

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

PORTLAND GENERAL ELECTRIC	)	
COMPANY,	)	
	)	
Petitioner,	)	
	)	LUBA No. 2025-_____
v.	)	
	)	
CITY OF PORTLAND,	)	
	)	
Respondent.	)	

NOTICE OF INTENT TO APPEAL

I.

Notice is hereby given that Petitioner Portland General Electric Company ("PGE") intends to appeal the final land use decision or limited land use decision of Respondent City of Portland known as Order of Council LU 24-041109 CU EN GW, which became final on May 8, 2025 ("Order of Council") and which is entitled *In the Matter of an appeal by Forest Park Neighborhood Association and Forest Park Conservancy against the Hearings Officer's decision to approve with conditions an Environmental Review, Conditional Use Review, and two Greenway Reviews for the upgrade and expansion of transmission lines in Forest Park*. The Order of Council overturns the March 7, 2025 decision of a City Hearings Officer which had approved the requested land use reviews for utility improvements by

PGE within its existing utility easement in Forest Park. A copy of Respondent's Notice of Final Decision is attached hereto as Exhibit 1.

II.

(a) Petitioner has as its contact information: Portland General Electric Company, c/o Kristin Ingram (telephone 503-464-7370, kristin.ingram@pgn.com), 121 SW Salmon Street 1WTC1301, Portland, OR 97204.

(b) Petitioner is represented by David J. Petersen as lead counsel (telephone 503-802-2054, david.petersen@tonkon.com) and Sasha Petrova (telephone 503-802-2130, sasha.petrova@tonkon.com), Tonkon Torp LLP, 1300 SW 5th Avenue, Suite 2400, Portland, OR 97201.

III.

(a) Respondent has as its mailing address and phone number: 1221 SW 4th Avenue, Portland, OR 97204, telephone (503) 823-4082.

(b) Respondent is represented by the Portland City Attorney's Office c/o Lauren King, Senior Deputy City Attorney (telephone 503-823-4087, lauren.king@portlandoregon.gov), 1221 SW 4th Avenue, Room 430, Portland, OR 97204.

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IV.

Other persons mailed or otherwise sent written notice of the land use decision or limited land use decision by Respondent, as indicated by its records in this matter, are listed in the attached Exhibit 2.

V.

Anyone designated in paragraph IV of this Notice who desires to participate as a party in this case before the Land Use Board of Appeals must file with the Board a Motion to Intervene in this proceeding as required by OAR 661-010-0050.

DATED: May 23, 2025



David J. Petersen, OSB No. 034220
Sasha Petrova, OSB No. 154008
Tonkon Torp LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201
503-221-1440

Attorneys for Petitioner

EXHIBIT 1
Order of Council



NOTICE OF FINAL DECISION

TO: All Interested Persons

DATE: May 13, 2025

LU 24-041109 CU EN GW – In the matter of an appeal by Forest Park Neighborhood Association and Forest Park Conservancy against the Hearings Officer's decision to approve with conditions an Environmental Review, Conditional Use Review, and two Greenway Reviews for the upgrade and expansion of transmission lines in Forest Park

To Whom It May Concern:

Enclosed is a copy of the Order of Council on LU 24-041109 CU EN GW granting the appeal, overturning the Hearings Officer's decision and adopting the findings. If you wish to obtain a copy of the City Council's findings and decision, please contact the Council Clerk by email at councilclerk@portlandoregon.gov or at (503) 823-4082.

City Council's decision is the final review process available through the City. You may appeal this decision to the Oregon Land Use Board of Appeals (LUBA) by filing a Notice of Intent to Appeal with LUBA within 21 days of the date of decision, as specified in the Oregon Revised Statute (ORS) 197.830. Among other things, ORS 197.830 requires that a petitioner at LUBA must have appeared orally or in writing during the City's proceedings on this land review. LUBA's address is 201 High Street, SE, Suite 600, Salem, Oregon 97301-3398. You may call LUBA at 1-503-373-1265, email at LUBA.Support@luba.oregon.gov, or visit the website (www.oregon.gov/LUBA) for further information on filing an appeal.

Yours sincerely,
Simone Rede
Auditor of the City of Portland
By: *Keelan McClymont*
Keelan McClymont, Council Clerk

Encl.



LU 24-041109 CU EN GW – In the matter of an appeal by Forest Park Neighborhood Association and Forest Park Conservancy against the Hearings Officer's decision to approve with conditions an Environmental Review, Conditional Use Review, and two Greenway Reviews for the upgrade and expansion of transmission lines in Forest Park

Applicants: Meredith Armstrong
Portland General Electric
121 SW Salmon Street
Portland, OR 97204

Randy Franks
Portland General Electric
121 SW Salmon Street
Portland, OR 97204

Owners: City of Portland Parks & Recreation (Forest Park site)
Attn: Laura Lehman
1120 SW 5th Avenue #1302
Portland, OR 97204-1926

Portland General Electric (Harborton Substation site)
Attn: Randy Franks or Meredith Armstrong
121 SW Salmon Street
Portland, OR 97204

United States of America (Parcel adjacent to Harborton Substation)
620 SW Main Street
Portland, OR 97205-3037

Representative: Noah Herlocker
David Evans & Associates, Inc.
2100 SW River Parkway
Portland, OR 97201

Appellants: Forest Park Neighborhood Association
Attn: Carol Chesarek, Land Use Chair
13300 NW Germantown Road
Portland, OR 97231

Forest Park Conservancy
Attn: Scott Fogarty, Executive Director
833 SW 11th Avenue, #800
Portland, OR 97205

Site Address: Forest Park & Harborton Substation (12500 NW Marina Way)

Legal Description: PARTITION PLAT 2022-7, LOT 1, DEPT OF REVENUE; SECTION 33 2N 1W, TL 500 3.29 ACRES; SECTION 34 2N 1W, TL 600 3.20 ACRES; SECTION 34 2N 1W, TL 1900 9.74 ACRES; SECTION 34 2N 1W, TL 1600 1.48 ACRES; SECTION 04 1N 1W, TL 1000 9.68 ACRES; SECTION 04 1N 1W, TL 200 23.89 ACRES; SECTION 34 2N 1W, TL 1700 59.73 ACRES; SECTION 34 2N 1W, TL 400 15.79 ACRES; PARTITION PLAT 2022-7, LOT 1 TL 101, SPLIT LEVY R725377 (R649940254), DEPT OF REVENUE; SECTION 34 2N 1W, TL 900 3.28 ACRES; SECTION 34 2N 1W, TL 500 1.80 ACRES; SECTION 34 2N 1W, TL 2000 19.28 ACRES; SECTION 04 1N 1W, TL 200 51.98 ACRES; SECTION 04 1N 1W, TL 700 0.57 ACRES; SECTION 04 1N 1W, TL 48.30 ACRES; HARBORTON, BLOCK 11, LOT 12; HARBORTON, BLOCK 11, LOT 11; HARBORTON, BLOCK 11, LOT 8-10; HARBORTON, BLOCK 11, W OF COMPROMISE LINE LOT 1-2, LOT 4-7; HARBORTON, BLOCK 11, E OF COMPROMISE LINE, LOT 1-3

Zoning: *Base Zones:* Open Space (OS), Heavy Industrial (IH)
Overlay Zones: Enviornmental Conservation (c), Enviornmental Protection (p), Greenway River General (g), Greenway River Water Quality (q), Greenway River Industrial (i), Prime Industrial (k)

Case Type: CU EN GW – Conditional Use Review, Environmental Review, Greenway Review

Procedure: Type III

Proposal

The applicant, Portland General Electric (PGE), is requesting approval to conduct utility improvements within their existing utility easement in Forest Park. These improvements include shifting the location of one power pole and rewiring a segment of existing transmission line to that new pole location (the Harborton-Trojan #1 and #2 230 kV lines) and installing two new poles to support a new, 1,400-foot-long segment of transmission lines (Evergreen-Harborton and Harborton-St. Mary's 230 kV lines). Both the shifted and new transmission line segments will connect west to existing PGE lines within Forest Park and span east across Highway 30 to PGE's existing Harborton Substation.

The proposed project is Phase 3 of PGE's Harborton Reliability Project (HRP). Phase 1 has been completed and involved rebuilding the Harborton Substation. Phase 2 which is currently active is rebuilding 115kV power lines from Harborton Substation along U.S. Highway 30 to better serve industrial and urban customers in Northwest Portland. Phase 3 of the 4 HRP involves transmission line routing updates and expansion which are the subject of this review. Phases 4 and 5 are future phases and may include additional transmission line improvements within existing easements in Forest Park.

The proposed transmission line activities will result in significant impacts to 4.7 acres of natural resources within Forest Park including the removal of 376 living trees and 21 dead trees (7,604 inches diameter breast height), permanent fill of two existing wetlands (Wetland A and Wetland B) and impacts to two streams (Stream 1 and Stream 2). The applicant proposes to restore the affected forested areas by:

- Installing a mixture of shorter-stature tree species, including Oregon white oaks.
- Retaining up to 10 percent of cut trees to place trunks onsite in a fire-safe manner.
- Seeding disturbed herbaceous areas with native seed mix that contains pollinator support species.

To mitigate for impacts to the forest, two wetlands, and two streams, the applicant is proposing to utilize the in-lieu funding sanctioned by City Ordinance 191314. This ordinance authorizes Portland Parks & Recreation (PP&R) to establish and collect fees in-lieu of mitigation activities to implement restoration projects in Forest Park, when deemed appropriate by PP&R.

Most of the project is within the City's Environmental Conservation and Environmental Protection overlay zones within the City's Forest Park Natural Resource Management Plan (FPNRMP). The FPNRMP includes a list of certain projects/actions that are in conformance with the FPNRMP, and which are allowed without a land use review. The FPNRMP does not specifically address the installation of new or the upgrade of transmission lines/corridors. Therefore, this proposal is considered an "exception" to the FPNRMP and is required to go through a Type III Environmental Review.

The project also includes alterations to existing development within the River General and River Water Quality overlay zones which requires approval through a Greenway Review. The applicant is also requesting to amend the Conditions of Approval for Greenway Review LU 18-151725 GW which was a voluntary habitat enhancement project located at Harborton Substation. Lastly, because the applicant is proposing a Rail Line and Utility Corridor Use within the Open Space base zone, a Conditional Use Review is also required. All the aforementioned reviews are being reviewed concurrently under this land use case.

The portion of the work within Forest Park is also within the Forest Park Subdistrict of the Northwest Hills Plan District and must meet the additional approval criteria for that subdistrict.

Approval Criteria

To be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The applicable approval criteria are:

- The "Approval Criteria for Exceptions" including criteria A through E in Section B on page 217 of the Forest Park Natural Resources Management Plan (by reference from 33.430.030).
- Approval Criteria for Environmental Review within the Forest Park Subdistrict in the Northwest Hills Plan District in Zoning Code section 33.563.210 A, B, and C.
- 33.440.350.A – All Greenway Reviews (Greenway Design Guidelines)
- 33.440.350.G – Development within the River Water Quality overlay zone setback
- 33.440.350.H – Mitigation Plan
- 33.815.230 – Rail Lines and Utility Corridors (Conditional Use Review)

The Portland Zoning Code is available online at <https://www.portland.gov/code/33>.

Procedural History

EA 22-142445. A Pre-Application Conference meeting was held June 9, 2022 (Exhibit G.4).

LU 24-041109 CU EN GW: The application was submitted May 10, 2024. The application was determined to be complete on October 29, 2024. A "Request for Response" was mailed November 4, 2024 and numerous comments were received, 5 as described in the section "Request for Response" below. A Notice of a Public Hearing on a Proposal in Your Neighborhood was mailed on January 2, 2025. Public comments received in response to this notice were sent to the Hearings Office. The Staff Report and Recommendation to the Hearings Officer was issued on January 17, 2025. The hearing before the Hearings Officer was held January 29, 2025. A hearing participant requested that the record be held open for the submittal of new evidence, rebuttal evidence and final legal argument. The record of the hearing was therefore held open

consistent with the requirements of ORS 197.797(6). The seven-day period for new evidence was held open until February 5, 2025, followed by a second, seven-day period to submit rebuttal evidence which was held open until February 12, 2025, and lastly a third, seven-day period until February 19, 2025, for the applicant only to submit final legal argument. In addition to the record exhibits compiled by PP&D staff, the Hearings Officer's record included over 850 exhibits containing submissions from the applicant, city bureaus and interested individuals and organizations. On March 7, 2025, the Hearings Officer, having reviewed and considered all the evidence and argument in the record, issued a decision approving the application with conditions.

The Forest Park Conservancy and the Forest Park Neighborhood Association subsequently filed timely appeals of the Hearings Officer's decision to the City Council on March 20, 2025, and March 21, 2025, respectively. The City Council held an on the record hearing on the appeal on April 17, 2025, and tentatively voted unanimously (12-0) to grant the appeal and reject the Hearings Officer's Decision with conditions of approval. At the close of the City Council hearing on April 17, 2025, the City Council set a date for adoption of findings and a final vote. At the final proceeding on May 7, 2025, the City Council adopted the findings contained in this Decision, together with the final conditions of approval, resulting in denial of the application for Environmental Review and approval of Conditional Use Review and Greenway review.

Because the appeal to the City Council was an on-the-record proceeding, evidentiary submittals for the April 17, 2025 hearing were limited to the evidence that was in the record on the date the Hearings Officer closed the public record; in this case that date is February 12, 2025, with the applicant permitted to submit final written argument to the Hearings Officer by February 19, 2025. No new evidence was permitted during the City Council proceedings but testimony based on or referring to evidence already in the record was allowed. The applicant, City Attorney, and City Planner monitored the evidence submitted into the record after February 12, 2025, and during the City Council proceedings. The applicant advised the City Council during the proceeding on a list of submittals that they believed were not previously submitted into the record before the Hearings Officer, as follows:

- Testifying orally at the April 17, 2025, City Council appeal hearing, Scott Fogarty (Appellant, Forest Park Conservancy) made a number of factual claims about the science of oak savannah and frog habitat and did not cite to the record.
- Testifying orally at the April 17, 2025, City Council appeal hearing, Mr. Beausoleil testified about PGE work in his neighborhood and his dissatisfaction thereof.
- Testifying orally at the April 17, 2025, City Council appeal hearing, Ms. Scipioni testified about a red-legged frog survey she participated in and what the data showed.

- Testifying orally at the April 17, 2025, City Council appeal hearing, Mr. Kauffman testified about tree cutting around the city and the status of air pollution in the city.

To the extent the portions of testimony containing this information are new evidence, the Council excludes this information from consideration and did not rely on or consider it in reaching its decision. To the extent any other materials submitted to or testimony received by the Council after February 12, 2025 contain new evidence, such evidence is rejected, not included in the record and not relied on by the Council in this decision.

Multiple members of Council disclosed ex parte contacts, including emails sent by members of the community and received by their offices. Some members of Council stated that while their office had received emails, they had not reviewed the emails. Other members of Council stated that while they had seen general emails opposing the project, they would base their decision on the evidence in the record. Some members of Council listed meetings they had with interested persons, including the dates and subjects of the meetings. The Council President invited anyone present at 6 the April 17, 2025 hearing to ask Councilors about their ex parte contacts. She noted that because some participants were in overflow rooms rather than in Council Chambers, they could also ask questions about ex parte contacts as part of their testimony. Only one person asked questions; that individual asked questions about the Mayor's and Mayor's staff's possible contacts with the applicant. Because the Mayor did not vote or participate in deliberations, the President stated that the Mayor would not disclose any ex parte contacts at that time.

One testifier identified that members of his group had experienced difficulty signing up for testimony. In response, the Council Clerk stated that she had helped those individuals sign up and she was not aware of others who had been unable to testify. No one raised an objection to the Clerk's representation

Decision

Based on evidence in the record and adoption of the Council's Findings and Decision in Case File LU 24-041109 CU EN GW and by this reference made a part of this Order, it is the decision of Council:

Denial of an Environmental Review for:

- An Exception to the Forest Park Natural Resources Management Plan to allow for the alteration of existing and the installation of new transmission line corridors;
- Permanent fill of two wetlands;
- Impacts to Stream 1 and Stream 2;
- Removal of 376 living trees and 21 dead trees (7,604 inches diameter breast height); and
- 4.7 acres of natural resource disturbance.

Approval of a Greenway Review for:

- Removal of four (4) trees;
- Installation of a temporary access road; and
- Installation of three (3) steel poles.

Approval of a Greenway Review for:

- Changes to conditions of approval for LU 18-151725 GW by removing Sub-Area 1 from the project scope (per Exhibit A.12).

Approval of a Conditional Use Review for:

- Portland General Electric (PGE) utility improvements within an existing utility easement in Forest Park to include:
- Shifting the location of one power pole and rewiring a segment of existing transmission line to that new pole location;
- Installing two new poles to support a new, 1,400-foot-long segment of transmission lines;
- Connecting the shifted and new transmission line segments west to existing PGE lines within Forest Park and east across Highway 30 to PGE's existing Harborton Substation.

In substantial conformance with Exhibits C.36 to C.38, C.40, C.61 to C.63, C.65, C.87 to C.89, C.91, and C.113. Approval of the two Greenway Reviews is subject to the following conditions:

- A. A Portland Permitting & Development (PP&D) Zoning Permit is required for inspection of required restoration plantings in the Greenway overlay zones and a separate PP&D construction permit may be required for development.** The Conditions of Approval listed below, shall be noted on appropriate plan sheets submitted for permits (building, Zoning, grading, Site Development, erosion control, etc.). Plans shall include the following statement, ***"Any field changes shall be in substantial conformance with partially approved LU 24-041109 CU EN 83 GW Exhibits C.36 to C.38, C.40, C.61 to C.63, C.65, C.87 to C.89, C.91, and C.113."***

Building Permits [or Construction Permits] shall not be issued until a BDS Zoning Permit is issued.

Building Permits shall not be finaled until the BDS Zoning Permit for inspection of restoration plantings required in Condition C below is finaled.

- B. Temporary timber matting must be placed as shown on Exhibits C.61 to C.63 and C.65, Construction Management Plan, to separate approved construction areas from areas to remain undisturbed.**
1. No mechanized construction vehicles are permitted outside of the approved "Limits of Disturbance" delineated by the timber matting. All planting work, invasive vegetation removal, and other work to be done outside the Limits of Construction Disturbance, shall be conducted using handheld equipment.
 2. Trees shall be protected according to tree protection measures provided in Title 11 Tree Code, Chapter 11.60.030 Tree Protection Specifications.
- C. The applicant shall obtain a BDS Zoning Permit for approval and inspection of a restoration plan in substantial conformance with Exhibits C.87 to C.89, C.91, and C.113, Restoration Plans. Any plant substitutions shall be selected from the Portland Plant List and shall be substantially equivalent in size to the original plant.**
1. Permit plans shall show:
 - a. The location of the trees, shrubs and ground covers required by this condition to be planted in the restoration area and labeled as "new required landscaping". The plans shall be to scale and shall illustrate a naturalistic arrangement of plants and should include the location, species, quantity and size of plants to be planted.
 - b. The applicant shall indicate on the plans selection of either tagging plants for identification or accompanying the BDS inspector for an on-site inspection.
 2. Plantings shall be installed between October 1 and March 31 (the planting season).
 3. Prior to installing required plantings, non-native invasive plants shall be removed from all areas within 10 feet of plantings, using handheld equipment.
 4. If plantings are installed prior to completion of construction, a temporary bright orange, 4-foot high construction fence shall be placed to protect plantings from construction activities.
 5. After installing the required restoration plantings, the applicant shall request inspection of the plantings and final the BDS Zoning Permit.
 6. All shrubs and trees shall be marked in the field by a tag attached to the top of the plant for easy identification by the City Inspector; or the applicant shall arrange to accompany the PP&D inspector to the site to locate plantings for inspection. If tape is used it shall be a contrasting color that is easily seen and identified.
- D. The applicant shall monitor the required plantings for two years to ensure survival and replacement as described below. The applicant is responsible for ongoing survival of required plantings beyond the designated two-year monitoring period.**

1. Prior to issuance of the PP&D Zoning Permit, the applicant must submit and pay fees for review of the Landscape Monitoring Reports required below.
 2. After installation and inspection of the initial restoration plantings, the applicant must submit 2 annual monitoring and maintenance reports for review and approval to the Land Use Services Division of PP&D containing the monitoring information described below. Submit the first report within 12 months following the final inspection approval of the permit required under Condition A. Submit a second report 12 months following the date of the first monitoring report. Monitoring reports shall contain the following information:
 - a. A count of the number of planted shrubs that have died. One replacement shrub must be planted for each dead shrub (replacement must occur within one planting season). 84
 - b. The percent coverage of ground covers. If less than 80 percent of the mitigation planting area is covered with groundcovers at the time of the annual count, additional groundcovers shall be planted to reach 80 percent cover (replacement must occur within one planting season).
 - c. A list of replacement plants that were installed.
 - d. Photographs of the restoration area and a site plan, in conformance with approved Exhibits C.87 to C.89, C.91, and C.113, Restoration Plan, showing the location and direction of photos.
 - e. An estimate of percent cover of invasive species (ivy, blackberry, reed canarygrass, teasel, clematis) within 10 feet of all plantings. Invasive species must not exceed 15 percent cover during the monitoring period.
- E. Failure to comply with any of these conditions may result in the City's reconsideration of this land use approval pursuant to Portland Zoning Code Section 33.700.040 and/or enforcement of these conditions in any manner authorized by law.

Conditions of Approval. The approved greenway reviews are subject to specific conditions of approval, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans and labeled as such.

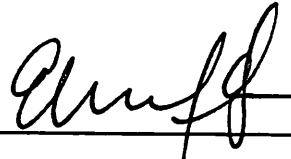
These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

About this Decision. This land use decision is not a permit for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

IT IS SO ORDERED:

8 May 2025

Date



Elana Pirtle-Guiney
Council President and Presiding Officer
at Hearing
May 7, 2025
9:30 a.m. Session

EXHIBIT 2
Notice List

LU 24-041109 CU EN GW
Order of council mailed:
5/13/25

Micah Meskel
5151 NW Cornell Rd
Portland, OR 97230

Jeremy Smith
336 SW Woods
Portland, OR 97201

Rachel Felice
2909 SW 2nd Ave
Portland, OR 97201

Kai McMurtry
1821 SE Ankeny St
Portland, OR 97214

Catherine Thompson
2524 SW 17th Ave
Portland, OR 97201

Mike Lindberg
PO Box 82
Seaside, OR 97138

Ali Berman
6600 SE Division St
Portland, OR 97206

Damon Motz-Storey
3060 SE 156th Ave
Portland, OR 97236

City of Portland
Attn: Laura Lehman
1120 SW 5th Avenue #1302
Portland, OR 97204-1926

Jim Coon
2939 NW 53rd Dr
Portland, OR 97210

Karl Anuta
735 SW First Ave, #200
Portland, OR 97204

United States of America
620 SW Main Street
Portland, OR 97205-3037

John Thompson
2524 SW 17th Ave
Portland, OR 97201

Matt Shipkey
937 NW Glisan St, #830
Portland, OR 97209

Forest Park Neighborhood Assoc.
Attn: Carol Chesarek
13300 NW Germantown Rd
Portland, OR 97231

Paul Majkut
4130 NE 18th Ave
Portland, OR 97211

Suenn Ho
3742 SE Mill St
Portland, OR 97214

Forest Park Conservancy
Attn: Scott Fogarty
833 SW 11th Ave, #800 |
Portland, OR 97205

Marcy Houle
16600 NW Gillihan Rd
Portland, OR 97231

Susan Andrews
13410 NW Springville Rd
Portland, OR 97229

Ellen Mendoza
2866 SE Harrison St
Portland, OR 97214

Rosie Sharrard
8729 SE Yamhill St
Portland, OR 97216

Thomas Cunningham
3244 NE 15th Ave
Portland, OR 97212

Thomas Giese
1634 NW 32nd Ave
Portland, OR 97210

Bob Weinstein
2335 NW Raleigh, #203
Portland, OR 97210

Katherine Peters
1420 NW 20th Ave
Portland, OR 97209

Tyler Smith
11620 NE Ainsworth Cir, #200
Portland, OR 97220

Brenna Bell
11640 SW Boones Ferry Rd
Portland, OR, OR 97219

Michelle Driessnack
3306 NE Holman St
Portland, OR 97211

Joe Rowe
7214 N Knowles Ave
Portland, OR 97217

Rachel Hu
2315 N Wygant St
Portland, OR 97217

Desiree Mariscal
3450 N Williams Ave
Portland, OR 97227

Gregory Smith
9707 NW Sawyer Ct
Portland, OR 97229

Ariana Scipioni
3236 S Kelly Ave
Portland, OR 97239

Lauren Bright
2256 NW Quimby St
Portland, OR 97210

Terri Moore
2425 NW Overton St
Portland, OR 97210

Judas Graves
13466 SE Steele St
Portland, OR 97236

Angus Duncan
2381 NW Johnson St
Portland, OR 97210

Lynne Warner
2287 SE 53rd Ave
Hillsboro, OR 97123

Albert Kaufman
2250 SE 44th Avenue
Portland, OR 97215

Carol Canning
13838 NW Riverview Dr
Portland, OR 97231

Sheila Brady
1820 NW 32nd Ave
Portland, OR 97210

Charlie Michelle-Westley
4228 N Willis Blvd
Portland, OR 97203-3643

Jolynn Moshner
13542 NW Riverview Dr
Portland, OR 97231

Michael Farley
2405 NE Alberta St
Portland, OR 97211

Lucila Cejas
10304 NW Thompson Rd
Portland, OR 97229

Arthur Marx
14200 NW Riverview Dr
Portland, OR 97231

Pamela Hayes
2330 NW Belgrave Ave
Portland, OR 97210

Robin Glenn
20074 SW 71st Ave
Tualatin, OR 97062

Randall Friesen
1001 Molalla Ave, #207
Oregon City, OR 97045

Tara Lilley
7838 SE 46th Ave
Portland, OR 97206

El Es
4212 NE Prescott St
Portland, OR 97218

Joe Bond
15937 NE Airport Way
Portland, OR 97230

Alison Hilton
616 NE 28th Ave
Portland, OR 97232

Jered Bogli
4623 N Mississippi Ave
Portland, OR 97217

Aaron Brown
10138 N James St
Portland, OR 97203-2256

Emily Platt
2808 SE 18th St
Portland, OR 97202

Sheri Smith
2045 N Emerson St, #A
Portland, OR 97217

Stephen Ott
12705 SE River Rd, #409D
Portland, OR 97222

Kimberly Christiansen
14226 Russ Wilcox Way
Oregon City, OR 97045

Ian Doyle
184 NW Hermosa Blvd
Portland, OR 97210

Alise Carter-Ward
6730 SW 168th Pl
Beaverton, OR 97007

Elora Arding
3207 SE 85th Ave
Portland, OR 97266

Olivia Ray
1210 SE 20th Ave
Portland, OR 97214

Karena Gaines
1716 SE Taggart St
Portland, OR 97202

Philip Broussard
6823 N Seneca St
Portland, OR 97203

Georgina Padilla
3140 SE Francis St
Portland, OR 97202

Richard Emery
6520 SE Scott Dr
Portland, OR 97215

Geert Aerts
30 SE 91st Ave
Portland, OR 97216

Shishir Agrawal
2222 NW Raleigh St, #414
Portland, OR 97210

Lee Rengert
3246 Caribou Ct NW
Salem, OR 97304

Julie Olds
2335 NW Raleigh St, #401
Portland, OR 97210

Richard Beauman
1720 SW 4th Ave, #801
Portland, OR 97201

Andrea Pepitone
1509 SW Carson St
Portland, OR 97219

Camille Holladay
7237 N Leonard St
Portland, OR 97203

Brian Blais
618 NE Faloma Rd
Portland, OR 97211

Marcelle Furrow-Kiebler
3205 NE 26th Ave
Portland, OR 97212

Lesley Atlansky
1901 NE 64th Ave
Portland, OR 97213

Cheryl Coon
2939 NW 53rd Dr
Portland, OR 97210

Melinda
1134 SW Mitchell St
Portland, OR 97239-2811

Hillary Tiefer
5007 SW Canterbury Ln
Portland, OR 97219-3369

Jessi Presley-Grusin
1716 SE Taggart St
Portland, OR 97202

Herb Fyfield
2750 SW California St
Portland, OR 97219-1911

Marna Herrington
25 NW 23rd Pl, #PMB 297
Portland, OR 97210

Meghan Cowen
6403 N Boston Ave
Portland, OR 97217

Lora Henager
14290 NW Melody Ln
Portland, OR 97229

Stephanie Duffy
5422 SE Flavel Dr
Portland, OR 97206

Linda Talbot
12421 NW Springville Rd
Portland, OR 97229

Jill Spencer
1300 NE 16th Ave, #1115
Portland, OR 97232

Genevieve DeGuzman
525 NE Fremont St
Portland, OR 97212

Laura Hunter
2748 Elinor St
Eugene, OR 97403

April Allen
12121 SE Wiese Rd
Damascus, OR 97089

Elizabeth Collins
3625 NE Alberta Ct
Portland, OR 97211

Linore
1745 NE 49th Ave
Portland, OR 97213

Brodie Cass Talbott
6532 NE 18th Ave
Portland, OR 97211

Lucinda Beltrand
1606 N Simpson St
Portland, OR 97217

Amy Valentine
2738 NE 9th Ave
Portland, OR 97212

Marsha Chrest
58762 Parkwood Dr
St. Helens, OR 97051

Chris Streight
9270 SW 3rd Ave
Portland, OR 97219

Hayley Kuhn
5151 SE Holgate Blvd, #302
Portland, OR 97206

Christina Burress
24775 Trask River Rd
Tillamook, OR 97141

Matt Pendergraft
2710 O ST
Vancouver, WA 98663

Candace Larson
3957 SE Cora St
Portland, OR 97202

Catherine Thompson
2524 SW 17th Ave
Portland, OR 97201

Nancy Crumpacker
575 SW Sheridan St, #364
Portland, OR 97201-4963

Linda Leyva
3143 NE 43rd Ave
Portland, OR 97213

Emily Schnipper
6730 SE 67th Ave
Portland, OR 97206

Zhou Fang
4821 SE 75th Ave
Portland, OR 97206

Tara Lemezis
10930 NE Eugene St
Portland, OR 97220

Robert Bosch
14601 NE 73rd St
Vancouver, WA 98682

Jeffrey Hayes
725 NW 10th Ave, #411
Portland, OR 97209

Valerie Yerger
4031 SE 122nd Ave, #72
Portland, OR 97236

Jill
7424 SW 32nd Ave
Portland, OR 97219

Jan and Chris Sokol
3750 NW Skyline Blvd
Portland, OR 97229

Andrew Lindstrom
1210 SE 20th Ave, #303
Portland, OR 97214

Jamie Latham
4012 SE 75th Ave
Portland, OR 97206

Sara Simon-Behrnes
7331 NE Sacramento St
Portland, OR 97213

Sweet
4810 NE Sandy Blvd, #101
Portland, OR 97213

Kathleen Bauer
3905 NE 17th Ave
Portland, OR 97212

Dana Mozer
4067 N Haight Ave
Portland, OR 97227

Olivia Mitchell
9859 SE Ellis St
Portland, OR 97266

Jean M. Avery
1441 NE 136th Ave, #119
Vancouver, WA 98684

Matthew Welch
9414 SW 62nd Dr
Portland, OR 97219

Jenny Pompilio
10425 NW Laidlaw Rd
Portland, OR 97229-3805

Maggie Anderson
19209 Windmill Dr
Oregon City, OR 97045

Bruce Barbarasch
3510 SE Alder St
Portland, OR 97214

Jamie Inman
7014 N Omaha Ave
Portland, OR 97217

Emily Porter
2627 NE Siskiyou St
Portland, OR 97212

John Lepschat
14040 NW Riverview Dr
Portland, OR 97231

Ace Slater
7430 SE Henry St, #13
Portland, OR 97206

Susan Weedall
3124 NE Knott St
Portland, OR 97212

Erin Williams
703 NE 81st Ave
Portland, OR 97213

Meghan Middleton
667 McVey Ave
Lake Oswego, OR 97034

Teddi Carbonneau
4246 SE Ogden St
Portland, OR 97206

Luan Pinson
826 SE Morgan Road
Vancouver, WA 98664

Alysha Henderson
1011 NE Prescott St
Portland, OR 97211-4577

Kelsey
9215 N Fortune Ave
Portland, OR 97203

Jill Riebesehl
3203 SE 24th Ave
Portland, OR 97202

Asiya Akhgar
1604 NE 52nd Ave
Portland, OR 97213

Sarina Oden
PO Box 23265
Tigard, OR 97281

Eve Bennett
8316 N Fessenden St
Portland, OR 97203

Willie Levenson
Human Access Project
707 SW Washington St, #1500
Portland, OR 97205

Robert Duval
4545 SW Galeburn St, #7
Portland, OR 97219

Tania Neubauer
9245 NW Skyline Blvd
Portland, OR 97231

Sue Selbie
11307 NW College Dr
Portland, OR 97229

Emily Stebbins
2245 SE 85th Ave
Portland, OR 97216

Maya Hurst-Mayr
5353 SE 52nd Ave
Portland, OR 97206

Leah Bendlin
7325 N Campbell Ave
Portland, OR 97217

April Brenneman
14680 SW 141st Ave
Tigard, OR 97224

Cody Villanueva
2531 N Halleck St
Portland, OR 97217

Douglass Burke
219 Mission Dr
Newberg, OR 97132

Madisen Keikkala
950 SW 21st Ave
Portland, OR 97205

Maggie Thompson
2926 SW 4th Ave
Portland, OR 97201

Lea Flores
7300 NE 62nd St
Vancouver, WA 98662

Wendy Wagner
4015 SE Monroe St
Milwaukie, OR 97222

Kristin Spurkland
2507 NE 62nd Ave
Portland, OR 97213

Matthew Melcarek
1330 SW 3rd Ave
Portland, OR 97201

John Harris
8407 NW 15th C
Vancouver, WA 98665

Germana de Falco
5128 SW Northwood Ave
Portland, OR 97239

Alon Raab
3139 NW Vaughn St
Portland, OR 97210

Mikasi Goodwin
6841 NE Roselawn St
Portland, OR 97218

Karly Chin
3414 NE Tillamook St
Portland, OR 97212

Erin Walker
5595 NE Sandycrest Ter
Portland, OR 97213

Sofija Olson
311 NE 22nd Ave
Portland, OR 97232

Richard Van Buskirk
2430 SW Arden Rd
Portland, OR 97201

Lindsay Babbitt
3954 NE Grand Ave
Portland, OR 97212

Paula Lambert
9282 SW Chopin Ln
Portland, OR 97225

Marissa Grice
8007 N Berkeley Ave
Portland, OR 97203

Anna Noak
1983 NW Flanders St, #301
Portland, OR 97209

Sara Libby
9424 N Van Houten Ave
Portland, OR 97203

Kyna Rubin
3232 NE 13th Ave
Portland, OR 97212-2203

Seanna Oakley-Hanson
2005 Nebraska Ave NE
Salem, OR 97301

Ian Bell
1604 NE 52nd Ave
Portland, OR 97213

Kendra Parkin
6645 N Bank St
Portland, OR 97203

Alyssa Gormaly
4063 NE 10th Ave
Portland, OR 97212

Anna Lebedev
1611 N Rosa Parks Way, #305
Portland, OR 97217

Sydne Scott
5134 SE Milwaukie Ave
Portland, OR 97202

Tiffany McElmurry
466 SW Valeria View Dr, #306
Portland, OR 97225

Kayla Ferguson
6112 E Burnside St
Portland, OR 97215

Nikki Graf
6029 NE 24th Ave
Portland, OR 97211

Connor Kerns
6625 W Burnside Rd, #230
Portland, OR 97210

Diane Jones
3907 SE Concord Rd
Portland, OR 97267

Will Aitchison
1628 NW 32nd Ave
Portland, OR 97210

Judas M.
2438 SE 41st Ave
Portland, OR 97214

Ashlee Taylo
3883 S Moody Ave, #402
Portland, OR 97239

Andrea Munson
1635 SW 139th Ave
Beaverton, OR 97005

Ralph Brooks
10820 NW Springville Rd
Portland, OR 97229

Liberada Guidone
8338 N Interstate Ave
Portland, OR 97217

Donna Murdock
2821 NE Everett St, #B10
Portland, OR 97232

Stefani Varney
8934 SE Hawthorne Blvd
Portland, OR 97216

Ruby Chevreuil
414 SE 13th Ave
Troutdale, OR 97060

Aenne Schumann
2130 N McClellan St
Portland, OR 97217

Cassia Gammill
5005 SE 72nd Ave, #403
Portland, OR 97206

Amy O'Daly
5232 NE 31st Ave
Portland, OR 97211

Brad & Jolynn Moshner
13542 NW Riverview Dr
Portland, OR 97231

Jon Isaacs
121 SW Salmon, #1440
Portland, OR 97236

Hannah
2227 NW Johnson St
Portland, OR 97210

Britney Thompson
55810 Garden View Ct
Warren, OR 97053

Carrie Milligan
2534 NW Pettygrove St
Portland, OR 97210

Mattie
7016 N Atlantic Ave
Portland, OR 97217

Cara L McMurry
8607 N Exeter Ave
Portland, OR 97203

Lindsay Thurwachter
9715 NW Newton Rd
Portland, OR 97231

Travis Nanchy
1866 NW Aspen Ave
Portland, OR 97210

Claudia Hutchison
2133 SE 52 Ave
Portland, OR 97215

Ann Ruttan
7018 NW Skyline Blvd
Portland, OR 97229

Alena Wilson
2855 SW 194th Ave
Aloha, OR 97003

Carol Valentine
6545 Lakeshore Dr
Selma, OR 97538

James Wilcox
10433 SW 53rd Ave
Portland, OR 97219-5837

Andrea Sparapano
3366 NW Vaughn St
Portland, OR 97210

Susan Milln
9209 N Hamlin Ave
Portland, OR 97327

Katherine Noble
5315 SE Martins Ct
Portland, OR 97206

Jean Longwill
4814 SE Rural St
Portland, OR 97206

Liz Saufley
9185 SW 91st Ave, #H-4
Portland, OR 97223

Susan Wilcox
10433 SW 53rd Ave
Portland, OR 97219

Logan Nelson
10445 SE Cook Ct, #302
Portland, OR 97222

Carolanne Fry
5148 SE Woodward St
Portland, OR 97206

Susan Anglada Bartley
6824 SE 65th
Portland, OR 97206

Allison Roberts
1596 NW Jennifer Pl
Portland, OR 97229

Karen McCain
315 N Alberta St, #73
Portland, OR 97217

Ethan Morehouse
3816 S Water Ave
Portland, OR 97239

Cheri Ceridwen
2020 NW Northrup St, #806
Portland, OR 97209

Tiffany Garner
428 NE 24TH Ave
Portland, OR 97232

Deb Whitcomb
2535 SE 41st Ave
Portland, OR 97202

Mark Merkens
1 Icarus Loop
Lake Oswego, OR 97035

Maleek
8931 NE Colonnade Dr
Hillsboro, OR 97124

Amber Redifer
5746 NE Skidmore St
Portland, OR 97218

Calypso Kupper
4405 SE 70th Ave
Portland, OR 97206

Madison Hancock-Varughese
8220 SE 6th Ave
Portland, OR 97202

Danielle Shermulis
2959 E Burnside St, #409
Portland, OR 97214

Lauren Mathieson
7428 N Charleston Ave
Portland, OR 97203

Ruby McCullers
1817 Weidler St
Portland, OR 97232

Nicole Mercier
4616 SE 30th Ave
Portland, OR 97202

Amy Daileda
4915 Ne 34th Ave
Portland, OR 97211

Ann Tiedeman
12065 SW Fairfield St
Beaverton, OR 97005

Meagan Gleason
3655 NW Thurman St
Portland, OR 97210

Carole Hardy
5025 SE Weeks Ct
Milwaukie, OR 97267

Magenta Kelly
719 N Baldwin St
Portland, OR 97217

Faith Rose
2958 Halldale Ave
Los Angeles, CA 90018

Lindsay Maizland
2226 NE Thorncroft Dr
Hillsboro, OR 97124

Mandelyn Hill
8123 N Ivanehoe St
Portland, OR 97203

Cory Bettinger
5601 N Campbell Ave
Portland, OR 97217

Anna Keeva
2327 NE 17th Ave
Portland, OR 97212

Irene Hoss
530 S Florida St
Portland, OR 97219

Jasper Bennett
2604 NE 20th Ave
Portland, OR 97212

Caroline Buchalter
3144 NE 64th Ave
Portland, OR 97213

Louisa Moore
9126 N Seward Ave
Portland, OR 97217

Steph Spencer
2188 NW Awbrey Rd
Bend, OR 97703

Ryder Booth
2020 NW 29th Ave
Portland, OR 97210

Macy C
1818 SW 4TH Ave
Portland, OR 97201

Jan Zuckerman
2914 NE 18th Ave
Portland, OR 97212

Sara Aviles
14261 SW Alpine Crest Way
Tigard, OR 97224

Adriana Wells
2547 NW 2nd Ter
Gresham, OR 97030

Tobin Weaver
1983 NW Flanders St, #501
Portland, OR 97209

Shalina Stillman
3115 NE Brazee St
Portland, OR 97212

Aniko Zoltan
114 NE 57th Ave
Portland, OR 97213

Roshelle Hall
1037 NE 90th Ave
Portland, OR 97220

Stephanie Soquet
320 S Lane St, #23
Portland, OR 97239

Paul Scherlie
16870 S Buckner Creek Rd
Beavercreek, OR 907004

Jyliann
8103 NE Wygant St
Portland, OR 97218

Dawn
3530 SE 70th Ave
Portland, OR 97206

Nicola Corl
3380 SW 70th Ave
Portland, OR 97225

Kyra Semone
2107 SE Yamhill St, #1
Portland, OR 97214

Marina Soto
2116 SE Tacoma St
Portland, OR 97202

Danielle
PO Box 14280
Portland, OR 97293

Bala Seshasayee
10440 NE Park Ridge Way
Hillsboro, OR 97006

Frances Andonopoulos
223 NE 22nd Ave
Portland, OR 97232

Angelina Vasile
305 SE 3rd Ave, #402
Portland, OR 97214

Claire Prichard
3522 SE Gladstone St
Portland, OR 97202

Carol Chesarek
13300 NW Germantown Rd
Portland, OR 97231

Lindsey Rickert
4225 N Juneau St
Portland, OR 97203

Van Tran
11741 SE Foster Rd
Portland, OR 97266

Sophia Zandi
2244 Alder St
Eugene, OR 97405

Amee Pacheco
4804 NE Davis St
Portland, OR 97213

Joana Kirchhoff
3414 NE 73rd Ave
Portland, OR 97213-5826

Nicholas Brennan
6112 E Burnside St
Portland, OR 97215

Monica Metzler
7059 N Fairport Pl
Portland, OR 97217

Kallista Mason
1701 SW Columbia St
Portland, OR 97201

Adele Dawson
347 Hemlock St
Florence, OR 97439

Stephanie Warren
2226 NE Ainsworth St
Portland, OR 97211

Dak Steinback
1410 Agate St
Eugene, OR 97403

Heidi Hart-Zorin
28 SE 28th Ave, #206
Portland, OR 97214

Sara Robison
7160 SW Oleson Rd, #5
Portland, OR 97223

Julie Zanzi
PO Box 1355
Ridgefield, WA 98642

Jennifer Johnson
8918 N Fortune Ave
Portland, OR 97203

Codi Johnson
4485 SW Bernard Dr
Portland, OR 97239

Michael Huber
11384 SW Capitol Hwy
Portland, OR 97219

Mikaela Swing
8410 SE 21st Ave, #5
Portland, OR 97202

Eric Cabral
3515 N Trenton St
Portland, OR 97217

Michaela Moran
2118 SE 89th Ave
Portland, OR 97216-2012

Elaine Rybak
7144 NW Thompson Rd
Portland, OR 97229

Amber Capwell
8501 NE Going Pl
Portland, OR 97220

Diana Oppenheim
29263 Shirley Ave
Madison Heights, MI 48071

Katie Bush
4972 SE Monroe St
Portland, OR 97222

Sarah-Jane Cikara
1437 SE Birch St
Portland, OR 97214

Noel O'Donnell
6717 NE 13th Ave
Portland, OR 97211

Dawn Jones
3407 Ivy Crest Ct
Forest Grove, OR 97116

Thomas
3244 NE 15th Ave
Portland, OR 97212

Jacque perry
13275 SW Oakwood St
Beaverton, OR 97005

Cheryl Neal
12115 NW Skyline Blvd
Portland, OR 97231

Eve Goldman
5023 SW Nevada Ct
Portland, OR 97219

Stevyn Llewellyn
9241 NW Germantown Rd
Portland, OR 97231

Paul Tate
636 SE 60th Ave
Portland, OR 97215

Dylan Plummer
2633 Harris St
Eugene, OR 97405

Alex Wilson
6647 N Astor St, #B
Portland, OR 97203

Noah Foley-Beining
3818 N Michigan Ave
Portland, OR 97227

Ashley Coleman
3725 SE Rhine St, #13A
Portland, OR 97202

Henri Banning
5833 SE 41st Ave, #B
Portland, OR 97202-7551

Michael Gill
10565 NW Skyline Blvd
Portland, OR 97231

Carla Smith
9620 SE Jeanne Rd
Happy Valley, OR 97086

Luke Kashdan
4413 NE Killingsworth St,
#211Portland, OR 97218

Alex Gray
10445 SE Cook Ct, #302
Portland, OR 97222

Alex Minor
5604 SE Tolman St
Portland, OR 97206

Dana Walas
10029 N Oregonian Ave
Portland, OR 97203

James Cooke
6701 N Denver Ave
Portland, OR 97217

Gaby Grussi
275 NW Lost Springs Ter
Portland, OR 97229-6436

Brooke
2450 SE 37th Ave, #221
Portland, OR 97214-5887

Kathaleen Macomber
8067 N Leavitt Ave
Portland, OR 97741

Sarah Lasoff
5304 NE Simpson S
Portland, OR 97218

Ken
1425 NE 7th Ave, #436
Portland, OR 97232

Owen Atlansky
1901 NE 64th Ave
Portland, OR 97213

Alyssa Tarbox
8355 SW Pfaffle St
Tigard, OR 97223

Holland Mulder
6315 NE 36th Ave
Portland, OR 97211

Mercury Baxley
430 NE 16th Ave, #214
Portland, OR 97232

Ravikumar Gohel
5477 NW 126th Ter
Portland, OR 97229

Chelsy Cortes Martinez
1578 SE Liberty Ave
Gresham, OR 97080

Isabella
1090 NE 91st Ave, #315
Beaverton, OR 97006

Diana
711 7th St
Lake Oswego, OR 97034-2209

Alexander Matteson
4523 NE 6th Ave
Portland, OR 97211

Katie Halmekangas
1525 SE 44th Ave
Portland, OR 97215

Drew Flowers
11944 SE Pardee St
Portland, OR 97266

Scott Carpenter
8405 SW Power Ct
Portland, OR 97225-3427

Chris Dodge
2724 NE 61st Ave
Portland, OR 97213

Allison Gordon
1425 SW Harrison St
Portland, OR 97201

Lacey Gonzales
7024 N Mississippi Ave
Portland, OR 97217

Alaina Rodriguez
4808 SE Franklin St
Portland, OR 97206

Hannah Hutchens
2805 NE Hoyt St
Portland, OR 97232

Georgena Moran
244 NE 69th Ave
Portland, OR 97213

Megan Dussault
5965 Trail Ave NE, #201
Keizer, OR 97303

Martin
18200 NE Couch St
Portland, OR 97230

Kelsey Luna
9490 SW 146th Terr
Beaverton, OR 97007

Clay Barnett
2763 NW Thurman St, #14
Portland, OR 97210

Anna Parks
111 SW Harrison St
Portland, OR 97201

Sophia
4550 NE 30TH Ave
Portland, OR 97211

Mark Bennett
5131 NE 35th Pl
Portland, OR 97211

Hank Stowers
2032 SE 11th Ave
Portland, OR 97214

Cody Frost
5030 SE Stephens St
Portland, OR 97215

Alli Bratt
627 SE 19th Ave
Portland, OR 97214

Gina Southern
7903 SE Tolman St
Portland, OR 97206

Salem Heideman
714 NE 79th Ave
Portland, OR 97213

Christian Heisler
2104 SE Yamhill St
Portland, OR 97214

Bethel Sishu
12635 NE Shaver St
Portland, OR 97230

Marie Taylor
1634 SW 58th Ave
Portland, OR 97221

Nicole Williams
11944 SE Pardee St
Portland, OR 97266

Marc Alifanz
13610 NW Riverview Dr
Portland, OR 97231

Karla Salinas
3630 SE 39th Ave, #15
Portland, OR 97202

Eric Brown
8405 SE Kelly St
Portland, OR 97266

Meghan Andela
2121 SW Multnomah Blvd
Portland, OR 97219

Nicole Diggins
7377 NE Cherry Dr
Hillsboro, OR 97124

Ellen Drumheller
1260 NW Naito Pkwy, #606
Portland, OR 97209

Peyton James
1955 NW Hoyt St
Portland, OR 97209

Declan McKenna
1425 SW Harrison St
Portland, OR 97201

Jacob Yudkin
3909 SE Lincoln St
Portland, OR 97214

Jonathan Celiz
14800 NW Cornell Rd, #11F
Portland, OR 97229-7403

Allie Wieland
206 SE 30th Pl
Portland, OR 97214

Leslie Howell
8311 SE 39th Ave
Portland, OR 97219

Monique Lopez
8007 N Hudson St
Portland, OR 97203-3118

Elliad Dagan
1943 SE Tenino St
Portland, OR 97202

Kayla Caldeira
7150 N Greenwich Ave, #11
Portland, OR 97217

Doris Cellarius
5704 SE 22nd Ave
Portland, OR 97202

Tracy Alifanz
13610 NW Riverview Dr
Portland, OR 97231

Adam Bender
4645 SE 33rd Pl
Portland, OR 97202

Maggie Baker
11826 SW Boones Ferry Rd
Portland, OR 97219

Amy Polansky
6701 N Denver Ave
Portland, OR 97217

Loren Harms
8820 NE Schuyler St
Portland, OR 97220

Nadia Busekrus
1614 N Church St, #3
Portland, OR 97217

Sarah Lumelsky
2061 NW 29th Ave
Portland, OR 97210

Jenn Hood
8986 N Clarendon Ave
Portland, OR 97203

Tara Hershberger
8830 NE Hancock St
Portland, OR 97220

Alex
5402 SE 99th Ave
Portland, OR 97266

Emma Cisneros
6914 N Philadelphia Ave
Portland, OR 97203

Skylar Cruz
1926 West Burnside St, #1011
Portland, OR 97209

Brenna Doyle
1809 SE 12th Ave, #B
Portland, OR 97214

Joanne Delmonico
9601 NW Leahy Rd, #305
Portland, OR 97229

Saffron Addams
6220 NE Glisan St
Portland, OR 97213

Diana Tuz
10695 NE Wygant St, #2
Portland, OR 97220

Angelika Rothberg
1433 NW 22nd Ave
Portland, OR 97210

Mark Holman
4423 NE Tillamook St
Portland, OR 97213

Erin
1751 NE 47th Ave, #1751
Portland, OR 97213

Jordan Lewis
1926 W Burnside St , #1011
Portland, OR 97209

Juan Olmos
6220 SE 138th Pl
Portland, OR 97236

Allie Tesar
10 Scarborough Dr
Lake Oswego, OR 97034

Natalie Bright
7235 SW Burlingame Ave
Portland, OR 97219

Hannah Solus
2061 NW 29th Ave, #11
Portland, OR 97210

Manuel Wanskasmith
7304 N Westanna Ave
Portland, OR 97203

Pamela Statz
3915 SE 14th Ave
Portland, OR 97202

Barb Fox Kilgore
39310 NE 6th Ave
Woodland, WA 98674

Hector Gomez Rivas
3127 SE 136th Ave
Portland, OR 97236

Kristin Gross
4429 NE 66th Ave
Portland, OR 97218

Juliette Oldfield
1433 NW 22nd Ave
Portland, OR 97210

Jesse Turner
2908 SE 51st Ave
Portland, OR 97206

Lucien Darensburg
3602 E 11th St
Vancouver, WA 98661

Shadrach Wood
12625 SW Colony Ln
Beaverton, OR 97005

Joseph Keller
10904 NE Beech St
Portland, OR 97220

Karinne Dadigan
5206 SE Francis St
Portland, OR 97206

LSK
3016 NE 55th Ave
Portland, OR 97213

R Wolters
5687 Northeast Glisan St
Portland, OR 97213

Ian Inocencio
140 SW Columbia St
Portland, OR 97201

Mike Ausman
PO Box 11918
Portland, OR 97211

Melanie Feder
381 Sunshine Ave
Philomath, HI 97370

Colleen C Brehm
4766 N Amherst St
Portland, OR 97203

Yannika Marquardt
1006 SE Clatsop St, #B
Portland, OR 97219

Daniel Simon
SW Canyon Dr
Portland, OR 97225

Emily Favret
118 NE Ivy St
Portland, OR 97212

Gwen Amsbury
21637 SE Ash St
Gresham, OR 97030

Michael Lee
2706 SE Alder St
Portland, OR 97214

Jessiemarie Duplessis
1830 NW 24th Pl
Portland, OR 97210

Dominic DeMarco
5965 Trail Ave NE, #201
Keizer, OR 97303

Suzanne
2537 Thurman St Apt 101
Portland, OR 97210

Abraham Baltazar
515 SE Rene Ave
Gresham, OR 97080

Kushal Bhatt
1481 NW 13th Ave, #345
Portland, OR 97209

Katrina Alfano
3031 SE 53rd AVE
Portland, OR 97206

Flora Rudolph
2226 NW Hoyt St, #21
Portland, OR 97210

Maxwell Sivers-Boyce
5940 SW Texas St
Portland, OR 97219

Mikaela Ehly
4920 SW Laurelwood Ave
Portland, OR 97225

Alexandra Gray
3143 SE 21st Ave
Portland, OR 97202

Ben Birdsall
4757 North Lombard St
Portland, OR 97203

Jaclyn Rose
11705 NW Winter Park Ter
Portland, OR 97229

Sarah Grill
4839 N Princeton St
Portland, OR 97203

Rebecca Harlow
34415E Columbia Ave
Scappoose, OR 97056

Mary Salmi
14628 E Burnside St
Portland, OR 97233

Kamran Farkhondepay Aryah
3935 NE 15th Ave
Portland, OR 97212

Audrey Howaniec
930 NW 25th Pl, #120
Portland, OR 97210

Nicole Pelham
27715 10th Ave
Des Moines, WA 98011

Jason
6221 Southeast Knight St
Portland, OR 97206

Steve Settle
1774 McKillican St
West Linn, OR 97068

Madeline Warner
2803 SE 49th Ave
Portland, OR 97206

Jere M Grimm and Family
1734 NW Aspen Ave
Portland, OR 97210

Antonia Januzzi-Thomas
1604 SW Clay St
Portland, OR 97201

Anna Lueck
6651 SW Terri Ct
Portland, OR 97225

Katie Irwin
20700 SW Wright St
Beaverton, OR 97078

Susan Weinberg
1740 NW 113th Ave
Portland, OR 97229

Kelsey Baker
8940 N Bradford St
Portland, OR 97203

Lisa Dunning
14055 NW Evergreen St
Portland, OR 97229

Lynnet McKenzie
5420 SW Idaho St
Portland, OR 97221

Stephanie Locicero
2605 SE 23rd Ave
Portland, OR 97202

Jasmine
16506 SE 29th St, #B14
Vancouver, WA 98683

Kerry Mason
2205 River Heights Cir
West Linn, OR 97068

Steven Johnson
4075 SW Moniker Pl
Aloha, OR 97078

Brooke Kollie
8844 SW Brightfield Cir
Portland, OR 97223

Grace Hardwicke
654 SE Rene Ave
Gresham, OR 97080

Nathan Norris
8571 N Hamlin Ave
Portland, OR 97217

Dawn Knopf
3624 NE Multnomah St
Portland, OR 97232

Clare Alexandra
10226 N Leonard St
Portland, OR 97203

Lydia Fakhouri
1644 SW Highland Pkwy
Portland, OR 97221

Eva Weyers
2841 SE Tibbetts St, #B
Portland, OR 97202

Meg Funston
4773 N Harvard St, #B
Portland, OR 97203

Jynx Houston
7605 SE Lincoln St
Portland, OR 97215

Leann Gill
1631 NE 25th Ave
Portland, OR 97232

Mary Jo Kalberer
3846 NW Thurman St
Portland, OR 97210-1237

Celeaya Hirst
1604 SW Clay St, #411
Portland, OR 97201

Courtney Dowell
4946 NE 35th Pl
Portland, OR 97211

Emma Sevre
14633 SE Raintree Ct
Milwaukie, OR 97267

Alli Miller
2645 NE 7th Ave
Portland, OR 97212

Emily Griffith
3002 N Clark St
Cornelius, OR 97113

Griffin O'Neill
3450 SW Downs View Ter
Portland, OR 97221

Diane Meisenhelter
4626 NE 19th
Portland, OR 97211

Lynn Herring
1090 Chandler Rd
Lake Oswego, OR 97034

Charles Kramer
6444 NE Rodney avenue
Portland, OR 97211

Michelle Ryan
2817 NE 20th Ave
Portland, OR 97212

Emily Becker
7715 N Fortune Ave
Portland, OR 97203-3304

Janelle Upshaw
1793 Pear Loop
Junction City, OR 97448

Julia Crammond
12 NE 70th Ave
Portland, OR 97213

Eli Wheeler
1425 SW Harrison St
Portland, OR 97201

Kay O'Neill
3450 Southwest Downs View Ter
Portland, OR 97221

Rebecca
2922 NE 92nd Avenue
Portland, OR 97220

Joel and Laine Schipper
4207 NE 24th Ave
Portland, OR 97211

Sarah M
4780 SE Arden St
Portland, OR 97222

Eleanor Stray
2470 NW Raleigh St
Portland, OR 97210

Eva Miller
5633 NE 15th Ave
Portland, OR 97211

Meaghan Lingo
4413 NE Killingsworth St
Portland, OR 97218

Willa Perlman
2743 NE Rodney Ave, #A
Portland, OR 97212

Melissa Robin
8140 SE 68TH AVE
Portland, OR 97206

Jasmine Chavez
639 SW Dillan Dr
Beaverton, OR 97006

Nicole Martel
14207 130th Ln SE
Yelm, WA 98597

Elizabeth Withers
1015 SE 143rd Ave
Portland, OR 97233

Lee Hall
6231 NE 6th Ave
Portland, OR 97211

Jennifer Aucott
6925 NE 23rd Ave
Portland, OR 97211

Alison Mortensen-Hayes
6843 SE Carlton St
Portland, OR 97206

Yvette Rosales
5241 NE 33rd Ave
Portland, OR 97211

Charlie Michelle-Westley
4228 N Willis Blvd
Portland, OR 97203-3643

Austin
5754 N 86TH Cir
Camas, WA 98607

Caitlin DeBoer
6539 SE 63rd Ave, #B
Portland, OR 97206

Breyanna Thompson
2849 SE 30th Ave
Portland, OR 97202

Alex Engelhardt
1425 SW Harrison St
Portland, OR 97201

Anisha Agarwal
4631 Cather Ave
San Diego, CA 92122

Anne DeVoe
1725 NW 29th AVE
Portland, OR 97210

Mark
4508 NE Garfield Ave
Portland, OR 97211

Alexa Dains
485 SE 14th Ave
Portland, OR 97214

Joanne Perlman
4609 N Gantenbein ave
Portland, OR 97217-2911

Desiree' DuBoise
617 SE 148th Ave
Portland, OR 9723

Barbara Quinn
7034 N Charleston Ave
Portland, OR 97203

Heather King
619 NE 81st Avenue
Portland, OR 97213

Alexander Bloch
2207 NE Davis St
Portland, OR 97232

Emily Castle
3915 SE 67th Ave
Portland, OR 97206

Emily Romero
1700 Main St, #506
Vancouver, WA 98660

Sarah Alibabaie
4265 NE Halsey St, #610
Portland, OR 97213

Liam
10924 Circle Dr
Bothell, WA 98011

Allie Bright
4720 NE Glisan St
Portland, OR 97213

Jeremy Beausoleil Smith
336 SW Woods St
Portland, OR 97201

Rita
7344 SE 45th Ave
Portland, OR 97206

Maggie Rose
20 NW 16th Ave, #101
Portland, OR 97209

Lara Stoyanov
60 SW 93rd Ave
Portland, OR 97225

Michael Rubin
5723 N Moore Ave
Portland, OR 97217

Robin Burgess
3214 NE 63rd Ave
Portland, OR 97213

elaine apaza
2525 NW Overton St
Portland, OR 97210

Brianne Scott
2260 Division St, #3B
Olympia, WA 98502

Caleb Ross
8660 SW Fannowood Ln
Beaverton, OR 97008

Alexander
3349 NE Multnomah St
Portland, OR 97232

Robin Jensen
1220 SW Westwood Ct
Portland, OR 97239

Anne Brink
3434 NE Hancock St
Portland, OR 97212

Michael Murawski
5315 NE Jessup St
Portland, OR 97218

Jared and Katrina Wilson
1803 N Skidmore St
Portland, OR 97217

Joanna Gatti
2572 NW Xavier St
Portland, OR 97210

Jade Whitley
1871 N Flint Ave, #706
Portland, OR 97227

Jonathan Haley
22 NE 2nd Ave
Portland, OR 97232

April
13710 SW Marcia Dr
Portland, OR 97223

Benoit Veillette
11438 SW Oak Creek Dr
Portland, OR 97219

Katie Roberts
3434 NE 29th Ave
Portland, OR 97212

Sarah Neel
1906 NE Ridgewood Dr
Portland, OR 97212

Fable Sorenson
6121 NE 16th Ave
Portland, OR 97211

Valerie Titan
26400 NW St Helens Rd, Slip 14
Scappoose, OR 97056

Caeli Gallagher
2943 SE Taylor St
Portland, OR 97214

Beth
5221 NE 29th Ave
Portland, OR 97211

Nora Foster
1524 SE Belmont St
Portland, OR 97214

Barb Aylward
10 Pourtales Rd
Colorado Springs, CO 80906

Rachael Volker
2062 NW Marshall St
Portland, OR 97209

Nicole Spinnler
PO Box 68992
Portland, OR 97268

Jenna Vice
932 N Fremont St Apt 4
Portland, OR 97227

Marissa Garnett
1470 NW Glisan St, #318
Portland, OR 97209

Ken Yoshikawa
6211 SE 43rd Ave
Portland, OR 97206

Linda
3850 SE 114th Ave
Portland, OR 97266

Mekaylah Cox
7737 N Central St
Portland, OR 97203

Allan Davis
14162 SE Holgate Blvd
Portland, OR 97236

Katie Goodwin
1255 NW 9th Ave, #408
Portland, OR 97209

Ciel Lorenzen
3911 NE Kingingsworth St
Portland, OR 97211

Sandra Moreland
2626 NE Siskiyou St
Portland, OR 97212

Jessica Daugherty
1310 NE Prescott St
Portland, OR 97211

Sean Cumming
1835 NE 16th Ave, 2
Portland, OR 97212

Kateri Morton
1834 SW 5th Ave, #202
Portland, OR 97201

Margaret Musty
6828 N Campbell Ave
Portland, OR 97217

April Baque
4850 North Drew St
Portland, OR 97203

Emily Crum
6709 NE Mallory Ave
Portland, OR 97211

Molly Pool
7035 N Burrage Ave
Portland, OR 97217

Janet Ayres
12527 NE Russell St
Portland, OR 97230

Matt Casey
1930 SE Ash St
Portland, OR 97214

Alex Dannemiller
2514 NE Alberta St
Portland, OR 97211

Wendy Guan
605 NE Royal Ct
Portland, OR 97232

Annie Robb
1414 NE Morgan St
Portland, OR 97211

Cynthia White
26400 NW St Helens Rd
Scappoose, OR 97056

Linna Truong
11921 SE Mill Ct
Portland, OR 97216

Kyle Klopff
1930 SE Ash St
Portland, OR 97214

Carolyn Supinka
1405 NE 46th Ave
Portland, OR 97213

Jennifer Coffman
2707 NW Overton St
Portland, OR 97210

Christine Crum
5714 N Commercial Ave
Portland, OR 97217

Robert B Bernstein
7415 SE Main St
Portland, OR 97215

Valerie Fabiano
13675 NW Petttygrove St
Portland, OR 97229

Leo Poole
4044 SE Holgate St
Portland, OR 97202

Anna
1527 N Emerson St
Portland, OR 97217

Nicholas Hughes
2672 SW Tablot Rd
Portland, OR 97201

Sarah Marble
2737 NW Upshur S, #214
Portland, OR 97210

Kelly Northway
10135 N Smith St
Portland, OR 97203

Thomas Russell
225 SE 74th Ave
Portland, OR 97215

Nick Gilla
1922 SE Hemlock Ave
Portland, OR 97214

Chase Spross
19980 NW Quail Hollow Dr
Portland, OR 97229

Anne Gendreau
1449 SW Susan Ln
McMinnville, OR 97128

Katie Winters
1922 SE Hemlock Ave
Portland, OR 97214

Sarah Stivers
1320 N Sumner St
Portland, OR 97217

Andrea Yonge
4316 N Haight Ave
Portland, OR 97217

Nadine
6265 SW 155th Ave
Beaverton, OR 97007

Katie MacKenzie
6525 N Greenwich Ave
Portland, OR 97217

Sara Kitcher
2030 NW Raleigh St, #619
Portland, OR 97209

Hannah Goldblatt
4017 SE 54th Ave
Portland, OR 97206

Madeline Geil
1825 SE 12th Ave, #2
Portland, OR 97214

Ann McMahon
4756 SE La Cour Ct
Milwaukie, OR 97267

Mimi Smith
625 NE Floral Pl
Portland, OR 97232

Alexandra Burress
6225 NE 14th Ave, #B
Portland, OR 97211

Jesse
7134 SW 54th Ave
Portland, OR 97219

Zoe Walker Aparicio
6646 SE 50th Ave
Portland, OR 97206

Dianne Lamberty
14110 SW Barrows Rd
Tigard, OR 97223

Karen Cartales
2323 SW Park Pl, #804
Portland, OR 97205

Marlee Mason-Maready
230 SW Ash St, #420
Portland, OR 97204

Cecilia Dominguez
11005 NE 285th St
Battle Ground, WA 98604

Hava
12916 NE Clackamas St
Portland, OR 97230

Rosemary Lee
2842 SE Tibbetts St
Portland, OR 97202

Chanel Trinnier
11141 NE San Rafael St
Portland, OR 97220

Maynapa Chanthanouvong
14135 SE Center St
Portland, OR 97236

Blake Mason
230 NE 28th Ave
Portland, OR 97232

Thea Yeager
5303 Ne Wistaria Dr
Portland, OR 97213

Ryan Elwood
1389 SW Taylors Ferry Ct
Portland, OR 97219

Ronna Fujisawa
8722 NW Skyline Blvd
Portland, OR 97231

Megan Marie Mishler
2003 SE Lincoln St
Portland, OR 97214

Trever Bolton
4155 SW Crestwood Dr
Beaverton, EA 97225

Justin Colquhoun
5505 E Evergreen Blvd, #314
Vancouver, WA 98661

Michelle Lin
6805 N Atlantic Ave
Portland, OR 97217

Keith Alnwick
2365 NW Northrup St, #H
Portland, OR 97210

Margarita Lubyana
1302 SE 26th Ave
Portland, OR 97214

Logan
8815 SW Oak Ln
Portland, OR 97223

Brook Harris
4594 NE 33rd Ave
Portland, OR 97211

Emily de Lorimier
2240 NW Lovejoy St
Portland, OR 97210

Tanner M-M
3720 S Bond Ave, #1018
Portland, OR 97239

Samantha Manklang
2936 SW 153rd Dr
Beaverton, OR 97003

Max Menchaca
4824 NE 42nd Ave, #139
Portland, OR 97218

Aubrey Hornor
7032 NE 7th Ave
Portland, OR 97211

Meaghan Michelle Wilkinson
336 SW Woods St
Portland, OR 97201

Christopher
17205 SE 21st St
Vancouver, WA 98683

Katherine Couch
4627 NE 27th Ave
Portland, OR 97211

Matt Whitehead
11705 NW Winter Park Ter
Portland, OR 97229

Tessa Stokes
810 NW Island Terr, #B1
Beaverton, OR 97006

Jen Cook-Chrysos
12274 NW West Rd
Portland, OR 97229

Sydney Glenn
1650 NW 21st Ave
Portland, OR 97209

Jamae Ann Sabangan
3150 SE Division St, #405
Portland, OR 97293

Kaia Kirkbride
807 SW 14th Ave
Portland, OR 97205

Leah Jakusovszky
6515 SW Ecola Pl
Beaverton, OR 97007

Matty Garrison
1420 SE 16th Ave, #711
Portland, OR 97214

Nick Mahoney
2124 SE 54th Ave
Portland, OR 97215

Jordan Straus
4946 NE 13th Ave, #101
Portland, OR 97211

3oolery
3604 NE 90th Avenue
Portland, OR 97220

Karen M Peterson
10217 NW Jack Ln
Portland, OR 97229

James Conway
3923 SE Gladstone St
Portland, OR 97292

Emily Elizondo
2503 NW Raleigh St
Portland, OR 97210

Sandra Farrell
3585 NW Blackcomb Dr
Portland, OR 97229

Forrest P
124 NE 3rd Ave
Portland, OR 97232

Ari Watkins
1935 SE Washington St, #3
Portland, OR 97214

Alyx Bowsher
1625 SW Alder St , #716
Portland, OR 97205

John Giacoppe
7364 SE Division St
Portland, OR 97206

Sophie Ciurlik Rittenbaum
5325 N Interstate Ave, #212
Portland, OR 97217

Tanvi Singh
2208 SE Belmont St
Portland, OR 97214

Molly Gilbert
2763 NW Thurman St, #17
Portland, OR 97210

Margaret Arata
6705 SW 30th Ave
Portland, OR 97219

Sarah Henry
4815 SE 75th Ave, #B
Portland, OR 97206

Emma Snodgrass
2325 SE 35th Pl
Portland, OR 97214

Sriya Chinnam
3024 NW Chapin Dr
Portland, OR 97229

Julia K Perini
3554 North Missouri Ave
Portland, OR 97227

Jeff Baertsch
3657 SE 40th Ave
Portland, OR 97202

William Simpson
1720 SE Main St
Portland, OR 97214

Niah Swendseid
3087 SE Ankeny St, #5
Portland, OR 97214

Raines Whittaker
2325 SE 35th Pl
Portland, OR 97214

Ricky King
7318 SE Division St
Portland, OR 97206

Joseph Van Kleeck
3013 SE Hawthorne Blvd, #301
Portland, OR 97214

Jasmine Wilder
7879 SE Milwaukie Ave
Portland, OR 97202-6118

Grace Keefe
7067 N Dwight Ave
Portland, OR 97203

Lena Adams
3517 SE 76th Ave
Portland, OR 97206

Audrey Janner
3356 NE 77th Ave
Portland, OR 97213

Breelyn Burns
8034 SE Aspen Summit Dr, #239
Portland, OR 97266

Sadie Sack
3947 NE 32nd Ave
Portland, OR 97212

Mark Lewis
8214 SE 76th Pl
Portland, OR 97206

Jon Blandin
8520 N Willamette Blvd
Portland, OR 97203

Ceilidh Kirk
38 NW Davis St, #528
Portland, OR 97209

Derek Klein
3615 W Rose St
Vancouver, WA 98660

Elissa Mendenhall
3826 SE 33rd Ave
Portland, OR 97202

Otis Tucker
2678 Indianola Ave
Columbus, OH 43202

Scott Gilbert
2221 SW 1st Ave, #1525
Portland, OR 97201

Tim Miller
2538 NW Thurman St, #305
Portland, OR 97210

Erin Olivia Bryndis
1926 W Burnside St, #711
Portland, OR 97209

Nia Phillip
15 NW Park Ave
Portland, OR 97209

Taylor Kaplan
4134 North Colonial Ave
Portland, OR 97217

Estelle
339 S Fairmount St
Pittsburgh, PA 15232

Tara Shepersky
35200 Tohl Ave
Nehalem, OR 97131

Hellene Gronda
2199 NW Everett St, #305
Portland, OR 97210

Natalie Porter
8940 NW Skyline Blvd
Portland, OR 97231

Lorin Gabbert
20225 NE Or St
Portland, OR 97024

Claire Barry-Thomas
8738 SE Yamhill St
Portland, OR 97216

Justine E Calcagno
5910 NE Beech St
Portland, OR 97213

Janis Lamberty
604 Pinehurst Dr
Newberg, OR 97132

Maddie Snell
2631 NE 92nd Ave
Portland, OR 97220

Kirsten Heming
131 Daniel Rd
Washougal, WA 98671

Matthew Hilz
6935 N Michigan Ave
Portland, OR 97217

Marisa Cropper
12260 SW Foothill Dr
Portland, OR 97225

Amie Oliver
11414 SE Grant St
Portland, OR 97216

Randy Zasloff
3739 NW Thurman St
Portland, OR 97210

Ashley J
2633 Harris St
Eugene, OR 97405

Lindsey Nicholson
3343 SE Deswell St
Milwaukie, OR 97266

Melisa Crosby
4645 NE 105TH Ave
Portland, OR 97220

Joyce Zhan
715 1/2 N Vendome St
Los Angeles, CA 90026

Kassaundra Lynn
271 W 8th Ave
Eugene, OR 97401

Jane Beebe
1807 NW 32nd Ave
Portland, OR 97210

Tamara Bryan
7045 N Boston Ave
Portland, OR 97217

Stephanie McBarron
1409 SW Dickinson Ln
Portland, OR 97219

Kimberley Neroda
1125 NW 9th Ave, #432
Portland, OR 97209

Anna Li
7020 NE 7th Ave
Portland, OR 97211

Brooke Noli
226 NE Graham St
Portland, OR 97212

CHRISTINE PSYK
2630 Sierra Ln
Hood River, OR 97031

Alyson Berman
6600 SE Division St, #307
Portland, OR 97206

katherine farrell
3639 NW Thurman Street
Portland, OR 97210

Miranda Mattlin
909 SE 12th Ave, #225
Portland, OR 97214

Bonnie Crocker
1711 N Going Ct
Portland, OR 97217

Elizabeth A Nesbitt
6425 SE 15th Ave
Portland, OR 97202

Julia Forsyth
10113 SE Hollywood Ave
Portland, OR 97222

Betsy Peters
850 NE 70th Ave
Hillsboro, OR 97124

Lori
2125 N Webster St
Portland, OR 97217

Eleanore Warner
940 N Shaver St
Portland, OR 97227

Michael Nesbitt
6425 SE 15th Ave
Portland, OR 97202

Dawn Schneider
346 SE 44th Ave
Portland, OR 97215-1007

Andy Escobar
8836 Noeline Ave
Spring Valley, CA 91977

Tracy L. Harness
16703 SE McGillivray Blvd, #215
Vancouver, WA 98683

Terresa White
11414 SE Grant St
Portland, OR 97216

Sharon Grayzel
1828 NW Aspen Ave
Portland, OR 97210

Frederick Cohen
3739 NW Thurman St
Portland, OR 97210

Oliver Binzen
847 NE Killingsworth St
Portland, OR 97211

Cory Gerety
923 NE 24th Ave
Portland, OR 97232

Chelsea Stewart-Fusek
8335 SW 8th Ave
Portland, OR 97219

Kristnh Freestone
20495A S Geiger Rd
Oregon City, OR 97045

Nick Pham
5120 N Interstate Ave, #206
Portland, OR 97217

John Skipp
13466 SE Steele St
Portland, OR 97236

Elena Gardella
4531 SE Belmont St, #204
Portland, OR 97215

Astrid Bloodgood
3630 SE Cesar Chavez Blvd
Portland, OR 97202

Alexa Phillips
4105 Southwest 165th Ave
Beaverton, OR 97078

Olivia Mack
2925 SE 50th Ave
Portland, OR 97206

Allie Marini
2389 NW Schmidt Way, #175
Beaverton, OR 97006

Eli Blackman
3214 NE Brazee St
Portland, OR 97212

Nathaniel Holder
8620 NE Dyer St
Portland, OR 97220

Todd Mustard
601 NE Everett St
Portland, OR 97232

Carol Pinegar
7005 NE Roselawn St
Portland, OR 97218

Kat Sherbo
2850 SW Peaceful Ln
Portland, OR 97239

Davin Kennedy
7617 NW Skyline Blvd
Portland, OR 97229

Julie Glasser
5701 Se Lexington St
Portland, OR 97206

Dale Kirkbride
720 NW Torreyview Dr
Portland, OR 97229

Renata Botelho
1786 NW Larkin Ter
Portland, OR 97229

Christopher C Sanchez-Burton
3930 N Montana Ave
Portland, OR 97227

Kristin Harvey
13200 SE Arista Dr
Milwaukie, OR 97222

Rose Cowing
15560 SE Dana Ave
Portland, OR 97267

Torie Baldwin
1920 NE Wasco St
Portland, OR 97232

Carol Kirkbride
720 NW Torreyview Dr
Portland, OR 97229

Eric Gold
1309 N Killingsworth St, #2
Portland, OR 97217

Dominic Agrifoglio
905 NE Stafford St
Portland, OR 97211

Cammi Vance
810 SE 26th Ave
Portland, OR 97214

Tracy Harness
16703 SE McGillivray Blvd, #215
Vancouver, WA 98683

Megan Wilson
13391 SE Wabash Ave
Portland, OR 97222

Chelsea Rippel
4424 NW BARNES RD
Portland, OR 97210

Arthi Vijaykumar
2207 NE Davis St
Portland, OR 97232

Nathanial Oester
7020 NE 7th Ave
Portland, OR 97211

Laura Ringler
2914 SE Salmon St
Portland, OR 97214

Natalie Jade Torresy
1650 NW 21st Ave
Portland, OR 97209

Tiana Monk
1802 SE 12th Ave, #5
Portland, OR 97214

Tara Wilkinson
3624 SE Yamhill St
Portland, OR 97214

Jean Trygstad
3630 SW Baird St, #1
Portland, OR 97219

Darcie Meihoff
841 S Gaines St, #305
Portland, OR 97239

Ben Koerbel
5409 NE 16th Ave
Portland, OR 97211

Brady Mekertichian
2259 SE 66th Ave
Portland, OR 97215

Sallye Wilkinson
505 NW Greenleaf Rd
Portland, OR 97229-6904

Travis Eri - IBEW Local 125
17200 NE Sacramento St
Portland, OR 97230

Devan Torbert
5131 NE 35th Pl
Portland, OR 97211

Mathew Lauritsen
5606 SE Reedway St
Portland, OR 97206

Alejandra Paz
1825 NE 78th Ave
Portland, OR 97213

Catherine McNeur
3136 NE Davis St
Portland, OR 97232

Dane E Mills
5835 SE Flavel St
Portland, OR 97206

Sarina Sanders
2045 S River Pkwy
Portland, OR 97201

Janani Srinivasan
253 N Broadway, #114
Portland, OR 97227

Yosef Trachtenberg
6314 NE Wygant St
Portland, OR 97218

Rudy
414 SE 13th St
Troutdale, OR 97060

Evelyn Whitlock MD, MPH
8611 SW 41st Ave
Portland, OR 97219

Christie Schaefer
1315 Saint Philip St, #B
New Orleans, LA 70116

Marri
11243 NE Shaver St
Portland, OR 97220-2437

Taylor King
2021 SE Oak St
Portland, OR 97214

Caleb Ohryn
4709 Stone Way N
Seattle, WA 98103

Alana Koscove
1975 NW Evertt St, #307
Portland, OR 97209

Alexandra
3811 N Albina Ave
Portland, OR 97227

Marissa Burns
1101 NE 111th Ave
Portland, OR 97220

Madeline Vincitore
7410 N Willamette Blvd
Portland, OR 97203

Dawn Smallman
1148 SE 50th Ave
Portland, OR 97215

Anja Shjarback
7666 N Peninsular Ave
Portland, OR 97217

Kristen Sartor
126 SE 52nd Ave
Portland, OR 97215

Maggie Burant
5725 N Albina Ave
Portland, OR 97217

Mallory Mead
610 E 5th St
Newberg, OR 97132

Olivia Arredondo
6580 N Greenwich Ave
Portland, OR 97217

Ashleigh Brantingham
4536 NE 85th Ave
Portland, OR 97229

Timothy Wildgoose
4721 NE 79th Ave
Portland, OR 97218

Matthew Gimpelevich
3303 NE 7th Ave
Portland, OR 97212

Silas Covert-Keefe
7611 SE Washington St
Portland, OR 97215

Kai Broach
3615 SE Milwaukie Ave, #3
Portland, OR 97202-3869

Claire Williams
1927 SE 11th Ave
Portland, OR 97124

Ali Himes-Ferris
2011 SE Cypress Ave
Portland, OR 97214

Bridgette Gross
500 NE Sumner St
Portland, OR 97211

Megan Beck
7330 SE Knight St
Portland, OR 97206

Matt McLinden
2634 NE Palazza Way
Hillsboro, OR 97124

Hannah Mohtadi
3737 NW Devoto Ln
Portland, OR 97229

Mary Watkins
2424 SE 78th Ave
Portland, OR 97206

Lauren Simms
2237 SE Oak St
Portland, OR 97214

Jenn Nicole Joslin
13873 SE Beech St
Milwaukie, OR 97222

Tessa Jacobson
5729 N Wilbur Ave
Portland, OR 97217

Cassidy Meinzer-Coleman
1716 SW 173rd Ter
Beaverton, OR 97003

Zachary Schroeder
919 SE 44th Ave, #A
Portland, OR 97215

Jaydra Perfetti
3945 SE 42nd Ave
Portland, OR 97206

Joshua Franco
2362 SW Cactus Dr
Portland, OR 97205

Carmen Pagliari
5622 NE 10th Ave
Portland, OR 97211

Taffney Nichols
2121 Sw Multnomah Blvd
Portland, OR 97219

Micah Dunham
7115 SW Raleighwood Ln
Portland, OR 97225

Nathan Beals
4073 N Borthwick Ave
Portland, OR 97227

Seren Chapin
1808 NE Weidler St
Portland, OR 97232

Nick Pagliari
4110 SE Hawthorne Blvd, #431
Portland, OR 97214

Jim Withington
909 SE 12th Ave
Portland, OR 97214

Tiffany Spahn
1013 SE Cora St
Portland, OR 97202-5020

Alexander Christy
8335 SW 8th Ave
Portland, OR 97219

Jill Reynolds
9925 NE Alton St
Portland, OR 97220

Laura Schneider
1543 Exchange St, #501
Astoria, OR 97103

Cadence Klindt
1975 Olive St
Eugene, OR 97405

Fiona Meier
2119 NE 14th Ave, #2
Portland, OR 97212

Theodora Tsongas
7324 SE Madison St
Portland, OR 97215

Russell Wood
2119 NE 14th Ave, #2
Portland, OR 97212

Muireall Brown
6702 SE 65TH Ave
Portland, OR 97206

Ivy Rose MacNair
13235 SW Whistling Way
Beaverton, OR 97008

Kim Cortes-M.
1578 SE Liberty Ave
Gresham, OR 97080

C Buckner
2723 SE 35th Place
Portland, OR 97202

Fiona Davis
7345 SW 76th Ave
Portland, OR 97223

Qwynci Bowman
925 NW Hoyt St
Portland, OR 97209

Jenifer Bryan
4536 SE 46th Ave
Portland, OR 97206

Michael Goren
3525 SE Taylor St
Portland, OR 97214

Emily Pinkowitz
7011 NE 11th Ave
Portland, OR 97211

Sutherland Carson
1719 SE Locust Ave
Portland, OR 97214

Dianne Ensign
11600 SW Lancaster Rd
Portland, OR 97219

Zachary Hewson
11590 SE 147th Ave
Happy Valley, OR 97086

Sofia Reis
810 NE Couch St, #204
Portland, OR 97232

Emily
1734 NE 53rd Ave
Portland, OR 97213

James Joynt
17850 SE Division St
Portland, OR 97236

Sarah Albritton
4487 NW McLoughlin Dr
Yamhill, OR 97148

Dawn Menken
3734 NE 22nd Ave
Portland, OR 97212

Ethan Hannemann
511 W Evergreen Blvd
Vancouver, WA 98660-3040

Jeff Howard
34 SE 75th Ave
Portland, OR 97215

Sarah Gardner
7060 SW 77th Ave
Portland, OR 97223

Amanda Morrison
11530 SE Harold St
Portland, OR 97266

Derek Smoots
212 NE Fremont St
Portland, OR 97212

Mervin Kurniawan
3538 NW Blackcomb Dr
Portland, OR 97229-8210

Morgan Oyster-Sands
1203 NE Webster St
Portland, OR 97211

Jessica Thomas
9817 NE Irving St, #221
Portland, OR 97220

Tamara Chacon
4515 SE 34th Ave
Portland, OR 97202

Emily Mathew
17682 Stafford Rd
Lake Oswego, OR 97034

Bill Van Bang
2718 N Willis Blvd
Portland, OR 97217

Catherine Overgaard
2323 SW Park Pl, #303A
Portland, OR 97205

Heather Pinney
7107 SW 5th Ave
Portland, OR 97219

Jordyn Siemens
9211 N Chicago Ave
Portland, OR 97203

Spencer Stegeman
5515 SE 31st Ave
Portland, OR 97206

Jonathan Nitcher
5279 NE 21st Ave
Portland, OR 97211-5644

Taylor A Feldman
6805 N Atlantic Avenue
Portland, OR 97217

Joseph Relich
126 SE 52nd Ave
Portland, OR 97215

Ash Livingood
2259 SE 66th Ave
Portland, OR 97215

Amanda Stammer
105 N Holland St
Portland, OR 97217

Luann Pillar
442 SW Valeria View Dr, #301
Portland, OR 97225

Lea Velliquette
7344 SE Ogden St
Portland, OR 97206

Lisa Douangphoumy
4780 SE Milwaukie Ave, #210
Portland, OR 97202

Lisa Hughes
9030 SE Clay St
Portland, OR 97216

Brice Suprenant
5404 SE 68th Ave
Portland, OR 97206

Catherine Clark
1630 SE Rural St, #311
Portland, OR 97202

Nicki Grimm
1725 SW Salmon St, #726
Portland, OR 97205

Daniel Prince
1839 SE 42nd Ave
Portland, OR 97215

Carolyn Riddle
1112 NE 117t Ave
Vancouver, WA 98685

Benjamin Lee
PO Box 220346
Portland, OR 97269

Helena Loftus
7339 SE Milwaukie Ave, #201
Portland, OR 97202

Noah Grunzweig
3945 SE 42nd Ave
Portland, OR 97206

Gretchen Bertman
650 S Lowell St, #637
Portland, OR 97239-4801

Dan Burke
2362 SW Cactus Dr, #3
Portland, OR 97205

Carrie Ivy Byloos
5933 SE Hawthorne Blvd
Portland, OR 97215

Casimir Covert-Keefe
6823 SE Mitchell St
Portland, OR 97206

Tracy Bialis-White
608 NE Mirimar Pl
Portland, OR 97232

Patrick Mojica
2915 SE 18th Ave
Portland, OR 97202

Maria Fitzgerald
3912 SE 28th Ave
Portland, OR 97202

Elizabeth Venable
7914 N Mississippi Ave
Portland, OR 97217

Chandlyr Crum
2885 SE Francis St, #11
Portland, OR 97202

Cornelia Wagner
4005 SE 33rd Ave
Portland, OR 97202

Diane Kern
3132 NE Thompson St
Portland, OR 97212

Melissa White
2728 NE Bryant St
Portland, OR 97211

Corrina Chase
5027 N Lombard
Portland, OR 97203

Lindsay Cogan-Sant
3340 SE Morrison St
Portland, OR 97214

Jared Rose
2372 NW Glisan St
Portland, OR 97210

Nancy Weil
6085 Columbia St
Arch Cape, OR 97102

Rachel Davis
7611 SE Washington St
Portland, OR 97215

C. Meier
2949 SE Yamhill St, #15
Portland, OR 97214

Sharon Hanson
4600 NE 81st Ave
Portland, OR 97218

Melissa Presto
225 SE 74th Ave
Portland, OR 97215

Paige Wyrick
4914 N Albina Ave
Portland, OR 97217

Ben Dickmeyer
1425 SW Harrison St
Portland, OR 97201

Sarah Dunn
1061 NE 9th Ave
Portland, OR 97232

Roger Brown
1948 SW Edgewood Rd
Portland, OR 97201

James Marshall
7344 SE Ogden St
Portland, OR 97206

James Haskell
13050 SE 162nd Ave
Clackamas, OR 97015

Cristian Villaquiran
1928 NW Broadway St
Portland, OR 97232

Virginia Marting
824 N Russet St
Portland, OR 97217

Theodora Tsongas
7324 SE Madison St
Portland, OR 97215

Elena Bensheimer
4650 N Concord Ave
Portland, OR 97217

Mitchell Fennimore
5725 N Albina Ave
Portland, OR 97217

Julia Mapilisan
1810 NE 11th Ave, #6
Portland, OR 97212

Spencer J Thayer
6830 N Columbia Way
Portland, OR 97203

Kayla Plater
2636 SE Main St
Portland, OR 97214

Sofia Lin
1000 SW Vista Ave, #319
Portland, OR 97205

Beth Parmenter
2433 NW Quimby St, #3
Portland, OR 97210

Sasha Strong
825 SE 42nd Ave, #2
Portland, OR 97215

Vinay Prasad
6636 North Wilbur Ave
Portland, OR 97217

Aurora Rupert
2138 NE Halsey St
Portland, OR 97232

Hannah Brown
2132 SW Boundary St
Portland, OR 97239

Marsha Mahon
14740 Gillihan Rd
Portland, OR 97231

Julia Fritz-Endres
33 SE 55th Ave
Portland, OR 97232

Hannah Glaser
6720 SE Tenino St
Portland, OR 97206

Laura Livermore
4725 SE Division St
Portland, OR 97206

Nicolas Weil
3411 NW Thurman St
Portland, OR 97210

Jesse Schmidt
6801 SW 35th Ave
Portland, OR 97219

Brandi Stack
6830 N Colombia Way, #1
Portland, OR 97203

Chiara Jacob
3338 SE 84th Ave
Portland, OR 97266

Hannah Dugan
7935 SE 9th Ave
Portland, OR 97202

Alayna Enos
922 NE 63rd Ave
Portland, OR 97213

Nancy Orr
10322 Northwest Barclay Ter
Portland, OR 97231

Finn Harrity
6735 NE Killingsworth St, #419
Portland, OR 97218

Dani Dennenberg
12916 NE Clackamas St
Portland, OR 97230

Kendall Eby
1402 SE Ash St
Portland, OR 97214

Jaq Kunz
3577 SE Mall St
Portland, OR 97202

Catherine Galpin
7026 N Boston Ave
Portland, OR 97217

Dr. Leah Baker
2930 NW Fairfax Ter
Portland, OR 97210

Dwayne Hedstrom
4823 NE 72nd Ave
Portland, OR 97218

Adam Gaya
4805 NE 16th Ave
Portland, OR 97211

Zella Rayne
725 SE 38th Ave
Portland, OR 97214

Stephanie Michaud
2632 SE 101st Ave
Portland, OR 97266

Kaiti Bestor
1622 SE 32 Pl
Portland, OR 97214

Victoria Lopez
772 NE Autumncreek Way
Beaverton, OR 97006

Jenna Ayers
11924 Northwest Tyler Ct
Portland, OR 97229

Erin Hammons
5027 N Lombard St
Portland, OR 97203

Michael Brooks
805 NE Kane Dr
Gresham, OR 97030

Sophia Kongshaug
1005 SE 14th Ave, #302
Portland, OR 97214

Margot Chirayath
2023 SE Madison St, #4
Portland, OR 97214

Ren Cevallos
7401 SE 87th Ave
Portland, OR 97266

Alexis
6150 SE Carlton St.
Portland, OR 97206-6724

Casey Leger
2330 SE 57th Ave
Portland, OR 97215

Grayson JohansenFlores
2516 SE 87th Ave
Portland, OR 97266

Antonio Zamora
10123 SE Holgate Blvd
Portland, OR 97266

Adrienne Bengtson
2623 Mark Ln
Milwaukie, OR 97222

Leigh Warner
2803 SE 49th Ave
Portland, OR 97206

Kristin Aardsma
10734 ne Skidmore St
Portland, OR 97220

Coy Woods
10215 Se Pine St, #B306
Portland, OR 97216

Danielle Renner
1717 SW Park Ave, #813
Portland, OR 97201

Caz Lee
5125 NE Multnomah St
Portland, OR 97213

MaryJo Andersen
1041 Ne 109th Ave
Portland, OR 97220

Ali Jones
6636 Ne Rodney Ave
Portland, OR 97211

Kira Anderson
7339 SE Milwaukie Ave, #201
Portland, OR 97202

Jeremy Famà
2124 NW 31st Ave, #2
Portland, OR 97210

Haley Nisson
1516 NE Hancock St, #495
Portland, OR 97219-7198

Wren wilder
2923 NE Oregon St
Portland, OR 97232

Joan Long
14695 SW Sandhill Loop, #202
Beaverton, OR 97007

Ren Elias Britton
736 NE Killingsworth Ct
Portland, OR 97211

Emily Paben
19091 Indian Springs Cir
Lake Oswego, OR 97035

Lara Mulvaney
5265 NE 14th Pl
Portland, OR 97211

Matthew Scharr
1625 SW Westwood Dr
Portland, OR 97239

Lee Thomas
1415 N Dekum St, #201
Portland, OR 97217

Bre Kemper
16730 NW Meadow Grass Ct
Beaverton, OR 97006

Mallory Wall-Tweten
3030 SW 4th Ave, #8
Portland, OR 97201

Sonny Sargent
2537 Ne 56th Ave
Portland, OR 97213

Darby Jones
5518 SE Flavel Dr
Portland, OR 97206

Peyton
800 SW Green Ave, #6
Portland, OR 97205

Thomas Pillar
442 SW Valeria View, #301
Portland, OR 97225

Jacob Williams
206 SE 30th Pl
Portland, OR 97214

Lynn Morrow
29750 SW Courtside Dr
Wilsonville, OR 97070

Carolyn Gilchriese
8018 N Seward Ave
Portland, OR 97217

Hailey Saguibo
1001 Molalla Ave
Oregon City, OR 97045

Nick Crawford
2520 SE Tarbell Ave
Milwaukie, OR 97267

Matthew Cooper
3925 SE 31st Ave
Portland, OR 97202

Karin Mohtadi
3737 NW Devoto Ln
Portland, OR 97229

Kate
7315 N Denver Ave
Portland, OR 97217

Cheyne Cumming
5706 NE 25th Ave
Portland, OR 97211

Soren G
9105 SE 32nd Ave, #6
Milwaukie, OR 97222

Alexandra Henrici
3155 S Moody Ave
Portland, OR 97239

Amy Rosenthal
624 NW 20th Ave, #4
Portland, OR 97209

Andrew Jones
1721N Prescott St
Portland, OR 97217

Grace DeBiccari
3267 SE 87th Ave
Portland, OR 97266

Jade Trujillo
5151 SE Holgate Blvd, #305
Portland, OR 97206

Mathew West
10615 SW 42nd Ave
Portland, OR 97219

Kai Kline
6912 N Jersey St
Portland, OR 97203

Kathryn M Midson
2021 SW Main St
Portland, OR 97205-1533

Rebecca Burwell
5633 SE Schiller St
Portland, OR 97206

Camden Boyd
1620 NE Broadway St
Portland, OR 97232

Caitlin Barthold
3005 SE Ankeny St
Portland, OR 97214

Emma Kehn
6404 SE 44th Ave
Portland, OR 97206

Piper Hughes
2516 SE 87th Ave
Portland, OR 97266

Kyle Mc
1653 SE Nehalem St
Portland, OR 97202

Alec Rawson
4828 N Houghton St
Portland, OR 97203

Justin Wright
2361 NW Pettygrove St
Portland, OR 97210

Yasasvini Duvvuri
530 NW 23rd Ave
Portland, OR 97210

Kayla Cosello
5144 SE 85th Ave
Portland, OR 97266

John Remy
1125 NW 9th Ave, #432
Portland, OR 97209

Samantha
2617 E 14th St
The Dalles, OR 97058

Natalie Finkel
1345 SE 87th Ave
Portland, OR 97216

James Goodhouse
7561 N Leavitt Ave
Portland, OR 97203

Krista Reininga
1725 NW 29th Ave
Portland, OR 97210

Kara McMullen
6704 N Mohawk Ave
Portland, OR 97203

Caito Scherr
4302 NE Holman St.
Portland, OR 97218

Avery LeClair
17587 NW Sauvie Island Rd
Portland, OR 97231

Luke Ehrmann
1963 SE Locust Ave
Portland, OR 97214

Jennifer Saunders
1941 NW 31st Ave
Portland, OR 97210

Brianna Algrabeli
7039 N Maryland Ave
Portland, OR 97217

Amanda Breese
9946 N Jersey St.
Portland, OR 97203

Julia Seydel
1504 NE 17th Ave
Portland, OR 97232

Sean DeLawder
705 NE 20TH Ave
Portland, OR 97232

Cole Franko
1730 SE 44th Ave
Portland, OR 97215

Steve Miesen
6275 Holmes St
West Linn, OR 97068

Robert Leger
2330 SE 57th Ave
Portland, OR 97215

Cameron Ladewig
2803 SE 49th
Portland, OR 97206

Irum Jaffri
4735 NE Alberta Ct
Portland, OR 97218

Whitney Blair
500 NE Sumner St
Portland, PO 97211

Desmond Aron
3338 SE 84th Ave
Portland, OR 97266

Fisher Munro
7404 SE Clay St
Portland, OR 97215

Angie Plitch
213 N Beech St
Portland, OR 97227

Mary Anne Joyce
1724 SE 48 Ave
Portland, OR 97215

Anne Zwartjes
9011 SW 42nd Ave
Portland, OR 97219

Amelia Sommer
2906 SE Washington St
Portland, OR 97214

Gina Giampaolo
411 SE 14th Ave, #408
Portland, OR 97214

Darren Larsen
8800 SE Causey Loop, #P206
Milwaukie, OR 97086

Joseph Mostchenski
4724 NE Multnomah St
Portland, OR 97213

Andrew Kidwell
3005 SE Ankeny St
Portland, OR 97214

Jonathan Nash
124 NW 22nd Pl, #3
Portland, OR 97210

Kameron Andromeda
1419 Ne 71st Ave
Portland, OR 97213

Olivia Shull
832 NE Hancock St
Portland, OR 97212

Noah Hanselman
1631 SW Yamhill St
Portland, OR 97205

Jessica Smith
8430 SW Pointer Way, #H
Portland, OR 97225

Allison Davis
2326 SE Ankeny St, #104
Portland, OR 97214

Amy Lestat
3523 SE 63rd Ave
Portland, OR 97206

Deblin McKnight
5205 E Burnside St, #2
Portland, OR 97215

Brianna McArthur
630 NE Laurelhurst Pl
Portland, OR 97232

Tom Jeanne
6623 N Haight Ave
Portland, OR 97217

Katie Ryan
6015 N Haight Ave
Portland, OR 97217

Claire Eskind
2250 NW Kearney St, #203
Portland, OR 97210

Halyna Beksa
1885 NW Quimby St, #618
Portland, OR 97209

Raquel Wigginton
3573 N Overlook Blvd
Portland, OR 97227

Jacob Hoopes
6121 NE 16th Ave
Portland, OR 97211

Skye Estes
555 NW Park Ave #215
Portland, OR 97209-3419

Shannon Henry
9538 N Pier Park Pl
Portland, OR 97203

Cameron Glynn
8430 SW Pointer Way, #H
Portland, OR 97225

John DeVoe
1725 NW 29th Ave
Portland, OR 97210

Morgan Zeller
3316 SE 67th Ave
Portland, OR 97206

Nora Aron
108 SE 71st Ave
Portland, OR 95215

Jennifer Joseph
3746 se haig st
Portland, OR 97202

Gabriella Brill
11590 SE 147th Ave
Happy Valley, OR 97086

Kira Kamrath
2361 NW Pettygrove St
Portland, OR 97210

Elizabeth Uno
325 N Emerson St Apt A
Portland, OR 97217

Velvet Nichols
145 W Berkeley St
Gladstone, OR 97027

Emil Witt
5928 NE 31st Ave
Portland, OR 97211

Daniel Marcantuono
7339 SE Milwaukie Ave, #301
Portland, OR 97202

Thomas Dreier
7037 SW 54th Ave
Portland, OR 97219

Diarmad Bash
7229 SW Cedar Ln
Portland, OR 97225

Amanda Chugg
6841 NE Roselawn St
Portland, OR 97218

Leilani Vandehey
9732 SE 78th Ave
Portland, OR 97222

Bridget Parker
1616 NE 50th Ave
Portland, OR 97213-2148

Alyssa Kirkbride
720 Nw Torreyview Dr
Portland, OR 97229

Ben Ruch
5518 SE Flavel Dr
Portland, OR 97206

Christopher Bryan
4536 SE 46th Ave
Portland, OR 97206

Tanner Montagriff-Peck
1234 SW 18th Ave, #410
Portland, OR 97205

Renee Intlekofer
3640 SW Dosch Rd
Portland, OR 97239

Kelsey Gorman
524 SE 16th Ave
Portland, OR 97214

Ethan Schmunk
9260 SW Washington St
Portland, OR 97225

Max Brumm
6815 SW Capitol Hill Rd, #10
Portland, OR 97219

Cindy Shepard
1315 NW 11th Ave
Portland, OR 97209

Anastasia R. Zankowsky
5525 Southeast 58th Ave
Portland, OR 97206

Leanna Moxley
2953 SE Washington St
Portland, OR 97214

Isaac Carrillo
2132 SW Boundary St
Portland, OR 97239

Cecil Nanrovah
818 N Shaver St
Portland, OR 97227

Timur Crone
3746 SE Haig St
Portland, OR 97202

Jayden Becker
3420 SE 56th Ave
Portland, OR 97206

Jordan Karr
1027 SE 42nd Ave
Portland, OR 97215

Jared Cetz
2805 NE 122nd Ave
Portland, OR 97230

Evan Budnick
1939 NE 102nd Ave
Portland, OR 97220

Annalise Servin
322 NE 76th Ave
Portland, OR 97213

Leo O'Connell
1532 NE 14th Ave
Portland, OR 97232

Sydney Litt
5522 SE 67th Ave
Portland, OR 97206-5314

Kenzi Garner
2206 N Willamette Blvd
Portland, OR 97217

Brooke Parker
4207 SE Woodstock Blvd, #494
Portland, OR 97206

Susan Nolte
17055 NW Springville Rd
Portland, OR 97229

Alix Lunsford
6521 N Atlantic Ave
Portland, OR 97217

Evelyn Tirosh
210 NE Fargo St
Portland, OR 97212

Kindell McIntosh
909 SE 12th Ave
Portland, OR 97214

Greta Hilbourne
2865 NW Savier St
Portland, OR 97210

John Frentress
64 NE Buffalo St
Portland, OR 97211

Christopher Nunn
4931 SE Flavel Dr
Portland, OR 97206

Lindy Anderson
5913 SE Ogden St
Portland, OR 97206

Alexandra Jones
3945 SW Troy St
Portland, OR 97219

Terry Koper
1428 SE Madison St, # 3
Portland, OR 97214

Katie Eiden
9743 N Portsmouth Ave
Portland, OR 97203

Shaunna Steinmetz
4865 SW 160th Ave
Beaverton, OR 97078

Dameon Ordaz
2125 SW Cedar Hills Blvd
Portland, OR 97225

Maraya Massin-Levey
2080 SE Caruthers
Portland, OR 97214

Catherine Kane
839 NW 16th Ave
Portland, OR 97209

Jayden Shuster
1021 NE 33rd Ave
Portland, OR 97232

Kirstin Alavezos
3100 SE Ankeny St, #11
Portland, OR 97214

Joshua Madrid
6924 NW 159th Ave, #206
Portland, OR 97229

Claire Christy-Tirado
5150 S Landing Dr
Portland, OR 97239

Anna
4113 SE Holgate Blvd
Portland, OR 97202

Kent Vandercar
5832 E Burnside St
Portland, OR 97215

Rita Alm
4825 NE Roselawn St
Portland, OR 97218

Haley Dixon
1428 SE Madison St
Portland, OR 97214

Milo Cutts-Carey
130 NE 17th Ave, #3
Portland, OR 97232

Marin
10423 SE Cook Ct
Portland, OR 97222

William Moore
8632 NW Ryan St
Portland, OR 97229

Jahnvi Hastings
6675 SW Raleighwood Ln
Portland, OR 97225

Fritillaria Newman
615 S Palatine Hill Rd
Portland, OR 97107

Lisa Blue
12387 SE Linwood Ave, #H-11
Milwaukie, OR 97222

Jeff McMorine
1962 SE Ladd Ave
Portland, OR 97214

Laura Mar
1315 SE Madison St
Portland, OR 97214-3621

Scott Bolton
2721 NE 37th Ave
Portland, OR 97212

Michael Hernandez
526 NE Graham St
Portland, OR 97212

Machree Mckenna
6211 SE 43rd Ave
Portland, OR 97206

Deana Kovacev
205 Ne Rosa Parks Way
Portland, OR 97211

Sam Gage
1366 N Simpson St
Portland, OR 97217

C.N.E. Corbin
4030 N Vancouver Ave
Portland, OR 97227

Eli Toombs
4207 SE Mason Ln
Milwaukie, OR 97222

Syan Waters
3612 NE 11th Ave
Portland, OR 97212

Christina Braks
2520 SE Tarbell Ave
Portland, OR 97267

Allison Winningstad
424 NE Hazelfern Pl
Portland, OR 97232

Griffin Christensen
2435 NW Northrup St
Portland, OR 97210

Risa Saulino
1920 NW 26th Ave, #229
Portland, OR 97210

Pamela Cameron
2924 NE 28th Ave
Portland, OR 97212

Sanela
2524 NW Savier St, #1
Portland, OR 97210

Amy Crawford
6604 SE Charles St
Milwaukie, IL 97222

Marianne Meese
7335 SW 90th Ave
Portland, OR 97223

Brittany Franco Wilson
2834 NE 66th Ave
Portland, OR 97213

Maggie
629 N Failing St
Portland, OR 97227

Joe Cameron
2924 NE 28th Ave
Portland, OR 97212

Khrizia Velacruz
1544 N Holman St
Portland, OR 97217

Melissa Vinson
445 NE Holland
Portland, OR 97211

Patricia Funk
3205 NE 44th Ave
Portland, OR 97213

Emi Koda
2828 NE Tillamook St
Portland, OR 97212

Spencer Spellman
3614 SE Center St
Portland, OR 97202

Jasmine Morrow
510 Juniper St
Lyons, OR 97358

Erica Parker
3557 NE Hollyrood Ct
Portland, OR 97212

Alicea L Maurseth
327 Northwest Park Ave, #4B
Portland, OR 97209

Joy Damiani
2336 SW Osage St
Portland, OR 97205

Olivia Webster
2943 NE 66th Ave
Portland, OR 97213

Julia Suplee
1125 SE 85TH Ave
Portland, OR 97216

Jenna Cowan
32044 Coburg Bottom Loop Rd
Eugene, OR 97408

Logan Bury
14258 111th NE
Kirkland, WA 98034

Alex W
alex@cascadiacarbon.com

Benjamin Ruch
bjaminruch@gmail.com

Veronica Ramos Dullack
vdullack@gmail.com

LeAnn Pinniger Magee
lepermag@gmail.com

Stephene Mahler
Stepheneemahler@gmail.com

Milo Hensley
milohensley@gmail.com

Cora Kehr
coramckenna19@gmail.com

Cheri Smith
Cherismith95@gmail.com

Miranda Paige
miranda.ppaige@gmail.com

Danny Noonan
noonan.dpj@gmail.com

Angel Lopez
Angel_lopez49@yahoo.com

Nate Stokes
nathan@iuoe701.com

Nevaeh Blair
hheavenbee@gmail.com

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on May 23, 2025, I filed the original of this **NOTICE OF INTENT TO APPEAL**, together with one true and correct copy, with the Land Use Board of Appeals, 201 High Street SE, Suite 600, Salem, Oregon 97301, by certified mail/return receipt requested.

I also certify that on May 23, 2025, I served a true and correct copy of this Notice of Intent to Appeal by first class mail on the persons listed below:

Portland City Attorney's Office
c/o Lauren King, Senior Deputy City Attorney
1221 SW 4th Avenue, Room 430
Portland, OR 97204

As listed in Exhibit 2 with a mailing address

I also certify that on May 23, 2025, I served a true and correct copy of this Notice of Intent to Appeal by email on the persons identified with only an email address in Exhibit 2.

DATED: May 23, 2025



David J. Petersen, OSB No. 034220
Tonkon Torp LLP
1300 SW Fifth Avenue, Suite 2400
Portland, OR 97201
503-221-1440

Attorneys for Petitioner