

West Linn Waterfront Community Vision Plan
Comments Received for City Council Public Hearing

11.18.2025





The Confederated Tribes of the Grand Ronde Community of Oregon

9615 Grand Ronde Road
Grand Ronde, OR 97347-9712

October 21, 2025

Darren Wyss, Principal Planner
City of West Linn Planning
22500 Salamo Rd.
West Linn, Oregon 97068

Sent via email to:
dwyss@westlinnoregon.gov

RE: West Linn Waterfront Project

Dear Mr. Wyss,

On behalf of the Confederated Tribes of the Grand Ronde Community of Oregon's Historic Preservation Office, thank you for the opportunity to review the West Linn Waterfront Vision Plan prior to final adoption by the Planning Commission and City Council. Please note the concerns raised in this letter are specifically from our Engineering and Community Development Division and Tribal Historic Preservation Office. Tribal Council and technical staff from other Tribal Departments may also offer comments.

Tribal History and Interests in the Project Area

The Confederated Tribes of the Grand Ronde Community of Oregon (hereafter "Tribe") is made up over 30 different tribes and bands with homelands in Oregon, southwest Washington, and northern California. Specifically, the area of West Linn was inhabited by the Clowwewalla band of Chinook. Leaders of the Clowwewalla, as well as leaders of other tribes and bands, were signers of the Willamette Valley Treaty of 1855, which ceded the Willamette Basin to the U.S. in exchange for certain rights and benefits. The peoples were subsequently removed to the Grand Ronde Indian Reservation where they became members of the Confederated Tribes of Grand Ronde.

Even after the removal from their treaty homelands, tribal members maintained deep connections to the resources and sacred places of their ancestral homes. Those connections continue today, largely through Tribal stewardship of resources and through partnerships with government agencies and non-governmental organizations. The Tribe is interested in protecting, enhancing, and restoring Tribal cultural and natural resources, and allowing for areas to be used by Grand Ronde Tribal community and the public, now and in the future.

Engineering and Community Development Division Comments

During the City Council work session on October 7, 2025, the presentation slides outlining next steps for the West Linn Waterfront Project were discussed. The slides titled "Coordination & Partnership Strategies" and "Public-Private Partnerships: Organizational Actions" identify key partners and organizations for collaboration in the project's next phases.

We were disappointed to see that the Confederated Tribes of Grand Ronde were not included among the listed partners. As signatories of the Willamette Valley Treaty of 1855, our ancestors ceded the Willamette Basin to the United States in exchange for certain rights and

benefits. The West Linn Waterfront Project lies within our ceded territory and ancestral homelands, where the Grand Ronde Tribe has lived, traded, and cared for the river, land, and its beings since time immemorial. As caretakers, we hold a responsibility to ensure that future development honors the culture, ecology, and spirit of this sacred place.

The Confederated Tribes of Grand Ronde expect to be included as a full and active partner in all next step discussions and decision making related to the West Linn Waterfront Project. Meaningful collaboration with the Grand Ronde Tribe is an act of respect, recognition, and shared stewardship for the generations to come.

Historic Preservation Office | Cultural Protection Program Comments

The Vision Plan is an ambitious framework for the transformation of the West Linn Waterfront. Please be aware that this area has been, and continues to be, an extremely significant cultural place for the Tribe. The area features in ancient *ikanum* (oral histories and legends) and contains archaeological resources dating back thousands of years, as well as the significant historic structures mentioned in the Plan. The Study Area also intersects with Historic Properties of Religious and Cultural Significance to the Tribe. Future planning must consider the presence of these significant cultural resources, and actions should be taken to identify these resources as early as possible.

Our Office recommends a comprehensive review of all historic property types, including archaeological sites, historic structures, and historic properties of religious and cultural significance, be prepared to inform future development and restoration actions proposed within the Study Area. HPO staff are willing to meet with the cultural resources consultant identified to develop this review. We look forward to continued engagement for the protection of cultural resources in the Study Area.

If there are any questions, please feel free to contact our staff.

Sincerely,



Cheryl Pouley (she/her)
Cultural Protection Coordinator
Direct: (503) 879-1667
Email: THPO@grandronde.org
cheryl.pouley@grandronde.org



Kristen Svcarovich, P.E. (she/her)
Community Development Manager
Direct: (503) 879-2070
Email: Planning@grandronde.org
Email: Kristen.Svcarovich@grandronde.org

ecc: Grand Ronde Tribal Council
Ian Johnson, Deputy SHPO
Consultation@grandronde.org

October 29, 2025

Dear Mayor Biaslowski, Councilor President Baumgardner, Councilor Bryck, Councilor Bonnington and Councilor Groner

Thank you for the opportunity to share public comments at the recent Waterfront Plan Working Meeting on October 21st. As mentioned, I am following up with additional information related to my remarks, with further references for your review.

I appreciate your time and consideration, and I am happy to answer any questions if that would be helpful.

Warm regards,

Kirsten Solberg
Robinwood neighborhood
Kirsten@SAMA-Arch.com
503-702-2444

FEMA Flood Map

Linked to development and construction requirements, National Flood Insurance Program (NFIP) and disaster relief eligibility

<https://msc.fema.gov/portal/home>

<https://msc.fema.gov/portal/search>

<https://www.fema.gov/emergency-managers/risk-management/building-science/national-flood-insurance-technical-bulletins>



Flood Damage-Resistant Materials Requirements

for Buildings Located in Special Flood Hazard Areas in
accordance with the National Flood Insurance Program

Technical Bulletin 2 / August 2008

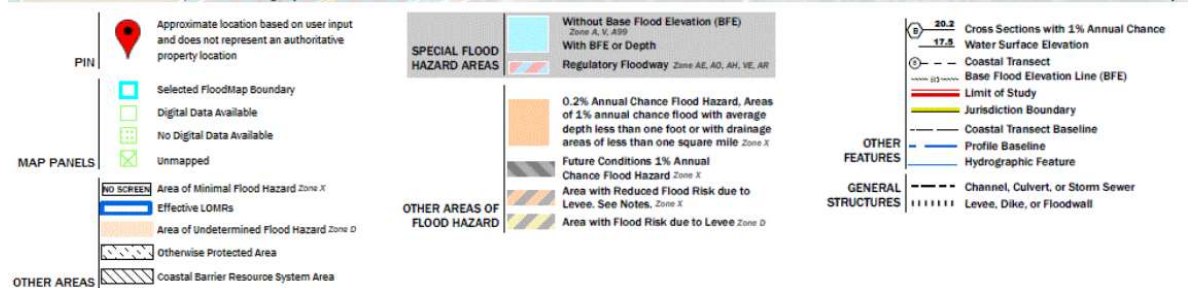
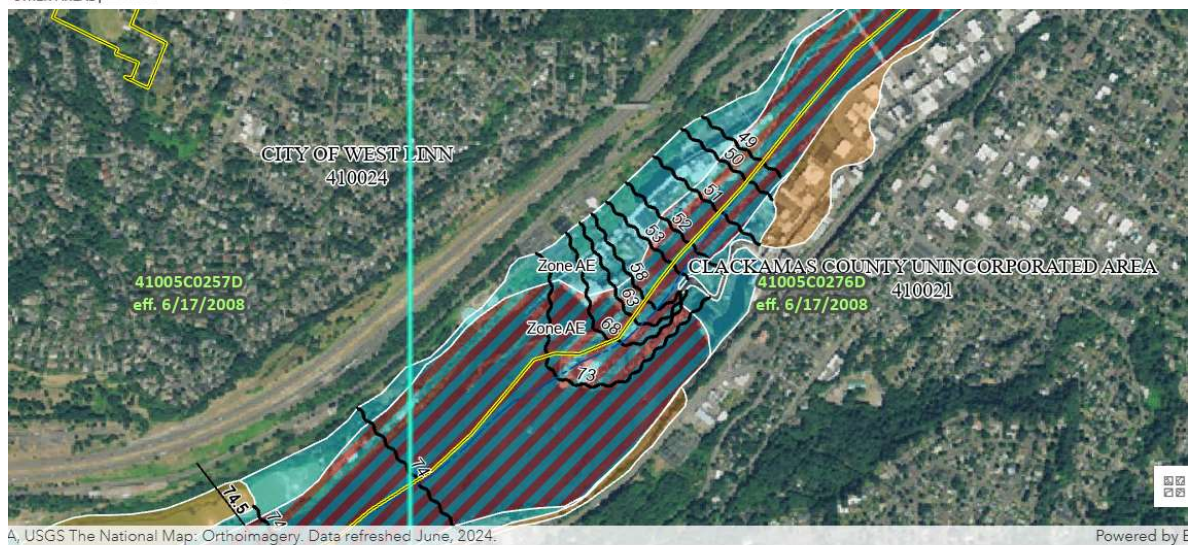
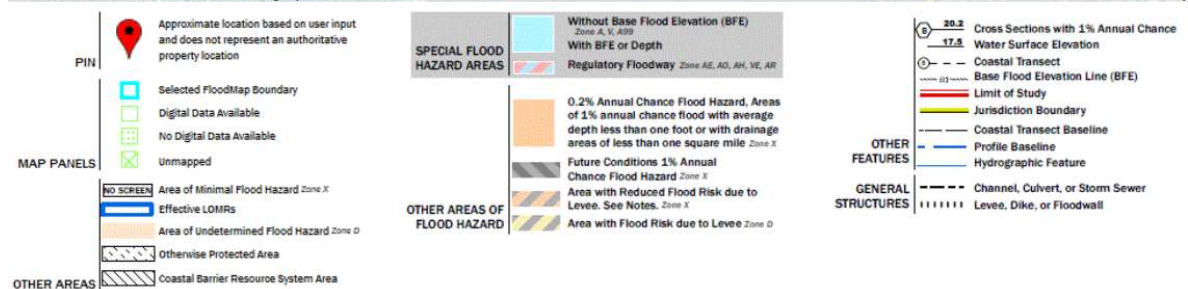
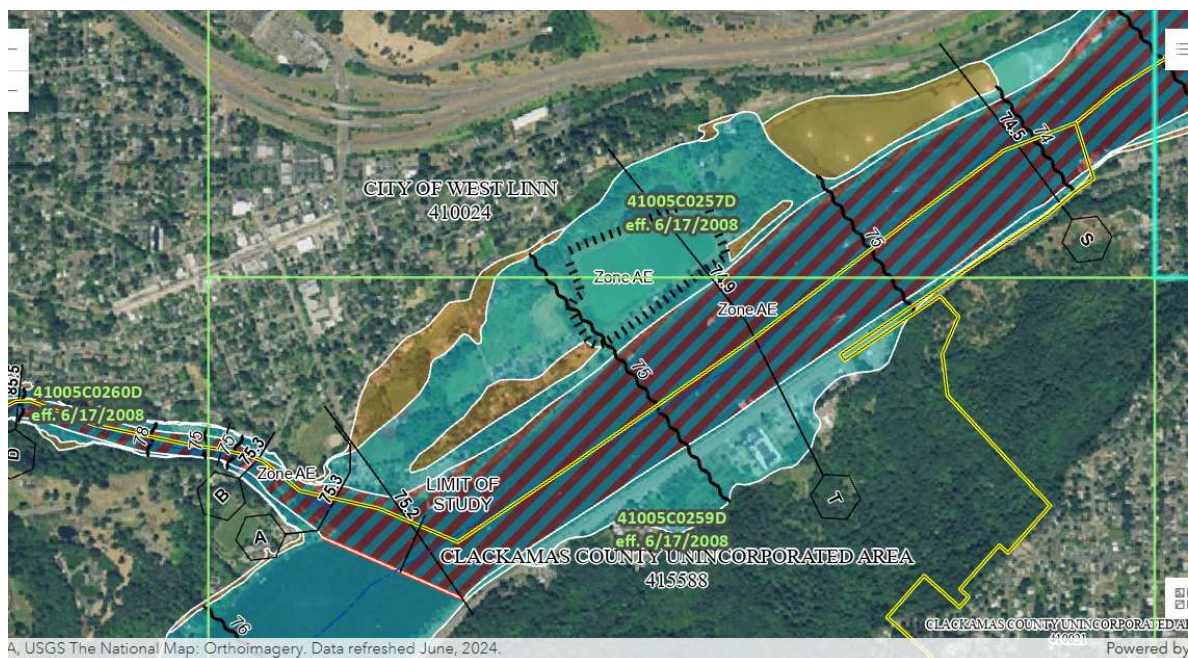


Requirements for the Design and Certification of Dry Floodproofed Non-Residential and Mixed-Use Buildings

Located in Special Flood Hazard Areas
in Accordance with the National Flood Insurance Program

NFIP Technical Bulletin 3 / January 2021





Industrial Mill Adaptive Reuse Projects

Dan River Falls – Mill #8 Danville, Virginia

550,000 sq. ft., Built in 1920, operated until 1996

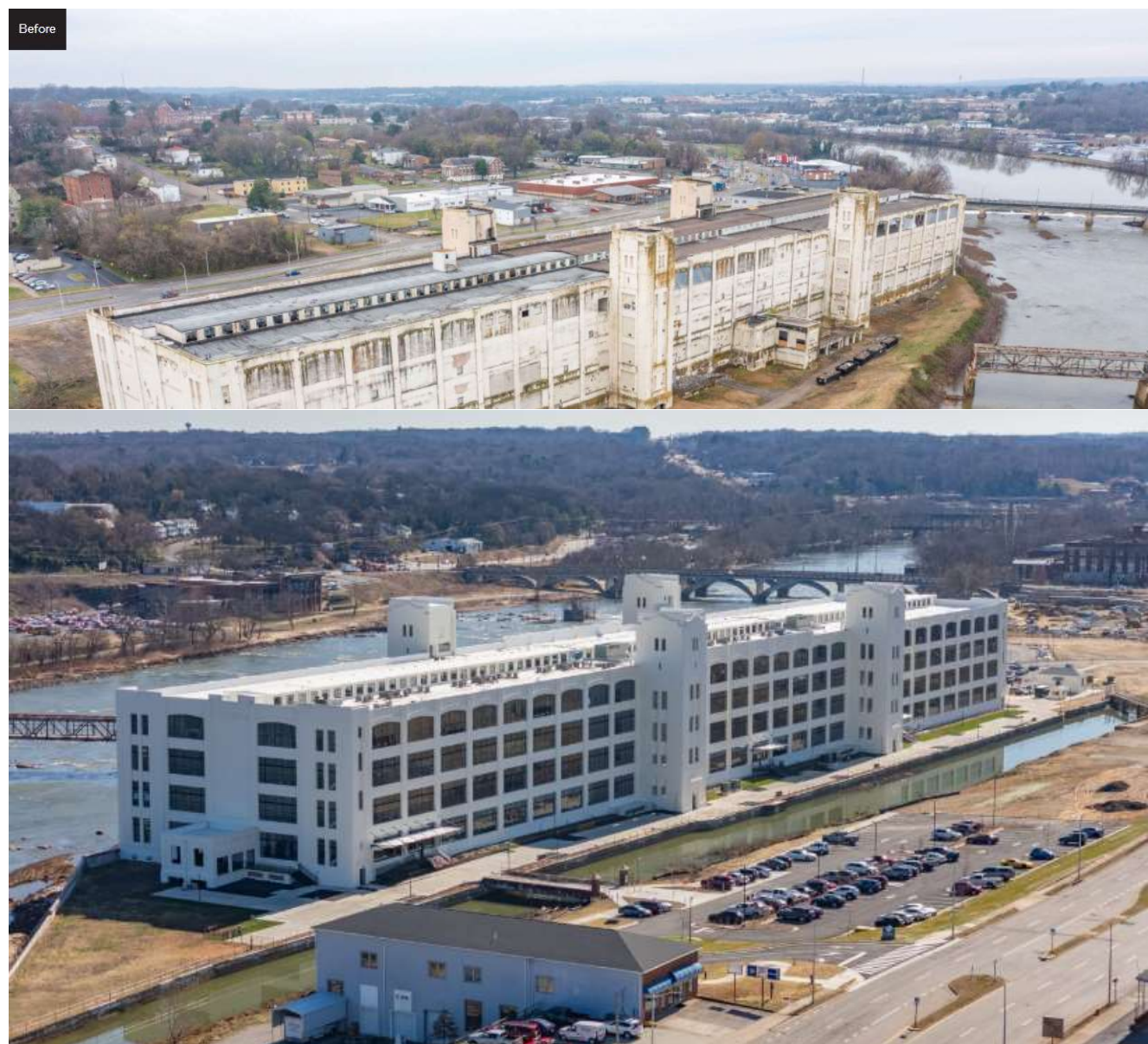
Textile mill converted into mixed-use: housing, retail, office and riverfront park

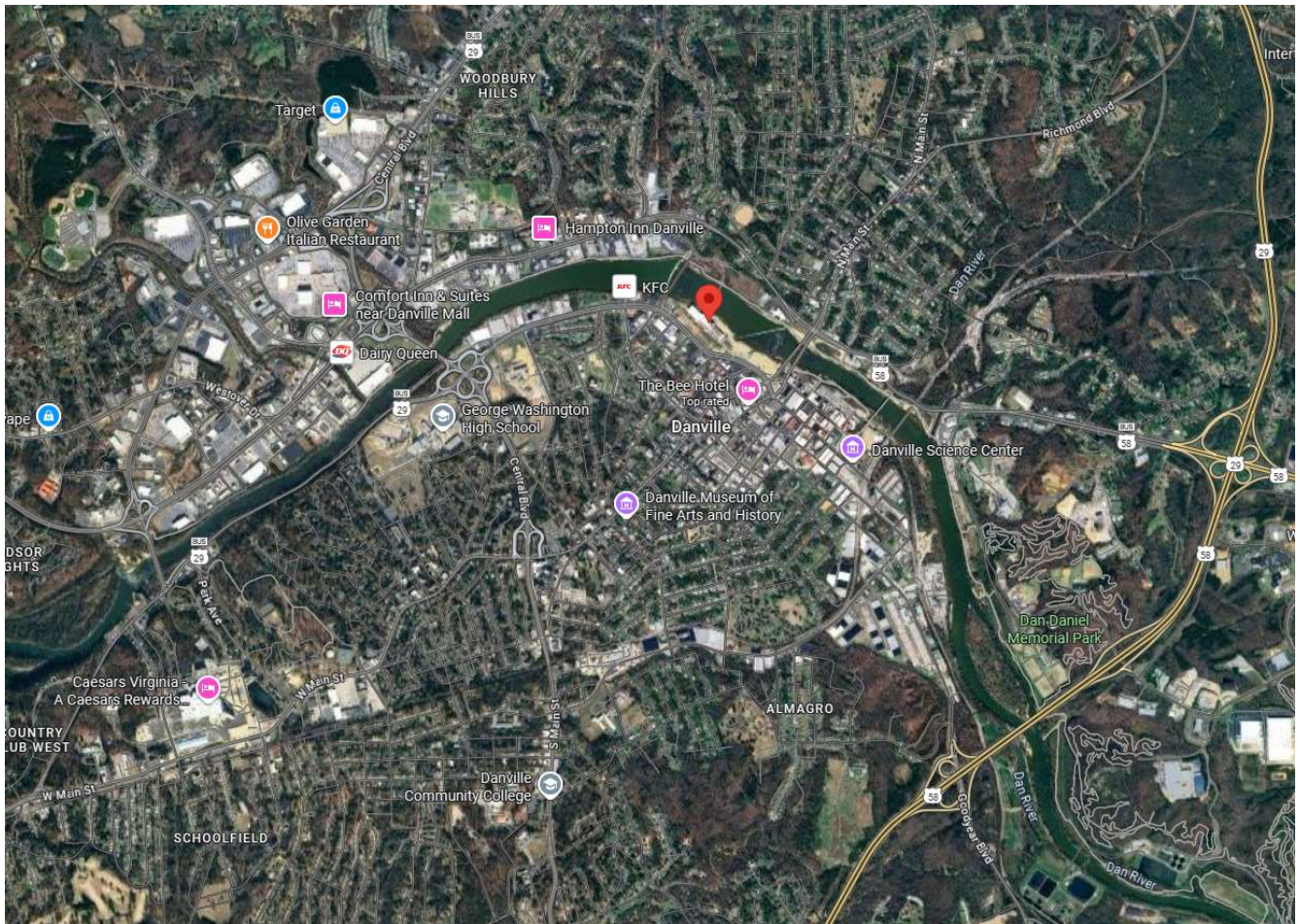
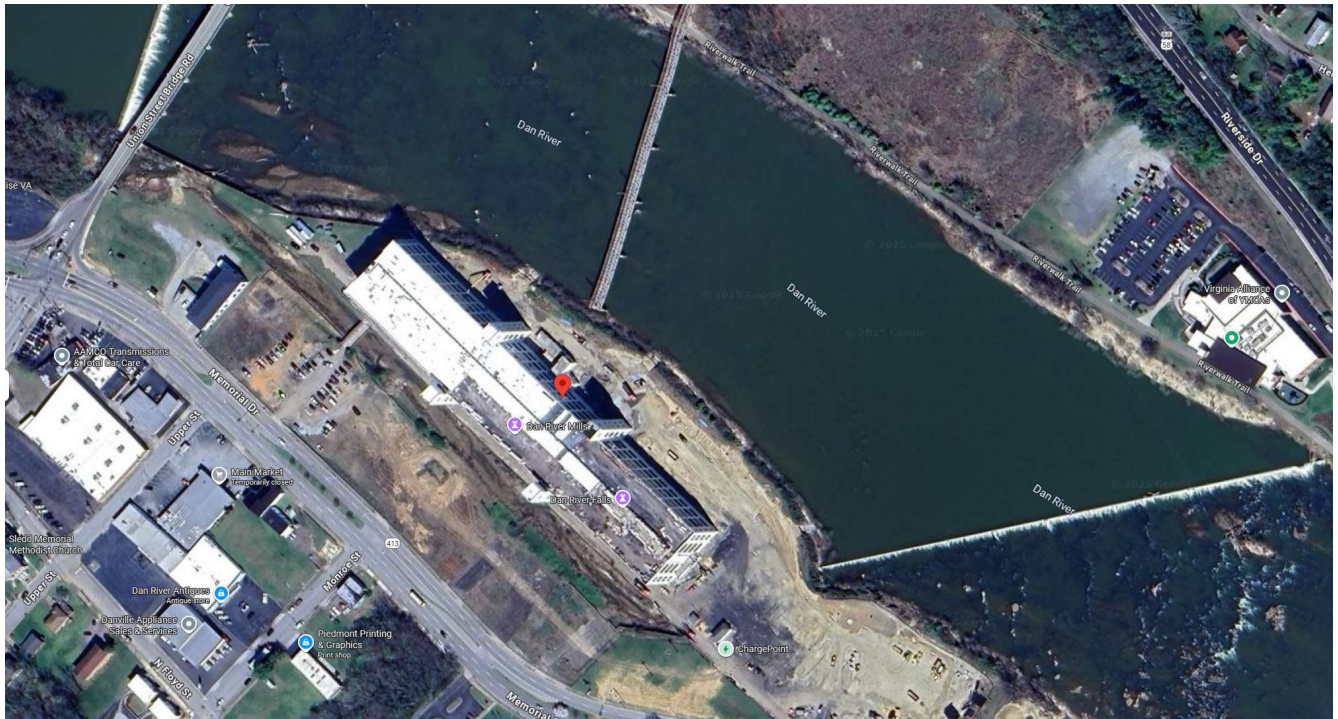
<https://alexandercompany.com/projects/whitemill/>

<https://rehabbuilders.com/dan-river-falls/>

<https://danriverfalls.com/history/>

<https://www.dhr.virginia.gov/historic-registers/108-0123/>





Royal Mills Complex West Warwick, Rhode Island

465,000 sq. ft., Built in 1890, operated until 1993

Industrial use at site began in 1809

Textile mill converted into mixed-use: housing and retail

<https://www.nps.gov/articles/royal-mills-ri.htm>

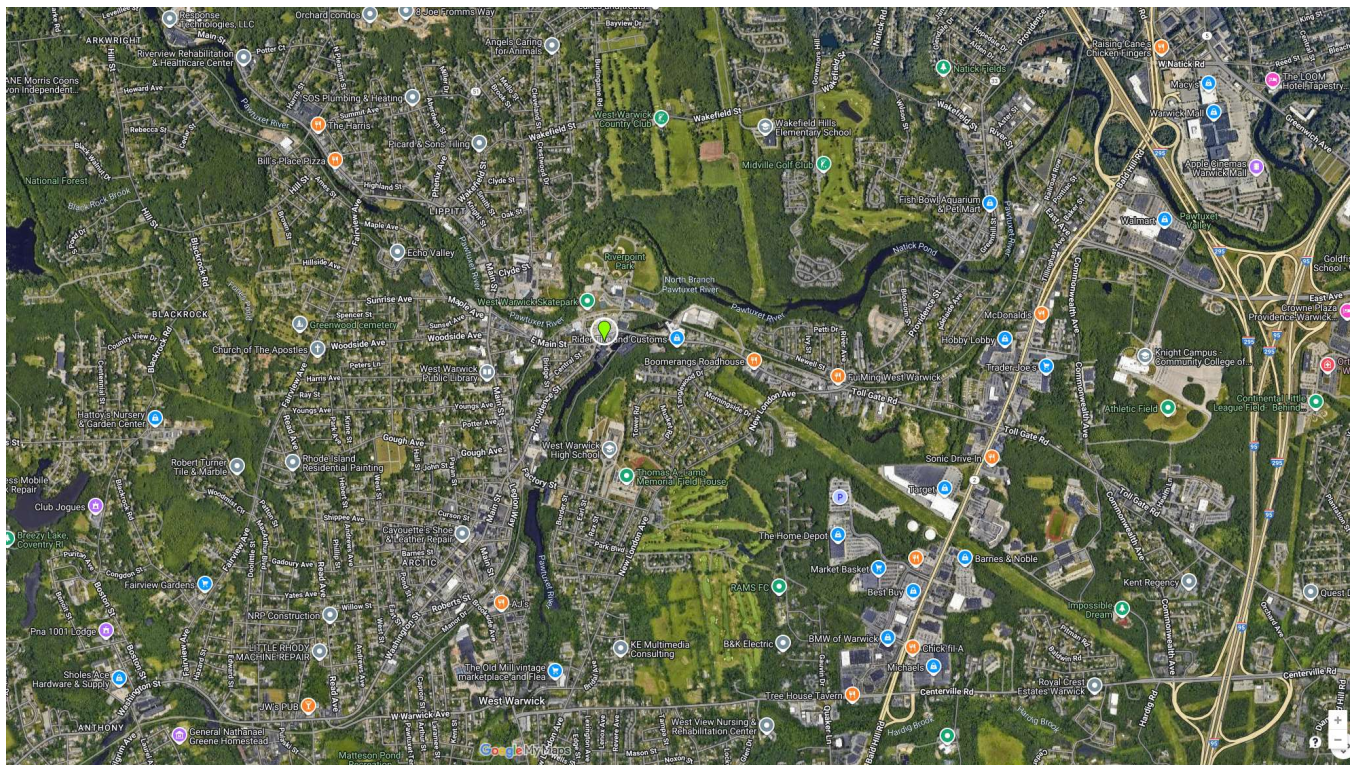
<https://www.architecturalteam.com/projects/royal-mills-at-riverpoint/>

<https://royalmillsliving.com/>

<https://artinruins.com/property/royal-mill-ace-dyeing/#gallery>







Lee Paper Mill Vicksburg, Michigan

416,000 sq. ft., Built in 1903, operated until 2001

Paper mill converted into brewery, auditorium, event space, housing & boutique hotel

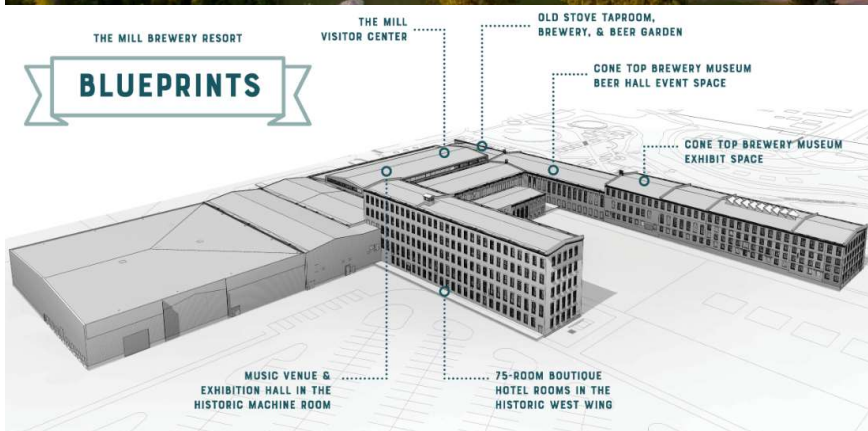
<https://vicksburgmill.com/>

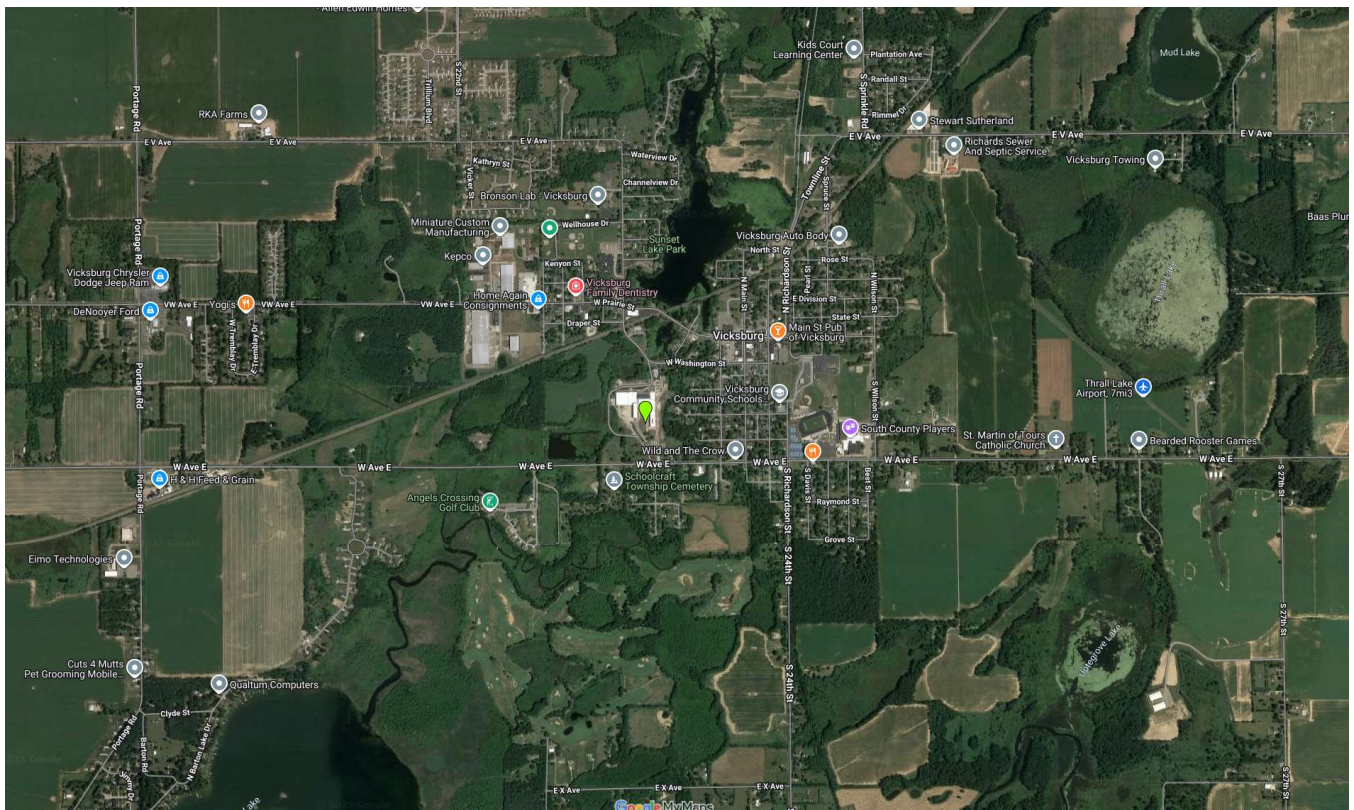
<https://vicksburgmill.com/about-the-mill/faq/>

<https://frederickconstruction.com/projects/the-mill-at-vicksburg/>

<https://kalcountybrownfield.com/portfolio-items/the-mill-at-vicksburg/>

<https://kalcountybrownfield.com/epa-grant/>





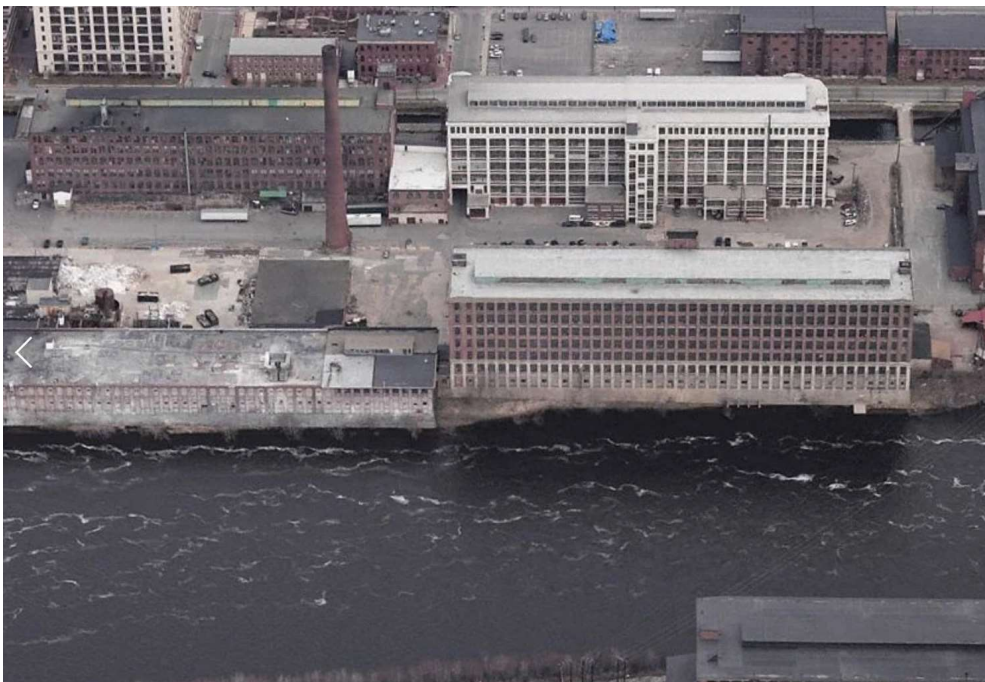
Newark Paper Mill / Mill240 Apartments Lawrence, Massachusetts

344,000 sq. ft., Built in 1870, operated until 1928
Paper mill converted into housing

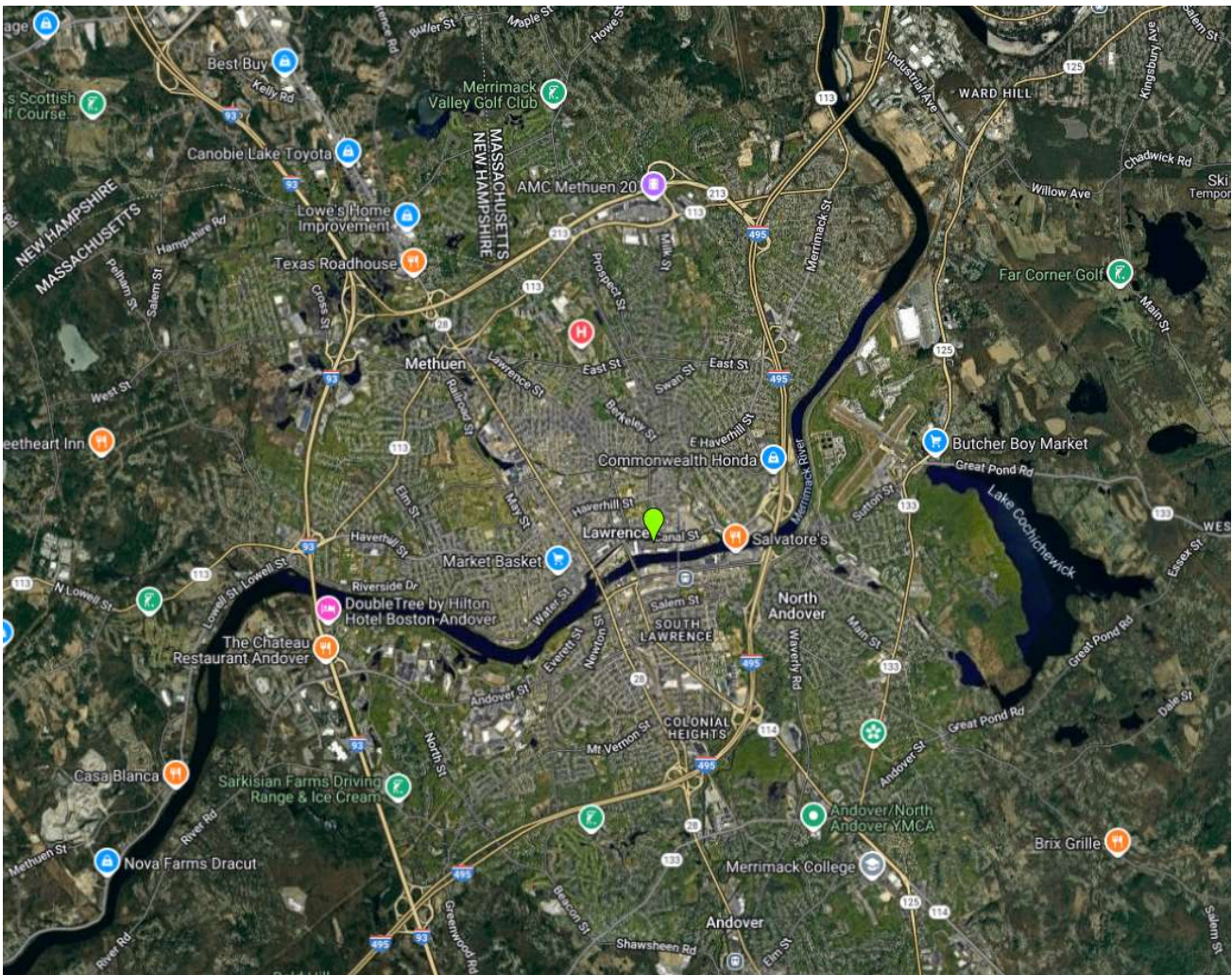
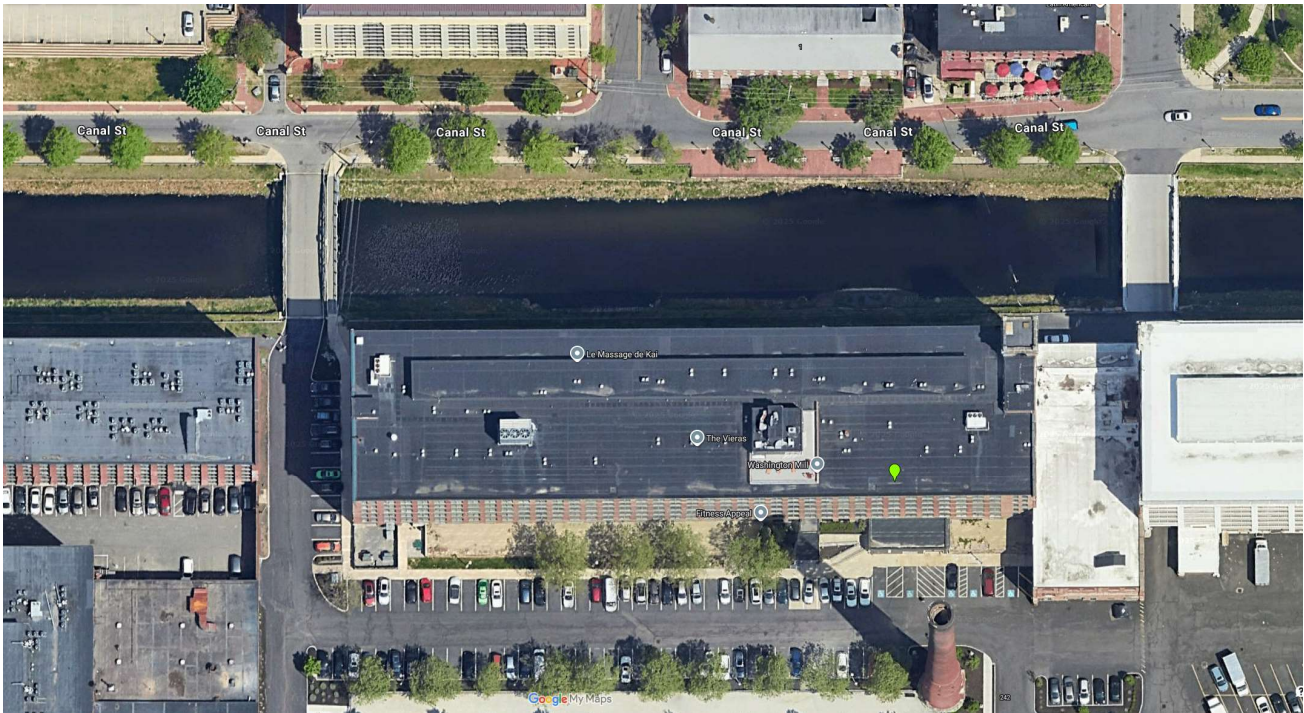
<https://pcconstruction.com/news/project-update-mill240/>

Additional Massachusetts Mill Adaptive Reuse projects, scroll to bottom:

<https://storymaps.arcgis.com/stories/959358bb4bda489198d31f479f5bd56c>







Followup Comments/Testimony RE October 21, 2025 City Council Work Session – West Linn Draft Waterfront Vision Plan

To: Mayor and City Council Members

From: Russ Axelrod, Former Mayor, Planning Commissioner, and 34-yr resident of West Linn

Date: October 29, 2025

Mayor and Council Members,

I'm sorry I was unable to attend your October 21 work session on the waterfront vision plan; however, I was able to later watch tv coverage of the agenda item.

First, let me say that as former Mayor and having spent 15 years deeply involved in City matters, I know well and have a deep appreciation for the many challenges you face in your Council roles. I want to share with you some observations from the meeting and this Vision Plan process that I hope will help Council moving forward. For the majority of Councilors that don't know me well, please understand that I think it's critically important to operate on factual information, and I'm not one to beat-around-the-bush on matters I feel are important to our community. Please know that I speak from the heart with only good intentions toward strengthening your role as Councilors to achieve our collective goals to honestly foster better community relations, and to help our City be more successful.

1. Regarding Housing Development South of 5th Avenue. This issue is a great example of one of the reasons I decided to run for Council years ago – it is a great frustration when the community feels it is not being heard by its City. This perception can have different roots and it often occurs when Council does not fully understand or grasp the power it holds toward achieving the community's aspirational goals. For example, Councilor Bonnington shared that he felt Council had no choice but to show the area south of 5th Avenue as a "Potential Development Area" because of current (older) zoning, and other Councilors agreed. It's unclear how Council accepts this rationale when the plan is full of proposed or alternative future land uses at other locations that conflict with current zoning, or certain Comprehensive Plan policies or goals? It's also difficult to grasp this rationale when the Council has no problem devoting the entire iconic Moore's Island to a group that has no history of engagement in our City planning and has not provided in any detail a defined project that has been vetted in the community.

Consider also these relevant facts about the property and the old (existing) zoning for this location that Council is defending in its position to not further alter the depictions in the Vision Plan map(s):

- It conflicts with a majority of the *Environmental Stewardship Guidelines* within the Vision Plan itself.
- It conflicts with the City's *Sustainable Strategic Plan* to reduce residents in high-risk areas susceptible to natural hazards.
- It has the highest natural hazards rating in the City's *Natural Hazards Mitigation Plan*.
- This property (formerly TriCity Sewer District land) is envisioned to be incorporated as part of the *Planned Riverfront Park* in the *2019 Parks Master Plan*.
- Please also note the following related to the new map: While it appears the City has revised the Vision Plan maps to reflect the 1996 flood level — commonly used as a proxy for the 100-year flood — to my knowledge this boundary has not been formally adopted by FEMA nor incorporated into official Flood Insurance Rate Maps (FIRMs). Additionally, to my knowledge I do not believe the City has yet

completed required Pre-Implementation Compliance Measures (PICM) under FEMA's interim protocols to align with the Endangered Species Act. Until these floodplain boundaries are formally confirmed through FEMA or ESA-compliant assessments, I recommend the City avoid labeling this line as the "100-year Flood Elevation." Instead, I suggest it be labeled the "1996 Flood Level," with a footnote clarifying that it approximates the 100-year flood and is pending formal designation.

Let's remember this is a "Vision" plan and the purpose of the document is to present what the community feels is needed at this location/area to address older land use zoning, controls, and restrictions that were made many years ago, and which do not reflect or support current community interests, environmental standards and stewardship, economic and cultural goals, etc. In addition, the core planning framework in the Vision Plan for the Ponds District is to preserve and restore our remaining habitat/wetland areas. Friends of Willamette Wetlands (FOWW) collected nearly 4,000 signatures from community members supporting environmental preservation and restoration at this 5th Avenue location, demonstrating overwhelming community support.

So where do we go from here? Based on the significance of this public interest issue, the Vision Plan should document and reflect the community's overwhelming preference to see environmental restoration at this location, rather than housing development as currently represented in the older, dated zoning for this property. However, this community aspiration is not reflected anywhere in the Vision Plan. As noted in my previous testimony, the community fully understands that a housing application can still be filed by the current owner until zoning changes are made or until other factors affecting property ownership or disposition might change. To reflect this common understanding and the community's strong interests, I urge Council to resolve this matter now by revising the Vision Plan map(s) as follows:

- Use a different color or pattern for the "Potential Development Area" south of 5th Avenue.
- For the newly patterned area, replace "Potential Development Area" with "Community preference for habitat/wetland restoration, not housing under current zoning."

2. Regarding Environmental Cleanup of Settlement Lagoon and Future Use. Council President Baumgardner asked staff if there was anything the City could do about setting higher (more restrictive) cleanup standards for the Blue Heron Lagoon site (herein Pond or Pond Site). Staff correctly responded that setting cleanup standards was not a matter of purview by Council. However, there are a number of steps the City/Council can take to see that cleanup of the abandoned Pond Site is expedited, and that the cleanup approach follows state and federal cleanup laws and regulations to be as complete as necessary to meet future City land use goals, requirements, and related interests. As I have pointed out before, the initial (2014) desired cleanup approach under assumed ownership by Water Environmental Services (WES), and passed along in the Prospective Purchaser Agreement (PPA) between current owner Bob Schultz and the DEQ, is flawed and has not followed complete cleanup process laws and regulations and should be totally unacceptable to the City. In fact, I (on behalf of FOWW) have already pointed out to DEQ that the owner is in serious non-compliance with their PPA. If Council is serious about restoring this landscape as outlined in the waterfront plan and strongly desired by the community, I would again encourage you to reach out to myself and our community non-profit FOWW that is working on a strategy to address a complete and appropriate cleanup action. This approach could possibly include multiple regional interested parties/partners.

3. Regarding the Need to Protect our Remaining Water Resources. I have outlined several times in my testimony on the draft waterfront plan the need to correct flaws and close loopholes in our current Water

Resource Protection Code (CDC Chapter 32). Again, these revisions are critical to ensure future development in our City reflects sound scientific knowledge and practice, as well as consistency with our City's Comprehensive Plan goals and policies, and our State Goal 5 criteria. To my understanding, while this issue has been on the Planning Commission docket for at least two years, neither the Planning Department or Council have publicly acknowledged, inquired about, or addressed this long-standing issue – at least there have been no public comments, statements or acknowledgement of this issue by any members that I am aware of. This is a critical need for our community with strong ties/relevance to the Vision Plan you are about to adopt, and would reflect your support for environmental preservation and stewardship. In this regard I urge you to express the need for these code revisions to the public and direct staff to address the matter now.

4. Regarding Reuse/Repurposing of Historic Structures. I appreciate Council listening to community input to incorporate language to encourage adaptive reuse of structures in future planning and development decision-making – notably for the Historic City Hall and Cultural Heritage Districts. Reusing structures not only preserves key historic and architectural features for future generations, it can also reduce our carbon footprint and it has the potential to significantly lower future development costs while creating cool/unique spaces for West Linn to enjoy and show case to all visitors. However, the potential concern for seismic stability, or instability on the flip side, also plays an important role in our local decision-making around adaptive reuse.

Some of the architectural examples presented to Council on adaptive reuse come from parts of the country that we (geologists) consider relatively stable from a seismic perspective. In those landscapes building standards are typically less rigorous (seismically) and sometimes more easily adapted to support reuse. While I am encouraged that many of our historic structures on or adjacent to Moore's Island are built directly on bedrock (basalt) or over shallow bedrock with minimal relatively stable soils compared to other valley locations, any buildings involving public occupancy must meet additional rigorous seismic standards because of our regional geologic setting involving the Cascadia Subduction Zone complex. At this time, I am unaware of construction details for many of the historic structures that might be considered for reuse. And while I support adaptive reuse approaches wherever possible, it may behoove the City to add language recognizing seismic stability and feasibility considerations in our future decision-making. Much of this should be addressed through compliance with our established building codes in the development process, however, including such guidance in our Vision Plan demonstrates healthy and science-based reasoning that can help guide/shape future discussions and considerations in the community.

5. Regarding Contamination Associated with Historic Buildings/Structures. Also related to Item 3 above, Council President Baumgardner raised the concern that environmental contamination associated with historic structures might limit future adaptive reuse considerations. While paper mill properties like this can certainly involve expensive cleanup considerations, in the case of Moore's Island, the cleanup potential may be much less relative to other similar sites that are typically underlain by extensive soil and groundwater media, and have contaminated sediment issues because of their location along rivers which collectively can significantly increase cleanup concerns and costs. Extensive demolition of historic structures can sometimes present additional contamination and waste management concerns (e.g., silica or asbestos issues) and can also present potential additional costs compared to reuse of structures with steps to minimize risk exposure (e.g., use of sealants or other stabilization methods).

It's worth noting that potential risk exposure and cleanup costs for the similar (Blue Heron) mill across the river are relatively low compared to equivalent sites at other river setting locations. At first glance this may appear surprising for an industrial site that operated for about 150 years, but this is in part because it is also underlain

by basalt bedrock and historic major flood events on the Willamette River effectively swept that property, and much of its associated particulate contamination downriver, to Portland Harbor and beyond. These flood effects may not have been as prolific for the most upland portions of the West Linn Mill site with its slightly higher elevation, but historic flooding swept notable portions of the property. In addition, the current available data do not suggest extensive contamination of adjacent river sediment compared to other typical mill sites along river settings.

6. Regarding Staff's not Providing Certain Public Comments to Working Group (WG) Members.

I really don't wish to raise this issue again, but feel I must comment briefly after Council President Baumgardner asked staff about it during your work session. In my opinion, the manner of inquiry and staff's response tended to make a mockery of this concern, which I have raised previously.

Here are the facts:

- The poor structure of the consultant questionnaire seeking public input in 2024 did not allow for meaningful feedback on many issues (*e.g., see N. Jackson's 7/17/25 testimony to the PC*), thus requiring submission of independent comments for review by WG members.
- I provided two submissions of comments directed to the WG - these were required to be submitted to Mr. Wyss's email only, in accordance with City protocol.
- Item 14 of the WG guidelines states that all public comments submitted to the City shall be provided to WG members.
- I learned later from at least three WG members that my comments were never provided by City staff to the WG.
- Staff partially addressed two of my lesser/minor comments in subsequent review drafts, but the more substantive comments (*e.g., the 5th Avenue wetland development issue, the unclear commitment to an unvetted project on Moore's Island, and the request to discuss potential future casino/gaming operations in West Linn*), were never provided to the WG. A request to retract a comment regarding the Pond cleanup based on new information later discovered was also not recognized/honored.
- When the Planning Commission asked staff about this oversight at their July 16 work session, Mr. Wyss responded: *"That was my mistake not getting the entire packet of comments to the WG. We did give them that summation of the topics."* (Timestamp 1:54:45).
- It's clear from the record that Mr. Wyss screened ("cherry-picked") comments on issues he wanted to either control or address himself, or issues he did not want to pass along for open consideration by WG members or the general public.

I do not enjoy having to raise this issue in public or refer to any specific staff member in this context, but the City should formally recognize there were process errors in the handling and distribution of public comments and clarify that Staff will strive to prevent such errors in the future. In the meantime, staff should ensure that the WG, PC, and Council members are made aware of this oversight and will give due consideration to all comments, including comments not addressed to date.

7. Regarding Potential Conflict of Interest for Council Member Baumgardner. During your deliberations Council President Baumgardner shared some of her thoughts about what she felt the City might be able to do or not do regarding the preservation of historic structures desired by the community. As some know, Councilor Baumgardner is a board member of the Willamette Falls Trust (WFT) that was recently

granted \$45 million of State funds to purchase Moore's Island for redevelopment. Given her role with the WFT, I recommend that potential conflicts of interest be formally reviewed and documented in your proceedings to maintain public confidence in this process. Perhaps I am unaware of her declaring a potential conflict of interest earlier in your proceedings, but if this has not been disclosed for the record, I recommend the potential conflict issue be addressed appropriately as directed by legal counsel.

In closing I look forward to seeing the Waterfront Vision Plan revised to reflect public comments and the overwhelming interests expressed by our community. Thank you for your service and addressing these matters for our community.

Respectfully,

Russ Axelrod

Wyss, Darren

From: Bob Schultz <bob.s@rivianna.com>
Sent: Wednesday, November 5, 2025 7:40 AM
To: Koper, Steve; Wyss, Darren
Cc: Aaron Murphy; David Hewett
Subject: Request for Reinstatement of Priority Project Designation: Publisher's Pond & Vision Plan Comments

CAUTION: This email originated from an External source. Do not click links, open attachments, or follow instructions from this sender unless you recognize the sender and know the content is safe. If you are unsure, please contact the Help Desk immediately for further assistance.

Request for Reinstatement of Priority Project Designation: Publisher's Pond

Dear Steve and Darren,

I hope this message finds you well.

Support for Vision Plan Modifications to include affordable housing

It is my understanding, and I want to express my support, that the council is considering adjustments to the Vision Plan to better support affordable housing initiatives for the Publisher's Pond area. This consideration addresses one of the primary reasons I previously objected to the Vision Plan, but in my opinion, it does not go far enough. I trust you recognize my passion for affordable housing.

Concerns Regarding the Pond's District

In addition to concerns about affordable housing, I continue to object to the property remaining within the boundaries of the 'Pond's District.' While I see the council's willingness to tweak the Vision Plan as a step in the right direction, I believe these changes do not go far enough to address the underlying issues.

Expert Assessments of Publisher's Pond

Leland Consulting, serving as the city's economic feasibility consultant for the waterfront district, has identified Publisher's Pond as a premier A+ location for luxury housing. According to Wally Hobson, the senior real estate development analyst at Leyland Consulting and widely regarded as one of Oregon's leading feasibility consultants, Publisher's Pond is expected to achieve both the highest rental rates and the highest condominium prices within the Portland Metro Area.

Financial Implications for Housing Development

The substantial value of luxury housing at Publisher's Pond can be leveraged to support affordable housing initiatives through cross-collateralization strategies. By utilizing the high value generated in this area, the city can effectively bookend affordable housing projects and reduce the reliance on public subsidies.

Background on Designation Removal

Darren previously indicated that the designation of my property, commonly known as the Publisher's Pond, was removed from the list of city "priority projects." I am seeking clarification on how this decision

was made, including the criteria used, the specific process and timeline involved, as well as whether the mayor or the council person or persons who initiated this effort and supported the removal of this designation and why was I not notified.

Objection to Designation Removal

I formally object to the removal of the priority designation from my property and respectfully request that it be reinstated. This removal negatively impacts the value of my property and devalues the district and makes it more difficult to develop affordable housing without a public subsidy.

Policy Alignment and Fiduciary Responsibilities

Given these expert assessments, removing the priority designation for Publisher's Pond contradicts the city's recent emphasis on housing priorities. Additionally, such a decision may conflict with the fiduciary duties of the mayor and City Council to the West Waterfront Tax Incremental Financing District.

Request for Response

I ask that you please advise on these matters.

Thank you for considering my perspective.

Regards,

—

Bob Schultz,
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Forward Vision Development, LLC
SDG-2, LLC

bob.s@rivianna.com

c: (971) 456-8678

"The future is not something we enter. It is something we create." Leonard I. Sweet