



Lake Oswego School District

Office of the Superintendent

2455 SW Country Club Road

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**EXHIBIT G-3
LU 15-0019**

HAND DELIVERED

RECEIVED

September 10, 2015

SEP 10 2015

Lake Oswego Planning Commission
City of Lake Oswego
PO Box 369
Lake Oswego, OR 97034

City of Lake Oswego
Community Development Dept.

Re: Proposed Revisions to Sensitive Lands Codes (LU-15-0019)

Dear Members of the Lake Oswego Planning Commission:

Thank you for this opportunity to provide written comments on the City's planned revisions to its Sensitive Lands Codes as part of its update of the City's Comprehensive Plan. On an overall basis, we believe the City's revisions will be a benefit to private property owners with sensitive lands designations and, by extension, the City as a whole. We are firmly of the belief that what is good for the City is good for the district, and vice versa.

However, we are in the nascent stages of long-range facility planning that we expect will result in recommendations that would, if ultimately funded, modify and potentially expand several of our facilities, and possibly even rebuild one or more. With that as context, any code changes that significantly reduced our current levels of flexibility in those ultimate plans gives us cause for concern.

The crux of the issue relates to the increased protections for tree groves. The district has several properties with large tree groves with sensitive lands designations, and the proposed changes increase the level of protections for designated tree groves from 50% to 85%. As a public entity, the incentives for private property owners do not appear to apply to us. For several of our properties, especially the Lake Oswego Jr. High School/Uplands property, this increased level of protection could greatly constrain future modifications or expansions of our facilities at these sites in ways that are difficult to forecast. While we do not presently have any development plans for that site, or for any other site, the rough estimation is that an additional approximate 45,000 square feet of the LOJ/Uplands property would be further restricted under the proposed sensitive lands code changes.

We believe there are two potential remedies to this that preserves our flexibility while still allowing the City to meet its overarching goals and requirements relating to the preservation of sensitive lands:

1. A further code revision that allows large public property owners with multiple sites to "transfer" a portion or all of the increased restricted tree grove area to other property or properties that the large public property owner owns. For example, to maintain the present 50% tree grove flexibility at one site, the 35% of proposed additional restricted area can be transferred to another site or sites of that owner so that the overall minimum 85% level of restricted tree groves is maintained.


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2. As an alternative, and in addition to the above potential remedy, a code revision could be added that gives a property owner the opportunity to move a protected tree grove to another acceptable location on the property. To maintain this as a viable option, this would not be a tree for tree move, but instead a planting of new trees of a reasonable caliper and similar native species that would, within a reasonable period, provide a very similar setting to the replaced tree grove.

We appreciate this opportunity to provide our perspective.

Sincerely,



Dr. Heather Beck

Cc: School Board Members

Scot Siegel, City Planning and Building Services Director

Stuart Ketzler