

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

3 1000 FRIENDS OF OREGON,
4 Petitioners,

5 v.

6 WASHINGTON COUNTY,
7 Respondent.

LUBA No. 2024-_____

8
9 NOTICE OF INTENT TO APPEAL

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11 I.

12 Notice is hereby given that Petitioner 1000 FRIENDS OF OREGON intends to
13 appeal the land use decision by Respondent entitled, “B-Engrossed Ordinance
14 882.” Respondent describes the order and resolution as “An Ordinance Amending
15 the Transportation System Plan Element of the Comprehensive Plan Relating to an
16 Extension of Tile Flat Road.” The ordinance amends the Roadway Element of
17 Respondent’s Transportation System Plan and maps to include Refinement Areas
18 for Tile Flat Road Extension, Tile Flat Road/ Mountainside Way Extension, and
19 Mountainside Way Southern Extension. The ordinance also includes text that
20 describes the new refinement areas.

21 The ordinance along with an accompanying resolution and order were adopted
on January 30, 2024. On February 1, 2024, notice of the decision was sent to

1 parties entitled to notice pursuant to ORS 197.615. ORS 197.830(9)
2 (comprehensive plan amendments are appealable 21 days after date notice of
3 decision is mailed); OAR 661-010-0015(1)(a) (same).

4 II.

5 Petitioner's name, address, and telephone number:

6 1000 Friends of Oregon
7 PO Box PO Box 40367
8 Portland, OR 97240
9 (503) 497-1000

10 Petitioner has as its legal counsel:

11 Andrew Mulkey, OSB #171237
12 Staff Attorney
13 1000 Friends of Oregon
14 PO Box 40367
15 Portland, OR 97240
16 (971) 420-0916
17 andrew@friends.org

18

19 III.

20

21 Respondent's mailing address and telephone number:

22

23 Washington County Board of Commissioners
24 155 N First Ave., Ste. 300
25 Hillsboro, OR 97124
26 (503) 846-8681

27 Respondent's legal counsel is:

28 Rob Bovett, OSB #910267
29 Washington County Counsel
30 Public Services Bldg. MS 24
31 155 N First Ave. Ste. 340
32 Hillsboro, OR 97124
33 (503) 846-3611

1 Rob_bovett@washingtoncountyor.gov

2 IV.

3 At the time of filing, the county has not responded to requests for the list of
 4 people who were mailed notice of the decision described above. The information
 5 petitioner has received indicates that the county sent notice of its decision to the
 6 following people:

7 Marissa Madrigal,
 Chief Operating Officer, Metro
 8 600 NE Grand Ave.
 Portland, OR 97232
 9 Plan Amendment Specialist
 10 Dept. of Land Conservation and
 Development
 11 635 Capitol Street NE, Ste. 150
 Salem, OR 97301
 12 plan.amendments@dlcd.oregon.gov

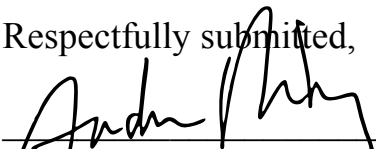
Gordon Howard, Manager
 Community Services Division
 Dept. of Land Conservation and
 Development
 635 Capitol Street NE, Ste. 150
 Salem, OR 97301
 gordon.howard@dlcd.oregon.gov

13 **NOTICE:**

14 Anyone designated in paragraph IV of this notice, which includes
 15 individuals listed on the attached notice list, who desires to participate as a party in
 16 this case before the Land Use Board of Appeals must file with the Board a Motion
 17 to Intervene in this proceeding as required by OAR 661-010-0050.

18 DATED: February 16, 2024

19 Respectfully submitted,

20 
 21 _____
 Andrew Mulkey, OSB #171237
 Staff Attorney, 1000 Friends of Oregon

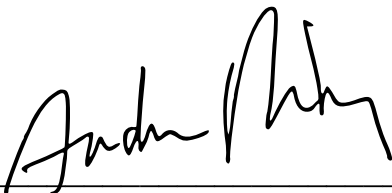
1 **CERTIFICATE OF FILING AND SERVICE**

2 I hereby certify that on the date indicated below, I served the original and
3 two copies of the foregoing Notice of Intent to Appeal by first class, certified mail,
4 return receipt requested on:

5 Land Use Board of Appeals
6 DSL Building
7 775 Summer Street NE, Suite 330
8 Salem OR 97301-1283
9 (503) 373-1265

10 I further certify that on the date indicated below, I served a true and correct
11 copy of the foregoing on all persons listed in paragraphs III and IV of this Notice
12 pursuant to OAR 661-010-0015(2) by first class mail and by email where
13 indicated.

14 DATED: February 16, 2024.

15 
16 _____
17 Andrew Mulkey
18 Staff Attorney, 1000 Friends of Oregon
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