No changes recommended.
Nicole Jackson	Visual depiction of the Ponds District on pg. 36, the map key omits important elements including the ecological corridor and 100-year floodplain	The ecological corridors are shown on page 17 of the Vision Plan but can be added to the legend for the Ponds District.	Planning Commission recommendation to update the map legends.
Nicole Jackson	West Linn’s largest remaining wetland is not properly delineated nor is the landslide and earthquake risks.	The Vision Plan intends to represent preferred future uses, infrastructure, and resource protections. Appendix B includes information on steep slopes and liquefaction hazards. Site specific wetland delineations are required as part of a development proposal.	No changes recommended.
Nicole Jackson	<p>Vision Plan includes a number of contradictions and does not adequately incorporate feedback from the community to preserve the Ponds District as a natural area with minimal development.</p> <p>The Environmental Stewardship guidelines include: “Safeguard natural and sensitive areas through wetland, habitat, and shoreline restoration” and “Do not over program districts and adversely impact natural areas and wildlife habitat”.</p> <p>How will this be achieved with the map for the Ponds District includes a “priority development area” for “medium-density residential currently in the planning stage” along the wetland and beaver habitat?</p>	<p>The Vision Plan shows minimal development opportunities in the Ponds District. Most of the district is shown as ecological corridors, open space, or wetlands, which is consistent with community input and the principles of the district.</p> <p>The Ponds District map shows Medium Density Residential as a potential development area. Development and environmental protection can co-exist. The City’s zoning code currently requires protection of natural resources, including wetlands and habitat conservation areas.</p>	<p>No changes recommended.</p> <p>No changes recommended.</p>
Nicole Jackson	FEMA Model Code should be addressed before the Vision Plan is finalized and adopted.	The City has existing floodplain regulations that must be followed as part of a development proposal and Willamette River Greenway regulations require habitat restoration and mitigation. The City has a project to amend the current code this year to include the no-net-loss of salmonoid habitat during development in a floodplain. The Vision Plan intends to represent preferred future uses, infrastructure, and resource protections and floodplain code amendments do not impact the future vision, only site-specific development proposals.	No changes recommended.
Nicole Jackson	There are additional factors to address in addition, including the current risks of the Blue Heron settling pond and lack of progress on cleanup and remediation for over 10 years.	The Oregon Department of Environmental Quality (DEQ) oversees regulations and clean-up efforts for contaminated properties. Any	The Pond District Map (pg. 36 of Vision Plan) clearly states for both the Blue Heron and PGE settling ponds that

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		development of the settling pond will need to complete DEQ processes prior to development.	“environmental remediation and other environmental protective measures and rezoning needed”.
Nicole Jackson	Vision Plan conflicts with the comprehensive plan and Working Group packet contains memo recommending changes.	The Policy and Regulatory Recommendations Memo was reviewed by the Working Group and provided as an attachment to the PC Memo. The Memo recommends strengthening language for mixed-use development specifically in the Historic City Hall District. The property being focused on has existing West Linn Comprehensive Plan Map designation and zoning that permits medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019.	No changes recommended.
Nicole Jackson	Comprehensive Plan Section 2.7 for designating residential land is a key contradiction with the “medium-density residential” area depicted in the Ponds District.	The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019. No changes are proposed with the Vision Plan.	No changes recommended.
Nicole Jackson	Designating residential areas in the 100-year floodplain is a key contradiction.	The floodplain boundary data is from FEMA and approximates the location. Development proposals are required to survey the flood elevation height as part of an application, so the site-specific location is known. Wetland delineations are also required to be submitted to the Division of State Lands for review and concurrence.	The FEMA 100-year floodplain elevation is 75 feet on the property containing the wetland, which is approximately the height of the 1996 Flood and the delineated wetland boundary provided by the applicant during the property consolidation process (MIP-23-07). Maps are attached to the Staff Memo. The PC could recommend using the 1996 flood boundary on the Ponds District map, or a disclaimer that site specific surveying will need to identify the exact boundary, or both.
Russ Axelrod	Later phase (post COVID) of engagement has been a complete failure.	Please see Appendix A for the Community Engagement Summary.	No changes recommended.
Russ Axelrod	Vision Plan conflicts with CDC and Comprehensive Plan, sometimes internally in conflict with its own design principles and framework (most notably in the Ponds District), and in conflict with community sentiment for the Ponds District.	<p>The Vision Plan shows minimal development opportunities in the Ponds District. Most of the district is shown as ecological corridors, open space, or wetlands, which is consistent with community input and the principles of the district.</p> <p>The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019. No changes are proposed with the Vision Plan.</p>	No changes recommended.

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Russ Axelrod	I submitted two sets of comments (Dec. 2024 and April 2025) and none were shared with all Working Group members. I have heard other comments were apparently not shared either.	A comment matrix, including Mr. Axelrod’s comments and all others received from Dec. 2024 to May 2025, was provided to the Working Group. The matrix specifically addressed comments related to the Vision Plan document. Many comments received were focused on a pre-application conference proposal for housing development along 5 th Avenue. The intent was to avoid confusion between the future vision and a potential current development proposal. All comments have been provided to the Planning Commission.	No changes recommended.
Russ Axelrod	I realize the plan is intended to be more conceptual and subject to change, however it is critical to get it as accurate as possible for when actual land and project decisions are made and implemented.	The Vision Plan intends to represent preferred future uses, infrastructure, and resource protections. The next phase of the Waterfront Project will be implementation of the Vision Plan, including zoning/code development/design standards and engagement with the community.	No changes recommended.
Russ Axelrod	I urge the city and PC to pause the schedule and engage more to prepare a revised plan later in 2025 or 2026.	Staff will bring the Vision Plan forward in the timeframe requested by City Council.	Planning Commission can recommend the Vision Plan to have more outreach before a decision by City Council.
Russ Axelrod	The plan should acknowledge the vision of the Willamette Falls & Landings Heritage Area Coalition.	The Vision Plan (pg. 8) recognizes the Willamette Falls State Heritage Area as an aligned project and planning effort.	No changes recommended.
Russ Axelrod	The plan commits a large area of Moore’s Island to the Willamette Falls Inter-Tribal Public Access Project. No project or plan has been vetted. I suggest the plan includes further context and clarity on intended use of the property, and recognition of the engagement and approval process of any future project that must meet planning and development protocols.	The Trust’s mission is to provide public access to Willamette Falls. This aligns with the Waterfront Project Guiding Principle of River Access, including views of the falls and river. The Trust has a Feasibility and Cooperation Agreement with PGE to determine establishing future public access. West Linn Elected Officials have been engaged in the discussion.	No changes recommended.
Russ Axelrod	Remove depiction of dense housing construction shown within the 100-year floodplain and wetland along 5 th Avenue. It conflicts with the plan’s “Design Principles for Environmental Stewardship” and violates aspects of the West Linn Comprehensive Plan and Development Code.	The Vision Plan shows minimal development opportunities in the Ponds District. Most of the district is shown as ecological corridors, open space, or wetlands, which is consistent with community input and the principles of the district. The existing West Linn Comprehensive Plan Map designation and zoning permit medium-density residential development in the area identified on the map. The City has consistently represented	No changes recommended.

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the area to remain the same zoning since Open Houses in December 2019. No changes are proposed with the Vision Plan.

Development and environmental protection can co-exist and any future development proposal will need to comply with floodplain regulations, Water Resource Area protections (wetland buffers), and Willamette River Greenway regulations.

Russ Axelrod	Remove “in the planning stages” from Ponds District map as no project has been filed.	Staff support removal of this language as it is not necessary or critical to the implementation of the Vision Plan.	Planning Commission recommendation to remove the language.
Russ Axelrod	Contamination and potential leakage from the settling pond needs to be cleaned up before any further development of the ponds property/area is considered. In accordance with state/federal rules, the cleanup plan process/approach must involve public engagement. The PC should make a similar recommendation to Council.	The Oregon Department of Environmental Quality (DEQ) oversees regulations and clean-up efforts for contaminated properties. Any development of the settling pond will need to complete DEQ processes prior to development.	The Pond District Map (pg. 36 of Vision Plan) clearly states for both the Blue Heron and PGE settling ponds that “environmental remediation and other environmental protective measures and rezoning needed”.
Russ Axelrod	In prior written comments, I recommended the plan should explicitly prohibit casino operations. This was never provided to the Working Group and not responded to by staff.	The next phase of the Waterfront Project will be implementation of the Vision Plan, including zoning/code development/design standards. The City will again engage the community in the process and ensure implementation reflects the Vision Plan and Guiding Principles. Developing a casino in Oregon must follow federal and state rules. Mr. Axelrod’s comment was provided to the Working Group in the comment matrix and responded to by staff.	No changes recommended.

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Russ Axelrod	There were several staff memos and other planning related documents included in recent Working Group packets that did not appear to be discussed/considered on any meaningful level by Working Group members or by the public. This needs clarification by staff and review by the Planning Commission.	The consultant team produced three implementation memos (Policy and Regulatory, Transportation, and Implementation and Financing) with associated recommendations. The Working Group was provided with the memos a week in advance of meetings. The group reviewed the Policy and Regulatory Memo at its May and July meetings. The Transportation and Implementation and Financing Memos were reviewed at the July meeting. The three memos will be packaged into an Appendix C and brought forward with the Vision Plan as part of the adoption process.	The three memos are attached to the Staff Memo.
Planning Commission	There are federal/state regulations for permitting in wetlands. Landowner rights aside, they need to follow the stringent requirements.	The City's zoning code currently requires protection of natural resources and will continue to do so. Any development proposal is required to follow all federal/state wetland permitting requirements. The Vision Plan intends to represent preferred future uses, infrastructure, and resource protections and does not alter wetland permitting requirements.	No changes recommended.
Planning Commission	As this is a Vision Plan and no zoning changes are proposed, could a private property owner develop now under current zoning and rules without this plan?	Correct, the Vision Plan does not propose any zoning or development code changes. That will be the next phase of the Waterfront Project and include additional community engagement. Property owners can currently propose development under existing regulations if they wish.	No changes recommended.
Planning Commission	The Willamette Falls Drive Concept Plan was 30% design but treated as 100% design. How will WF Drive properties take access?	Willamette Falls Drive properties will continue taking access from the shared drive. Re-routing the street will remove pass-through traffic, making it easier to exit the shared drive. Two properties requested access from the new street alignment, and this will be provided as part of the infrastructure improvements.	No changes recommended.
Planning Commission	A second roundabout can be confusing. Leave WF Drive as is and not benefit the property owner who should be developing the road.	One of the Waterfront Project Guiding Principles was Transportation Improvements, including improved local access through the area. The preferred solution to improve traffic flow through the WF Drive/Hwy 43 intersection was a roundabout. This was modeled by ODOT as part of the I-205 Project. The City studied options to maintain the route north to A Street from the roundabout but it is too steep without the purchase and removal of existing structures. The property owner will pay its	The Vision Plan map (pg. 32) has language "Further study needed for WFD realignment, access to PGE facilities, and creation of Main Street" as final engineering studies will be needed to determine exact location of the streets.

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proportional share of the improvements as part of any development proposal.

Planning Commission	The Willamette Falls Trust project is a small group of tribes and is leaving out the Grand Ronde.	The Trust has an open seat for the Grand Ronde. The Trust and Grand Ronde were represented in the Working Group.	No changes recommended.
Planning Commission	There is a competing hierarchy surrounding future development under this plan. How do the following interlock? 100-year floodplain, FEMA Model Code, Private ownership, Stewardship plan, Ecological corridor, Comprehensive Plan	Please see answers provided to the different comments submitted by the community. The Vision Plan intends to represent preferred future uses, infrastructure, and resource protections. Any proposed development will need to comply with existing regulations. The next phase of the Waterfront Project will look at potential zoning/code changes to implement the vision and further community engagement will occur.	No changes recommended.
Planning Commission	The testimony raised questions on the viability of the survey, whether all public comments were represented, and Working Group member comments not considered.	Please see answers on these subjects in the above community comments.	No changes recommended.
Planning Commission	Survey shows opposition to dense development in Ponds District.	<p>The Pond District Framework Plan shows the protected resource areas, including the wetlands. Preservation and rehabilitation of natural areas with appropriately scaled development is the land use focus of the district. The City’s zoning code currently requires protection of natural resources, including wetlands.</p> <p>The Vision Plan shows minimal development opportunities in the Ponds District. Most of the district is shown as ecological corridors, open space, or wetlands, which is consistent with community input and the principles of the district. The City’s zoning code currently requires protection of natural resources and the area shown as medium-density residential is currently zoned for that type of development.</p>	No changes recommended.
Planning Commission	Prior concept plans ignored further feedback during final design.	The next phase of the Waterfront Project will be implementation of the Vision Plan, including zoning/code development/design standards. The City will again engage the community in the process and ensure implementation reflects the Vision Plan and Guiding Principles.	No changes recommended.
Planning Commission	Stark difference between interpreting data and debating accuracy of data. The PC needs access to full comments.	The PC was provided with all comments received from Dec. 2024 to May 2025 on the Final Draft Vision Plan, including the matrix with staff responses, as part of its July 16 th work session packet. All comments, including the ones received for the July 16 th work	No changes recommended.

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session, have been attached to the Staff Memo and this comment matrix is intended to provide the PC some additional context.

Planning Commission	Risk to Vision Plan implementation if no further community input is taken.	The next phase of the Waterfront Project will be implementation of the Vision Plan, including zoning/code development/design standards. The City will again engage the community in the process and ensure implementation reflects the Vision Plan and Guiding Principles.	No changes recommended.
Planning Commission	The language “in planning stages” looks like an endorsement and recommend removing.	Staff support removal of this language as it is not necessary or critical to the implementation of the Vision Plan.	Planning Commission recommendation to remove the language.
Planning Commission	Need to rectify the 100-year floodplain boundary and medium density residential area that overlap.	The floodplain boundary data is from FEMA and approximates the location. Development proposals are required to survey the flood elevation height as part of an application, so the site-specific location is known. Wetland delineations are also required to be submitted to the Division of State Lands for review and concurrence.	The FEMA 100-year floodplain elevation is 75 feet on the property containing the wetland, which is approximately the height of the 1996 Flood and the delineated wetland boundary provided by the applicant during the property consolidation process (MIP-23-07). Maps are attached to the Staff Memo. The PC could recommend using the 1996 flood boundary on the Ponds District map, or a disclaimer that site specific surveying will need to identify the exact boundary, or both.
Planning Commission	Was the Willamette Falls Trust represented in the Working Group?	The Trust and Grand Ronde were represented in the Working Group.	No changes recommended.
Planning Commission	What type of Comprehensive Plan changes will be required?	The Policy and Regulatory Recommendations Memo was reviewed by the Working Group and provided as an attachment to the PC Memo. The Memo recommends strengthening language for mixed-use development specifically in the Historic City Hall District. The property being focused on in the Ponds District has existing West Linn Comprehensive Plan Map designation and zoning that permits medium-density residential development in the area identified on the map. The City has consistently represented the area to remain the same zoning since Open Houses in December 2019.	No changes recommended.