

Jessica T. Hamilton  
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July 15, 2008

**VIA CERTIFIED MAIL**

Kelly Burgess  
Land Use Board of Appeals  
Public Utility Commission Building  
550 Capitol NE, Suite 235  
Salem, OR 97301-2552

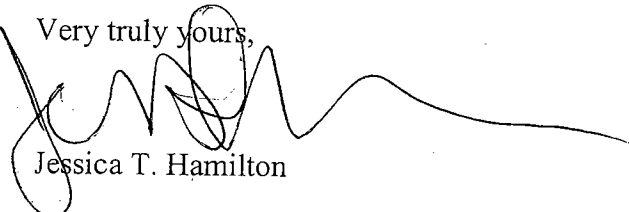
**Re: *Friends of Urban Renewal, Neilson Abeel, Robert Ames, Lawrence Dully, Wayne Kingsley, Patrick La Crosse, Oliver Norville, and Jeffrey Tashman v. City of Portland; Appeal of Ordinance No. 181972***

Dear Kelly:

Enclosed for filing are an original and two copies of the Notice of Intent to Appeal the decision of the City of Portland, entitled Ordinance No. 181972. Also enclosed is a check in the amount of \$325, made payable to the Land Use Board of Appeals, for the filing fee.

Thank you for your assistance in this matter.

Very truly yours,

  
Jessica T. Hamilton

JTH:dma

Enclosures

cc: Steven L. Pfeiffer  
Kathryn Beaumont (City of Portland) ✓

BEFORE THE LAND USE BOARD OF APPEALS  
OF THE STATE OF OREGON

FRIENDS OF URBAN RENEWAL, NEILSON  
ABEEL, ROBERT AMES, LAWRENCE  
DULLY, WAYNE KINGSLEY, PATRICK LA  
CROSSE, OLIVER NORVILLE, and JEFFREY  
TASHMAN,

Petitioners,

v.

CITY OF PORTLAND,

Respondent.

LUBA No. 2008 - \_\_\_\_\_

**NOTICE OF INTENT TO APPEAL**

**I.**

Notice is hereby given that petitioners intend to appeal the decision of respondent entitled Ordinance No. 181972, which became final on June 25, 2008. The decision involves the Portland City Council's approval of a decision by the City Council to amend the River District Urban Renewal Plan to create a noncontiguous "satellite," or "island" district encompassing 8.53 acres of property owned by David Douglas School District and increasing the maximum indebtedness by \$19 million to fund the capital construction of an elementary school. A copy of the City Council's Final Decision is attached hereto as **Exhibit A**.

**II.**

Petitioners are represented by Steven L. Pfeiffer and Jessica T. Hamilton of Perkins Coie LLP, 1120 NW Couch Street, 10<sup>th</sup> Floor, Portland, OR 97209, (503) 727-2261. Petitioners have standing to appeal through their participation below by submitting written and / or oral testimony on this matter.

III.

2 Respondent City of Portland has as its mailing address: 1121 SW 4th Avenue, Portland,  
3 Oregon 97204. Respondent has as its legal counsel in this matter: Kathryn Beaumont of the  
4 Portland City Attorney's Office.

IV.

5  
6 The following persons were provided written notice of the City Council's Final Decision  
7 as shown on the governing body's records:

8  
9 According to information provided by the Portland City Council's Clerk's office, notice of  
10 the decision was performed by the Portland Development Commission ("PDC"). Per the PDC,  
11 notice was given through publication in *The Oregonian* on June 29, 2008, as directed by the  
12 Portland Development Commission. No parties were provided individual written notice of the  
13 decision.

14  
15 NOTICE

16 Anyone designated in Paragraph IV of this Notice who desires to participate as a party in  
17 the case before the Land Use Board of Appeals must file with the Board a Motion to Intervene in  
18 this proceeding as required by OAR 661-10-050.

19  
20 DATED: July 15, 2008.

21 **PERKINS COIE LLP**

22  
23 By 

24 Steven L. Pfeiffer, OSB No. 814533  
25 Jessica T. Hamilton, OSB No. 033370

26 Attorneys for Petitioners

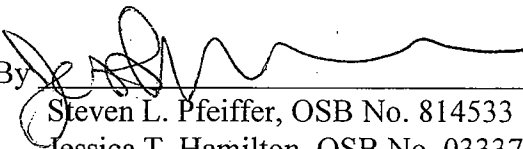
**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on July 15, 2008 I filed the original and two copies of this Notice of Intent to Appeal via certified mail with the Land Use Board of Appeals, PUC Building, Suite 235, 550 Capitol Street NE, Salem OR 97301.

I further certify that on July 15, 2008, I served a true and correct copy of this Notice of Intent to Appeal on all persons listed in paragraphs III and IV of this Notice pursuant to OAR 661-010-0015(2) by first-class mail.

DATED: July 15, 2008.

**PERKINS COIE LLP**

By   
Steven L. Pfeiffer, OSB No. 814533  
Jessica T. Hamilton, OSB No. 033370

Attorneys for Petitioners