

From: [Oliver Orjiako](#)
To: [Jeffrey Delapena](#)
Subject: FW: Resolution No. 2025-03-xx
Date: Friday, April 4, 2025 4:10:18 PM
Attachments: [image001.png](#)
[Ltr to Chair Sue Marshall & Council Members.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Jeff,

FYI. For the comp plan index of record. Thanks.



OLIVER ORJIAKO
Director
COMMUNITY PLANNING

564.397.2280



From: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Sent: Friday, April 4, 2025 3:47 PM
To: Sue Marshall <Sue.Marshall@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>
Cc: Christine Cook <Christine.Cook@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; James D. Howsley <jamie.howsley@jordanramis.com>; Ezra L. Hammer <Ezra.Hammer@jordanramis.com>
Subject: Resolution No. 2025-03-xx

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Please find attached a letter of today's date from Jamie Howsley. Please confirm receipt.

Thank you,
Darlene



Darlene Ferretti | Legal Assistant

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Portland Metro | Bend | Vancouver WA

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VIA EMAIL ONLY

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Clark County Council
Vancouver, Washington

Re: Resolution No. 2025-03-xx

Dear Chair Marshall and Council Members:

If the Clark County Council adopts Resolution No. 2025-03-xx as currently written, it will serve to severely degrade the long-term economic health of the cities of La Center and Ridgefield. Additionally, despite your wishes to the contrary, it will not slow the pace of urbanization and economic growth along the I-5 corridor. That growth will continue, likely at an accelerated pace, and Clark County will receive none of the financial benefits associated with that growth. To wit, if the Clark County Council adopts Resolution No. 2025-03-xx, it will increase the unregulated urbanization of resource land and financially harm La Center, Ridgefield, and Clark County. For this reason, we strongly recommend that you reverse course and do not adopt Resolution No. 2025-03-xx.

La Center – Preferred Growth Strategy

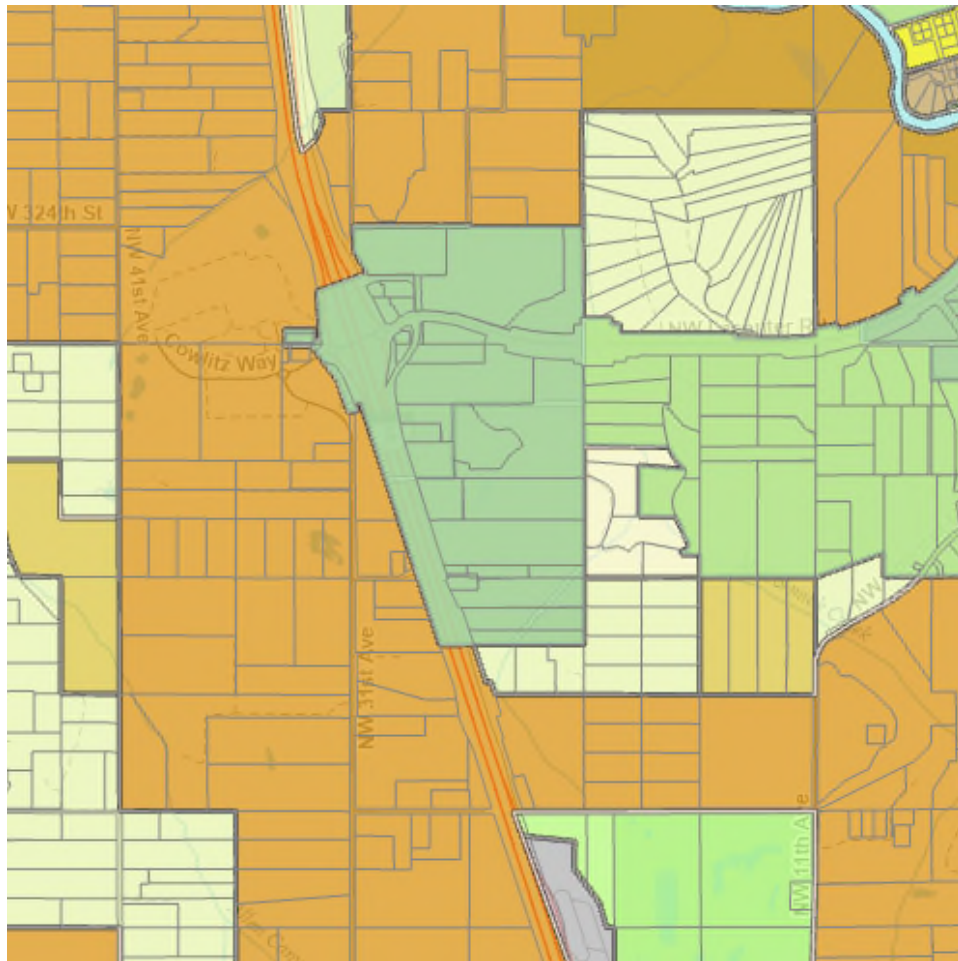
La Center wishes to grow in a manner that can take advantage of the I-5 Corridor and facilitate revenue generating businesses (i.e. commercial and industrial uses) in the areas immediately surrounding Exit 16. Importantly, the lands near Exit 16 are most appropriate for job growth as they are connected to the County's most important transportation corridor, served by municipal utilities, and relatively flat.

In recognition of this fact, the La Center City Council voted to advance two DEIS alternatives that reflect this desire. Following that, the Clark County Council accepted the DEIS alternatives and voted in December of 2024 to conduct environmental analysis consistent with the alternatives.

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As illustrated below in Exhibit 1, all of the land surrounding Exit 16 is designated as agricultural (i.e. resource) under the Clark County zoning code (agricultural land is represented in the orange brown color on the map). This is despite the fact that the supposed agricultural land currently supports a casino, retail stores, and the largest parking structure in the County.

Exhibit 1



Ridgefield – Preferred Growth Strategy

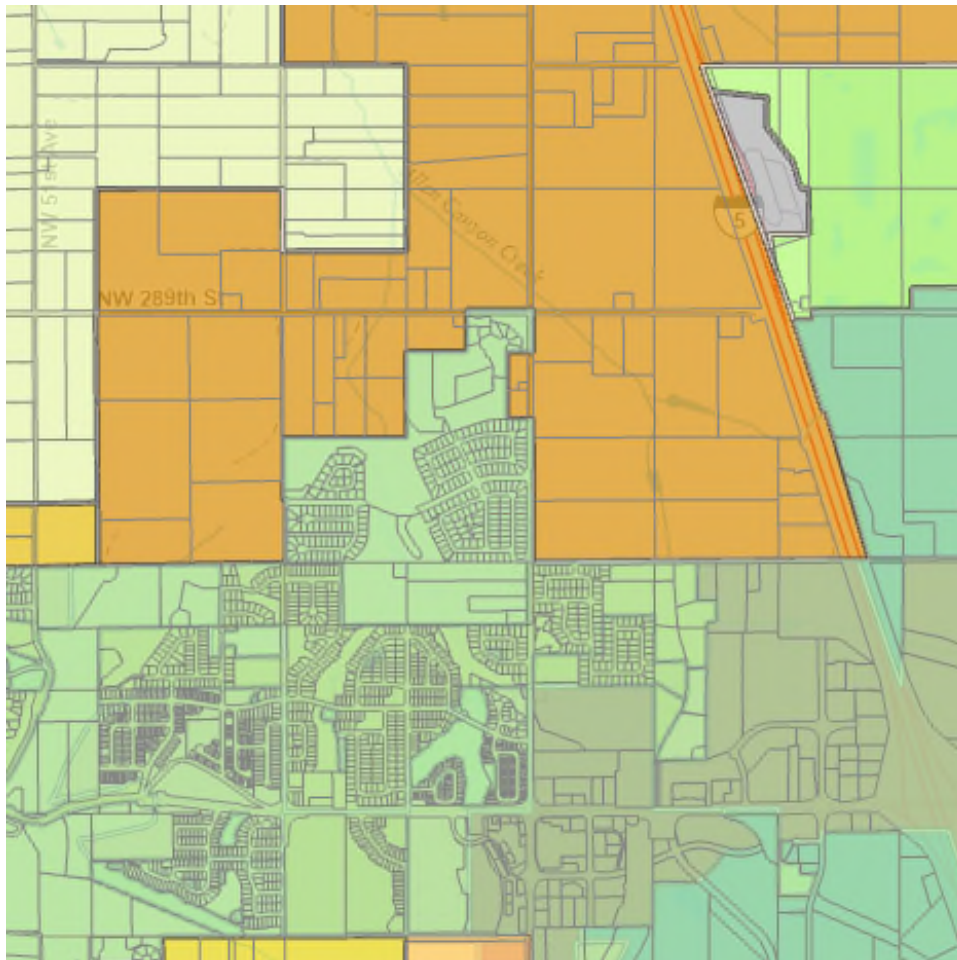
Like La Center, Ridgefield also wishes to grow in a manner that can take advantage of the I-5 Corridor and facilitate commercial and industrial uses in the areas immediately south of Exit 16.

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In recognition of this fact, the Ridgefield City Council voted to advance two DEIS alternatives that reflect this desire. Following that, the Clark County Council accepted the DEIS alternatives and voted in December of 2024 to conduct environmental analysis consistent with the alternatives.

As illustrated below in Exhibit 2, all of the land surrounding Exit 16 is designated as agricultural under the Clark County zoning code. This is despite the fact that this land is fully urbanized and is surrounded by residential development, commercial uses, and the I-5 Corridor.

Exhibit 2



Despite the fact that the land surrounding Exit 16 is characterized by urban growth, neither La Center nor Ridgefield can expand their Urban Growth Area (UGA) boundaries to include

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agriculturally zoned land. In order to allow the cities to expand their UGAs pursuant to the approved DEIS alternatives and include the land around Exit 16 in municipal boundaries, Clark County must “de-designate” the resource land and zone it as something else.

Clark County can only engage in the de-designation process as part of a comprehensive plan update process, which happens once every 10 years. Additionally, in order to de-designate agricultural lands and bring them into the La Center or Ridgefield UGAs, Clark County “must conduct a comprehensive countywide analysis” (WAC 365-190-050(1)).

This issue was brought to the County’s attention beginning in June of 2024. In recognition that a countywide resource land study was needed to support the Camas, La Center, and Ridgefield DEIS alternatives, the Clark County Council voted to conduct the study in December of 2024.

Despite this vote and its importance for the long-term economic health of La Center and Ridgefield, the Clark County Council is currently considering Resolution No. 2025-03-xx, which would overturn the decision to conduct the countywide resource land study.

This means that La Center and Ridgefield would be unable to expand their UGAs around Exit 16 and the cities’ attempts to grow in a manner consistent with current urbanization patterns and provide a stable economic framework for existing and future residents would be thoroughly stifled.

Members of the County Council have indicated that they do not wish to conduct the countywide resource land study because it may lead to the development of farmland. However, as is evident by the fact that the County still designates the Cowlitz Indian Tribe Reservation as resource land – despite the fact that it includes the aforementioned casino, retail stores, and the largest parking structure in the County – designation alone will not prevent urbanization. In fact, if the County Council prevents the cities of La Center and Ridgefield from growing consistent with the DEIS alternatives, it is highly likely that the land surrounding Exit 16 will urbanize at a far faster pace and in a manner that deprives Clack County of any revenue associated with said urbanization.

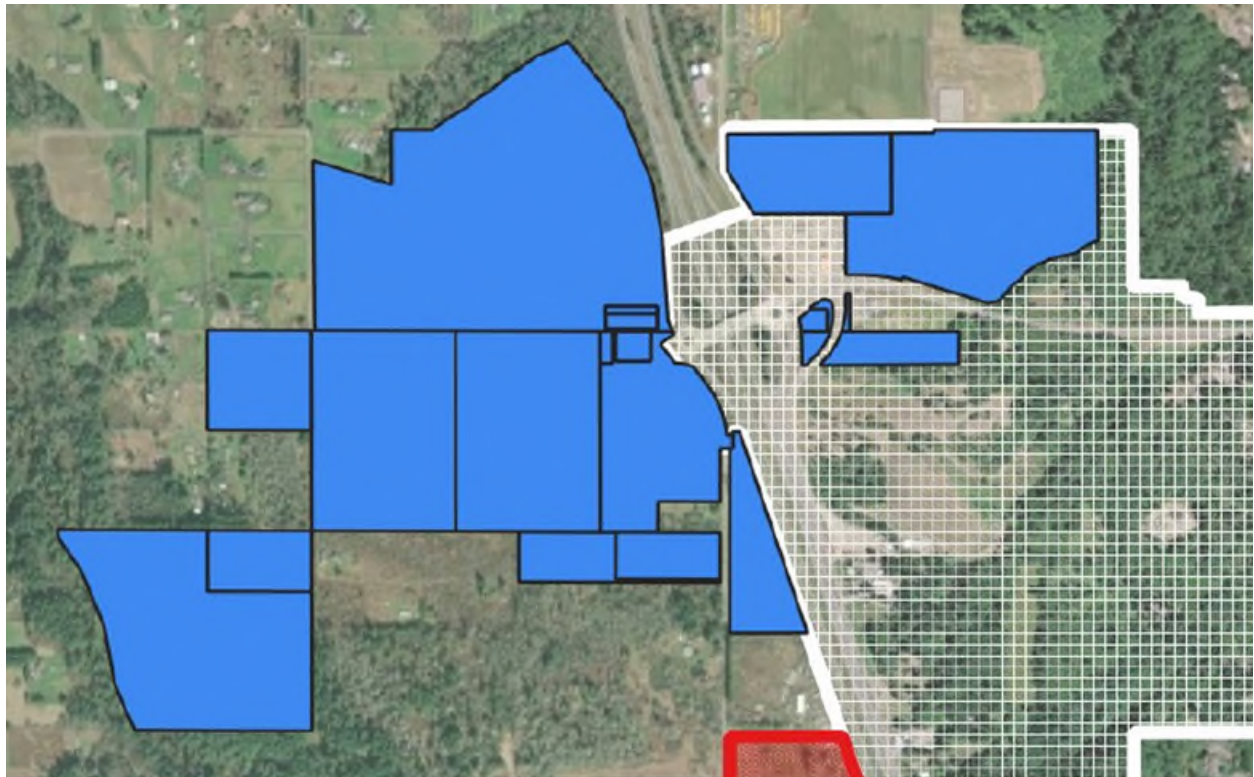
HB 1039 (2025) has passed both houses of the Washington State Legislature. HB 1039 permits cities to expand urban governmental services beyond city and UGA limits to property within a federally recognized Indian Tribe's jurisdiction that abuts city's boundaries. The City of La Center has expanded its sewer system to the eastern edge of the Cowlitz Indian Tribe Reservation and has plans in place to provide the Reservation with sewer service. This

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means that if La Center is not able to implement one of their approved DEIS alternatives, the city will have no choice but to rely on the provision of sewer services in order to address its economic needs.

Simply put, if the County Council reneges on its commitment to conduct the countywide resource land study, the Cowlitz Tribe will be heavily incentivized to take the land surrounding Exit 16 into trust and add it to the Reservation. As shown below in the blue area on Exhibit 3, the Cowlitz Tribe has already brought significant land – on both sides of the I-5 Corridor into trust.

Exhibit 3



Quil Ceda Village in the Tulalip Indian Reservation provides a clear template of what will happen if La Center and Ridgefield are unable to expand into the area surrounding Exit 16. In that case, the Tualip Tribes recognized obvious market demand, took advantage of the reservation's proximity to the I-5 corridor, and developed a thriving commercial center that includes the Seattle Premium Outlets with 483,000 square feet of retail space. The mall, is a premier shopping and dining destination in the Seattle region and boasts top brands such as

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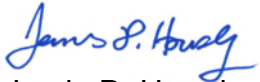
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Nike, Crocs, and Levi's. In addition to the mall, the Reservation also includes a Walmart, Home Depot, and Cabelas, which collectively serve as a driver of economic growth in the region. However, none of this economic benefit accrues to Snohomish County, because the land on which the mall and other businesses sit is not on the county's tax roles.

The same dynamic will undoubtedly unfold in Clark County if the Clark County Council fails to stand with its cities and conduct the countywide resource land study.

Sincerely,

JORDAN RAMIS PC



Jamie D. Howsley

Admitted in Oregon and Washington

cc: Chris Cook, Christine.Cook@clark.wa.gov
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Jose Alvarez, Jose.Alvarez@clark.wa.gov