From:	Jeffrey Delapena
To:	Darlene.Ferretti@jordanramis.com
Cc:	Oliver Orjiako; Jose Alvarez; James D. Howsley; Rebecca Messinger
Subject:	FW: Letter to Clark County re Characterized by Urban Growth
Date:	Thursday, October 1, 2026 4:42:00 PM
Attachments:	image001.png image002.png Letter to Clark County re Characterized by Urban Growth 10.1.2026.pdf image003.png image004.png image005.png image006.png

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Hello Darlene,

Thank you very much for submitting Jordan Ramis' comments related to the 2025 Comprehensive Plan update.

Confirming this has been received and will be added to the Comprehensive Plan Index of Record.

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Darlene Ferretti <Darlene.Ferretti@jordanramis.com>
Sent: Thursday, October 1, 2026 4:40 PM
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: 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>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; James D. Howsley <jamie.howsley@jordanramis.com>
Subject: Letter to Clark County re Characterized by Urban Growth

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 see attached letters dated today from Mr. Howsley. Please confirm receipt.

Thank you,
Darlene

Darlene Ferretti | Legal Assistant
Direct: (503) 598-5551

JORDAN RAMIS

1211 SW Fifth Ave, Suite 2700
Portland OR 97204

jordanramis.com | (888) 598-7070
Portland | Bend | Vancouver WA



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JORDAN RAMIS

Jamie D. Howsley
jamie.howsley@jordanramis.com
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October 1, 2026

VIA EMAIL

Clark County Community Planning
c/o Oliver Orjiako, Community Planning Director
1300 Franklin Street
Vancouver, WA 98660
Email: oliver.orjiako@clark.wa.gov
comp.plan@clark.wa.gov

Re: 2025 Comprehensive Plan Periodic Update – Supplemental Submission in Support of Site-Specific Request: APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000 (SE 283rd Avenue); Inclusion in City of Camas UGA; AG to Urban Low Density Residential / AG-20 to Single Family Residential (R1-5)

Dear Mr. Orjiako:

I. Introduction

This office represents the owners of eighteen parcels in unincorporated Clark County, identified as Assessor parcel numbers 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000 (collectively, the "Property"). On January 17, 2023, we submitted a site-specific request asking Clark County (the "County") to (1) include the Property in the City of Camas urban growth area ("UGA") or the City of Washougal UGA; (2) change the Property's Comprehensive Plan designation from Agriculture (AG) to Urban Low Density Residential (UL). That request is attached as Exhibit A. We now also request that, (3) Clark County changes the zoning designation from Agriculture-20 (AG-20) with the Urban Holding overlay to Single Family Residential (R1-5) with no overlay to comport with the allowed zones of the Urban Low Density Residential Comprehensive Plan designation.

We submit this letter and the enclosed exhibits to be included in the record as part of that request. They show that the Property is "characterized by urban growth" under the Growth Management Act, chapter 36.70A RCW. The Property is bordered on its West side by the Camas UGA and the City of Camas. It is located entirely within the Camas Water District, and Camas School District, and borders the Camas Wastewater District. The Property is located only 3,000 feet from Camas High School and less than 2,000 feet from Woodburn Elementary in an area that is fully urbanized. The following exhibits are enclosed:

- Exhibit A – Site-Specific Request Letter dated January 17, 2023.
- Exhibit B – GIS Fact Sheet for the Property.

II. The Property

The Property consists of eighteen parcels arranged in a rectangle in unincorporated Clark County, located along SE 283rd Avenue from SE Nourse Road to SE 7th Street. The Property is bordered on its West side by the Camas UGA and the City of Camas. Current and historical aerial images of the Property, along with maps of the Camas and Washougal UGA boundaries, are included in the GIS Fact Sheet attached as Exhibit B. Each parcel is designated Agriculture (AG) on the Comprehensive Plan map and zoned Agriculture-20 (AG-20), except for a small portion of APN 178614000 that is designated Single Family High (SFH) and zoned R1-6, as well as one parcel, 178659000, that is currently zoned Rural-10 (R-10). The parcels are:

- APN 178613000 – no situs address; 5 acres;
- APN 178657000 - no situs address; 5 acres;
- APN 178658000 - no situs address; 5 acres;
- APN 178659000 - no situs address; 5 acres;
- APN 178660000 - no situs address; 5 acres;
- APN 178661000 - no situs address; 5 acres;
- APN 178662000 - no situs address; 5 acres;
- APN 178663000 - no situs address; 5 acres;
- APN 178664000 - no situs address; 5 acres;
- APN 178665000 - no situs address; 5 acres;
- APN 178666000 - no situs address; 5 acres;
- APN 178667000 - no situs address; 5 acres;
- APN 178668000 - 1115 SE 283rd Avenue, Camas, 98607; 5 acres;
- APN 178669000 - no situs address; 5 acres;
- APN 178670000 - no situs address; 5 acres;
- APN 178671000 - no situs address; 5 acres;
- APN 178626000 - 1219 SE 283rd Avenue, Camas, 98607; 2 acres; and,
- APN 178614000 - 1403 SE 283rd Avenue, Camas, 98607; 79.2 acres.

  Total 161.2 acres

The Property is surrounded by urban development to the west and south, including the Camas High School campus just down the road, and several large residential subdivisions in close proximity. Nearby parcels are zoned for commercial as well as dense residential uses. Because of this surrounding development, it is functionally difficult, if not impossible, to use the Property for commercially viable agriculture.

III. Why the Property is Characterized by Urban Growth

Under the Growth Management Act, land is "characterized by urban growth" if it has urban growth on it, or if it is "located in relationship to an area with urban growth on it as to be appropriate for urban growth." RCW 36.70A.030(49). The Property meets this standard. It is bordered on its west side by the Camas UGA, it is already within the water, and school districts that serve the City, and it sits in an area that is urbanized.

A. The Property borders the Camas UGA.

As shown in the GIS Fact Sheet (Exhibit B), the Property borders the Camas UGA to the west and the City of Camas to the south. It is effectively an island of “agricultural” land inside the UGA. Including the Property would not expand the UGA into rural or resource land or create leapfrog development. It would simply fill a gap in the existing boundary.

B. Urban services are available to the Property.

The Growth Management Act defines "urban governmental services" to include storm and sanitary sewer, domestic water, fire and police protection, and public transit. RCW 36.70A.030(48). Clark County GIS data show that these services already serve or are available to the Property (Exhibit B):

- Sanitary sewer: The property is adjacent to the Camas Sewer District to the south.
- Water: All tax lots are located entirely within Camas Water District.
- Stormwater: The County's storm sewer system extends along the length of SE 283rd Avenue bordering the property.
- Fire: The Property is within the Camas-Washougal Fire Department jurisdiction and service area.
- Schools: All tax lots are located entirely within the Camas School District; The Property is located only 3,000 feet from Camas High School and less than 2,000 feet from Woodburn Elementary.
- Transit: C-TRAN bus service is available on NE 3rd Avenue, approximately 1.5 miles away.

Because the Property is already within the water and school districts that serve the City of Camas, it falls squarely within the areas the GMA prioritizes for urban growth: "areas already characterized by urban growth that have adequate existing public facility and service capacities to serve such development," or, at a minimum, areas "that will be served adequately by a combination of both

existing public facilities and services and any additional needed public facilities and services." RCW 36.70A.110(3).

C. The surrounding area is developing at urban intensity.

The Property is surrounded by urban development. The Property is located only 3,000 feet from Camas High School and less than 2,000 feet from Woodburn Elementary, and the Property is also in close proximity to several large residential subdivisions. Nearby parcels are zoned for commercial and dense residential uses.

This is the kind of development the GMA describes as urban growth: the “intensive use of land for the location of buildings, structures, and impermeable surfaces.” RCW 36.70A.030(49). New homes, streets, parks, and commercial centers surround the Property.

IV. Conclusion

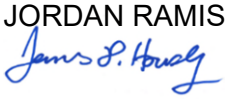
The Property is bordered on its west side by the Camas UGA and to the south by the City of Camas. It is located entirely within the Camas Water District and the Camas School District, and borders the Camas Wastewater District. The Property is located only 3,000 feet from Camas High School and less than 2,000 feet from Woodburn Elementary in an area that is continually urbanizing. Several large subdivisions are less than a mile away next to a large residential subdivision, in an urban area, as the County's GIS data (Exhibit B) shows.

For these reasons, we respectfully request that the County (1) include the Property in the City of Camas urban growth area ("UGA") or the City of Washougal UGA; (2) change the Property's Comprehensive Plan designation from Agriculture (AG) to Urban Low Density Residential (UL); and, (3) Clark County changes the zoning designation from Agriculture-20 (AG-20) with the Urban Holding overlay to Single Family Residential (R1-5) with no overlay to comport with the allowed zones of the Urban Low Density Residential Comprehensive Plan designation.

Please include this letter and its exhibits in the record for the 2025 Comprehensive Plan Periodic Update. Thank you for your consideration.

Sincerely,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington

Exhibits:

A – Original Site-Specific Request dated January 17, 2023.

B – GIS Fact Sheet.

JORDAN RAMIS

Jamie D. Howsley
jamie.howsley@jordanramis.com
WA Direct Dial: (360) 567-3913
OR Direct Dial: (503) 598-5503

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T (503) 598-7070
F (503) 598-7373

January 17, 2023

Clark County Board of County Council
c/o Oliver Orjiako, Community Planning Director
Clark County
1300 Franklin St.
Vancouver, WA 98660
E-mails: Oliver.Orjiako@clark.wa.gov, Rebecca.Messinger@clark.wa.gov

Re: ***Site-Specific UGA Expansion Request – Westpark Communities***

Dear Chair Bowerman, Councilors Belkot, Marshall, Medvigy, and Yung:

Our office represents Westpark Communities ("Westpark") in regard to real property located east of SE 283rd Avenue in Camas, specifically the following Assessor's parcels (the "Property"):

178614000	178669000	178670000	178671000	178664000	178665000
178666000	178667000	178660000	178661000	178662000	178663000
178613000	178657000	178658000	178659000	178668000	178626000

This letter is written to respectfully request that Clark County (the "County") approve the expansion of either the Washougal or Camas Urban Growth Areas (UGA) to include the Property.

Letters from each of the property owners are included with this request authorizing Jordan Ramis PC to represent their request for inclusion into the UGA. A complete list of the property owners is attached to this request.

The vast majority of the Property currently has the Comprehensive Plan designation of Agriculture (AG) and is zoned AG-20. A small portion of parcel 178614000 is located west of SE 283rd Ave. and is designated Urban Low Density Residential (UL) with the Urban Holding overlay. This small portion of parcel 178614000 is zoned R1-6.

This Site-Specific Request is submitted for consideration during the current Comprehensive Plan Periodic Update 2025 (the "2025 Plan") in compliance with Clark County Unified Development Code (CCC) 40.560.010. We respectfully request the County include the Property in the UGA during the current Comprehensive Plan update process and change the Comprehensive Plan designation to UL in order to provide the land necessary to meet the housing needs of Camas, Washougal, and Clark County residents.

We have attached the following exhibits for reference and additional support for this request:

Exhibit A – Map Identifying the Property

Exhibit B – List of Property Owners

Exhibit C – Letters of Authorization from Property Owners

Copies of this Site-Specific Request have been submitted to the City of Camas and the City of Washougal for their consideration. Once the 2025 Plan update schedule is finalized, we intend to submit a detailed narrative for this request addressing the criteria of the Growth Management Act (GMA), CCC, Clark County's 20-Year Comprehensive Plan, and the municipal codes and Comprehensive Plans of the Cities of Camas and Washougal as they relate to this request to expand the UGA.

Thank you for your consideration of this request.

Very truly yours,

JORDAN RAMIS PC

Jamie D. Howsley
Admitted in Oregon and Washington

cc: Client
Keenan Ordon-Bakalian, Jordan Ramis PC
Dave Scott, City of Washougal, David.Scott@cityofwashougal.us
Mitch Kniepp, City of Washougal, Mitch.Kneipp@cityofwashougal.us
Doug Quinn, City of Camas, DQuinn@cityofcamas.us
Alan Peters, City of Camas, APeters@cityofcamas.us

Exhibit A
Map Identifying the Property

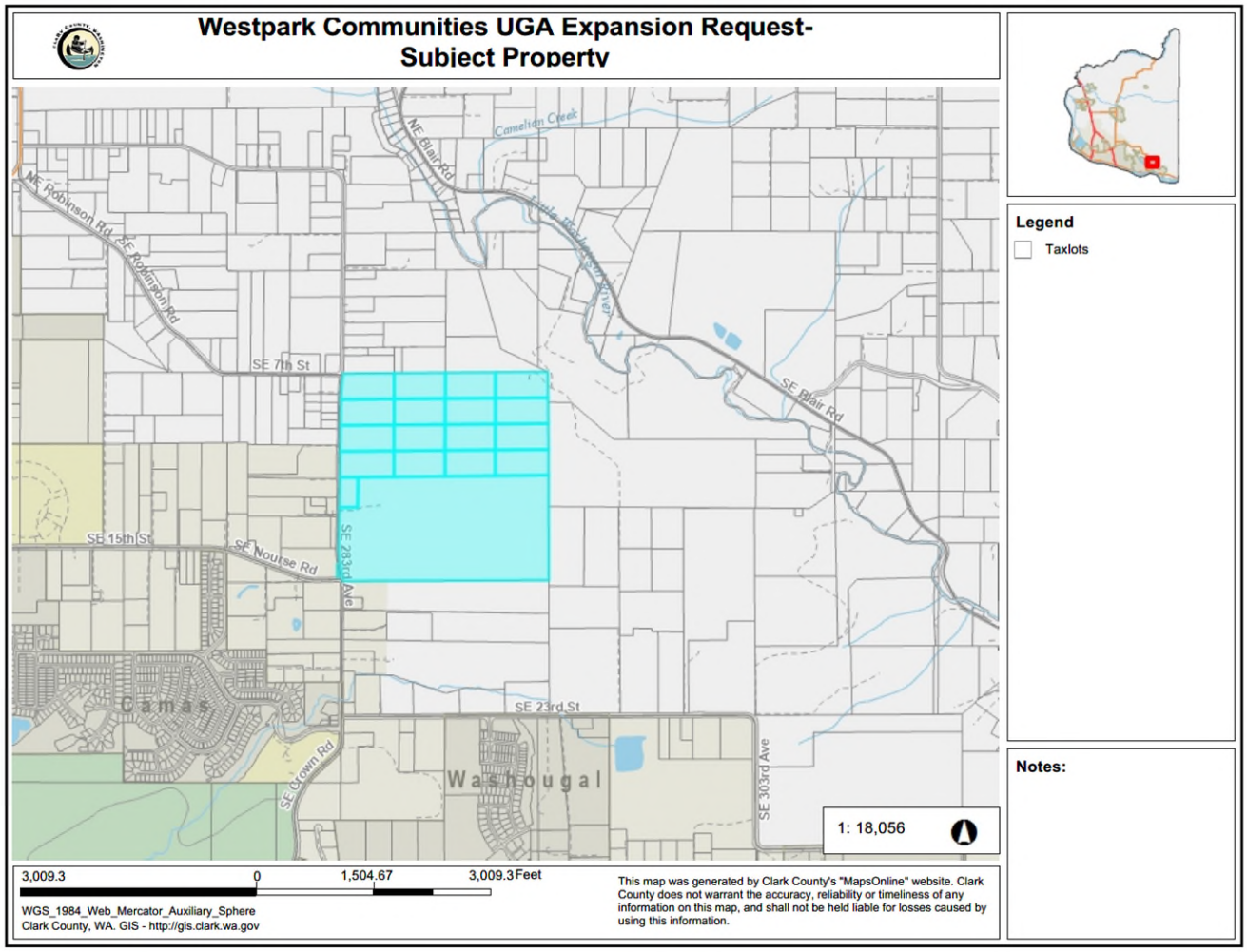


Exhibit B
List of Property Owners

JORDAN RAMIS

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

List of Property Owners for Subject Property

1. **Elizabeth and Justin Boyer:** 1219 SE 283rd Avenue, Camas, WA 98607 (APN 178626000)
2. **Cyndi and Aaron Meyers:** 1115 SE 283rd Avenue, Camas, WA 98607 (APN 178668000)
3. **Collette Minturn (Irene Nevin G 1/2 Interest):** 1403 SE 283rd Avenue, Camas, WA 98607 (APN 178614000)
4. **Sandra and Robert Nevin:** APNs 178669000, 178670000, 178671000, and 178667000
5. **Robert Nevin (Nevin Trust):** APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, and 178666000

Exhibit C
Letters of Authorization from Property Owners

JORDAN RAMIS

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

LETTER OF AUTHORIZATION

I, Robert B Nevin, am the Trustee for the Robert Harold Nevin Jr. Trust (the "Trust"). The Trust is the owner of record for the real property located at Assessors Tax Parcel Nos. 178813000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, and 178666000 (the "Property"). I hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County approve the expansion of either the Washougal or Camas Urban Growth Areas (UGA) to include the Property.

I expressly acknowledge and agree that as of the effective date of this document, Jordan Ramis PC **does not** represent myself or the Trust in any capacity and that there is **no attorney-client relationship** between Jordan Ramis PC and myself or the Trust.

Robert Harold Nevin Jr. Trust

By: Robert B Nevin POA
Name: Robert B Nevin
Title: Son - POA
Date: 1-10-2023

56354-80942 4877-9920-2120.5

JORDAN RAMIS

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

LETTER OF AUTHORIZATION

We, Sandra and Robert Nevin ("Nevin"), are the owners of record for the real property located at Assessors Tax Parcel Nos. 178669000, 178670000, 178671000, and 178667000 (the "Property"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County approve the expansion of either the Washougal or Camas Urban Growth Areas (UGA) to include the Property.

Nevin expressly acknowledges and agrees that as of the effective date of this document, Jordan Ramis PC **does not** represent Nevin in any capacity and that there is **no attorney-client relationship** between Jordan Ramis PC and Nevin.

Sandra Nevin

Sandra Nevin

Date: 1-10-23

Robert Nevin

Date: 1-10-23

JORDAN RAMIS

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

LETTER OF AUTHORIZATION

We, Cyndi and Aaron Myers ("Myers"), are the owners of record for the real property located at 1115 SE 283rd Avenue, Camas, WA 98607 (Assessors Tax Parcel No. APN 178668000) (the "Property"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County approve the expansion of either the Washougal or Camas Urban Growth Areas (UGA) to include the Property.

Meyers expressly acknowledges and agrees that as of the effective date of this document, Jordan Ramis PC **does not** represent Meyers in any capacity and that there is **no attorney-client relationship** between Jordan Ramis PC and Meyers.

Cyndi Myers

Cyndi Myers

Date: 1/10/23

Aaron Myers

Aaron Myers

Date: 1-10-23

JORDAN RAMIS

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

LETTER OF AUTHORIZATION

I, Collette Minturn, am an owner of record for the real property located at 1403 SE 283rd Avenue, Camas, WA 98607 (Assessors Tax Parcel No. APN 178614000) (the "Property"). I hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County approve the expansion of either the Washougal or Camas Urban Growth Areas (UGA) to include the Property.

I expressly acknowledge and agree that as of the effective date of this document, Jordan Ramis PC **does not** represent me in any capacity and that there is **no attorney-client relationship** between Jordan Ramis PC and myself.

Collette Minturn

Collette Minturn

Date: 1/9/23

56354-80942 4869-9503-0124.2

JORDAN RAMIS

PACWEST, 27th Floor
1211 SW Fifth Avenue
Portland, OR 97204
T (503) 598-7070
F (503) 598-7373

LETTER OF AUTHORIZATION

We, Elizabeth and Justin Boyer ("Boyer"), are the owners of record for the real property located at 1219 SE 283rd Avenue, Camas, WA 98607 (Assessors Tax Parcel No. APN 178626000) (the "Property"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County approve the expansion of either the Washougal or Camas Urban Growth Areas (UGA) to include the Property.

Boyer expressly acknowledges and agrees that as of the effective date of this document, Jordan Ramis PC **does not** represent Boyer in any capacity and that there is **no attorney-client relationship** between Jordan Ramis PC and Boyer.

Elizabeth Boyer

Elizabeth Boyer

Date: 1/10/2023

Justin Boyer

Justin Boyer

Date: 1/10/23

56304-00942 4879-4401-0650.1

APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000

City: Camas
Property addresses: 1403 SE 283rd Avenue, Camas, 98607; 1219 SE 283rd Avenue, Camas, 98607; 1115 SE 283rd Avenue, Camas, 98607; no situs address

Current comprehensive plan designation: AG
Current zoning plan designation: AG-20
Requested comprehensive plan designation: Urban Low Density Residential
Requested zoning plan designation: Single Family Residential (R1-5) (no overlay)

Existing Urban Services

- Sewer – The property is adjacent to the Camas Sewer District to the south.
- Water – All tax lots are located entirely within Camas Water District.
- Stormwater – system installed along the length of SE 283rd Avenue bordering property.
- Transportation – does not have direct access to C-Tran bus routes; however, ~1.5 miles to downtown Camas which has C-Tran bus routes.
- Schools / School Districts – All tax lots are located entirely within the Camas School District; The Property is located only 3,000 feet from Camas High School and less than 2,000 feet from Woodburn Elementary.
- Located within Camas-Washougal Fire Department jurisdiction and service area.

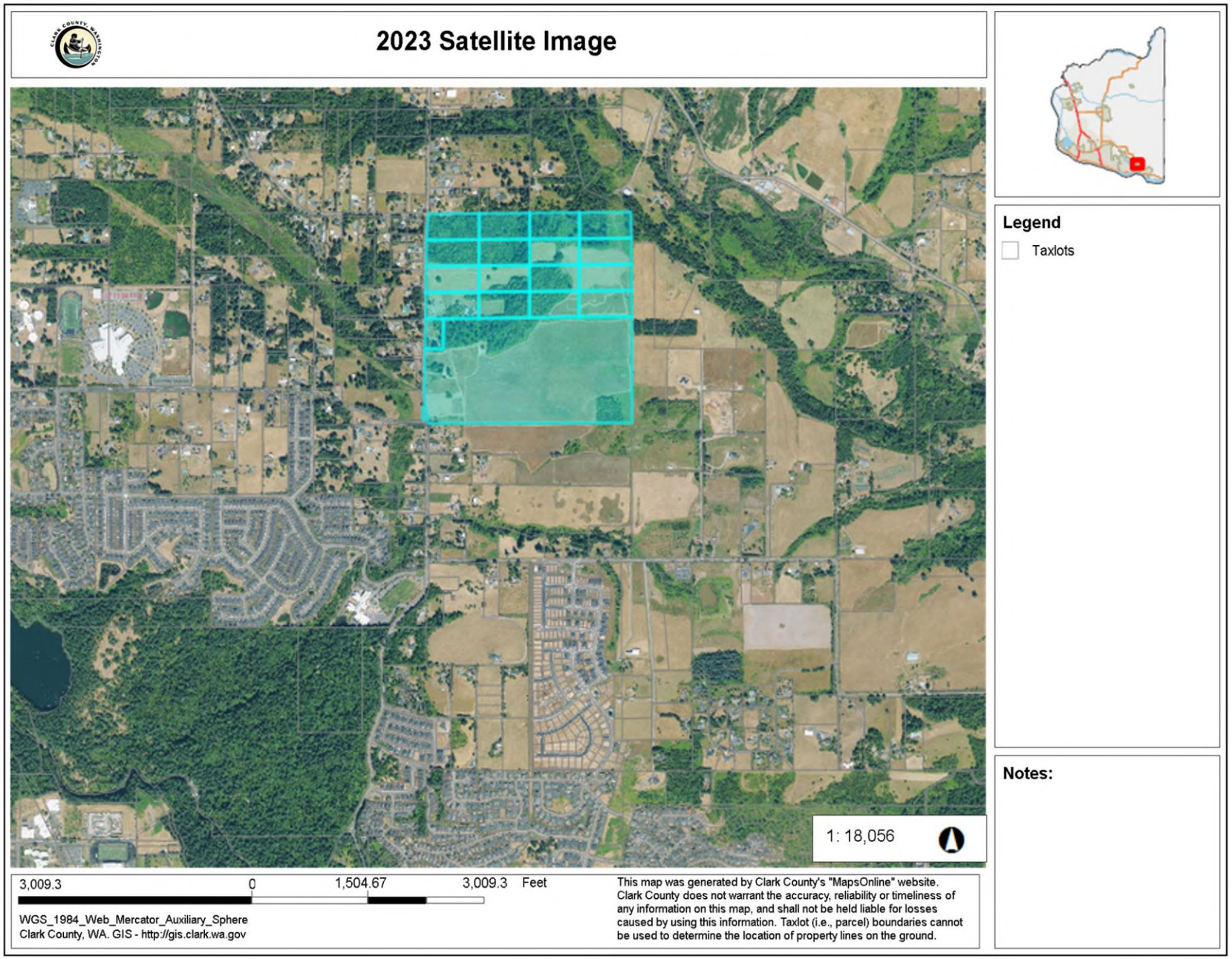
Proximity and Contiguity to UGA

The parcels border the Camas UGA to the west and south and are less than half a mile from the Washougal UGA to the south.

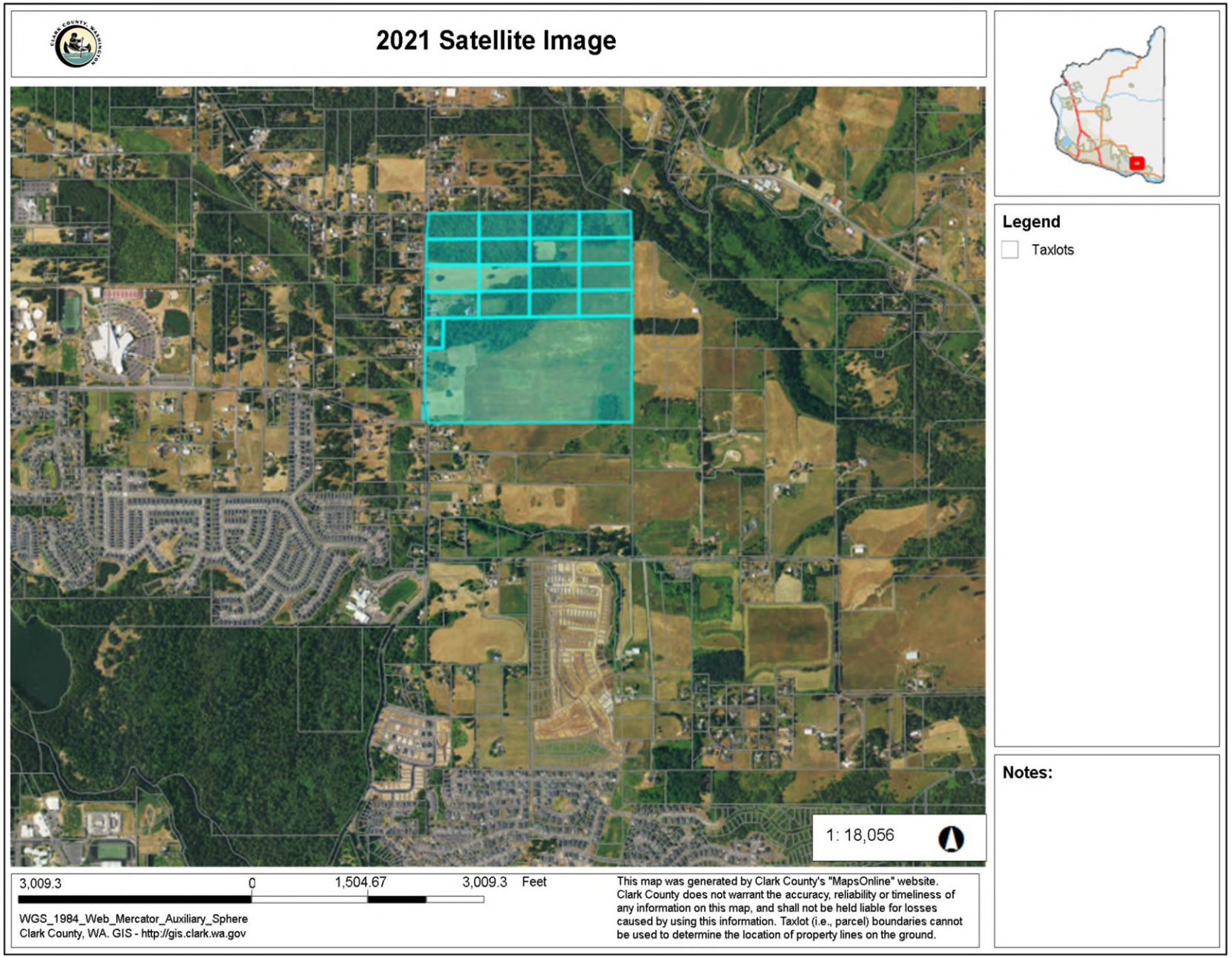
New Development

1) Hills at Round Lake – .25 miles away to the southwest, consists of 307 homes built in phases from 2013 to 2018.
2) Magnolia Heights – .68 miles to the southwest of the property, includes 38 homes, began construction in 2020 and completed by the end of 2023.
3) Northside – .33 miles to the south of the property, with 258 homes built out between 2024 and 2026.

GIS Fact Sheet - APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000



GIS Fact Sheet - APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000



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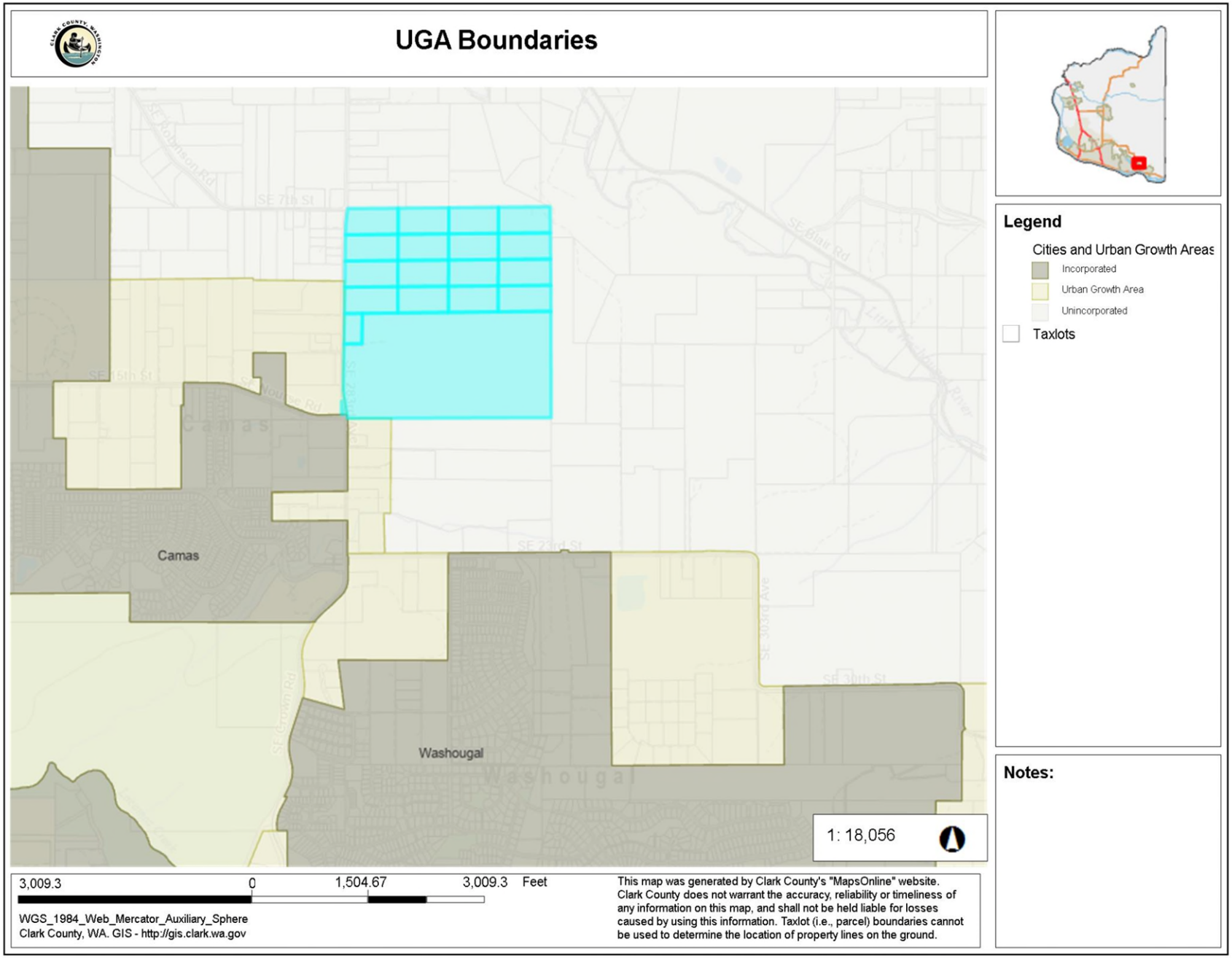

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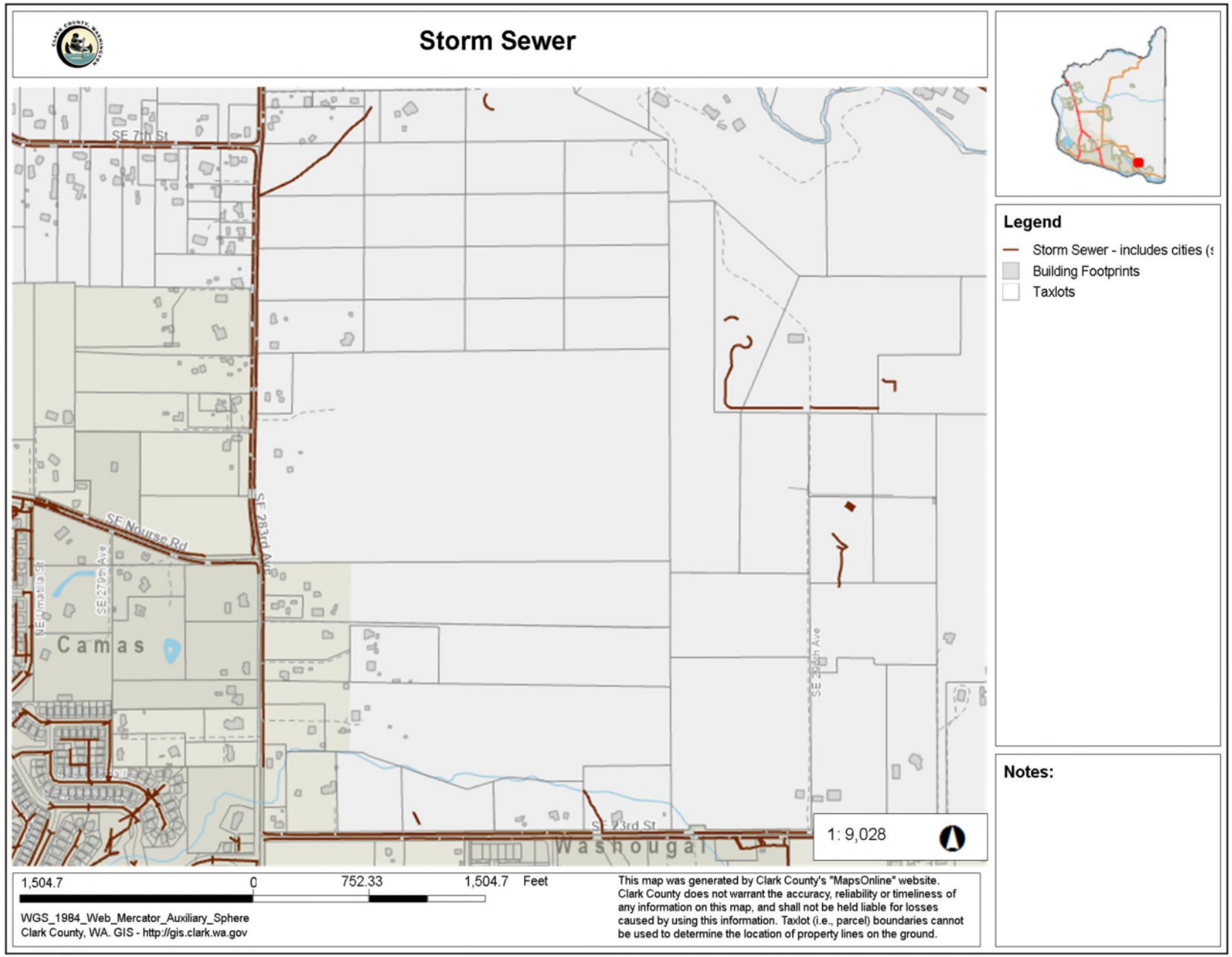
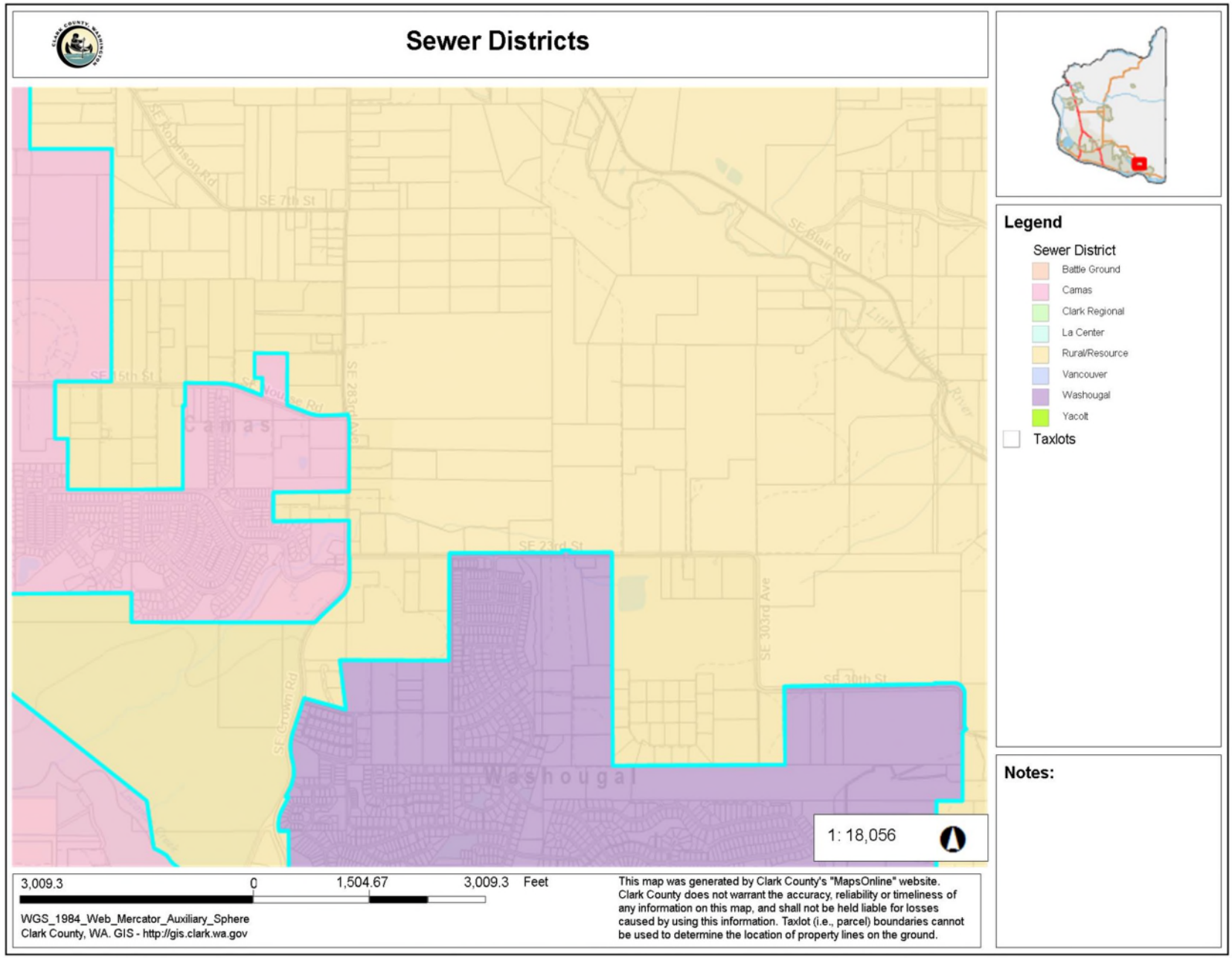


GIS Fact Sheet - APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000



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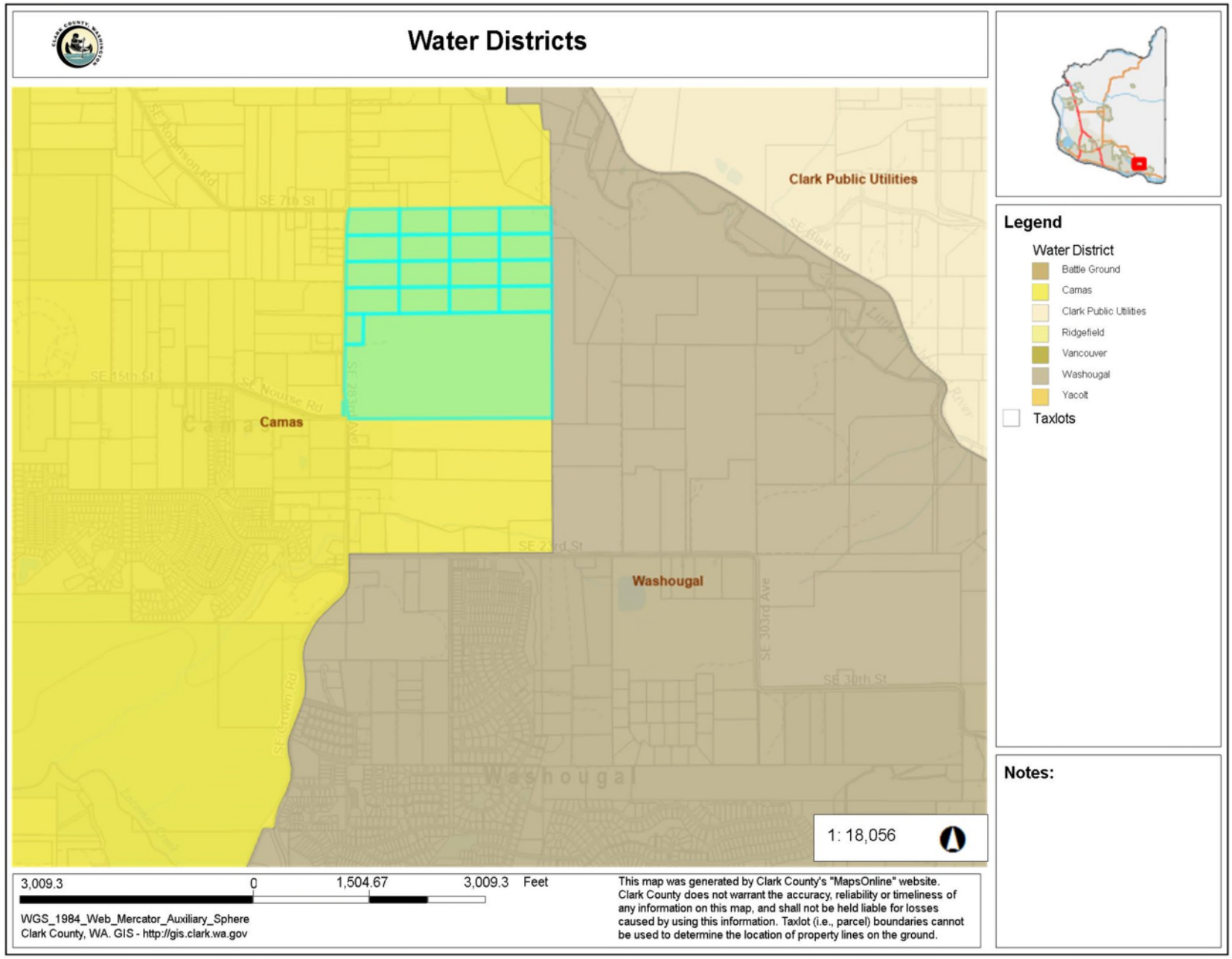
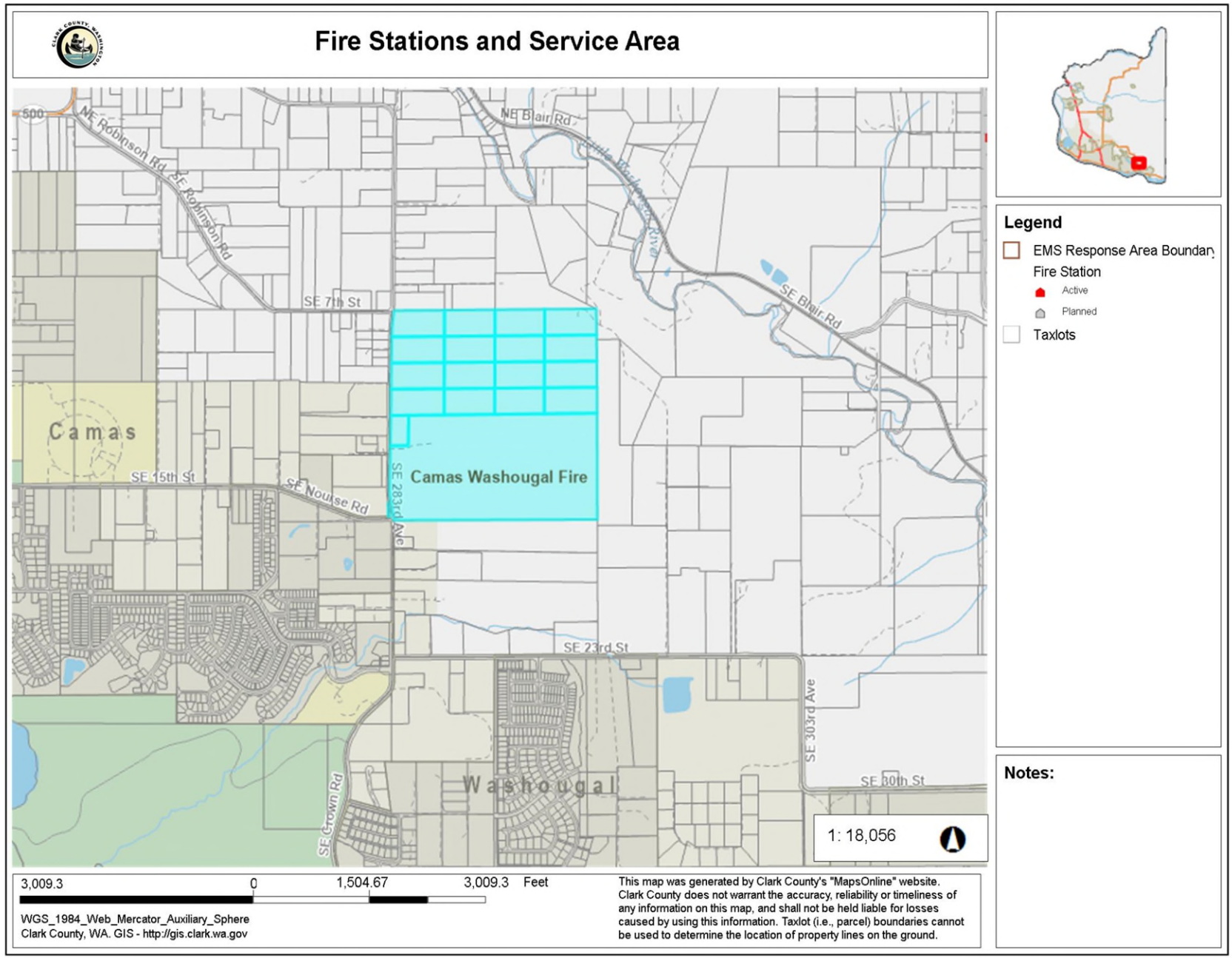


GIS Fact Sheet - APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000



GIS Fact Sheet - APNs 178613000, 178657000, 178658000, 178659000, 178660000, 178661000, 178662000, 178663000, 178664000, 178665000, 178666000, 178667000, 178668000, 178669000, 178670000, 178671000, 178626000, and 178614000

