1	BEFORE THE LAND USE BOARD OF APPEALS
2	OF THE STATE OF OREGON
3 4 5 6 7 8	1000 FRIENDS OF OREGON, NEIGHBORS FOR CLEAN AIR, and NORTHWEST ENVIRONMENTAL DEFENSE CENTER, )
9	Petitioners, )
10 11 12	vs. ) LUBA No
13	CITY OF PORTLAND,
14	) Pagnandant
15	Respondent. )
16	NOTICE OF INTENT TO APPEAL
17	I.
18	Notice is hereby given that 1000 Friends of Oregon, Neighbors for Clean Air
19	and Northwest Environmental Defense Center intend to appeal that land use decision
20	or limited land use decisions of the City of Portland entitled "Commercial Building
21	Permit #22-123645-000-00-CO" ("Permit") Copies of the challenged decision is
22	attached as Exhibit A. The City of Portland approved the Permit on November 28,
23	2023.
24	II.
25	Petitioners, 1000 Friends of Oregon, Neighbors for Clean Air, and Northwest
26	Environmental Defense Center are represented by:
27	//
28	
_	

1	Meriel L. Darzen
2	Rebeka Dawit
3	Crag Law Center
4	3141 E Burnside St
5	Portland, OR 97214
6	(503) 525-2722
7	
8	Petitioner Northwest Environmental Defense Center is also represented by:
9	Mary Stites
10	Northwest Environmental Defense Center
11	10101 S. Terwilliger Blvd
12	Portland, OR 97219
13	(503) 768-6747
14	
15	III.
16	Respondent, City of Portland, has as its mailing address and telephone
17	number:
18	City of Portland
19	1221 SW 4 <sup>th</sup> Avenue
20	Portland, OR 97204
21	(503) 823-4000
22	and has, as its legal counsel:
23	Robert L. Taylor
24	Portland City Attorney
25	1221 SW 4 <sup>th</sup> Ave Ste 430
26	Portland, OR 97204
27	(503) 823-4047
28	IV.
29	Applicants, RFC Joint Venture and HFK Realty Partners, has as its mailing
30	address and telephone number:

1 2 3 4	c/o Mike Coyle, Faster Permits 2000 SW 1 <sup>st</sup> Avenue Suite 420 Portland, OR 97201
5	Other persons mailed written notice of the land use decision or limited land
6	use decision by City of Portland, if any, as indicated by its records in this matter
7	include those within Attachment B.
8	<u>NOTICE</u> :
9	Anyone designated in paragraph IV of this Notice who desires to participate
10	as a party in this case before the Land Use Board of Appeals must file with the Board
11	a Motion to Intervene in this proceeding as required by OAR 661-010-0050.
12	
13	Dated December 19, 2023
14	CRAG LAW CENTER
15	mes
16 17	Meriel L. Darzen, OSB No. 113645
18	Rebeka Dawit, OSB No. 210171
19	
20	Northwest Environmental Defense Center
21	Mmy Still
22	
23 24	Mary Stites, OSB No. 225005
25	Wai y Stites, OSB 110. 223003
26	
27	
28	

29

1	CERTIFICATE OF SERVICE
2	I hereby certify that on December 19, 2023 I served a true and correct copy of
3	this NOTICE OF INTENT TO APPEAL on all persons listed in paragraphs III and
4	IV of this Notice pursuant to OAR 661-010-0015(2) by first class mail or by
5	electronic mail.
6	Dated: December 19, 2023
7	
8 9	Meriel L. Darzen, OSB. No 113645
10	
11	
12	CERTIFICATE OF FILING
13	I hereby certify that on December 19, 2023, I filed the original of this
14	NOTICE OF INTENT TO APPEAL together with two copies, with the Land Use
15	Board of Appeals, 775 Summer Street NE, Suite 330, Salem, OR 97301-1283, by
16	Certified Mail.
17	Dated: December 19, 2023
18 19 20 21	Meriel L. Darzen, OSB. No 113645

23