

West Linn Waterfront Community Vision Plan
Comments Received for City Council Work Session

10.07.2025



Comments/Testimony for 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 7, 2025

General Comments on Process Elements of Plan Development

This past year I submitted six (6) sets of comments or testimony on our draft waterfront vision plan.

Contrary to staff's matrix comments in your planning packet, my submittals in December and May were never provided to Working Group (WG) members by Staff in violation of the WG's own guidelines (Item 14), so the comments were largely unaddressed. As noted in my previous testimony, public comments by some others were similarly not distributed/addressed, and some members of the WG felt there was inadequate discussion and resolution on some plan elements before staff moved the plan to the Planning Commission (PC).

As you review your extensive packet, please also be aware that the staff matrix typically reflects staff's angle/interpretation on matters (not the PCs vetted opinion) and can sometimes be biased and/or incomplete in its analysis or coverage on some issues.

I submitted comments or testimony to the PC in May, July, August and September. These were partially addressed by the PC, however, to date there have been no substantive changes to the actual draft plan in your packet, and no actions taken on some other related items recommended (see following section).

This despite the fact that the PC made three final unanimous recommendations at its September 17 final hearing, including their finding to remove from the Ponds District map the depiction showing future housing development as an acceptable land use intruding our City's most significant remaining wetlands and the 100-yr floodplain boundary south of 5th Avenue.

At the PC's September 17 deliberations, they unanimously determined this housing depiction to conflict with the "Planning Framework" described for the Ponds District, and in conflict with overwhelming community comments that requested to remove the housing "vision" from this location. Also, at least two PC members astutely noted the large (untenable) potential liability for the City if it promoted/allowed such housing development in our City's most hazardous location (No. 5 ranking) as depicted in our natural hazards mitigation plan – and all PC members also agreed with this liability concern.

Having served on the PC for several years, it was hard to watch them struggle with the deliberation process. While Chair Melton had a reasonable grasp on the limits of their review/actions, staff should have helped members better understand the scope of their authority and the full range of actions/options they could and probably should contemplate – deliberating a plan like this is vastly different from code compliance matters typical of much of their PC work.

During my tenure on the PC on similar matters we typically outlined in detail the exact changes (e.g., wording) we expected to see, and more commonly we changed the actual planning documents including figures or findings on other matters before finalizing them or passing them on to Council for review and adoption. This was also documented for the record in a formal action/agreement signed by the Chair or Vice Chair and Planning Director; I have not seen such an agreement in this case, but final recommended changes to a plan like this vision plan should be reviewed by all PC members.

What concerns me most today, is the continued obfuscation of this housing matter in the wetlands in your packet that appears to not support the overwhelming desires expressed by the community (nearly 4,000 already signed in support), and now seemingly misrepresenting or not appearing to support a final recommendation by the PC to remove the housing proposal in the wetlands from the plan?

Today's planning packet describes/characterizes the PC's findings as "considerations," and never correctly presents them as the clear, final findings the PC recommended. This is simply unacceptable!

I researched the difference between a "consideration" and a "recommendation" and here is the concise output by independent AI source (*emphasis added*): *A consideration is a factor that requires careful thought or evaluation when making a decision or forming an opinion, while **a recommendation is a strong endorsement of a specific course of action, person, or item based on expertise or experience. A recommendation is a specific type of opinion or suggestion that carries more authority and an expectation of being followed**, unlike a general consideration or a more casual suggestion.*

This obfuscation must stop and staff should immediately provide to Council (and the Community) a revised plan reflecting the findings and recommendations of our PC's review and hearing process.

It should also be clarified for the record that our community supports alternative housing in the Ponds District and in the other districts, but the housing must be properly located. The community opposition to housing we have documented pertains to staff's proposed housing only in the wetland area south of 5th Avenue. Staff continues to misrepresent this housing concern by characterizing it to apply to the entire Ponds District, and that misrepresentation must end.

Two Additional Specific Issues for the Ponds District and Waterfront Plan

1. Correct/fix our Water Resource Protection Code (CDC 32.070)

There are critical water resource features located in the Ponds District and throughout the waterfront plan area. Future waterfront planning/construction projects will necessarily intersect some of these water resource features so it is critical that our City's water resource protection code be as complete and protective as the community expects. Currently, there are loopholes in our water resource protection code (notably CDC 32.070, Alternate Review Process) that have sometimes been exploited to approve land uses in sensitive areas that should not be allowed.

This code revision need has been sitting idle on the PC docket for two years or more now because the PC has not been allowed to review and revise the code. These same issues are relevant and ongoing in other areas of our City where similar evaluations are needed in our development planning, so it is imperative to see that the code is reviewed and corrected as soon as possible.

I urge Council to simply direct the City Manager to see that the PC completes a thorough review, and revision as necessary, of our water resource protection code as soon as possible.

2. Inform the Oregon Department of Environmental Quality (DEQ) to direct responsible parties to complete a Feasibility Study and implement cleanup of the idled settlement pond immediately, and before any further development is considered/allowed in this critical waterfront area

In my prior testimony I provided further background on this critical environmental matter related to both our planning and City interests. I have worked professionally for more than 40 years on similar cleanup matters in Oregon and across the country. I have also met with the DEQ on behalf of Friends of Willamette Wetlands (FOWW) to learn more about the Pond project status, and recently informed DEQ that they have not followed State and Federal cleanup rules which has allowed the situation and property/conditions to flounder (more than 10 years) and degrade

with the potential to impact Bernert Creek and the Willamette River, and in the process also compromised city/community planning efforts.

I have shared some of this information and DEQ correspondence with Council members more recently. FOWW is committed to seeing that cleanup rules are followed and that the cleanup approach be properly assessed by completing a Feasibility Study (FS) and implemented before any further development of the ponds property/area is considered. In accordance with cleanup rules, the cleanup plan process/approach must also involve public engagement.

This effort would greatly benefit from the City Council also expressing to DEQ that you share FOWW's concerns and support prioritizing the cleanup effort. On behalf of FOWW, I'm available to Council to discuss or in anyway assist this matter and potential next steps at your convenience.

In closing I look forward to seeing the waterfront vision plan finally revised to reflect the overwhelming interests of our community as a successful interim step in this planning process we began in 2016 when I was Mayor. Thank you for listening and for serving our community.

Respectfully,

Russ Axelrod

Howard, Teresa

From: Mollusky, Kathy
Sent: Tuesday, October 7, 2025 7:19 AM
To: Howard, Teresa
Subject: FW: Fwd: Testimony for tomorrow

From: [REDACTED]
Sent: Monday, October 6, 2025 10:22 PM
To: City Council <citycouncil@westlinnoregon.gov>
Cc: Williams, John <JWilliams@westlinnoregon.gov>
Subject: Re: Fwd: Testimony for tomorrow

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Dear Mayor and Council,

As a 25-year Board Member and a representative today of the local preservation nonprofit "Advocates for Willamette Falls Heritage" – formerly Willamette Falls Heritage Foundation – I'm very happy this afternoon to witness the official start of Council's important involvement in the Waterfront Vision Concept process.

Online I see that the first strategic goal under the WaterFront Vision was producing a plan that will move the study areas towards the creation of a world class destination where people can work, live and recreate. Bravo for setting a goal that lays the foundation for an exceptional future here at such a historically significant and thrilling location. And bravo for enlisting expert community input from groups such as the Historic Review Board.

The Advocates, which currently represents the heritage preservation sentiments of more than 500 West Linn residents, would like at this time to see your adoption of more specific Vision language to clarify and focus the third, rather confusing bulleted recommendation from the Planning Commission.

The Working Group recommended the following: "Consider including stronger language in Plan for reuse of existing structures."

Staff's recommended wording to you – much more vague than that suggested by the Advocates and the Working Group is: "3. Add encourage or stronger language for reuse of cultural resources in Cultural Heritage District."

We recommend clarifying by specifically encouraging the preservation of some of the built industrial structures currently on Moore's Island, for repurposing and interpretation. This could encompass buildings, foundations and other interesting structural remnants that could physically and visually represent the City's proud industrial heritage.

Thank you for enabling and supporting a bold vision that can embrace and represent all of the many layers of this City's unique riverbank heritage.

Yours truly,

Sandy Carter

13505 S.E. River Road, #247

Portland, Oregon 97222

West Linn resident: December 31, 1993 to May 6, 2025.

Kathy Mollusky
City Recorder
Administration

[#6013](#)



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