



O'NEIL LAW LLC

Experience | Integrity | Solutions

SHAWN M. O'NEIL
ATTORNEY AT LAW

LICENSED IN OREGON & WASHINGTON
8755 SW CITIZENS DRIVE, SUITE 202
WILSONVILLE, OR 97070

T 503.570.8755 | F 503.570.8757
SMO@SHAWNONEIL.COM | WWW.SHAWNONEIL.COM

September 21, 2015

By Email: douglask@wlwv.k12.or.us
Mr. Bill Rhoades
Superintendent
West Linn-Wilsonville School District
22210 SW Stafford Road
Tualatin, OR 97062

Re: Public Records Request Concerning Inza R. Wood Middle School, Boones Ferry & Lowrie Elementary Emergency Procedures

Dear Mr. Rhoades:

I really appreciate the District's efforts to address concerns that I have as a parent concerning Kinder Morgan's 53 year old Santa Fe Petroleum Pipeline.

As anticipated, I had a very constructive and positive conversation with Director Tim Woodley last Friday afternoon concerning my September 17, 2015 public records request. Mr. Woodley also conveyed your invitation to meet with both of you to discuss this matter further. I look forward to that opportunity if it becomes necessary. As I conveyed to Mr. Woodley, I am not focused on the District, but need complete and transparent information as I examine the Pipeline and Kinder Morgan. I also try to be thorough before I make contact with any public institution and have at my disposal other information.

From my discussion with Mr. Woodley and these other sources it is my understanding:

1. The District has had no contact with Kinder Morgan or any of its representatives concerning the Santa Fe Petroleum Pipeline (the Pipeline) since 1997.
2. Prior to September 17, 2014, there were no specific emergency procedures or communication protocols at Inza R. Wood Middle School, Boones Ferry Primary & Lowrie Primary that concerned the Pipeline or addressed a pipeline hazard triggered by a rupture, earthquake or other cataclysmic event. This would include evacuation of students and school personnel away from the Pipeline.
3. Prior to September 17, 2014, there were no emergency procedures at these three schools that took into account the Pipeline including a pipeline hazard triggered by a rupture, earthquake or other cataclysmic event. This would include parent-child reunification locations away from the Pipeline.

Page 2
September 21, 2015
Mr. Bill Rhoades
Re: Public Records Request

4. Prior to September 17, 2014, there had not been any specific discussions concerning the Pipeline including any potential pipeline hazard triggered by a rupture, earthquake or other cataclysmic event.
5. Since September 17, 2014, the District has started to take into account potential hazards caused by Kinder Morgan's Santa Fe Petroleum Pipeline. The incorporation of a potential pipeline rupture/ hazard in the overall safety procedures of the above schools is still in process, and not formalized in any written documentation. As I understand it the Safety Committee has now been discussing this issue. Mr. Woodley has taken advantage of the information and resources I have shared with the community on my website, as well as the links of other sources found on that site. He has also reached out to other agencies. I also understand the a national safety consultant retained by the District to address over all safety issues and procedures within the District will also now examine the Pipeline in this process including taking steps to reach out to Kinder Morgan.

If the District is in a position to confirm the accuracy of the above facts without material qualification or ambiguity, I will withdraw 1 through 4 of my public records request but will still require a complete response to items 5 and 6. If it is not in a position to do so, I would request that all documents requested (1-6) be produced.

Lastly, Mr. Woodley has conveyed that the District's Safety Committee currently does not have a representative of the Tualatin Valley Fire & Rescue or a Citizen Member. Is this something the District would consider in the future?

I will be more than happy to discuss this further with you if you would find that helpful. I would also be more than happy to volunteer to assist on these issues. Thank you.

Very truly yours,



Shawn M. O'Neil