

Public Comments | Draft Willamette Falls Riverwalk Master Plan  
 Summary prepared December 14, 2017

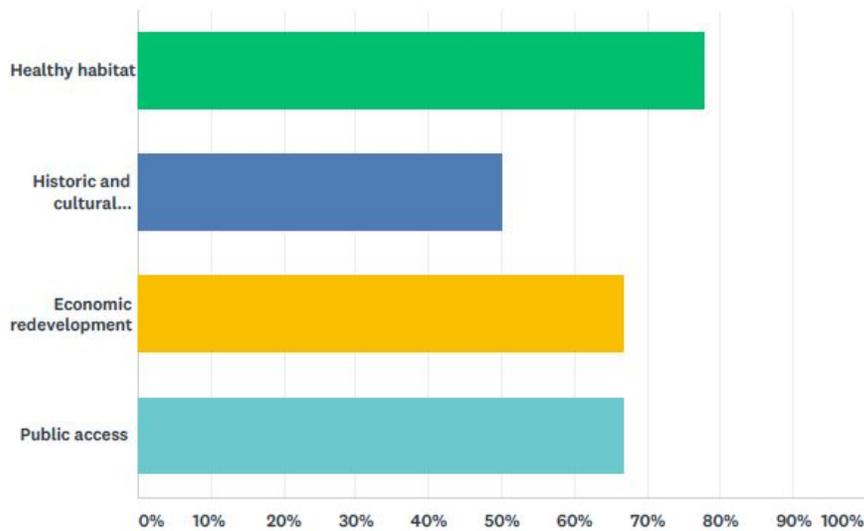
**Summary:** The Willamette Falls Legacy Project began a public master planning process for the Willamette Falls riverwalk in early 2015. Throughout the planning process, there were multiple opportunities for project partners and the public to participate and provide feedback on the future of Willamette Falls. The final master plan aims to provide a long-term vision that will guide future development and public use of the riverwalk.

The public comment period for review of the draft master plan was open from November 22 through December 13, 2017. Nineteen individual people filled out the online survey and project staff received comments or letters from four additional individuals or groups. Below is a summary report of the compiled public comments received.

**Question 1:** *The four core values that have been adopted by the Willamette Falls Legacy Project are: healthy habitat, historic and cultural interpretation, economic redevelopment and public access. In your opinion, what core values does the draft Willamette Falls Riverwalk Master Plan address adequately? Select all that apply.*

Answered: 18

Skipped: 1



ANSWER CHOICES	RESPONSES
Healthy habitat	77.78% 14
Historic and cultural interpretation	50.00% 9
Economic redevelopment	66.67% 12
Public access	66.67% 12
Total Respondents: 18	

**Question 2:** Please share additional thoughts, comments or feedback on the draft plan.

Answered: 17

Skipped: 2

#1

Thorough master plan highlighting the thoughtful public involvement process and adherence to the four core values. I am very excited about this project!

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#2

A bridge to access the Promenade should replace the current bridge at the VFW Hall. Please keep the same location. Anything higher on the bluff would impact the view and complicate parking.

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#3 and #4

Habitat and shoreline areas would not be given adequate protection with river access. Specifically, concerning page 125, river access map.

1). No (red line) light water craft and “toes in the water” access on shoreline near public yard habitat area- keep natural habitat only. No human interference.

2). No (orange line) motorized or non-motorized watercraft public dock that extends nearly one half across the front of the natural habitat shoreline.

3). Limit (blue line) upper falls use of commercial boats docking on mill shoreline to one half area to lower impact.

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#5

I was very disappointed that the plan did not directly address parking issues through new parking lots. I live in Oregon City and own a business on the bluff above the elevator. Parking for our customers is constantly being used by people taking the elevator to go downtown. Many of my friends in West Linn won't come into downtown OC anymore because parking is difficult now. What will it be like with the redevelopment and no parking garage? More bikes and uber won't solve this problem – this is suburbia. And I doubt if we would approve any extension of light rail. Build a parking garage in the first phase, not the last.

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#6

Although I agree that parking is an issue, it is currently a problem and I can only imagine it getting worse, connecting MAX to Oregon City brings a whole different set of issues/concerns with it. I'm glad that isn't something that will be happening soon.

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#7

This whole project is a joke. All those buildings were to be removed years ago and here we sit while the local governments got involved and gave residents the finger. If this had stayed a private project we would be shopping and enjoying a view now.

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#8

You need parking! No one wants to be shuttled or walk distances or will take mass transit to have access to this potentially amazing location. Get real planners. This is reality. Just because you limit parking does not mean this will work out. If you want people to use and enjoy this location you need PARKING!

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#9

I read about the parking plan. You are stressing public transportation. I live 4 miles out of Oregon City with no public transportation available. I'm excited about the riverwalk and the whole Willamette Falls project. Where do I park when I bring my guests to the Falls? I believe a pay-to-park parking lot is the best option. If the parking lot is left out of the final plan there will be a huge under serviced population of visitors. Thank you.

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#10

Pg. 18 photo caption of mill works and raft caption should read “Above” not Below. Mill A is still standing on the West Linn side, why is it referred to as “razed” in the ’64 flood? Under Tribal – why cite the Walla Walla Treaty? It would make more cultural/historic sense to call out the Willamette Valley Treaty of the same time period.

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#11

Need to include specifics around river access for recreational paddlers.

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#12

Regarding p.69 “Falls Legacy LLC walked back from core value of economic redevelopment when they stopped 2040 Planning and Development Grant work to pursue private econ dev.” Why? Will private hotels be consistent with other core values? Low or high rise? Block falls view or not? Two hotels or one hotel?

*Additional comments emailed to [info@willamettefallslegacy.org](mailto:info@willamettefallslegacy.org)*

P 77 under caption Riverwalk Design, Area 1 North Riverfront, 3<sup>rd</sup> line should read Flour Mill, not Four Mill.

How will visitor centers and historic artifacts inform the public about the industrial history of Willamette Falls, especially papermaking?

Are both theaters mentioned in the plan outdoor or do you have indoor space planned to show documentary and other films especially during the winter months when use of outdoor theaters is limited by weather?

P 69 of the draft plan makes note of a divergence of opinion between Falls Legacy LLC and the 2040 Planning and Development Grant team regarding the best way to move forward on economic development planning (i.e. hotels). What is the nature of this conflict and why did the private developer decide to continue economic development planning independent of the 2040 group? What impact will this have on the riverwalk and future projects? The Oregon Journal of Business indicated that this break occurred in November 2017, not 2016 as noted in the draft plan. Or was the Business Journal article about something else?

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#13

Skipped

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#14

The plan looks good. It will help as construction “happenings” arise.

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#15

Overall, I think it’s great! I attended most of the meetings and so have been following this since its inception. You have it mostly covered – though much is iterative and will evolve over time.

In reviewing Part IV of the draft and Appendix F, the Interpretive Framework, I have a couple of ideas and additional sources for the team. First is the recommendation that ART be more fully integrated into the plan.

First on page 65 of the plan, and pages 11 & 13 of the appendix outline the take home strategies and interpretive framework. Another example of narrative is Mud Island, in Memphis Tennessee with the Mississippi River. Along or embedded into the pathway, informative stepping stones with symbols representing one of the four core values could be integrated providing a narrative option.

While ideas for On-Site Development opportunities are in their infancy, development could include galleries and artist studios. This could include Native Arts as well as traditional crafts that address both economic redevelopment and historic and cultural interpretation. A Wood Crafts shop with classes for instance. Are there plans for the museum on the bluff to be relocated down into the mill area? Other ideas could be a fish and tackle shop is an idea. A shop of woolen goods from Oregon.

The Patterson Great Falls area in New Jersey created an Arts Revitalization Plan (<http://library.rpa.org/pdf/RPA-Paterson-Arts-Revitalization.pdf>) into their larger scope of renovating a declined industrial area. Public Art is listed on page 56 of Appendix. Manchester England's Northern Quarter, which was industrial, included many examples in addition to the wonderful array listed in the Appendix.

Participatory art and music making are referenced indirectly, but can be key to bringing people here over and over. Pop-up art events could happen in the Yard. Plein Air painting workshops; traditional drumming events; on and on.

Tourism is covered in the plan and appendices. Could Amtrak be a partner in the transportation sector – perhaps providing tourism options from Portland or elsewhere. Does the Portland Spirit make a stop in Oregon City? Again, a package where the boat brings you down, you spend the night, then go back to Portland the next day. Education is a huge opportunity, so I was happy to see an idea of school children visiting the site.

Thank you for sharing this for the public to review.

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#16

I feel that there are missing pieces from historic & cultural interpretation and public access surrounding the river at Willamette Falls most specifically in relation to a water or portage trail.

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#17

See attached letter from Audubon Society of Portland

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#18

The Greater Oregon City Watershed Council (GOCWC) boundaries and creeks include inputs into the Willamette River above and below the Falls. As such, the GOCWC has followed with great interest the planning processes for the overall Willamette Legacy Project and its current phase with the Riverwalk Project.

The GOCWC concurs with the public's priority to experience interactions with nature that the habitat restoration and natural history interpretation aspects of the Riverwalk Project will facilitate.

As the next phase of work commences focusing on refining design ideas and concepts for the Riverwalk Project, the GOCWC urges the use of the Stillwater Sciences technical reports and in particular, the considerations for the conceptual design outlined in the October 2017 report.

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#19

The plan is excellent overall. Just a few comments. First, a photograph of the Brick Mill claims it was built on stilts for floodplain purposes. I don't think this is the case. I think a clear copy of the photo would show that the stilts are only holding up the wood plank walkway going around the perimeter of the building, and that behind these stilts the basalt foundation reaches down to the bedrock along the river bank. In fact the basalt foundation can pretty clearly be seen reaching bedrock in the 1867 Carlton Watkins photo. Second, I hope that the Riverwalk Plan could make a commitment to preservation and adaptive reuse of the following historic structures: a) The Mill G recovery boiler, because of its critical significance to Oregon environmental history. It was built in 1970 as a result of Oregon's very strong water quality law enacted in 1967 (as was the Clarifier in 1968), and embodies the Tom McCall legacy. b) The entirety of the Woolen Mills Puller / Publishers Paper Carpentry shop. It is thrilling that the WFLP has evolved in its thinking to recognize the significance of the oldest building on the Blue Heron site. It would be even more thrilling to see the building not dismantled to the extent that the draft shows it being dismantled with only remnant posts remaining. At a minimum, I hope that the four corner posts and full pitched-roof form of the building can be retained. c) There should be a commitment to retain at least the north half of No. 3 Paper Machine building. The south half has been significantly altered, but the north half, known as "Mill F," retains its original 1913 structure. It does not interfere with the open space objectives of the Riverwalk, and is a great economic development opportunity, being on the riverfront, and at the

corner of 4<sup>th</sup> and Water Streets, which will be a high traffic corner. The sub-basements of the building could be instantly converted to parking, further enhancing its potential for redevelopment.

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*Additional comments submitted, not via the online survey*

#1

*Emailed directly to project staff*

The City of West Linn is missing from the first local area Falls map, pg 13.

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#2

*Emailed directly to project staff*

This project has come a long way. Overall the plan is great, I just have some minor comments or requests for clarifications. I referenced the electronic page numbers.

Page 81 identifies an access point to a proposed dock to the north and the following illustration shows a gangway going nowhere. I would recommend that the dock be included for illustrative purposes since the gangway leading to nowhere is a bit confusing.

Page 85 identifies that stairs or ramps to the river's edge are not included in the North Riverfront area due to safety concerns...and that the location south of the existing Oregon City Boat Club dock has the potential for moored, floating dock...This seems to conflict with the information on page 81 that identifies an access point to the dock. Can this be clarified with the information from page 81?

Page 89 the graphic identifies informal water access but on page 91 I believe the item is referred to as an informal gravel path and informal access path. Can this be clarified with one name? Is this the area that you envision swimming, wading, paddling and bank angling to occur? The draft mentions "dip your toes" instead of swimming. Is the intention to not have swimming, if so how would you prevent it?

Page 109 typo in the public comment box "acorss"

Page 129 Figure 5: River Access identifies that the dock is reliant upon many factors. I didn't find what the factors were within the document.

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#2

Letter dated December 12, 2017, submitted from Audubon Society of Portland, attached.

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#3

Letter dated December 12, 2017, submitted from We Love Clean Rivers, attached.

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#4

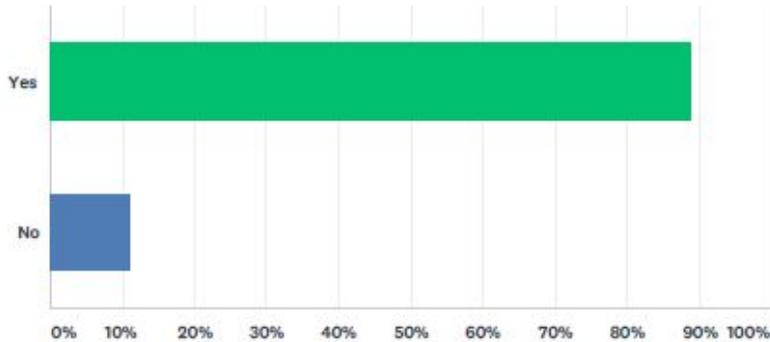
Letter dated December 13, 2017, submitted from PGE, attached.

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**Question 3:** Have you participated in a Willamette Falls Legacy Project or riverwalk planning event in the past?

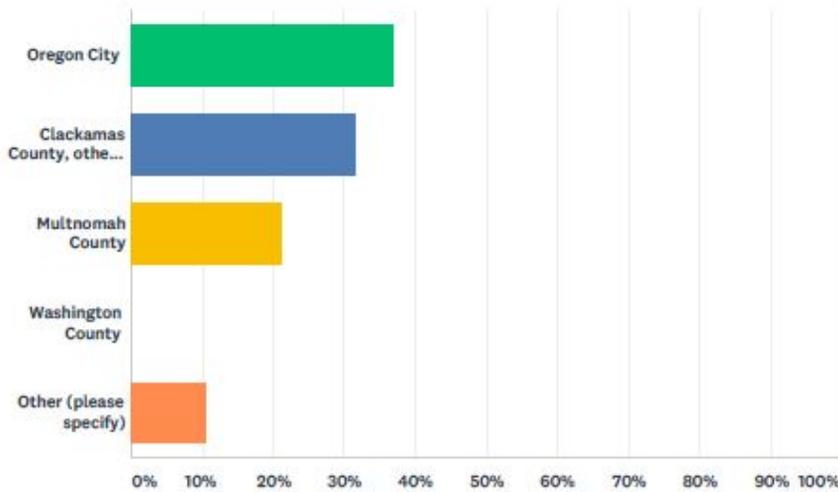
Answered: 18

Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	88.89%	16
No	11.11%	2
<b>TOTAL</b>		<b>18</b>

**Question 4:** Of the following options, which best describes where you live?



ANSWER CHOICES	RESPONSES	
Oregon City	36.84%	7
Clackamas County, other than Oregon City	31.58%	6
Multnomah County	21.05%	4
Washington County	0.00%	0
Other (please specify)	10.53%	2
<b>TOTAL</b>		<b>19</b>

\*The answer choice "Other" indicates residents from the City of West Linn.



December 12, 2017

Dear Metro Council,

Please accept the following comments from the Audubon Society of Portland (Audubon) regarding the Draft Willamette Falls Riverwalk Master Plan. In general, Audubon is strongly supportive of this master plan and believes that Metro has done an outstanding job developing a compelling vision for this site. We have appreciated the opportunity to be involved in various stages of the planning process.

Our comments focus primarily on Appendix A (Baseline Habitat Conditions Report) and Appendix B (Habitat Restoration Conceptual Design). However, the concerns we raise in these appendices are applicable to the Master Plan as well. They generally cover four primary areas where we feel the plan is deficient. They are as follows:

- 1) **Birds:** Willamette Falls is home to an incredible array of birds. However, the plan is tremendously fish centric. No one questions the importance of this project for fish, but the plan would be remiss if it did not better highlight the diversity of avian species and avian habitats at this site. We have provided a number of technical comments, but we would also encourage Metro to look for opportunities throughout the plan to augment the degree to which birds are incorporated.
- 2) **Bird Safe Building Design:** Window collisions kill up to 1 billion birds annually, making collisions one of the leading causes of avian mortality in the United States. The Metro Region, Portland in particular, is rapidly becoming a national leader in promoting bird friendly building design. Portland's new Central City Plan 2035 will require bird friendly design on all new buildings constructed in the Central City with more than 30% glazing. The Oregon Zoo has recently incorporated bird friendly design into two new buildings and has conducted one bird safe retrofit. OMSI has developed an interpretive display on its Eastbank Esplanade windows to educate the public about bird safe building design. The City of Portland has recently installed a retrofit on a problematic building. The Willamette Falls Legacy Project, due to its location along a narrow, confined stretch of river adjacent to habitat areas and the falls, presents a very high risk to birds if bird friendly design strategies are not required. We urge Metro to incorporate bird friendly design into this project and join the growing list of innovative, high profile projects that are intentionally reducing hazards for birds. It is easier, more effective and significantly

less expensive to incorporate bird friendly strategies into the original design of a building than to try to retrofit a building after a bird strike problem is identified.

- 3) Ecologically Responsible Lighting: There is a large and growing body of literature describing the negative impacts that light pollution has on wildlife (including fish and birds), human health, and the livability of our cities. We urge Metro to require the Willamette Falls Project to adhere to exemplary lighting standards that minimize skyglow, light trespass into habitat areas, and other forms of unnecessary light pollution.
- 4) Green Infrastructure: While the plan does a good job of outlining habitat goals and objectives, it provides very little information regarding green infrastructure on the built portions of the property. We would urge Metro to incorporate additional information regarding integration of green streets and parking areas, green roofs, green walls and trees into the built environment on this project.

### **Appendix A Baseline Habitat Conditions Report**

<http://www.willamettefallslegacy.org/wp-content/uploads/2017/11/Appendix-A-Baseline-Habitat-Conditions-Report.pdf>

#### 2.5.2 Birds

We recommend adding language to this section about the value of bird species in the Portland area. The Portland region hosts a remarkable 209 species of birds, and this introduction presents a rather random assortment of birds, including starlings, rather than species of concern that could potentially show up or be prioritized for habitat conservation (purple martin, willow flycatcher, yellow-breasted chat, etc.).

### 3 CONSERVATION PRIORITIES

This section lists a number of policy and guidance documents that address best practices and/or conservation focus areas. We recommend adding the City of Portland's document: *Avoiding Impacts on Nesting Birds Best Management Practices* available here:

<https://www.portlandoregon.gov/bes/index.cfm?a=322164>

### 4 CONSIDERATIONS FOR CONCEPTUAL DESIGN

We recommend that the general concepts listed in this section should also include avoiding unintended consequences for migratory and nesting bird behavior, including minimizing light trespass by adhering to best practices in lighting design (listed below in detail). Also, when discussing the potential to educate public about the ecological value of the site, we recommend specifically addressing bird migration and nesting.

## Appendix B Habitat Restoration Conceptual Design

<http://www.willamettefallslegacy.org/wp-content/uploads/2017/11/Appendix-B-Habitat-Restoration-Concept-Design-Report.pdf>

### 3 EXISTING CONDITIONS

This section includes bird species associated with particular habitat types, but which may or may not be realistic given the habitat patch size limitations on this site. Nevertheless, we offer suggestions for more appropriate species guilds given particular target habitats.

#### 3.1.1 Riparian Basalt

Key plant species: Idaho fescue (formerly Roemer's fescue), arrow-leaf wild buckwheat, Richardson's penstemon, broadleaf stonecrop, wild mock orange, various mosses

Key wildlife species: special-status Western pond turtle and fringed myotis (bat). non-special status Oregon fairy shrimp, Pacific chorus frog, and American beaver.

No birds listed for this habitat type. We recommend adding Rufous hummingbird, Killdeer, Anna's hummingbird, etc., based on plant assemblage and habitat type.

#### 3.1.2 Riparian forest

Key plant species: red alder, white alder, big-leaf maple, Pacific ninebark, Oregon ash, various willows (Pacific, Sitka, Scouler's), American dogwood, Douglas spirea

Key wildlife species: special-status band-tailed pigeon, chipping sparrow. non-special status wood duck, Anna's hummingbird, black-capped chickadee, coyote, and common raccoon.

Recommend adding Willow flycatcher, Yellow warbler, White-breasted nuthatch, Yellow-breasted chat, etc., based on plant assemblage and habitat type.

#### 3.1.3 Upland forest

Key plant species: Douglas fir, Western red cedar, big-leaf maple, oso berry, thimbleberry, holly-leaved Oregon grape

Key wildlife species: special-status acorn woodpecker, slender-billed nuthatch, silver-haired bat. non-special status house wren, orange-crowned warbler, red-breasted sapsucker, and long-tailed weasel

Consider adding Pileated woodpecker, Western Screech owl, Northern Pygmy owl, Peregrine Falcon, etc., based on plant assemblage and habitat type.

#### 3.1.4 Oak woodland savanna

Key plant species: Oregon white oak, slender hair grass, Idaho fescue

Key wildlife species: special status American peregrine falcon, Lewis's woodpecker, and long-legged myotis (bat). non-special status Wilson's warbler, rubber boa, and bush tit.

Consider adding White-breasted nuthatch, Acorn Woodpecker, etc., based on plant assemblage and habitat type.

### 3.2 Aquatic Habitat Types

#### 3.2.1 In-channel river

Key wildlife species: Special status Pacific Lamprey, Spring-run Chinook Salmon, Steelhead, and Western painted turtle. non-special-status white sturgeon, Osprey, double-crested cormorants, and California sea lion

Consider adding Bald eagle, Belted kingfisher, Lesser Scaup, Bufflehead, Common Merganser, etc., based on plant assemblage and habitat type.

### 3.2.2 Off-channel alcove

Key plant species: lateral sedge, marsh spike-rush, soft rush, spreading rush, rice cutgrass, Douglas spiraea

Key wildlife species: Special-status Pacific lamprey, coho salmon, Northern red-legged frog, common nighthawk. Non-special status common garter snake, green heron, great blue heron, belted kingfisher, and river otter.

Recommend adding Marsh wren, Virginia Rail, Common Yellowthroat, etc., based on plant assemblage and habitat type.

## 4 STAKEHOLDER ENGAGEMENT

Audubon Society of Portland is not named as a key stakeholder in this section, in spite of Audubon staff attendance at 1 public meeting, 1 open house, and multiple Audubon representatives meeting with Metro's project management team (Brian, Brian and Alex). We recommend specifically naming Audubon Society of Portland as a key stakeholder in this process.

## 5 CONSERVATION

### 5.2 Prioritizing Strategic Restoration and Stewardship Actions

Table 1. Priority status for riverwalk project conservation targets.

Only Native Fish, Riparian Basalt and Riparian Forest are listed as conservation targets. Consider identifying bird species of conservation concern that may be associated with high priority riparian basalt and riparian forest habitats, such as Rufous hummingbird, Killdeer, Willow flycatcher and Yellow breasted chat.

### 5.3 Key Ecological Attributes

Table 2. Riverwalk project conservation target and key ecological attributes

Birds are scarcely mentioned in this matrix. We recommend emphasis on birds as a key element of a healthy, restored ecosystem.

### 5.4 Threats to Conservation

We recommend adding language specifically about threats in the built landscape, including unmarked window glass and unshielded lighting. Window collisions kill up to 1 billion birds in the United States annually, representing one of the top 3 conservation issues impacting native birds. Our region is growing and redeveloping, becoming both glassier and brighter along the way. There are many strategies to achieve bird friendly buildings that synergistically meet sustainability objectives, building performance objectives and other design objectives, and we recommend that this is specifically identified as a conservation threat.

Impacts of artificial lighting are a related bird-safe design issue. Most songbirds migrate at night and rely on the moon and stars to navigate. Light emanating from cities drowns out these natural cues and can attract birds into cities, where they face deadly and deceptive building glass. Thus, lighting installation and management can have enormous impact on migrating birds. Moreover, light pollution has been implicated in a wide range of deleterious impacts to fish, wildlife, and plants, as well as human health concerns, energy waste and loss of opportunities to view the night sky. The recommendation is not to eliminate necessary lighting or to compromise safety; it is simply to reduce misdirected, poorly designed, and superfluous lighting that results in light trespass and skyglow.

More specifically, blue-rich white light LED's should not be used in exterior applications, as they are overly bright, create significant glare, and emit harmful blue light into the nighttime environment. This kind of short wavelength light has been demonstrated to impact circadian rhythms in humans, plants, fish & wildlife; scatters more readily than longer wavelength sources, and actually worsens light pollution.

Best practices include:

1. Exterior lights shall be fully shielded so that no light is projected above 90 degrees; and
2. Light fixtures shall be fully shielded with opaque materials to direct downwards; and
3. Exterior lamps shall fall below 3,000K or within an S/P ratio range of 1 to 1.2; and
4. Lighting must be contained within the boundaries of the lot on which it is located; and
5. Lighting Zones shall be established according to the Illuminating Engineering Society of North America/International Dark-sky Association's Model Lighting Ordinance, which specifies 5 lighting Zones (ranging from LZ0, designed for pristine natural environments and limited outdoor lighting, to LZ4, for application in areas of extensive development in large cities).

Recommend adding Audubon's Resource Guide to Bird-friendly Building Design (2012):  
<http://audubonportland.org/files/hazards/bfbdd>

Recommend adding IESNA/ IDA Model Lighting Ordinance for reference:  
<http://www.darksky.org/our-work/public-policy/mlo/>

## 6 RESTORATION

No mention of birds is made in this section. We recommend building in specific language related to the importance of both restoring habitat on site and providing connectivity to nearby anchor natural areas in order to support native nesting and migrating bird populations.

Thank you for your consideration of these comments. We look forward to continuing to work with Metro on this project.

Respectfully,

Mary Coolidge  
BirdSafe and Lead-free Campaign Coordinator

Bob Sallinger  
Conservation Director



We Love Clean Rivers

PO Box 14345  
Portland, OR 97239

Website: [welovecleanrivers.org](http://welovecleanrivers.org)

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December 12, 2017

Metro Councilors  
Metro Regional Government  
600 NE Grand Ave.  
Portland, OR 97232

Re: Willamette Falls Riverwalk November 2017 Draft Master Plan

Honorable Councilors:

The State of Oregon's Willamette River *Water Trail Concept Plan* "was developed through a collaborative effort between numerous [over 50] public and not for profit entities who hope to develop this opportunity as a means of recreation and as a vehicle to raise public awareness about the river and the numerous restoration efforts aimed at making it an even more special place to enjoy".

The State of Oregon and National Park Service have recognized the Willamette River as a National Water Trail, one of only 20 in the country. The *Water Trail Concept Plan* applies to the Willamette River from the Coast and Middle Forks to its confluence with the Columbia River, nearly 190 miles in length.

**There currently exists only one gap in this designated Water Trail. That gap exists at Willamette Falls.**

The following comments are intended to assist the design team and decision-makers in integrating the Water Trail into the Riverwalk Master Plan.

#### Master Plan Site History

Page 17: There is a focus on the history of the site, and mention of it being a "transportation hub", but no mention of it as a historical portage nor that the significance of the site is related to *boat traffic*.

#### Flooding and Hydrologic Conditions

Page 23: The flood and hydrologic summary seems incomplete. As there are no maps

showing floodplain/floodway and there is no indication of the probability of high occurrence floods, it makes it difficult to evaluate potential design solutions.

### Design Options Input

Page 49: Water access is highlighted in a number of ways. However, there is no mention of portaging and no relation to the identified use of whitewater. The *quote* speaks clearly but is not then turned into a task, which could lead to action. This needs to be corrected.

Page 52: The summer programming bar chart neglects to identify boating opportunities, regattas, etc. as mentioned later in the report.

### Recommended Riverwalk Concept Design

Page 62: “The Riverwalk will provide access for boats.” This statement is not supported by any plan for boat storage or boat access to the ‘public dock’ (see comment below re: page 79). Figure 5 avoids the entire idea of closing the Willamette River Water Trail gap by identifying future technical work required to be done. This should be completed as part of this work effort to ensure best possible outcomes.

Page 71: If the Main Street terminus was at Second Street, there could be additional real estate to daylight for habitat and a potential channel or portage trail around Mill Plant E.

### Riverwalk Design

Page 79: Graphic of the public dock. This location would be summer only. At flows over 22.5’ the water flows around the fuel bunker. Just north of the fuel bunker is the only place on the site that has a gentle slope for ‘informal river access’ (e.g. non-motorized boat access). Access to the river’s edge ought to be provided north of the fuel bunker.

Docks will not survive high water at the location as shown. The existing ‘Oregon City Boat Club Dock’ was designed to be seasonal and was to be removed every winter per permit. Since the Locks closed, the Club has been unable to relocate the existing dock, which has resulted in a flood/repair cycle and being out of compliance with permit requirements. The “No Wake Zone- above the Arch Bridge” recommendation per Oregon City Boat Club recommendation at the “boaters focus group meeting” was omitted from the report.

Page 87: It seems clear the best place for non-motorized put-ins and take-outs is in the tail-race channels and not the dock in the main channel. This might require a dedicated drop-off loop for boats, stairs, etc. History tells us that the main channel is likely to have powerful/high velocity flows at times that could inundate and damage fixed docks in this area.

## Additional Comments

1. Boating and fishing are not identified as economic opportunities in this study. Commercial locations should be highlighted that could be built and tailored to these types of businesses, including kayak storage and access.
2. Could not locate a proposed portage trail within the plan. This is perhaps the most significant human-related historical aspect of the site.
3. There is discussion of holding regattas and like public viewing events, but there are no support facilities such as parking, access, festival grounds, places for portable restrooms, etc. It is necessary to provide adequate support facilities for events suggested in the Master Plan.

We Love Clean Rivers is interested in public access for non-motorized boats connecting the upper and lower Willamette River Water Trail as a component of the Riverwalk Master Plan. Such access may be in-water or portage.

Historically, the edge of the river was utilized as a portage trail for boaters navigating the waterway. While the draft master plan highlights much of the historical context of the site, it does overtly neglect this one key historical use to the detriment of non-motorized boating and cultural relevance.

We are respectfully requesting the Metro Council provide direction to the design team and staff regarding consideration for closing the one gap in the Willamette River Water Trail as part of this Riverwalk Master Plan. Thank you in advance for your consideration of this request.

Sincerely,

Kate Govaars  
Board Secretary  
We Love Clean Rivers

Sam Drevo  
Board President



**Portland General Electric**  
121 SW Salmon Street • Portland, Ore. 97204  
PortlandGeneral.com

December 13, 2017

Brian Moore  
Willamette Falls Legacy Project Manager  
Metro  
600 NE Grand Avenue  
Portland, OR 97232

**Subject:** Portland General Electric Comments on Willamette Falls Riverwalk Master Plan – November 2017 Draft

Dear Brian,

Over the past few years, as a landowner and community partner, PGE has been significantly involved in the master planning process for the Willamette Falls Riverwalk. We have valued the coordination with Metro as the potential development scenarios have been explored. In our review of the final draft, we would like to call attention to a few concerns that have been previously communicated to staff.

On March 16, 2016, PGE shared with Metro our principles and constraints for the project. Of note are two critical elements of that document we feel are important to reiterate in our comments regarding the draft plan:

1. No unconstrained recreational access in waters immediately above the dam structure or in waters/lands immediately below dam spillways/structures.
  - a. Unconstrained means:
    - i. that there is no physical barrier between recreationist and dam structures to prevent entrainment in flows over or through dam structure, or
    - ii. in direct path of any controlled or uncontrolled release of water to areas below the dam. Examples are failure of obermeyer weir(s) under walkway resulting in unplanned/uncontrolled spill from the lagoon onto otherwise dewatered areas below, or flashboard failure with sudden release of water to otherwise dewatered areas around base of Falls.
2. Access through adjacent property for PGE project/contracted personnel/equipment to perform daily and weekly Hydro Project inspections.



**Portland General Electric**  
121 SW Salmon Street • Portland, Ore. 97204  
PortlandGeneral.com

We appreciate the consideration noted related to any potential river access being conditional on meeting PGE's safety and operational requirements. Recreational river access adjacent to an operating dam presents many safety concerns. PGE is willing to continue to discuss options utilizing our previously communicated guiding principles regarding public safety near the dam, but maintains the right to prohibit these types of activities if concerns cannot be adequately addressed.

While the two options for the terminus of Main Street are qualified with the notation that "both options require further discussions and coordination with PGE and Falls Legacy LLC for selection and refinement," we want to emphasize strongly that option 2 is not a feasible option to perform daily and emergency work. Maintaining safe and reliable access for our employees, their trucks, and other equipment is a requirement for reliable dam operations.

PGE is supportive of the redevelopment of the Willamette Falls area and we look forward to continuing to work with Metro and other partners as the project progresses.

Sincerely,

A handwritten signature in black ink that reads "Dave Robertson". The signature is written in a cursive, flowing style and is set against a light-colored, slightly textured background.

Dave Robertson  
Vice President, Public Policy and Corporate Resiliency