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March 26, 2010

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City of Springfield
Planning Commission
c/o Gregory Mott
225 5th Street
Springfield, OR 97477

VIA EMAIL AND REGULAR FIRST CLASS MAIL

Re: **Springfield School District – Rainbow Property, Clearwater Property,
Old Mt. Vernon School**
Our File Nos. 12585-8, 12585-16, and 12585-22

Dear Planning Commissioners:

I am writing on behalf of the Springfield School District No. 19 (School District) to supplement the record with 4 exhibits relevant to the School District's prior submitted written comments and testimony.

As indicated in my letter of March 15, 2010, regarding the Old Mt. Vernon School property, the School District requests that the Old Mt. Vernon School property be zoned High Density Residential under the 2030 Refinement Plan. Such a designation will provide the opportunity for high density affordable housing to be built adjacent to the existing school building which is occupied by Head Start. Included with this letter is an aerial view of the old Mt. Vernon School with the most likely area for the construction of high density affordable housing near the school building (Exhibit 1). I have also included an aerial photograph of the Old Mt. Vernon School with the entire parcel highlighted in yellow (Exhibit 2). The School District requests that the entire parcel be designated high density residential. Such a designation will begin to address the deficit of high density residential property identified under the 2030 Refinement Plan.

I have also included herewith a map showing the surplus Rainbow property (Exhibit 3). Pursuant to my letter of March 15, 2010, regarding the Rainbow property, the School District requests that the Rainbow property be designated medium density residential under the 2030 Refinement Plan.

I have also included a map depicting the Clearwater property which is adjacent to but outside of the proposed Urban Growth Boundary under the 2030 Refinement Plan (Exhibit 4). As you know, the Jasper Natron area is experiencing population growth and is expected to

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continue experiencing growth. As shown on Exhibit 4, the majority of Springfield's undeveloped low density residential land is in the Jasper Natron area. If a site within the currently proposed Urban Growth Boundary cannot be obtained, the School District likely would address its need for a new school in the Jasper Natron area by building a school on the Clearwater property. The School District cannot use the Clearwater property for the construction of a new school unless it is within the Urban Growth Boundary. Accordingly the School District requests that the Clearwater property be included within the Urban Growth Boundary as a part of the final 2030 Refinement Plan.

Lastly, during the March 16, 2010 Planning Commission Hearing, a commissioner asked if the School District could build a school outside of the Urban Growth Boundary. Pursuant to ORS 195.110, a large school district, meaning a school district that has an enrollment of over 2,500 students, must address its school facility needs under a school facility plan by identifying land that is suitable, as a permitted or conditional use, for school facilities *inside the Urban Growth Boundary*. Accordingly it appears the School District is statutorily prohibited from locating a school outside of the Urban Growth Boundary.

Thank you for your consideration of these additional exhibits.

Sincerely yours,

THORP, PURDY, JEWETT,
URNESS & WILKINSON, P.C.



Brian J. Millington

BJM:kdh
Enclosures
cc: Nancy Golden, Superintendent
Jeff DeFranco
(doc #203522, 203523, 203524)