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Supreme Court No. 97187-1

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

Court of Appeals No. 50406-5-II

FUTUREWISE,

Appellant,

v.

CITY OF RIDGEFIELD, MILT BROWN, RDGB ROYAL FARMS LLC, RDGK
REST VIEW ESTATES LLC, RDGM RAWHIDE ESTATES LLC, RDGF
RIVER VIEW ESTATES LLC, and RDGS REAL VIEW LLC,
Respondents.

ANSWER TO PETITION FOR REVIEW

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I. IDENTITY OF RESPONDENT

Respondents RDGB ROYAL FARMS LLC, RDGK REST VIEW ESTATES LLC, RDGM RAWHIDE ESTATES LLC, RDGF RIVER VIEW ESTATES LLC, and RDGS REAL VIEW LLC, by and through their counsel of record, and respondent City of Ridgefield, by and through its counsel of record, respectfully request that this Court deny Appellant-Futurewise's Petition for Review by the Supreme Court of the State of Washington ("Petition for Review"), which seeks review of the unpublished opinion of the Court of Appeals Division II ("Division II") in *Futurewise v. City of Ridgefield, RDGB Royal Farms LLC, RDGK Rest View Estates LLC, RDGM Rawhide Estates LLC, RDGF River View Estates LLC, RDGS Real View LLC, and Milt Brown*, Court of Appeals Case No. 50406-5-II, filed on January 29, 2019 ("Final Decision"), as well as the Order Denying Motion for Reconsideration in the same matter, filed on April 10, 2019. *See* Pet. for Review, Appendix A.

II. ANSWERS TO ISSUES PRESENTED FOR REVIEW

1. The Final Decision does not conflict with a decision of the Washington State Supreme Court, specifically *Schnitzer W. LLC v. City of Puyallup*, 190 Wn.2d 568, 416 P.3d 1172 (2018).

2. The Final Decision does not involve an issue of substantial public interest that should be determined by the Supreme Court, and the Final Decision does not conflict with a decision of the Washington State Supreme Court, specifically *SAVE v. Bothell*, 89 Wn.2d 862, 576 P.2d 401 (1978).

III. STATEMENT OF THE CASE

A. Factual Background.

On September 8, 2016, the City of Ridgefield (“the City”) adopted Ordinance No. 1216, annexing 111.42 acres, commonly referred to as the “Brown Annexation.” Ordinance No. 1216 also zoned the Brown Annexation area as Residential Low Density 6 (“RLD-6”). CP 20–22.

The land within the Brown Annexation area is contiguous land north of the City limits and within the Ridgefield UGA. CP 26. The Ridgefield UGA is shown on the Ridgefield Urban Growth Area Comprehensive Plan Map of the Clark County 20-Year Comprehensive Growth Management Plan, which the Board of Clark County Councilors adopted on June 28, 2016, in Clark County Ordinance No. 2016-06-12.¹ CP 20. There are 18 legal lots within the Brown Annexation area, all of which are owned by five limited liability corporations: RDGB Royal Farms LLC, RDGK Rest View Estates LLC, RDGM Rawhide Estates LLC, RDGF River View Estates LLC, and RDGS Real View LLC (together, “the LLCs”). CP 13, 354.

The LLCs² initiated the Brown Annexation on June 22, 2016, by direct

¹ Futurewise and Friends of Clark County have filed a separate challenge of an order of the GMHB related to Clark County’s 2015 Comprehensive Plan Update, as adopted in Amended Ordinance 2016-06-12. *Clark County, et al. v. Growth Management Hearings Board, et al.*, No. 50847-8 (Div. II, 2017) (direct review accepted by the Court).

² Mr. Milt Brown signed the annexation petition as a member of the LLCs (above-captioned parties), not in his individual capacity, contrary to Futurewise's assertion. Pet. for Review, at 3. Further, Mr. Brown was dismissed from this case.

petition, pursuant to RCW 35A.14.120. CP 21, 348–49. The City adopted Resolution No. 511 on August 11, 2016, accepting a notice of intent to annex the Brown Annexation area and authorizing commencement of annexation proceedings. CP 20. The Clark County Deputy Assessor certified the sufficiency of the Brown Annexation on August 15, 2016. CP 21. The Ridgefield City Council held a properly noticed public hearing on the Brown Annexation on August 25, 2016. CP 21. Futurewise and its members commented on the Brown Annexation, and the City Council considered such comments and input from the public. CP 12.

As required by the Growth Management Act (“GMA”), RCW 36.70A.130(5)(b), Clark County updated its Comprehensive Plan³ on June 28, 2016, which, among other things, expanded the Ridgefield UGA by 111 acres. CP 11, 157, 174-5. Previously, the land within the Brown Annexation area was unincorporated Clark County land, designated as agricultural. CP 10. The 2016 Clark County Comprehensive Plan de-designated agricultural land within the Brown Annexation area. CP 10. Futurewise challenged the adoption of the 2016 Clark County Comprehensive Plan, alleging dozens of violations of the GMA and specifically challenging the expansion of the Ridgefield UGA to include the Brown Annexation area and the de-designation of the agricultural farmland. CP 171-78,

³ Futurewise's statement that "[t]his is the second time that Clark County has illegally expanded its UGAs onto agricultural lands and cities annexed some of that land" is wholly irrelevant to the issues under the present appeal. *See* Pet. for Review, at 7.

186-196. That case has been adjudicated by the GMHB (CP 253) and is currently pending before this Court.⁴

Ridgefield Municipal Code (“RMC”) 18.210.015(B) requires all newly annexed RLD land be RLD-6 or greater density. Ordinance No. 1216 states:

[U]nder RMC 18.210.015, the City is applying RLD zoning to implement the residential/urban low comprehensive plan designation adopted by the County Council on June 28, 2016;

...

[T]he City is designating subject properties RLD-6, as under RMC 18.201.015(B), the City is required to designate all newly annexed RLD land as RLD-6 or greater density; . . .

CP 20-21.

With respect to the Clark Regional Wastewater District sewer facilities, the pump station, and developer agreement with a non-party entity (Pioneer Place Ridgefield LLC), Respondents defer to their Answer to Motion for Reconsideration, filed in the below court of appeals matter (Case No. 50406-5-II). *See Resp't Answer to Mot. for Reconsideration*. Respondents Answer to Motion for Reconsideration discusses precisely why the annexation ordinance at issue has

⁴ *Clark County, et. al., v. Growth Management Hearings Board, et. al.*, No. 50847-8 (Div. II, 2017). Futurewise incorrectly asserts that the GMHB decision in GMHB Case No. 16-2-0005c is "still good law" and effects these proceedings. Pet. for Review, at 2. GMA relief is prospective only: "[a] determination of invalidity is prospective in effect..." RCW 36.70A.302(2). A GMA decision "does not extinguish rights that vested under state or local law before receipt of the board's order by the city of county." RCW 36.70A.302(2). Thus, annexations completed during a GMHB appeal prior to the Board's decision cannot violate any future, prospective Board determinations.

no legal relationship with the sewer facilities, pump station, or developer agreement, and thus, provides no basis for standing in this case. Further, Respondents emphasize the fact that the Pioneer Place Pump Station is not associated with the annexation ordinance at issue in this appeal, and Futurewise could have challenged the approval for that pump station but did not.

With respect to Futurewise's statements regarding alleged harm from the annexation ordinance, there is no construction or development authorized by the annexation ordinance. Pet. for Review, at 6-7. Any and all allegations of harm arising from annexation ordinance are completely speculative and unknown at this point, as further discussed below.

B. Procedural History.

On September 16, 2016, Futurewise filed a “Complaint and Petition for Judicial Review Under RCW 26.70C; Petition for Declaratory Judgment Under RCW 7.24; Petition for Declaratory Judgment Under Article IV, Section 6 of the Washington State Constitution; Petition for Writ of Certiorari Under RCW 7.16; Petition for Writ of Certiorari Under Washington; Article IV, Section 6; Petition for Writ of Review Under Washington Constitution, Article IV, Section 6 of the Common-Law” (hereafter “Complaint”) in Superior Court alleging that Ordinance No. 1216 is “invalid and in violation of the requirements of Chapter 35A.14 RCW, Annexation by Code Cities, Chapter 36.70A RCW, the Growth Management Act, and other applicable provisions of state law, and the Ridgefield Development Code.” CP 1, 4.

In response to Futurewise’s Complaint, the LLCs filed a Motion to

Dismiss on December 27, 2016, alleging lack of standing, lack of jurisdiction, and seeking the dismissal of Mr. Brown, as an individual. CP 49–50. After two rounds of briefing and significant oral argument, the trial court granted the LLCs' Motion to Dismiss. CP 402. Futurewise then appealed to Division II, which issued a 19-page decision unanimously affirming the LLC's Motion to Dismiss. *See* Final Decision.

IV. ARGUMENT

Rules of Appellate Procedure ("RAP") 13.4(b) states that a petition for review will only be accepted if one or more of the four listed criteria are met. Futurewise argues that the Final Decision is in conflict with two particular decisions of the Supreme Court and that its petition involves issues of substantial public interest. RAP 13.4(b)(1), (4). Futurewise fails to demonstrate that its petition satisfies either of these criteria, and this Court should deny its Petition for Review.

A. **Division II's Final Decision Does Not Create Conflict with Supreme Court Precedent Regarding Site-Specific Rezones**

Futurewise first argues that the Court of Appeals decision created a conflict with existing precedent, specifically *Schnitzer West*, because Division II concluded that the zoning of the annexed property was not a site-specific rezone subject to the Land Use Petition Act, RCW 36.70C ("LUPA"). Pet. for Review, at 7-11.

Division II analyzed the three requirements for a site-specific rezone, as described in *Schnitzer West*, and concluded that neither of the parties involved

requested a specific classification change: the LLCs requested annexation (but not particular zoning), and the City, upon decision on annexation, only applied default zoning to the annexed properties as required by City Code. Final Decision, at 11-12. Accordingly, Division II concluded that the adoption of zoning for the annexed property was not a site-specific rezone decision, and thus, not subject to LUPA and superior court jurisdiction. *Id.* The Final Decision is fully consistent with *Schnitzer West*.

Futurewise further argues that the Court of Appeals erred because "some party must initiate the rezone," that the City Council could have adopted a higher density zone if it wished, and that the City Council was authorized to initiate a site-specific rezone under City Code. Final Decision, at 11-12. Thus, Futurewise asserts, the Court of Appeals acted in conflict with *Schnitzer West* when it concluded that the City did not adopt the zoning for the properties based on any request, rather that it was mandated by City Code upon annexation. *Id.*

Initially and importantly, as a plurality opinion, *Schnitzer West* offers persuasive authority, but not binding authority. *Schnitzer West*, 190 Wn.2d 568, 416 P.3d 1172 (2018); *Lauer v. Pierce Cnty.*, 173, Wn.2d 242, 258, 267 P.3d 988 (2011) (quotations omitted); *State v. Clark-El*, 196 Wn. App. 614, 619-20, 384 P.3d 627 (2016); *Koenig v. Pierce Cnty.*, 151 Wn. App. 221, 231, 211 P.3d 423 (2009). Even so, and as discussed below, Division II's analysis of the facts at issue is consistent with the holding of *Schnitzer West*. Futurewise has failed to demonstrate that the Final Decision is in conflict with *Schnitzer West*. Even a conflict did exist, Futurewise has failed to demonstrate that conflict with merely persuasive authority satisfies the rule.

Second, whether the annexation decision at issue was a "site-specific rezone" for the purposes of LUPA jurisdiction is irrelevant to the primary issue of Futurewise's standing in this matter. Moving the jurisdictional line between superior court (LUPA) and the growth management hearings board (GMA) does not create an injury-in-fact, which Appellant lacks but must demonstrate in order to establish standing. Futurewise exercised its rights before the Growth Management Hearings Board and brought forward its alleged GMA violations; it fully exercised the rights afforded to it under state law.

Finally, notwithstanding the non-binding nature of *Schnitzer West*, Futurewise's application of *Schnitzer West* to this matter is inaccurate and misplaced. *Schnitzer West* provides that a governmental entity (specifically, a city council) may be an initiating party for purposes of site-specific rezones. *Schnitzer West*, 90 Wn.2d at 577-78. However, that holding has no bearing on whether the City of Ridgefield, in this case, was in fact the initiating party. In other words, just because a governmental entity may be the initiating party does not mean upon any annexation the entity is necessarily the initiating party.

Futurewise asserts that the "court of appeals' fixation on whether a person or the municipal code initiated the rezone is contrary to the *Schnitzer West* 'hold[ing] that site-specific rezones—regardless of the initiating party—are reviewable under LUPA.'" Pet. for Review, at 12. In doing so, Futurewise tacitly acknowledges that Division II analyzed the facts under appeal to determine whether there was indeed a specific party initiating the rezone request. *Schnitzer West* does not dictate that the governmental entity is always the initiating party in certain instances; rather, *Schnitzer West* provides the framework to assess whether

there is a site-specific rezone at issue and clarifies that a governmental entity can be the initiating party. Those critical findings under *Schnitzer West* are not at all in conflict with the Final Decision. In fact, Division II analyzed the alleged site-specific rezone consistent with *Schnitzer West*, and concluded that the City was not specifically requesting the rezone, since the annexed property was zoned purely on the basis of pre-existing default Code requirements following annexation. *Schnitzer West* does not contradict that conclusion in any respect.

Reduced to basics, Futurewise's arguments regarding conflict between the Final Decision and *Schnitzer West* relate only to factual distinctions. Factual distinctions, however, do not create a conflict in law. In *Schnitzer West*, the Puyallup City councilors drafted, prepared, and approved the proposed ordinance (applying zoning restrictions to the subject property) at issue; there was no local municipal code mandate or third-party application that the Council then modified or conditioned for approval. In this matter, the City of Ridgefield approved the annexation, and applied the Code-mandated zoning designations for those newly annexed properties.

Not only is the present case significantly distinct factually from *Schnitzer West*, but Division II expressly applied the site-specific rezone criteria outline in *Schnitzer West* to properly resolve that question in this case. For those reasons, the Final Decision is not in conflict with *Schnitzer West*, and Futurewise has failed to demonstrate that the Supreme Court should accept review of the Final Decision.

B. Division II's Final Decision Does Not Create Conflict with Supreme Court Precedent Regarding Representational Standing and There is No Issue of Substantial Public Interest

Futurewise argues Division II incorrectly concluded Futurewise does not

have representational standing to challenge the City of Ridgefield's annexation, and that representational standing, in this matter, is an issue of substantial public interest. Pet. for Review, at 12; RAP 13.4(b)(4). Futurewise further argues that Division II incorrectly interpreted the *SAVE v. Bothell* decision with respect to representational standing, and thus, Division II created conflict with a Supreme Court decision. Pet. for Review, at 12, 15, 19; RAP 13.4(b)(1).

Division II analyzed Futurewise's members' allegations of harm to determine whether there was "sufficient injury *because of the annexation.*" Final Decision, at 16 (emphasis in original). Division II found that the declarations alleging injury inappropriately assumed residential development would occur on the annexed property in the future, that any potential future conditions placed on the proposed development would be inadequate, and that future development would impact their property in the same manner as other nearby developments. *Id.* at 16-17. Division II concluded that such allegations of injury were purely speculative, since the nature and extent of development on the annexed property is unknown and wholly outside the record here. *Id.* at 17.

Division II accurately characterized *SAVE v. Bothell* as inapplicable to the present case because the City of Ridgefield's annexation here did not approve or permit a specific project; rather, the annexation merely moved the annexed property from unincorporated Clark County into the City. *Id.* at 17-18. Unlike in *SAVE*, the unknown nature of development for the annexed property means any alleged injury to "adjacent property owners is speculative." *Id.* at 18. The Brown Annexation

does not authorize any *actual development* to occur and the harm claimed in the four Futurewise member declarations relate to pre-existing development actions that cannot be attributed to the annexation decision. CP 20–28.

Futurewise lacks representational standing to challenge the annexation ordinance. Representational standing requires three elements: (1) the members of the association would otherwise have standing to sue in their own right; (2) the interests that the association seeks to protect are germane to its purpose; and (3) neither the claim asserted nor the relief requested requires the participation of the association's individual members. *Des Moines Marina Ass'n v. City of Des Moines*, 124 Wn. App. 282, 291, 100 P.3d 310, 316 (2004).

Futurewise must show "injury in fact" caused by the annexation to one of its members. *See, e.g., Thompson v. City of Mercer Island*, 193 Wn. App. 653, 662, 375 P.3d 681 (2016).

Regardless of the allegations offered by Futurewise's members, and as Division II emphasized, Ordinance No. 1216 authorizes annexation only and does not authorize development of any type to occur. Future development is unknown and speculative. There is nothing in the annexation allowing a house to be constructed, a sewer pump station to be built, or condemnation for streets. The conditions that would be imposed upon any future development in the area are wholly speculative. Final Decision, at 16-18.

Futurewise argues that the Final Decision denying Futurewise's representational standing creates a conflict with existing Supreme Court precedent, specifically *SAVE v. Bothell*. However, as Division II discussed, *SAVE* involved an entirely different set of facts from the present controversy, and thus,

SAVE was wholly inapplicable to the representational standing arguments in this case. Final Decision, at 17.

In *SAVE*, the organization's members included people residing in the area adjacent to property that was rezoned by the city to permit construction of a shopping center. *SAVE v. Bothell*, 89 Wn.2d at 863-65. The *SAVE* court held that the organization had standing because its members "alleged direct and specific harm to its members which would flow from the building of a shopping center." *Id.* at 868. In that case, it was known that a shopping center would be built. In this case, Ordinance No. 1216 does not approve any specific construction or development; the City merely annexed undeveloped land into the City. Futurewise argues that "*SAVE* was a rezone case just like this [present] case," but this is factually inaccurate. The specific nature of development at the annexed properties is unknown, and thus, entirely different from the facts of *SAVE*. Again, factual distinctions between two cases do not create a conflict in law.

Finally, Futurewise argues its representational standing arguments are issues of substantial public interest because cities are "using annexation as an end run around the normal checks and balances that apply to urban growth area expansions." Pet. for Review, at 19-20. Those "normal checks and balances" of course are nothing more than the express statutory provisions that the City used to accomplish the annexation, and that Futurewise used to challenge the annexation. Adherence to statute hardly qualifies as an improper "end run" sufficient to justify review in this Court.

Representational standing is not an issue of substantial public interest. The case law is abundantly clear, and Division II reviewed, analyzed, and applied that

precedent to conclude that Futurewise could not demonstrate standing because the alleged injuries to its members were entirely speculative. Division II's holding on representational standing has nothing to do with the annexation process. If Futurewise is concerned with the annexation procedures in Washington state, the proper forum for those grievances is the Washington State Legislature. Futurewise's political position on annexations in the state of Washington has not created a new legal issue of substantial public interest requiring the Supreme Court's review and resolution.

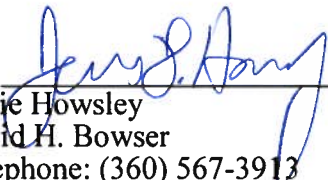
V. CONCLUSION

Futurewise's Petition fails to satisfy any of the criteria for review set forth in RAP 13.4(b). For the reasons above, Futurewise's Petition for Review should be denied.

Respectfully submitted this 10th day of June, 2019.

Respectfully submitted,

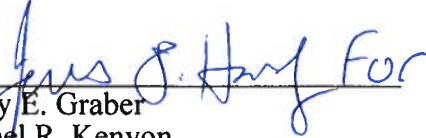
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via permission June 10, 2019

CERTIFICATE OF SERVICE

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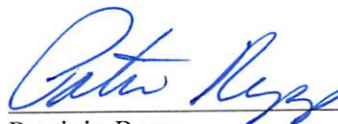
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