

BEFORE THE DEPARTMENT OF ADMINISTRATIVE SERVICES, THE DEPARTMENT
OF LAND CONSERVATION AND DEVELOPMENT OF THE STATE OF OREGON

IN THE MATTER OF THE CLAIM)
FOR COMPENSATION UNDER)
BALLOT MEASURE 37 (CHAPTER 1,)
OREGON LAWS 2005) OF)
Leslie and Delza Goins, CLAIMANTS)

FINAL ORDER
CLAIM NO. M 120574

Claimants: Leslie and Delza Goins (the Claimants)

Property: Tax Lot 700, T.21S, R.4W, Section 28, W.M., Douglas County

Claim: The demand for compensation and any supporting information received from the Claimant by the State of Oregon (the Claim).

Claimants submitted the Claim to the State of Oregon under Ballot Measure 37 (2004) (Oregon Laws 2005, Chapter 1) (hereafter, Measure 37). Under OAR 125-145-0010 *et seq.*, the Department of Administrative Services (DAS) referred the Claim to the Department of Land Conservation and Development (DLCD) as the regulating entity. This order is based on the record herein, including the Findings and Conclusions set forth in the Final Staff Report and Recommendation of DLCD (the DLCD Report) attached to and by this reference incorporated into this order.

ORDER

The Claim is approved as to laws administered by DLCD and the Land Conservation and Development Commission (LCDC) for the reasons set forth in the DLCD Report, and subject to the following terms:

1. In lieu of compensation under Measure 37, the State of Oregon will not apply the following laws to the claimants' division of the 82.34-acre property into three parcels or development residential dwellings on two of those parcels: applicable provisions of Statewide Planning Goals 3 and 4, ORS 215 and OAR 660, divisions 6 and 33, enacted after the claimants each acquired their interest in the property. These land use regulations will not apply to Leslie Goin's use of the property only to the extent necessary to allow him a use permitted at the time he acquired the property on March 11, 1966. These land use regulations will not apply to Delza Goins' use of the property only to the extent necessary to allow her a use permitted at the time she acquired an interest in the property on January 20, 1978.
2. The action by the State of Oregon provides the state's authorization to Leslie Goins to use the property subject to the standards in effect on March 11, 1966, and to Delza Goins to use the property subject to the standards in effect on January 20, 1978. On January 20, 1978, the property was subject to Statewide Planning Goals 3 and 4 and applicable provisions of ORS 215.

3. To the extent that any law, order, deed, agreement or other legally enforceable public or private requirement provides that the property may not be used without a permit, license, or other form of authorization or consent, the order will not authorize the use of the property unless the claimants first obtain that permit, license or other form of authorization or consent. Such requirements may include, but are not limited to: a building permit, a land use decision, a permit as defined in ORS 215.402 or ORS 227.160, other permits or authorizations from local, state or federal agencies, and restrictions on the use of the property imposed by private parties.

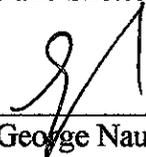
4. Any use of the property by the claimants under the terms of the order will remain subject to the following laws: (a) those laws not specified in (1) above; (b) any laws enacted or enforced by a public entity other than the Commission or the department; and (c) those laws not subject to Measure 37 including, without limitation, those laws exempted under Section (3) of the Measure.

5. Without limiting the generality of the foregoing terms and conditions, in order for the claimants to use the property, it may be necessary for them to obtain a decision under Measure 37, from a city and/or county and/or metropolitan service district that enforces land use regulations applicable to the property. Nothing in this order relieves the claimants from the necessity of obtaining a decision under Measure 37, from a local public entity that has jurisdiction to enforce a land use regulation applicable to a use of the property by the claimants.

This Order is entered by the Deputy Director of the DLCD as a final order of DLCD and the Land Conservation and Development Commission under Measure 37, OAR 660-002-0010(8), and OAR 125, division 145, and by the Deputy Administrator for the State Services Division of the DAS as a final order of DAS under Measure 37, OAR 125, division 145, and ORS 293.

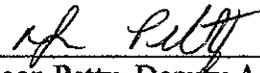
FOR DLCD AND THE LAND CONSERVATION
AND DEVELOPMENT COMMISSION:

Lane Shetterly, Director


George Naughton, Deputy Director
DLCD

Dated this 3^d day of October, 2005.

FOR the DEPARTMENT OF ADMINISTRATIVE
SERVICES:


Dugan Petty, Deputy Administrator
DAS, State Services Division

Dated this 3 day of October, 2005.

NOTICE OF RIGHT TO APPEAL OR OTHER JUDICIAL RELIEF

You are entitled, or may be entitled, to the following judicial remedies:

1. **Judicial review under ORS 293.316:** Judicial review under ORS 293.316 may be obtained by filing a petition for review within 60 days from the service of this order. Judicial review under ORS 293.316 is pursuant to the provisions of ORS 183.482 to the Court of Appeals.
2. **Judicial review under ORS 183.484:** Judicial review under ORS 183.484 may be obtained by filing a petition for review within 60 days from the service of this order. A petition for judicial review under ORS 183.484 may be filed in the Circuit Court for Marion County and the Circuit Court in the county in which you reside.
3. **A cause of action under Oregon Laws 2005, chapter 1 (Measure 37 (2004)):** A present owner of the property, or any interest therein, may file a cause of action in the Circuit Court for the county where the property is located, if a land use regulation continues to apply to the subject property more than 180 days after the present owner made a written demand for compensation.

(Copies of the documents that comprise the record are available for review at the Department's office at 635 Capitol Street NE, Suite 150, Salem, Oregon 97301-2540)

FOR INFORMATION ONLY

The Oregon Department of Justice has advised the Department of Land Conservation and Development that “[i]f the current owner of the real property conveys the property before the new use allowed by the public entity is established, then the entitlement to relief will be lost.”

**BALLOT MEASURE 37 (CHAPTER 1, OREGON LAWS 2005)
CLAIM FOR COMPENSATION**

**OREGON DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT
Final Staff Report and Recommendation**

October 3, 2005

STATE CLAIM NUMBER: M120574

NAMES OF CLAIMANTS: Leslie and Delza Goins

MAILING ADDRESS: 777 E. Main
John Day, Oregon 97845

PROPERTY IDENTIFICATION: Township 21S, Range 4W, Section 28
Tax Lot 700
Douglas County

OTHER INTEREST IN THE PROPERTY: Goins Living Trust

DATE RECEIVED BY DAS: April 13, 2005

180-DAY DEADLINE: October 10, 2005

I. SUMMARY OF CLAIM

The claimants, Leslie and Delza Goins, seek compensation in the amount of \$295,000, for the reduction in fair market value as a result of certain land use regulations that are alleged to restrict the use of certain private real property. The claimants desire compensation or the right to divide their 82.34-acre property into three parcels of between 18- and 40-acres each, and to develop single-family dwellings on two of the parcels. The subject property is located on Bear Creek Road, near Curtin, in Douglas County. (See claim.)

II. SUMMARY OF STAFF RECOMMENDATION

Based on the findings and conclusions set forth below, the Department of Land Conservation and Development (the department) has determined that the claim is valid. Department staff recommends that, in lieu of compensation, the requirements of the following state laws enforced by the Land Conservation and Development Commission (the Commission) or the department, not apply to Leslie and Delza Goins' division of the property into three parcels and development of residential dwellings on two of the parcels: Statewide Planning Goals 3 (Agricultural Lands) and 4 (Forest Lands), applicable provisions of ORS 215 and OAR 660, divisions 6 and 33. These laws will not apply to the claimants only to the extent necessary to allow Leslie Goins a use of the property permitted at the time he acquired it in 1966, and allow Delza Goins a use of the property

permitted at the time she acquired it in 1978. (See the complete recommendation in Section VI. of this report.)

III. COMMENTS ON THE CLAIM

Comments Received

On May 14, 2005, pursuant to OAR 125-145-0080, the Oregon Department of Administrative Services (DAS) provided written notice to the owners of surrounding properties. According to DAS, two written comments, evidence or information were received in response to the 10-day notice.

The comments do not address whether the claim meets the criteria for relief (compensation or waiver) under Measure 37. Comments concerning the effects a use of the property may have on surrounding areas generally are not something that the department is able to consider in determining whether to waive a state law. If funds do become available to pay compensation, then such effects may become relevant in determining which claims to pay compensation for instead of waiving a state law. (See comment letters in the department's claim file.)

IV. TIMELINESS OF CLAIM

Requirement

Ballot Measure 37, Section 5, requires that a written demand for compensation be made:

1. For claims arising from land use regulations enacted prior to the effective date of the Measure (December 2, 2004), within two years of that effective date or the date the public entity applies the land use regulation as an approval criteria to an application submitted by the owner, whichever is later; or
2. For claims arising from land use regulations enacted after the effective date of the Measure (December 2, 2004), within two years of the enactment of the land use regulation, or the date the owner of the property submits a land use application in which the land use regulation is an approval criteria, whichever is later.

Findings of Fact

This claim was submitted to DAS on April 13, 2005, for processing under OAR 125, division 145. The claim refers to laws that restrict division and development of the property as the basis for the claim. Only laws that were enacted prior to December 2, 2004, the effective date of Measure 37, are the basis for this claim. (See citations of statutory and administrative rule history of the Oregon Revised Statutes and Oregon Administrative Rules.)

Conclusions

The claim has been submitted within two years of December 2, 2004; the effective date of Measure 37, based on land use regulations adopted prior to December 2, 2004, and is therefore timely filed.

V. ANALYSIS OF CLAIM

1. Ownership

Ballot Measure 37 provides for payment of compensation or relief from specific laws for “owners” as that term is defined in the Measure. Ballot Measure 37, Section 11(C) defines “owner” as “the present owner of the property, or any interest therein.”

Findings of Fact

Leslie Goins acquired the subject property on March 11, 1966, according to a Warranty Deed included with the claim. Delza Goins acquired an interest in the property on January 21, 1978, according to a deed submitted in response to a request letter from the department. According to the Douglas County Assessor’s Office, the current owners are Leslie and Delza Goins, Trustees of the Goins Living Trust. The revocable living trust was established by claimants on May 21, 1993, according to a trust document submitted in response to a request letter from the department. Transfer of the subject property to the trust did not result in a change in ownership for purposes of Measure 37.

Conclusions

The claimants, Leslie and Delza Goins, are “owners” of the subject property, as that term is defined by Section 11(C) of Ballot Measure 37. Leslie Goins acquired an interest in the property on March 11, 1966, and Delza Goins acquired an interest on January 21, 1978. Leslie Goins is a “family member” under Ballot Section 11(A) of Measure 37, with respect to Delza Goins.

2. The Laws that are the Basis for this Claim

In order to establish a valid claim, Section 1 of Ballot Measure 37 requires, in part, that a law must restrict a claimant’s use of private real property in a manner that reduces the fair market value of the property relative to how the property could have been used at the time the claimant or a family member acquired the property.

Findings of Fact

The claim states that laws “restricts division of property in that a newly created parcel must contain a minimum of 80 acres...Restricts the placement of a dwelling on the newly created parcel of less than 80 acres.” According to a Douglas County’s decision letter to Leslie and Delza Goins, the claimants desire to divide their property into three parcels of between 18- and 40-acres in size and build single-family dwellings on two of the parcels.

The claim is based, generally, on Douglas County's current Farm Forest (FF) and Timberland Resource (TR) zones, and the applicable provisions of state law that require such zoning.

The claimants' property is zoned FF and TR, a mixed agricultural and forestland zone adopted to comply with Statewide Planning Goal 4 (Forest Lands) and the implementing provisions of OAR 660-006-0050 (effective February 5, 1990,) and subsequently amended on March 1, 1994, to comply with the provisions of HB 3661 (Chapter 792, Or Laws 1993).

Under OAR 660-006-0050, all the uses permitted under Goals 3 and 4 are allowed except that for dwellings, either the Goal 3 or 4 standards are applicable based on the predominant use of the tract on January 1, 1993. No information was provided to the department regarding the predominant use of the property on January 1, 1993. Depending on the predominant use on January 1, 1993, the property is subject to either the requirements for dwellings applicable under Exclusive Farm Use (EFU) zoning required by Statewide Goal 3 and OAR 660, division 33 or forest zone provisions required by Statewide Planning Goal 4 and OAR 660, division 006. This includes the dwelling standards asserted by the claimants as restricting the use of the property. No analysis of whether any of the tax lots can be approved for a dwelling under the applicable farm or forest provisions has been provided.

For land divisions, OAR 660-006-0055 authorizes the creation of new parcels based on the standards applicable to farm or forest zones which implement the 80-acre minimum lot size specified in ORS 215.780. Under OAR 660-006-055, the claimants' property cannot be divided into parcels smaller than 80 acres.

Leslie Goins acquired the subject property on March 11, 1966, prior to the establishment of the Statewide Planning Goals and their implementing statutes and rules. At that time, the property was not zoned by the county.

Conclusions

The zoning requirements, minimum lot size and dwelling standards established by Statewide Planning Goals 3 (Agricultural Lands) and 4 (Forest Lands) and provisions applicable to land zoned FF and TR in ORS 215 and OAR 660, divisions 6 and 33, were all enacted after Leslie Goins acquired ownership of the subject property in March 1966, and do not allow the division and development of the property, thereby restricting the use of the property relative to the uses allowed when he acquired the property.

This report addresses only those state laws that are identified in the claim, or that the department is certain apply to the property based on the uses that the claimants have identified. There may be other laws that currently apply to the claimants' use of the property, and that may continue to apply to the claimants' use of the property, that have not been identified in the claim. In some cases, it will not be possible to know what laws apply to a use of property until there is a specific proposal for that use. When the claimants seek a building or development permit to carry out a specific use, it may become evident that other state laws apply to that use.

3. Effect of Regulations on Fair Market Value

In order to establish a valid claim, Section 1 of Ballot Measure 37 requires that any land use regulation described in Section V.(2) of this report must have “the effect of reducing the fair market value of the property, or any interest therein.”

Findings of Fact

The claim includes an informal estimate of \$295,000; as the reduction in fair market value as a result of current regulations. This amount is based on an estimate of the value of smaller parcels (10- to 40-acres and 30- to 80-acres) provided to the claimants by a real estate broker.

Conclusions

As explained in Section V.(1) of this report, the current owners are Leslie and Delza Goins who acquired the property on March 11, 1966, and January 20, 1978, respectively. Under Ballot Measure 37, Leslie and Delza Goins are due compensation for land use regulations that restrict the use of the subject property in a manner that reduces its fair market value. Based on the findings and conclusions in Section V.(2) of this report, laws adopted since Leslie Goins acquired the property, restrict division and development of the subject property. The claimants estimate the reduction in value due to the restrictions to be \$295,000.

Without an appraisal or other documentation, it is not possible to substantiate the specific dollar amount the claimants demand for compensation. Nevertheless, based on the submitted information, the department determines that it is more likely than not that there has been some reduction in the fair market value of the subject property as a result of land use regulations enforced by the Commission or the department.

4. Exemptions under Section 3 of Measure 37

Ballot Measure 37 does not apply to certain land use regulations. In addition, under Section 3 of the Measure, certain types of laws are exempt from the Measure.

Findings of Fact

The claim is based on land use regulations that restrict the use of the property relative to what would have been allowed in 1966, when Leslie Goins acquired the property, including Statewide Planning Goals 3 (Agricultural Lands) and 4 (Forest Lands), applicable provisions of ORS 215, and OAR 660, divisions 6 and 33 which Douglas County has implemented through its FF and TR zones. None of these laws appear to be exempt under Section 3(E) of Ballot Measure 37, which exempts laws in effect when the claimants or claimants’ family acquired the property.

The department notes that ORS 215.730 and OAR 660, division 6, include standards for siting dwellings in forest zones. Those provisions include fire protection standards for dwellings and for surrounding forest lands. Section 3(B) of Measure 37, specifically exempts regulations “restricting or prohibiting activities for the protection of public health and safety, such as fire and

building codes...” The department finds that siting standards for dwellings in forest zones in ORS 215.730 and in Statewide Planning Goal 4 and its implementing rules (OAR 660, division 6) are exempt under Section 3(B) of Measure.

Conclusions

Without a specific development proposal for the property, it is not possible for the department to determine what laws may apply to a particular use of the property, or whether those laws may fall under one or more of the exemptions under Measure 37. It does appear that the general statutory, goal and rule restrictions on residential development and use of mixed farm and forest land apply to the claimants’ use of the property, and for the most part these laws are not exempt under Section 3(E) of Measure 37.

Laws in effect when the claimants acquired the property are also exempt under Section 3(E) of Measure 37, and will continue to apply to the claimants’ use of the property. The siting requirements of ORS 215.730, Goal 4 and its implementing rules related to dwelling siting standards based on health and safety are also exempt under Section 3(B) of the Measure and will continue to apply to the property. There may be other laws that continue to apply to the claimants’ use of the property that have not been identified in the claim. In some cases, it will not be possible to know what laws apply to a use of property until there is a specific proposal for that use. When the claimants seek a building or development permit to carry out a specific use, it may become evident that other state laws apply to that use. And, in some cases, some of these laws may be exempt under subsections 3(A) to 3(D) of Measure 37.

This report addresses only those state laws that are identified in the claim, or that the department is certain apply to the property based on the uses that the claimants have identified. Similarly, this report only addresses the exemptions provided for under Section (3) of Measure 37, that are clearly applicable given the information provided to the department in the claim. The claimants should be aware that the less information they have provided to the department in their claim, the greater the possibility that there may be additional laws that will later be determined to continue to apply to their use of the property.

VI. FORM OF RELIEF

Section 1 of Measure 37, provides for payment of compensation to an owner of private real property if the Commission or the department has enforced a law that restricts the use of the property in a manner that reduces its fair market value. In lieu of compensation, the department may choose to not apply the law in order to allow the present owner to carry out a use of the property permitted at the time the current owner acquired the property. The Commission, by rule, has directed that if the department determines a claim is valid, the Director must provide only non-monetary relief unless and until funds are appropriated by the legislature to pay claims.

Findings of Fact

Based on the findings and conclusions set forth in this report, laws enforced by the Commission or the department, restrict the division of the subject property into three parcels and the development

of residential dwellings on two of those parcels. The claim asserts the laws enforced by the Commission or department reduce the fair market value of the subject property by \$295,000. However, because the claim does not provide an appraisal or other specific documentation establishing how the specified restrictions reduce the fair market value of the property, a specific amount of compensation cannot be determined. Nevertheless, based on the record for this claim, the department acknowledges that the laws on which the claim is based likely have reduced the fair market value of the property to some extent.

No funds have been appropriated at this time for the payment of claims. In lieu of payment of compensation, Ballot Measure 37 authorizes the department to modify, remove or not apply all or parts of certain land use regulations to allow Leslie Goins to use the subject property for a use permitted at the time he acquired the property on March 11, 1966, and to allow Delza Goins to use the subject property for a use permitted at the time she acquired an interest in the property on January 20, 1978.

Delza Goins acquired an interest in the property after the Statewide Planning Goals were established. In 1978, when she acquired an interest in the property, it was zoned AG, which allowed 10-acre minimum lot sizes and dwellings only if resource-based. However, because the Commission had not acknowledged Douglas County's plan and land use regulations, including the AG zone, in 1978, when Delza Goins acquired an interest in the property, the Statewide Planning Goals applied directly to the property.¹

In general, in 1978, the Goal 4 standards required local land use regulations to "conserve Forest Lands for forest uses." Specifically, Goal 4 only allowed land divisions that would protect Forest Lands for forest uses. Dwellings in forest zones were allowed if found to be "necessary and accessory" to one of the enumerated forest uses as defined in Goal 4.²

The opportunity to divide the property and to place residential dwellings on the property when Delza Goins acquired an interest in it in 1978, was limited to land divisions that were consistent with the provisions of Statewide Planning Goal 4 that were in effect in 1978. However, no

¹ Statewide Planning Goals became effective on January 25, 1975, and were applicable to legislative land use decisions and some quasi-judicial land use decisions prior to the Commission's acknowledgment of the County's plan and implementing regulations. (*Sunnyside Neighborhood Assn. v. Clackamas County*, 280 Or 3 (1977), *1000 Friends of Oregon v. Benton County*, 32 Or App 413 (1978), *Jurgenson v. Union County*, 42 Or App 505 (1979), *Alexanderson v. Polk County*, 289 Or 427 rev den 290 Or 137 (1980) and *Perkins v. City of Rajneeshpuram*, 300 Or 1 (1985)). After the County's plan and land use regulations were acknowledged by Commission, the Statewide Planning Goals and implementing rules no longer directly applied to such local land use decisions (*Byrd v. Stringer*, 295 Or 311 (1983)). However, statutory requirements continue to apply, and insofar as the state and local provisions are materially the same in substance, the applicable rules must be interpreted and applied by the County in making its decision. *Forster v. Polk County*, 115 Or App 475 (1992) and *Kenagy v. Benton County*, 115 Or App 131 (1992).

² Statewide Planning Goal 4 prohibited uses that were not enumerated by Goal 4, as permissible uses for forest lands as well as those that were not necessary and accessory to an enumerated forest use, *Lamb v. Lane County*, 7 Or LUBA 137 (1983). Dwellings in Forest Lands were required to be "necessary and accessory" to show that such dwellings comply with the Goal 4 requirement that local land use regulations must "conserve Forest Lands for forest uses", *1000 Friends v. LCDC (Curry County)*, 301 Or 447 (1986). A dwelling that may "enhance" forest uses is not "necessary and accessory" to a forest use to the extent required by Goal 4, *1000 Friends of Oregon v. LCDC (Lane County)*, 305 Or 384 (1988).

analysis of whether the subject property can be divided for dwellings under the earlier Goal 4 standards for land divisions to “protect commercial Forest Lands for commercial forest uses” and for dwellings to be “necessary and accessory to one of the enumerated forest uses” has been provided. Nor does the claim establish that the density of use desired by the claimants was permissible under the provisions of Goal 14 in effect in 1978.³ Thus, it is unclear whether the requested level of development would have been permitted when Delza Goins acquired the property.

Conclusion

Based on the record, the department recommends that the claim be approved, subject to the following terms:

1. In lieu of compensation under Measure 37, the State of Oregon will not apply the following laws to the claimants’ division of the 82.34-acre property into three parcels or development residential dwellings on two of those parcels: applicable provisions of Statewide Planning Goals 3 and 4, ORS 215 and OAR 660, divisions 6 and 33 enacted after the claimants each acquired their interest in the property. These land use regulations will not apply to Leslie Goin’s use of the property only to the extent necessary to allow him a use permitted at the time he acquired the property on March 11, 1966. These land use regulations will not apply to Delza Goins’ use of the property only to the extent necessary to allow her a use permitted at the time she acquired an interest in the property on January 20, 1978.
2. The action by the State of Oregon provides the state’s authorization to Leslie Goins to use the property subject to the standards in effect on March 11, 1966, and to Delza Goins to use the property subject to the standards in effect on January 20, 1978. On January 20, 1978, the property was subject to Statewide Planning Goals 3 and 4 and applicable provisions of ORS 215.
3. To the extent that any law, order, deed, agreement or other legally enforceable public or private requirement provides that the property may not be used without a permit, license, or other form of authorization or consent, the order will not authorize the use of the property unless the claimants first obtain that permit, license or other form of authorization or consent. Such requirements may include, but are not limited to: a building permit, a land use decision, a permit as defined in ORS 215.402 or ORS 227.160, other permits or authorizations from local, state or federal agencies, and restrictions on the use of the property imposed by private parties.
4. Any use of the property by the claimants under the terms of the order will remain subject to the following laws: (a) those laws not specified in (1) above; (b) any laws enacted or enforced by a public entity other than the Commission or the department; and (c) those laws not subject to Measure 37 including, without limitation, those laws exempted under Section (3) of the Measure.

³ For guidance, the Goal 4 provisions were interpreted under OAR 660, division 6, effective September 1, 1982 and in *Lamb v. Lane County*, 7 Or LUBA 137 (1983), *1000 Friends v. LCDC (Curry County)*, 301 Or 447 (1986), and *1000 Friends of Oregon v. LCDC (Lane County)*, 305 Or 384 (1988).

5. Without limiting the generality of the foregoing terms and conditions, in order for the claimants to use the property, it may be necessary for them to obtain a decision under Measure 37, from a city and/or county and/or metropolitan service district that enforces land use regulations applicable to the property. Nothing in this order relieves the claimants from the necessity of obtaining a decision under Measure 37, from a local public entity that has jurisdiction to enforce a land use regulation applicable to a use of the property by the claimants.

VII. COMMENTS ON THE DRAFT STAFF REPORT

The department issued its draft staff report on this claim on September 15, 2005. OAR 125-145-0100(3), provided an opportunity for the claimants or the claimants' authorized agent and any third parties who submitted comments under OAR 125-145-0080 to submit written comments, evidence and information in response to the draft staff report and recommendation. Comments received have been taken into account by the department in the issuance of this final report.

From: Tracy Edwards
To: David, Taylor
Date: 9/30/2005 10:40:03 AM
Subject: Litigation

We have received information on the following claimants:

Patton M119728
Patton M119727
Patton M119726
Corey M119478

Thanks Tracy

Tracy Edwards
Comp Claims Review Support Specialist
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CC: Beier, Ann; Gustafson, Virginia L; Naughton, George; PRESTON, Shelia; Shetterly, Lane; Sundermier, Paul; Whitman, Richard