



# CITY OF West Linn

## Memorandum

Date: July 12, 2021

To: Mayor Walters  
West Linn City Council

From: Darren Wyss, Planning Manager

Subject: Additional Public Comments Received for PLN-21-01

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Six additional public comments were received after the publishing of the City Council agenda packet for PLN-21-01. The comments are attached. The comments relate to subjects previously addressed in Staff Memorandums dated June 16, 2021 and June 28, 2021 (Attachments 2 and 4 of the Council Agenda Bill).

### List of comments:

1. Transportation Advisory Board Letter of Support
2. Dave Robertson, PGE
3. Nancy McMath
4. Rachel O'Doud Vega
5. Lilla Minniti
6. Santiago Vega

**From:** [Calvert, Lance](#)  
**To:** [Wyss, Darren](#)  
**Subject:** FW: Approval of the Willamette Falls Drive Concept Plan  
**Date:** Tuesday, June 29, 2021 2:09:48 PM

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For the record.

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**From:** Greg DiLoreto [REDACTED]  
**Sent:** Monday, June 28, 2021 4:42 PM  
**To:** City Council <citycouncil@westlinnoregon.gov>  
**Cc:** #Board - Transportation Advisory <transportationadvisoryboard@westlinnoregon.gov>; Calvert, Lance <lcalvert@westlinnoregon.gov>  
**Subject:** Approval of the Willamette Falls Drive Concept Plan

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West Linn City Council:

On Thursday, June 24th, the West Linn Transportation Advisory Board, after a detailed presentation by the consultants for the Willamette Falls Drive Concept Plan, followed by a discussion of the Board, has approved the plan and forwards its recommendation for approval and adoption by the West Linn City Council.

Should the Council have any questions or require additional information from the Board please do not hesitate to contact us.

Thank you for the opportunity to review the proposed plan.

On behalf of the Transportation Advisory Board.

Greg DiLoreto, P.E., P.L.S., Pres.13.ASCE  
Chair, West Linn Transportation Advisory Board  
3171 Meadowlark Drive  
West Linn, OR 97068  
[REDACTED]



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC17 • Portland, OR 97204  
503-464-8543 • portlandgeneral.com

**Dave Robertson**  
Vice President, Public Affairs

July 8, 2021

John Williams  
Darren Wyss  
City of West Linn  
22500 Salamo Road  
West Linn, Oregon 97068

Re: Willamette Falls / Transportation System Plan Alignment

Gentlemen:

Thank you for the opportunity to submit comments on behalf of Portland General Electric. We remain grateful for your continued partnership, collaboration, and ongoing opportunity to proactively engage on the current proposed West Linn Willamette Falls Drive (WFD) 2021 Conceptual Design Plan and Oregon City-West Linn Pedestrian/Bicycle Bridge.

PGE is committed to active participation in the City's efforts to improve its transportation system, and at the same time, it is imperative that PGE take all steps necessary to ensure public and employee safety, physical security and operational flexibility for its hydro operations and the operations of its tenants at Willamette Falls.

To that end, PGE has engaged Marni Heffron, a Transportation Engineer with Heffron Transportation Inc., to help us better understand the physical, operational, and regulator constraints that the WFD realignment and bridge could have on PGE's properties.

Below is a summary of Ms. Heffron's findings to be considered for the WFD redesign, and the proposed pedestrian/bike bridge:

### **Willamette Falls Drive**

- Provide access, staging, and maneuvering space for WB-67 trucks – All materials delivered to or from both PGE and the Mill arrive by trucks that need to stage and maneuver in the bench area at the top of the Main Access Drive. These trucks then back down the Main Access Drive to the three-bay loading dock. There are no options to provide additional staging or maneuvering at river level due to steep cliffs and the Locks. Any design for a new Sunset Avenue must retain the truck staging and maneuvering areas. In addition, the driveway's location appears to have restricted sight lines that could hinder ingress and egress for large trucks that have slow acceleration rates. Treatment to enhance operations for large trucks including enlarged turning radii or acceleration lanes should be considered.
- Reduce potential for vehicle/pedestrian or bike conflicts at site driveway – The Concept Plan locates the two-way path on the east side of the new Sunset Avenue roadway where it would cross the PGE driveway. The slope and angle of the driveway connection could severely affect a truck driver's ability to see a pedestrian or bicyclist crossing its path due to sightline blind spots. Various design alternatives to reduce or eliminate that potential safety issue should be considered, including:
  - Locating the path on the west side of the street where it would have no conflict with driveways;
  - Adding control at the intersection (e.g., traffic signal); or

- Retaining the existing section of WFD higher on the hill as the primary route for through traffic and bicycles, which would then locate bicycle crossings at the proposed roundabout.
- Design roundabouts for WB-67 vehicles – The primary access route for PGE and Mill trucks would pass through three new roundabouts between the site and I-205. All roundabouts must be designed to accommodate WB-67 trucks.
- Maintain parking – PGE has some parking on the upper bench that would need to be reconfigured with a new roadway. Its current easement with Belgravia includes parking for 10 vehicles at any one time and the right to request more parking for extraordinary circumstances or additional space for temporary staging or loading or unloading of equipment.
- Maintain access and staging at pulp and chemical supply tanks – All pulp and chemicals for the Mill operation is delivered by tanker truck to the tanks and utility system located off WFD north of the substation. The trail design must provide adequate space for trucks to safely pull off, maneuver, stage, and re-enter WFD.
- Meet requirement for clearance distance to high-voltage (HV) power lines – The PGE primary substation and power transmission lines are located just east of WFD. Widening this segment of road may require relocating lower-height roadside utility poles. Such relocations must consider the clearance requirements for the nearby HV lines.
- Future consideration for site re-use/redevelopment – The new roadway design should be adaptable to accommodate future uses and/or more public access to Moore's Island. Key elements could include a driveway that accommodates higher volume of traffic; additional parking and staging on the upper bench; and future trail or pedestrian bridge access.

### **Pedestrian/bike bridge**

- Reduce potential for vehicle/pedestrian/bike conflicts where bridge meets Mill Avenue or proposed Sunset Avenue – Depending on the implementation schedule, a new bridge could tie into the existing Mill Avenue roadway system, which currently supports the Mill's large truck staging and maneuvering functions described previously. Under this condition, additional measures will likely be needed to safely and effectively maintain these functions and separate them from the additional pedestrian/bike activity. If the street improvements are made first, measures described in the Willamette Falls Drive section above should be considered.
- Limit potential public parking – A new bridge is likely to attract recreational users who try to park on the west side of the river. Additional facilities for public parking on non-PGE property and/or protections to prevent use of PGE parking or staging areas or on other PGE property interests will be needed
- Maintain vertical and horizontal clearances for trucks – Any structure that crosses an access road must allow for safe and efficient passage by a WB-67 truck.
- Upgrades to meet FERC security requirements – Access to Moore's Island is currently very restricted. With a new overhead structure, additional security measures may be required to

John Williams  
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City of West Linn  
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prevent pedestrian access to the T.W. Sullivan Power Plant and the heavy industrial property utilized by Willamette Falls Paper.

- Future consideration for site re-use/redevelopment – The new bridge should be designed to allow for future access to/from Moore's Island if and when public access is allowed. This may include providing space for future elevator and/or ADA compliant stair/ramp connections to the bridge. In addition, the height of the bridge should assume re-opening of the Locks with appropriate vessel clearance.

As we communicated to the West Linn Planning commission in our June 11, 2021 letter, PGE remains neutral on the Willamette Falls Drive 2021 Conceptual Design Plan and pedestrian/bicycle bridge at this time. We would welcome an opportunity to meet with the City's planners and design engineering team on site to discuss Ms. Heffron's findings.

Although Ms. Heffron was not engaged to review any rezoning efforts underway by the City, PGE requires continued unconstrained industrial/commercial use of PGE's property interests ("grandfathered in" should zoning be changed) and, in addition, any future zoning must enable PGE to fully utilize and realize the benefits of its property interests.

PGE will also need to employ the same type and level of analysis to the proposed path of the pedestrian/bike trail as that plan is further developed.

We look forward to continuing our work with the City Council, the Planning Commission and the city staff as plans are further developed to address the issues and concerns, we have raised. It is our hope to eventually be able to support the plan as it gets further refined. Once again, thank you for your partnership and understanding on all matters related to current operations and future development at Willamette Falls. We look forward to connecting again with your team soon.

Sincerely,



Dave Robertson  
Vice President, Public Affairs

cc: Jerry Gabrielatos, City Manager

Attachment: June 11, 2021 Letter to the West Linn Planning Commission



**Portland General Electric Company**  
121 SW Salmon Street • 1WTC17 • Portland, OR 97204  
503-464-8543 • portlandgeneral.com

**Dave Robertson**  
Vice President, Public Affairs

June 11, 2021

John Williams  
Darren Wyss  
City of West Linn  
22500 Salamo Road  
West Linn, Oregon 97068

Re: Willamette Falls / Transportation System Plan Alignment

Gentlemen:

The purpose of this letter is to convey the preliminary thoughts of Portland General Electric Company ("PGE") on the current conceptual design of the proposed Transportation System Plan alignment at Willamette Falls. We appreciate the opportunity to weigh in at this point in the process and will provide additional details in the coming weeks as we complete more in-depth analysis of the various transportation related proposals at the Falls.

PGE would like to express our sincere appreciation to the West Linn staff for their robust cadence of stakeholder outreach and engagement over the last two years. We have appreciated the multiple opportunities to participate and lend our perspective throughout this process.

PGE has more than a century of presence in West Linn and at Willamette Falls, and we are truly grateful for the partnership with the City on all aspects of its current and future development. PGE has and continues to make significant investments in its property and utility operations at Willamette Falls, showcased by the ongoing upgrades to our Sullivan Generating Facility. PGE is committed to active participation in the City's efforts to improve its transportation system, and at the same time, it is imperative that PGE take all steps necessary to insure public and employee safety, physical security and operational flexibility for its hydro operations and the operations of its tenants at Willamette Falls. We are also keenly aware of the need to maximize the commercial viability and value of our property as we continue to collaborate closely with you and other interested parties on future development options for the entire Willamette waterfront area, upstream and downstream of the Falls.

That said, we are conducting additional analysis on the Transportation System Plan and are taking a neutral position on all the plan elements at this time – Sunset Avenue/Willamette Falls Drive, rezoning, and the pedestrian/bike bridge. We apologize for any inconvenience this may cause. To ensure our analysis is thorough and informed, PGE has engaged Marni Heffron of Heffron Transportation Inc., to help us better understand the physical, operational, and regulatory constraints that could affect the access to the PGE properties. We would welcome an opportunity to meet with the City's planners and design engineering team on site to discuss as soon as possible.

In the meantime, below are the basic needs and requirements through which PGE is viewing the Transportation System Plan and other redevelopment proposals in and around Willamette Falls:

- Unimpeded access to all PGE property interests. Note that current zoning and use is industrial and, as such, access will need to include large commercial vehicles (and associated turning limitations) 24/7/365.
- Adequate upland parking and periodic laydown areas to serve PGE's property interests including industrial uses.

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Darren Wyss  
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June 11, 2021  
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- Ability to properly secure PGE's property interests and, at its sole discretion, control any third-party access (including the public) to all portions of the PGE property.
- Continued unconstrained industrial/commercial use of PGE's property interests ("grandfathered in" should zoning be changed) and, in addition, any future zoning must enable PGE to fully utilize and realize the benefits of its property interests.
- Control and flexibility necessary to fulfill PGE's Federal Energy Regulatory Commission (FERC) License obligations and to safely and efficiently secure, operate, and maintain the Sullivan Generating Facility and all of PGE's related utility equipment and facilities.

Once again, thank you for your partnership and understanding on all matters related to current operations and future development at Willamette Falls. PGE intends to stay in contact with City staff, the Planning Commission, and elected leaders as this process moves forward in the weeks ahead. We look forward to connecting again with your team soon.

Sincerely,



Dave Robertson  
Vice President, Public Affairs

cc: Jerry Gabrielatos, City Manager

**From:** [Mollusky, Kathy](#)  
**To:** [Wyss, Darren](#)  
**Subject:** FW: Willamette Falls Concept Plan  
**Date:** Monday, July 12, 2021 2:11:33 PM

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-----Original Message-----

From: nancy mcmath <[REDACTED]>  
Sent: Monday, July 12, 2021 10:04 AM  
To: City Council <citycouncil@westlinnoregon.gov>  
Subject: Willamette Falls Concept Plan

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Please enter this as written testimony for city council meeting 7/12/21. I think that the proposed major roadway through the paper mill parking lot is a very bad idea. It will alter any hope of a historic, thoughtful, respectful, pleasant waterfront area as it will be intersected by constant traffic, noise and pollution. Whatever the city hopes to develop there will be up against a major road adjacent to several roundabouts. Most of the traffic will be passing through in order to cross the bridges. The mill will continue to operate and it's enormous fleet of semi trucks will be moving through also. West Linn's oldest historic homes will be relegated to a traffic island and all the planned for bikers and pedestrians will be up above looking down on heavy vehicular traffic and concrete. In this era roads and traffic should not be placed closer to rivers. You do have a choice. You can decide that this presently unattractive area should be respectfully restored and not defined by another major road. You could ask that this portion of the plan be rejected and returned for reconsideration. There is not a more historic area in West Linn. I understand that the city wants a plan to go after funding and that Belgravia ( present mill property owner ) is awaiting their money for property acquisition. I am asking you to look at the larger picture and ask yourselves what would really benefit the residents of West Linn in the future.



**From:** [Mollusky, Kathy](#)  
**To:** [Wyss, Darren](#)  
**Subject:** FW: Official Testimony for West Linn City Council meeting 7/12/2021  
**Date:** Monday, July 12, 2021 2:11:42 PM

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**From:** Rachel O'Doud Vega <[REDACTED]>  
**Sent:** Monday, July 12, 2021 10:31 AM  
**To:** City Council <citycouncil@westlinnoregon.gov>  
**Subject:** Official Testimony for West Linn City Council meeting 7/12/2021

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I am submitting my testimony in **opposition** to the proposed Willamette Falls Concept Plan. I am opposed to this plan for the following reasons;

a). The plan is being pushed through quickly after a year and a half of the State being shut down. The plan appears to be a direct reaction to the IDOT traffic circle, future work on I205, offering quick solutions that will not solve a traffic issue and more important - more development. The traffic is coming from other over-developed suburbs and the majority of cars are coming through West Linn from the south and crossing the OC bridge/or 205 bridge - in order to avoid slowdowns on 205. Who is this really helping? Traffic will not decrease - this is simply an expensive project changing traffic problems from Willamette Falls Dr. to the river. The traffic will not decrease nor will the slowdowns. In fact; with a toll - more cars will reroute to a new road along the river. The maps show the new road will hug a historical area of five homes and leave plenty of room for more river development - hurting river access for the general public, hurting bird and shoreline environments and causing an increase in pollution near the river (road runoff and development into the riverway).

b) Past West Linn projects are an indicator of future projects (same crew - city planners and engineers). What happened to a cute Willamette? Now it is a massive parking lot - no charm. The City of West Linn is interested in developing every last square inch of green space for revenue for the city. The traffic problem will not be solved and residents will not benefit. Residents would like more river access; walking and areas for recreation. Residents do not understand this plan. Communication is vague and superficial; token outreach with no real interest other than planners and engineers going through the motions and putting something on paper to pass through, as opposed to critical thinking and creativity.

c) There are other cheaper, more effective ways of decreasing traffic. First, this traffic does not belong to West Linn...it is coming from the south and passing through - causing wear and tear, pollution and congestion. What about more effective stop sign positions that would deter I205 traffic rerouting through West Linn. Everyone is looking at their google maps trying to shave off a few minutes. If West Linn offers a slower route - traffic will stay on I205.

It is clear that city planners and engineers are interested in revenue from development and nothing about the residents who actually live here. This is a short-sighted solution and bad

development practices. Therefore I am opposed to the Willamette Falls Concept Plan.

Rachel O'Doud-Vega

**From:** [Mollusky, Kathy](#)  
**To:** [Wyss, Darren](#)  
**Subject:** FW: Written Testimony for Council Meeting Today, 7/12/21  
**Date:** Monday, July 12, 2021 2:11:50 PM

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-----Original Message-----

From: Lilla Minniti <[REDACTED]>  
Sent: Monday, July 12, 2021 10:47 AM  
To: City Council <citycouncil@westlinnoregon.gov>  
Subject: Written Testimony for Council Meeting Today, 7/12/21

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I believe The Willamette Falls Concept Plan is a bad idea for multiple reasons. Though pedestrian and bicycle safety is presented as central, it is more of a way to funnel increased vehicular traffic through our region. The destructive changes that will occur to the waterfront area will last generations. At a critical time when mass transit should be promoted, we are building a whole new roadway and it will quickly be packed. There will be more concrete, more vehicles, and more pollution.

Thank you,

Lilla Minniti  
5734 W A Street

**From:** [Mollusky, Kathy](#)  
**To:** [Wyss, Darren](#)  
**Subject:** FW: Written Testimony 7/12/2021 City council meeting; Willamette Falls Concept Plan.  
**Date:** Monday, July 12, 2021 2:11:59 PM

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**From:** Santiago Vega <[REDACTED]>  
**Sent:** Monday, July 12, 2021 11:19 AM  
**To:** City Council <citycouncil@westlinnoregon.gov>  
**Subject:** Written Testimony 7/12/2021 City council meeting; Willamette Falls Concept Plan.

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I am in opposition to the City of West Linn's Willamette Falls Concept Plan. This plan will have a negative environmental impact on the river and shoreline. This will affect future generations to come.

--

Santiago Vega  
David Douglas High School  
Biology Teacher  
(503) 261-8400