



## West Linn – Wilsonville Schools

October 26, 2015

By email: smo@shawnoneil.com  
Mr. Shawn M. O'Neil  
O'Neil Law LLC  
8755 SW Citizens Drive, Suite 202  
Wilsonville, OR 97070

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

- A. Letter of Public Record Request dated Septemeber16, 2015
- B. Letter of Public Record Request dated September 21, 2015

Dear Mr. O'Neil

West Linn-Wilsonville School District is in receipt of the two (2) referenced letters (Exhibit 1 and 2) regarding records request(s) relating to emergency procedures for Wood, Boones Ferry and Lowrie schools located in west Wilsonville and affirms the Santa Fe Petroleum Pipeline managed by Kinder Morgan transects or is in the immediate neighborhood of these facilities.

In a letter (Exhibit 3) from the School District dated October 28, 2014, the District provided a response to seventeen (17) specific questions from you in response to your Public Records request dated September 17, 2014. In an email from you dated October 31, 2014 you state, "Thank you Mr. Wooley (sp). I appreciate your response and the further information. I want to thank the District for responding to the public records request. It has been extremely helpful. We have what we need." (Exhibit 4)

To be clear, your Public Records Request from 2014 referenced the Pipeline and Emergency Procedures as related to Inza R. Wood Middle School only. Your recent Request(s) now reference Boones Ferry Primary and Lowrie Primary.

In your Letter B dated September 21, 2015, you state:

"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."

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Mr. Shawn O'Neil  
Re: Public Records Request

In response to this statement, the District does affirm statements 1 through 5 as being accurate. It is my understanding, having affirmed the above, you are still requesting a response to items 5 and 6 from your September 16, 2015 letter.

5) All documents including emails falling outside the attorney-client privilege that reflect communications including meetings regarding my original September 1, 2014 Public Records Request and efforts to respond to the requests. This includes communications with third parties either by District personnel or its attorneys. This also includes all documents memorializing these communications and meetings.

- A. The following documents are attached:
- a. Copy of 1962 right of way deed (Exhibit 5)
  - b. Sheet C20-1995 survey (Exhibit 6)
  - c. 10/31/14 email w/website reference (Exhibit 7)

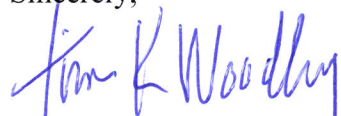
6) All documents including correspondence, notes, calendars, recordings, emails, reflecting all communications including meetings with the School District (including but not limited to these three schools) with the press/media concerning the Pipeline, pipeline safety awareness, and emergency procedures to address a pipeline rupture, earthquake or other cataclysmic event. This includes all documents memorializing these communications and meetings.

- A. No such document is on file.

I hope this response is satisfactory. While the effort has taken a good amount of time to thoughtfully process, there is no fee associated with this response.

As I conveyed in our conversation, the District is taking proactive steps to include appropriate emergency preparedness plans as related to the Kinder Morgan Pipeline for each of the schools mentioned in the future.

Sincerely,



Tim K. Woodley, Director  
Department of Operations  
woodleyt@wlwv.k12.or.us