

CLACKAMAS COUNTY BOARD OF COUNTY COMMISSIONERS
Sitting/Acting as (if applicable)
Study Session Worksheet

Presentation Date: March 13 **Approx. Start Time:** 10:30 am **Approx. Length:** 30 Minutes

Presentation Title: School District Boundary Changes

Department: County Counsel

Presenters: Stephen L. Madkour, County Counsel

Other Invitees:

WHAT ACTION ARE YOU REQUESTING FROM THE BOARD?

Informational policy session on the process involving school district boundary mergers and changes. Please see attached initiating petition from Holt Homes.

EXECUTIVE SUMMARY:

The County has received a petition to change the school district boundary line for the Centennial and North Clackamas School Districts. Please see attached staff report providing additional details. The matter was initially scheduled for a public hearing on February 15, where testimony was taken but the matter continued until March 22, 2018 to allow for additional input from the affected districts and others. The policy session was scheduled to answer any questions that the board may have with respect to this request and the statutory process.

FINANCIAL IMPLICATIONS (current year and ongoing): No direct financial impact on Clackamas County.

LEGAL/POLICY REQUIREMENTS: The legal process to approve school district boundary changes is set forth in ORS Chapter 330. The statute is not a model of clarity. The Board of County Commissions shall constitute as the district boundary board. In the present case, approval is required by both Clackamas and Multnomah Counties.

Clackamas is the more populous school district, and as such, votes first, then Multnomah, and then the matter if referred back to Clackamas for issuance of the final order. The County Board decisions are administrative with very little discretion afforded the district boundary boards.

Any remonstrance would take place after the final order is approved by Clackamas County. The remonstrance period is 20 days and requires a petition signed by at least five percent or at least 500, whichever is less, of electors of a school district affected by the proposed change. At this point, the statute seems to contemplate that a petition filed by one district requires an affirmative vote by both affected districts. A majority of votes cast in an affected district to oppose the change shall defeat the change. If both districts support the change, then the change is effective without further elections.

A failure to act by either jurisdiction could result in the State Board of Education making the determination.

PUBLIC/GOVERNMENTAL PARTICIPATION: N/A

OPTIONS:

1. Provide preliminary approval and refer the matter to Multnomah County; or
2. Take no action. Under ORS 330.090(6), if the district boundary board fails to follow the time schedules prescribed in ORS 330.107 or to approve a request or petition under subsection (3) of this section, the district school boards of the affected school districts or the petitioners may appeal to the State Board of Education to order the proposed boundary change or merger. The state board shall order the change or merger and shall direct the district boundary board to perform the duties described in ORS 330.101 in the same manner as if the district boundary board had ordered the boundary change or merger.

RECOMMENDATION:

Proceed to March 22, 2018 public hearing and grant preliminary approval of boundary change and refer the matter to Multnomah County. Multnomah would have 60 days to make a decision.

ATTACHMENTS:

November 7, 2017 petition from Holt Homes; and
February 15, 2018 staff report prepared by County Counsel.

SUBMITTED BY:

Division Director/Head Approval _____
Department Director/Head Approval _____
County Administrator Approval _____

<p>For information on this issue or copies of attachments, please contact Stephen L. Madkour, County Counsel at 503-655-8362 or SMadkour@Clackamas.us.</p>
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PERKINS COIE

1120 NW Couch Street
10th Floor
Portland, OR 97209-4128

+1.503.727.2000
+1.503.727.2222
PerkinsCoie.com

*see
Boundary
change
MISC*

November 7, 2017

Michael C Robinson

MRobinson@perkinscoie.com
Clackamas

P. +1.503.727.2264

F. +1.503.346.2264

NOV 13 2017

County Counsel

VIA UPS OVERNIGHT

Board of County Commissioners of Clackamas County
Attn: Clerk of the Board
2051 Kaen Road
Oregon City, OR 97045

Re: **ORS 330 Petition to Change Boundaries of Centennial and North Clackamas School Districts**

Dear Clerk of the Board:

This firm represents Holt Homes, Inc. ("Holt"). In accordance with ORS Chapter 330, Holt hereby submits this petition to the District Boundary Board of Clackamas County (the Clackamas County Board of Commissioners - hereinafter the "Board") to change the boundaries of Centennial School District and North Clackamas School District in accordance with the legal description that is included as Exhibit A to this petition. The chief petitioner for this petition is Kelli Warner, as indicated on Exhibit B to this petition.

ORS 330.090 provides that a district boundary board must "change the boundaries of common or union high school districts" on the "petition of five percent or 500 electors of each affected district, whichever is less[.]" As required by ORS 330.095(1), this petition includes the names and numbers of districts affected by the change, a concise statement of the type of change requested (a change of the boundaries of Centennial School District and North Clackamas School District), a legal description of the area to be changed, and the signatures and mailing addresses of the petitioners and the names of the school districts in which they reside (Exhibit B). ORS 330.095(3) provides that the district boundary board of the county in which lies the "most populous" of the school districts that the boundary change will affect must act first upon the petition. Of the two school districts that this boundary change will affect, North Clackamas School District is the most populous. Accordingly, Holt first submits this petition to the Board.

The following is a general overview, as Holt understands it, of the process the Board must use, pursuant to ORS Chapter 330, to review this petition. After receiving the petition, ORS 330.101 requires the Board to give notice to the public of the "proposed [boundary] change ... and the session of the board at which it will be ordered." ORS 330.101(1) obligates the Board to order the boundary change unless opponents of the change submit a remonstrance petition in accordance with ORS 330.101(2). ORS 330.107 requires the Board to "complete all action" on this petition "within 100 days" of the date on which the Board receives it, provided that the

Board of County Commissioners of Clackamas County
November 7, 2017
Page 2

Board may utilize an additional 60 days for the Multnomah County Board of Commissioners to also act on the petition because Centennial School District lies within Multnomah County.

If the Board disagrees that this letter sets forth (in general terms) the applicable process for review of this petition, Holt requests that the Board notify of it the nature of the disagreement. Furthermore, Holt requests that the Board notify it when it has received all the materials that ORS 330 requires for the boundary change and has selected a session to consider the boundary change.

Very truly yours,



Michael C. Robinson

MCR:rsr
Enclosures

cc: Client (via email) (w/encls.)
Ms. Katherine Thomas (via email and mail) (w/encls.)
Mr. Chris Storey (via email and mail) (w/encls.)



OFFICE OF COUNTY COUNSEL

**PUBLIC SERVICES BUILDING
2051 KAEN ROAD OREGON CITY, OR 97045**

February 15, 2018

Board of County Commissioners
Clackamas County

Members of the Board:

Boundary Change Petition to Transfer Property from Centennial School
District to North Clackamas School District

Stephen L. Madkour
County Counsel

Kathleen Rastetter
Chris Storey
Scott C. Ciecko
Alexander Gordon
Amanda Keller
Nathan K. Boderman
Christina Thacker
Shawn Lillegren
Jeffrey D. Munns
Assistants

Purpose/Outcomes	Conduct Public Hearing/Approve Order
Dollar Amount and Fiscal Impact	None
Funding Source	Not Applicable
Duration	Permanent
Previous Board Action	None
Strategic Plan Alignment	Build Public Trust Through Good Government, hold transparent and clear public processes regarding jurisdictional boundaries
Contact Person	Chris Storey, Assistant County Counsel Amanda Keller, Assistant County Counsel
Contract No.	Not Applicable

BACKGROUND:

The County Board is charged with making boundary change decisions for many types of special districts within the County. Oregon Revised Statutes ("ORS") Chapter 330 gives the responsibility to the Board to process petitions to change school district boundaries.

Clackamas County received a petition to shift an area (the "Petition Area") that is currently within Centennial School District 28J ("Centennial") to North Clackamas School District 12 ("NCSD"). The petition was originally submitted on November 13th, 2017 and rejected for lack of sufficiently valid signatures. It was resubmitted and deemed complete and timely on December 18th, 2017. A copy of the original submittal letter, legal and map of the proposed transfer area, and a sample petition signature page is attached.

This petition has been submitted pursuant to Oregon Revised Statutes ("ORS") Chapter 330.090(3). This statutory provision allows for the modification of school district boundaries upon petition of at least five hundred voters in the affected districts. That threshold was reviewed and deemed met by the Clackamas County Clerk in December – the Clerk's certification is also attached. This boundary change was not proposed or vetted by either school district.

ORS 330.090 states in relevant part:

330.090 Mergers. (3) Subject to the provisions of ORS 330.092 to 330.101, the district boundary board on the request of the district school boards of the affected districts or on petition of five percent or 500 electors of each affected district, whichever is less, shall merge smaller districts into larger districts or change the boundaries of common or union high school districts. *[emphasis added]*

As the Board will note from the statute, there does not appear to be any discretion in the question of whether or not to allow the boundary change to go forward. The process is purely administrative from the perspective of the Board and County administration of the issue.

With respect to the manner of the boundary hearing, it is set forth in ORS 330.107, which states in relevant part:

330.107 Time for boundary board action; extension. The district boundary board shall complete all action on a request or petition for boundary change or a merger required under ORS 330.101 within 100 days of the date of receipt of the request or petition if the boundary change or merger requested or petitioned lies totally within the jurisdiction of that board. If the boundary change or merger requested or petitioned requires ratification of an adjacent boundary board as in ORS 330.095 (3), an additional 60 days may be utilized for action of the second boundary board...

The Board has until March 27th, 2018 to take action with respect to the petition, and Multnomah County will have an additional 60 days from then to also act on the petition since Centennial is partially in Multnomah County. The Board has received a request from Centennial to defer taking action on the petition to allow additional time to consider the matter.

There is no appeal of the order once made final. However, the initial action is not the final action needed to implement the statute. As set forth in ORS 330.101, a final action on the boundary change petition cannot be taken until all boundary boards (County Board of Commissioners, in this case) have had an opportunity to consider. The statute states in relevant part:

330.101 Notice; order; remonstrance; election. (1)... If no remonstrance petition on the change or merger is submitted requiring an election as provided in subsection (2) of this section, the board shall issue an order that the change or merger shall become effective as provided in ORS 330.103. The remonstrance petition is subject to ORS 332.118. However, the boundary board shall not issue an order until all affected boundary boards have had opportunity to consider the proposed change or merger. *[emphasis added]*

(2) If a remonstrance petition on a proposed change or merger signed by at least five percent or at least 500, whichever is less, of the electors of a school district affected by the proposed change or merger is filed with the district boundary board within 20 days after the date of the order to effect the proposed change or merger, and when all district boundary boards have acted on the change or merger as provided in ORS 330.095 (3), the board shall submit the question of the proposed change or merger to the electors of each affected school district from which a remonstrance petition was filed, with the district boundary board acting as the district elections authority on behalf of the school districts. Separate elections shall be held in sequence in the districts from which remonstrance petitions have been filed, commencing with the least populous district and progressing in order of population to the most populous district. If the majority of votes in each election favor the change or merger, an election shall be held in the next most populous district...

Therefore, the process would be for the Board to consider the matter at a hearing as required by statute, adopt a preliminary order (see attached draft) effecting the change conditional on action by Multnomah County, and refer the matter to the Multnomah County Board of County Commissioners for additional consideration. Once Multnomah County has acted to enter a final order, Clackamas County would then enter a final order as required, which would be the date from which remonstrances must be received by would be calculated.

RECOMMENDATION:

Based on the attached petition and statute, staff recommends adoption of a preliminary order changing the boundary of Centennial and North Clackamas school districts and referring the matter to Multnomah County for additional consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Storey", with a long horizontal flourish extending to the right.

Chris Storey
Assistant County Counsel

**BEFORE THE BOARD OF COUNTY COMMISSIONERS
OF CLACKAMAS COUNTY, STATE OF OREGON**

In the Matter of Preliminarily
Approving Boundary Change
Petition with Respect to
Centennial School District 28J
And North Clackamas School
District 12



ORDER NO. 2018-_____

WHEREAS, this matter coming before the Board at this time, and it appearing that pursuant to ORS 330.090(3) that petitions to change the boundaries of school districts are submitted to the Board for process and public hearing; and

WHEREAS, it further appearing that this Board is charged with implementing this petition for a boundary change pursuant to ORS Chapters 330; and

WHEREAS, it further appearing that that the petition has been deemed sufficient by the County Clerk as set forth in Exhibit A; and

WHEREAS, it further appearing that the area to shift from the Centennial School District 28J ("Centennial") to North Clackamas School District 12 ("NCSD") is described by petitioners with the legal description attached hereto as Exhibit B and the map attached hereto as Exhibit C (the "Petition Area"); and

WHEREAS, it further appearing that this matter came before the Board for public hearing on February 15, 2018 as required by statute; and

WHEREAS, it further appearing that the Board of County Commissioners of Multnomah County is required to hold a second hearing as required by ORS 330 with respect to the petition;

NOW THEREFORE, IT IS HEREBY ORDERED that that the Boundary Change Petition to shift the Petition Area from Centennial to NCSD (as described in Exhibit B and depicted on Exhibit C) is preliminarily approved as required by statute, that the petition is referred to Multnomah County for additional consideration, and staff is directed to schedule a hearing after consideration by Multnomah County for entry of a final order effectuating the boundary changes contemplated by the petition.

ADOPTED this 15th day of February, 2018.

BOARD OF COUNTY COMMISSIONERS

Chair

Recording Secretary

EXHIBIT A



**CLACKAMAS
COUNTY**

Office of the County Clerk

SHERRY HALL
CLERK

1710 Red Bull Ct, Ste 100
OREGON CITY, OR 97045

STATE OF OREGON

COUNTY OF CLACKAMAS



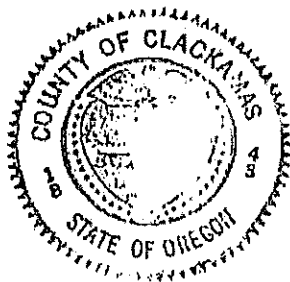
ss.

Petitioner: Kelli Warner

Petition : Petition for Proposed Change (8/8/2017)

I, SHERRY HALL, Clerk of the County of Clackamas, hereby certify that I have compared the signatures of the petition referenced, with the signatures of said electors as they appear on the registration cards in my office, and from such information as I have been able to obtain, I believe that the signatures numbering 23 are genuine for qualified electors residing in North Clackamas School District and the signatures numbering 75 for qualified electors residing in Centennial School District.

There were 509 signatures for qualified electors residing in North Clackamas School District and 523 signatures for qualified electors residing in Centennial School District from the combined two submittals.



Dated: December 18, 2017

SHERRY HALL
COUNTY CLERK

Signed: _____

Andrew Jones, Elections Manager

BOARD OF PROPERTY TAX APPEALS
1710 Red Bull Ct
OREGON CITY, OR 97045

ELECTIONS DIVISION
1710 Red Bull Ct
OREGON CITY, OR 97045

RECORDING DIVISION
1710 Red Bull Ct
OREGON CITY, OR 97045

RECORDS MANAGEMENT DIVISION
1720 Red Bull Ct
OREGON CITY, OR 97045

EXHIBIT A

County: CLACKAMAS Date : 12/18/2017 1:56:17 PM
 User Name : Jones, Andrew

Petition Sample Statistics Report

Number : 3-2017-SD-281/12 Title : Petition for Proposed Change (Centennial SD 281)

SUBMITTAL : Submittal 2

Total Samples : 1 Total Signatures : 80 Total Pages : 13

Accepted Signatures : 75 Rejected Signatures : 5 Remaining Signatures : 0

SAMPLE : 1

Sample Size : Remaining Signatures : 0

Accepted Signatures : 75 Rejected Signatures : 5

Reason	Total	Reason	Total
Valid Signature	75	Signatures Do Not Match	1
		Printed Signature	1
		Not in Sample	3

CERTIFIED COPY OF THE ORIGINAL
 SHERRY HALL, COUNTY CLERK

BY: 

EXHIBIT A

Original signatures and mailing addresses of the petitioners and the names of the school districts
in which they reside.

EXHIBIT A

Signature Sheet | Local Petition for Proposed Change (ORS 330.095)

It is against the law to sign a petition more than one time. Signers of this page must be active registered voters of the jurisdiction at the time of signing.

SOME circulators NO circulators for this petition are being paid.

To the District Boundary Boards of Clackamas and Multnomah Counties:

We, the undersigned voters, request that the boundaries of Centennial School District 28J and North Clackamas School District 12 be changed by adding the tract of land within Centennial School District 28J described on the reverse of this sheet to North Clackamas School District 12. A full and correct description of the proposed change was made available for review and I have not previously signed a petition sheet for this measure.

Initial any changes the circulator makes to your printed name, residence address, or date you signed the petition.

Signature	Date Signed mm/dd/yy	Printed Name	Address Number, Street, City, ZIP	School District
1. Wendy Milner	8/31/17	Wendy Milner	1110 SE 77th Ave 97223	North Clackamas 12
2. Bonnie Webb	8/31/17	Bonnie Webb	7742 SE Heather Ct	North Clackamas 12
3. Tom Mott	8/31/17	Tom Mott	7726 SE Heather Ct	North Clackamas 12
4. Sue White	8/31/17	Alice Holt	7706 SE Heather Ct	North Clackamas 12
5. Amy White	8-31-17	Fred Hill	7888 SE 41st Ave 97223	North Clackamas 12
6. Emily Silkin	8-31-17	Emily Silkin	7851 SE Thompson Rd 97223	North Clackamas 12
7. Jeremy Todd	8-31-17	Jeremy Todd	1401 SE Thompson Rd	North Clackamas 12
8. John L. Lohmeyer	8-31-17	John Lohmeyer	7709 SE Thompson Rd	North Clackamas 12
9. Kristina Searle	8-31-17	Kristina Searle	7801 SE Thompson Rd	North Clackamas 12
10. Kristina Searle	8-31-17	Kristina Searle	11088 SE 78th Ct Milwaukie OR 97222	North Clackamas 12

Circulator Certification This certification must be completed by the circulator and additional signatures should not be collected on this sheet once the certification has been signed and dated. I hereby certify that I witnessed the signing of the signature sheet by each individual whose signature appears on the signature sheet, and I believe each person is a voter qualified to sign the petition (ORS 255.135). I also hereby certify that compensation I received, if any, was not based on the number of signatures obtained for this petition.

[Signature]
Circulator Signature

08/31/17

Date Signed mm/dd/yy

Stefan Howerton
Printed Name of Circulator

2348 SE Salmon St. Portland OR 97214

Circulator's Address street, city, zip code

1
Sheet Number
Completed by
chief petitioner

EXHIBIT B



AKS ENGINEERING & FORESTRY, LLC
12965 SW Herman Road, Suite 100, Tualatin, OR 97062
P: (503) 563-6151 F: (503) 563-6152

AKS Job #6183

OFFICES IN: TUALATIN, OR - VANCOUVER, WA - SALEM-KEIZER, OR


A tract of land, and portions of right-of-way, located in the Southeast One-Quarter of Section 25, Township 1 South, Range 2 East, and the Southeast One-Quarter and Southwest One-Quarter of Section 30, Township 1 South, Range 3 East, Willamette Meridian, City of Happy Valley and Clackamas County, Oregon, and being more particularly described as follows:

Beginning at the northwesterly corner of the plat "Pioneer Highlands", Plat No. 4426, Clackamas County Plat Records; thence along the northerly line of said plat, Easterly 1341 feet, more or less, to the westerly right-of-way line of SE Vradenburg Road; thence along said westerly right-of-way line and east line of the northeast one-quarter of the southeast one-quarter of said Section 25, Southerly 993 feet, more or less, to the southerly line of Partition Plat No. 1990-096; thence along said southerly line, Easterly 1286 feet, more or less, to the south one-sixteenth corner common to Section 25 and Section 30; thence along north line of the southwest one-quarter of the southwest one-quarter of said Section 30, Easterly 1480 feet, more or less, to the westerly line of the plat "Grand View Meadows", Plat No. 4492, Clackamas County Plat Records; thence along said westerly line, Northerly 323 feet, more or less, to the northerly line of said plat; thence along said northerly line, Easterly 1346 feet, more or less, to the westerly right-of-way line of SE 172nd Avenue; thence along northeasterly 110 feet, more or less, to the easterly right-of-way line of SE 172nd Avenue; thence along northerly line of Document Number 2006-119589 and the northerly line of Document Number 2011-069023, Easterly 1295 feet, more or less, to the easterly line of said Document Number 2011-069023; thence along said easterly line, Southerly 19 feet, more or less, to the northerly line of Document Number 2010-016038; thence along said northerly line and the northerly line of Document Number 2010-063872, Easterly 1087 feet, more or less, to the westerly right-of-way line of SE Foster Road; thence along said westerly right-of-way line, Southeasterly 1738 feet, more or less, to the south line of said Section 30; thence along said south line, Westerly 75 feet, more or less, to the North Clackamas School District (NCSD) line; thence continuing along said south line and said NCSD line, Westerly 5484 feet, more or less, to the south line of said Section 25; thence along said south line, Westerly 2604 feet, more or less, to the north-south one-quarter section line of said Section 25; thence along said north-south line, Northerly 2293 feet, more or less, to the Point of Beginning.

The above described tract of land contains 305.26 acres, more or less.

8/2/2017

REGISTERED
PROFESSIONAL
LAND SURVEYOR

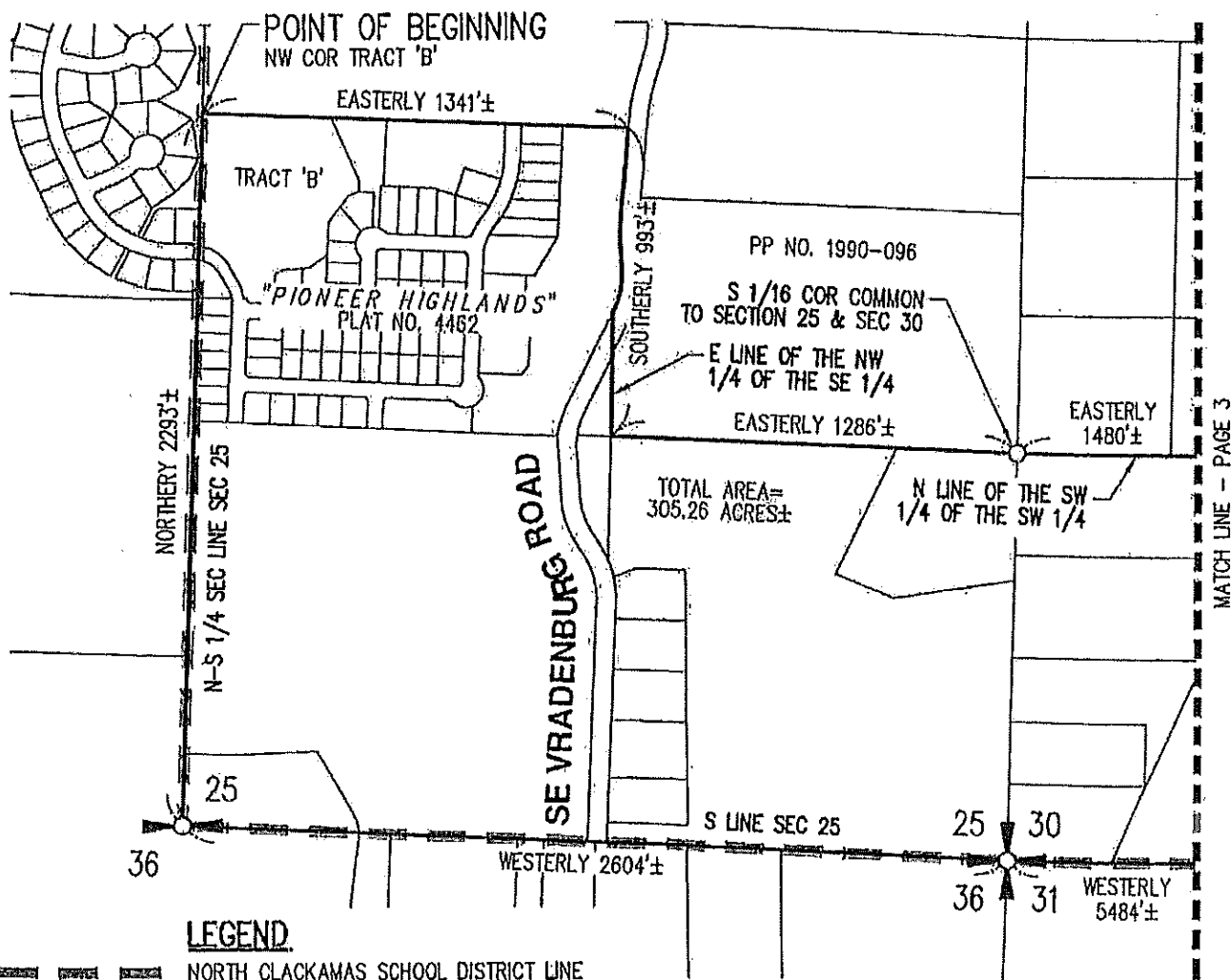


OREGON
JANUARY 11, 2005
ROBERT D. RETTIG
80124LS

RENEWS: 12/31/10

EXHIBIT C

A TRACT OF LAND, AND PORTIONS OF RIGHT-OF-WAY,
 LOCATED IN THE SOUTHEAST 1/4 OF SECTION 25,
 TOWNSHIP 1 SOUTH, RANGE 2 EAST, AND THE SOUTHEAST 1/4 AND
 SOUTHWEST 1/4 OF SECTION 30, TOWNSHIP 1 SOUTH, RANGE 3 EAST,
 WILLAMETTE MERIDIAN, CITY OF HAPPY VALLEY AND CLACKAMAS COUNTY, OREGON



LEGEND

--- NORTH CLACKAMAS SCHOOL DISTRICT LINE

8/2/2017

REGISTERED
 PROFESSIONAL
 LAND SURVEYOR

[Signature]

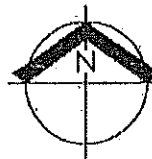
JANUARY 11, 2005
 ROBERT D. RETTIG
 60124LS

RENEWS: 12/31/18

PREPARED FOR

THE HOLT GROUP, INC.
 P. O. BOX 61426
 VANCOUVER, WA 98666

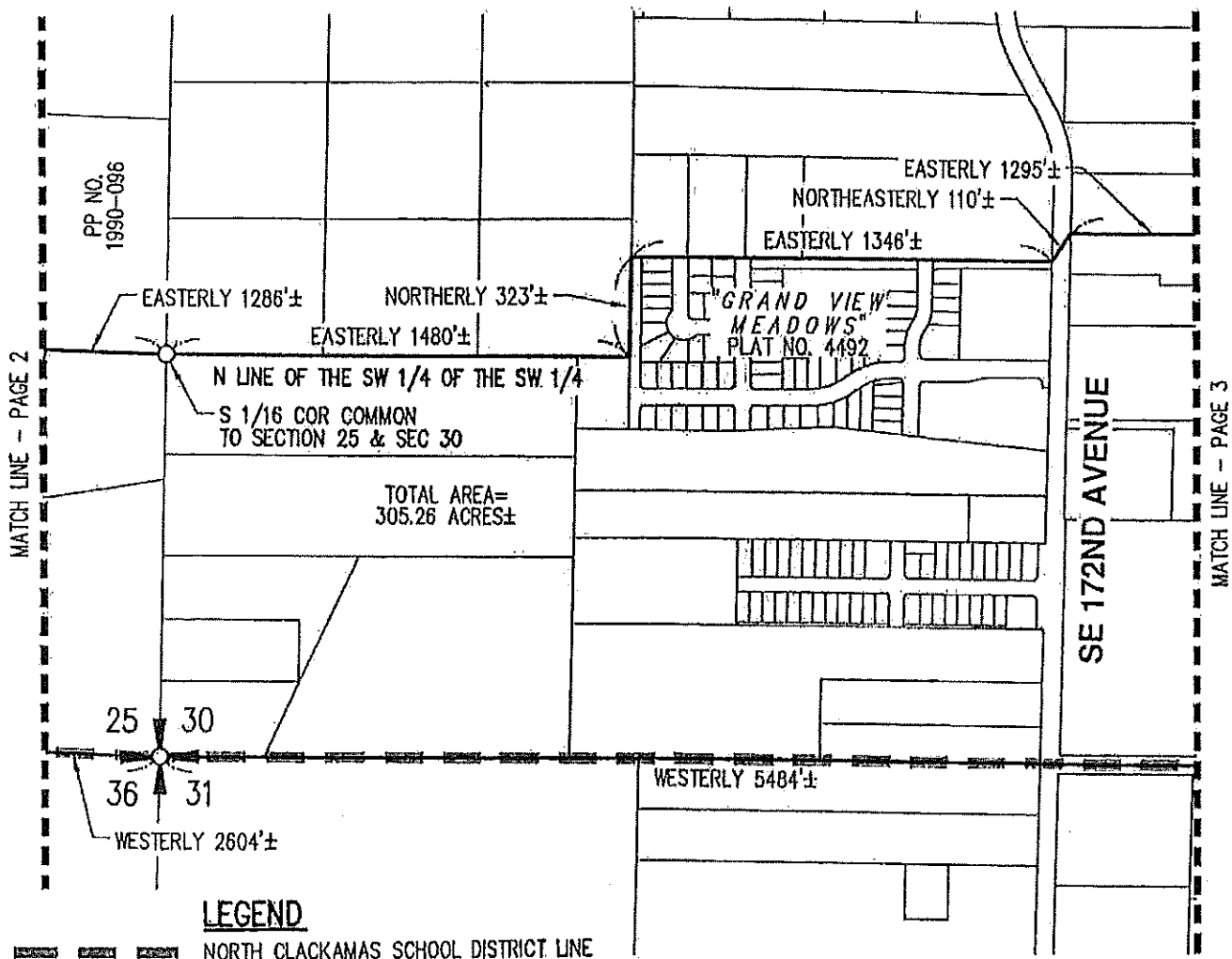
SCALE: 1" = 500 FEET



NORTH CLACKAMAS SCHOOL DISTRICT BOUNDARY CHANGE		EXHIBIT C
AKS ENGINEERING & FORESTRY, LLC 12965 SW HERMAN RD, STE 100 TUALATIN, OR 97062 P: 503.563.6151 F: 503.563.6152 oks-eng.com		DRWN: WCB CHKD: RDR AKS JOB: 6183

EXHIBIT C

A TRACT OF LAND, AND PORTIONS OF RIGHT-OF-WAY,
 LOCATED IN THE SOUTHEAST 1/4 OF SECTION 25,
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 SOUTHWEST 1/4 OF SECTION 30, TOWNSHIP 1 SOUTH, RANGE 3 EAST,
 WILLAMETTE MERIDIAN, CITY OF HAPPY VALLEY AND CLACKAMAS COUNTY, OREGON



LEGEND

NORTH CLACKAMAS SCHOOL DISTRICT LINE

8/2/2017

REGISTERED
 PROFESSIONAL
 LAND SURVEYOR

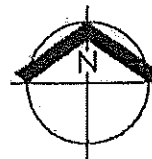
JANUARY 11, 2005
 ROBERT D. RETTIG
 60124LS

RENEWS: 12/31/18

PREPARED FOR

THE HOLT GROUP, INC.
 P. O. BOX 61428
 VANCOUVER, WA 98666

SCALE: 1" = 500 FEET



NORTH CLACKAMAS SCHOOL DISTRICT
 BOUNDARY CHANGE

EXHIBIT
 C

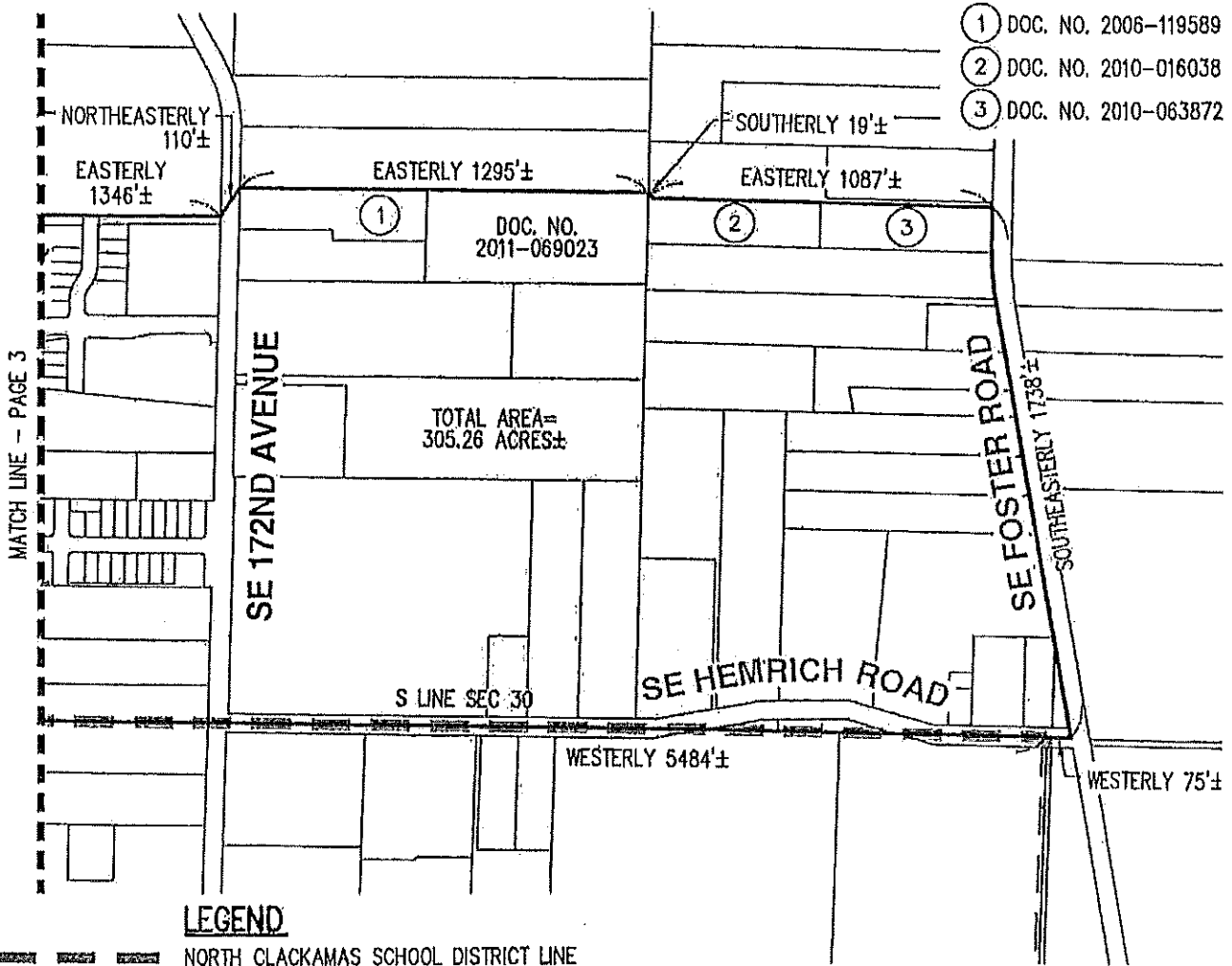
AKS ENGINEERING & FORESTRY, LLC
 12965 SW HERMAN RD, STE 100
 TUALATIN, OR 97062
 P: 503.563.6151 F: 503.563.6152 aks-eng.com



DRWN: WCB
 CHKD: RDR
 AKS JOB:
 6183

EXHIBIT C

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 SOUTHWEST 1/4 OF SECTION 30, TOWNSHIP 1 SOUTH, RANGE 3 EAST,
 WILLAMETTE MERIDIAN, CITY OF HAPPY VALLEY AND CLACKAMAS COUNTY, OREGON



- ① DOC. NO. 2006-119589
- ② DOC. NO. 2010-016038
- ③ DOC. NO. 2010-063872

8/2/2017

REGISTERED
 PROFESSIONAL
 LAND SURVEYOR

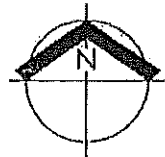
JANUARY 11, 2005
 ROBERT D. RETTIG
 60124LS

RENEWS: 12/31/18

PREPARED FOR

THE HOLT GROUP, INC.
 P. O. BOX 61426
 VANCOUVER, WA 98666

SCALE: 1" = 500 FEET



NORTH CLACKAMAS SCHOOL DISTRICT
 BOUNDARY CHANGE

AKS ENGINEERING & FORESTRY, LLC
 12965 SW HERMAN RD, STE 100
 TUALATIN, OR 97062
 P: 503.563.6151 F: 503.563.6152 oks-eng.com



EXHIBIT
 C

DRWN: WCB
 CHKO: RDR
 AKS JOB:
 6183