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May 31, 2011

**VIA E-MAIL AND U.S. MAIL**

Urban and Rural Reserves Specialist  
Department of Land Conservation and Development  
635 Capitol Street NE, Suite 150  
Salem, OR 97301

**Re: Objections to Redesignation of Urban and Rural Reserves in Metropolitan Portland  
(Metro Ord. No. 11-1255, Multnomah County Ord. No. 1180, Washington County  
Ord. 740, and Clackamas County Approval of Findings)**

Dear Urban and Rural Reserves Specialist:

This office represents Metropolitan Land Group ("MLG"), the owner of approximately 38 acres of real property located in the 607-acre study area known as East Bethany in Multnomah County ("Property"). The purpose of this letter is to file written objections with the Department of Land Conservation and Development ("DLCD") to the redesignation of urban and rural reserves in metropolitan Portland by the Metro Council ("Metro") and the Counties of Clackamas, Multnomah, and Washington (together, the "Counties") as referenced in the joint and concurrent submittal by these government agencies to DLCD dated May 12, 2011 ("Redesignation").

On July 14, 2010, MLG filed written objections ("Objections") with DLCD of the initial designation of reserves by Metro and the Counties. The Objections addressed both programmatic and Property-specific concerns. The Redesignation does not address, correct, respond to, or eliminate the need for the Objections in any way. In fact, the Redesignation maintains the same deficiencies as the initial reserves designation, particularly as it relates to the Property. As such, MLG objects to the Redesignation on the same grounds and for the same reasons set forth in the Objections. For the sake of efficiency, MLG does not restate the Objections in full in this letter but instead incorporates the Objections by reference herein, including the statement of standing and the recommended changes to resolve the Objections, in response to the Redesignation.

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Perkins Coie LLP and Affiliates

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For the reasons set forth in the Objections, DLCD and the Land Conservation and Development Commission should remand the Redesignation to Metro and the Counties to remove the "rural reserve" designation from the Property, replace it with an "urban reserve" designation, and to otherwise address the legal deficiencies identified in the Objections.

Thank you for your attention to this letter and to MLG's Objections.

Very truly yours,



Steven L. Pfeiffer

cc: Laura Dawson Bodner, Metro (via U.S. mail)  
Mike McCallister, Clackamas County (via U.S. mail)  
Chuck Beasley, Multnomah County (via U.S. mail)  
Aisha Willits, Washington County (via U.S. mail)  
John O'Neil, Metropolitan Land Group, LLC (via e-mail)  
Matt Wellner, Metropolitan Land Group, LLC (via e-mail)  
Seth King, Perkins Coie (via e-mail)

**French, Larry**

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**From:** Lundgren, Christina (Perkins Coie) [CLundgren@perkinscoie.com] on behalf of Pfeiffer, Steven L. (Perkins Coie) [SPfeiffer@perkinscoie.com]  
**Sent:** Tuesday, May 31, 2011 3:17 PM  
**To:** 'Jennifer.Donnely@state.or.us'; 'Larry.French@state.or.us'  
**Cc:** King, Seth J. (Perkins Coie)  
**Subject:** Supplemental Objections  
**Attachments:** Letter.pdf

Attached please find written objections submitted on behalf of Metropolitan Land Group, LLC to the redesignation of urban and rural reserves in metropolitan Portland. Please confirm receipt. Please also place a copy of these written objections into the official record and place them before the Land Conservation and Development Commission prior to its consideration of this matter.

Thank you for your assistance.

**Steven L. Pfeiffer | Perkins Coie LLP**

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